

South Worcestershire Development Plan Review (SWDPR)

Statement of Common Ground between the South Worcestershire Councils (Malvern Hills District Council, Wychavon District Council and Worcester City Council)

and

Natural England

**Matters relating to SWDPR 07: Green Infrastructure (including
Areas of Informal Recreation (AIRs) and Malvern Hills SSSI
Mitigation)**

Date: 22/04/2025



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1. Introduction

1.1 To support the Examination in Public of the South Worcestershire Development Plan Review, the South Worcestershire Councils have been working with Natural England to address concerns relating to policy SWDPR07: Green Infrastructure and mitigation of impact on the Malvern Hills Site of Special Scientific Interest (SSSI) arising from development proposed in the Plan. This Statement of Common Ground (SoCG) gives the latest position and highlights areas of agreement between the parties.

2. Relevant Parties

2.1. The relevant parties to this SoCG are the Local Authorities (Malvern Hills District Council, Wychavon District Council and Worcester City Council) and statutory consultation body Natural England.

3. Regulation 19 Representation

Regulation 19 – Publication (2022) (Consultee ID: 1172390)

3.1. At the Regulation 19 consultation stage, Natural England raised objections to policy SWDPR 7: Green Infrastructure. The SWCs have been working positively and constructively in collaboration with Natural England to resolve these objections.

4. Matters of Agreement

4.1. The matters of agreement between the SWCs and Natural England are as follows:

- i) The South Worcestershire Councils have engaged with Natural England and consulted them at the appropriate stages.
- ii) The parties agree to the proposed modifications for policy **SWDPR 07 at Criteria G, H, and I** in relation to the Malvern Hills SSSI Mitigation Strategy and for the inclusion of a new 'Development Management-style' policy in the SWDPR as relates to the Areas of Informal Recreation (AIRs). Minor modifications to the Reasoned Justification in SWDPR07 and an accompanying Reasoned Justification to the new 'AIRs Policy' are also agreed. There have been some additional updates to the policy wording submitted in the Schedule of Proposed Modifications (Written Statements Index [WS0/1](#) and [WS0/2](#)), agreed by both parties. These updates are also set out in the Appendix.

- iii) The SWDPR, with the proposed modifications, therefore contains the following mitigation measures for the Malvern Hills SSSI:
 - a. SWDPR07 Criterion G to include Malvern Hills SSSI Mitigation Strategy for onsite mitigation on the SSSI;
 - b. A modification to the Policies Map to include the 25 km 'Zone of Influence';
 - c. One allocated AIR at Honeybourne;
 - d. A development management 'enabling' policy to allow for further AIRs to be allocated with a preference for these to be within the Zone of Influence;
 - e. No new housing or employment allocations located within 500m of the Malvern Hills SSSI;
 - f. Significant levels of high-quality Green Infrastructure provision at the strategic allocations and urban extension reallocations (c.893 ha);
 - g. High levels of green infrastructure to be provided throughout the remaining allocations and through qualifying windfall development in accordance with Policy SWDPR07;
 - h. Reference to Local Nature Recovery Strategies in Policy SWDPR27 to help inform the most appropriate biodiversity net gain measures;
 - i. Commitment through a modification to SWDPR07 at Criterion I to ongoing collaboration with Natural England and other relevant stakeholders at Local Plan Review to build on the mitigation measures put forward in this plan.

- iv) It is agreed that a cross-boundary approach may be required to address the potential impacts arising from development within the identified zone of influence. The SWCs are committed to working with neighbouring local planning authorities through a cross-boundary working group, which has been established by Natural England, and is attended by other key stakeholders. As part of the Statements of Common Ground developed with the surrounding local authorities (Herefordshire Council, Forest of Dean District Council, Tewkesbury Borough Council), it has been agreed and signed up to that any adverse impact on the Malvern Hills from development would also be considered as part of each authority's plan making process. Statements of Common Ground have also been signed with the Malvern Hills Trust and the Malvern Hills National Landscape Board which support the principle of the of the proposed SSSI Mitigation Strategy for the SWDPR and ongoing working with the SWCs in regard to mitigating the impact of development on the Malvern Hills SSSI.



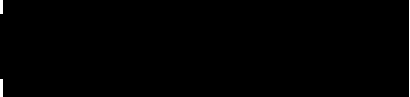
- v) The parties will continue to work positively together and where relevant, with other prescribed bodies in relation to mitigating the effects of development on the Malvern Hills SSSI and on any other strategic cross boundary issues.

5. Matters of Disagreement

5.1 There are no outstanding matters of disagreement between the parties.

6. Signatories

This SoCG has been agreed and signed by the following:

<p>South Worcestershire Councils</p> <p>Name: Ian Macleod</p> <p>Position: Director of Planning and Infrastructure, Malvern Hills District Council and Wychavon District Council</p> <p>Date agreed: 22/04/2025</p> <p>Signature:</p>  <p>And,</p> <p>Name: Duncan Rudge</p> <p>Position: Head of Planning, Worcester City Council</p> <p>Date agreed: 22/04/2025</p>  <p>Signature:</p>	<p>Natural England</p> <p>Name: Joanna Redgwell</p> <p>Position: Acting Midlands Deputy Director West Midlands team</p> <p>Date agreed: 22/04/2025</p> <p>Signature:</p> 
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Appendices

Appendix 1 - SWDPR 07: Green Infrastructure – updated proposed policy modifications.

Appendix 2 – SWDPR 7X: Areas of Informal Recreation (AIRs) proposed policy modifications.

Appendix 1 - SWDPR 07: Green Infrastructure - proposed policy modifications

SWDPR 07: Green Infrastructure

A. Housing proposals are required to contribute towards the provision, maintenance, improvement and connectivity of multi-functional Green Infrastructure (GI)¹ as follows:

- i. For greenfield sites exceeding 1 ha (gross) - 40% GI excluding private gardens.
- ii. For greenfield sites of less than 1 ha but more than 0.2 ha (gross) - 20% GI excluding private gardens.
- iii. For all brownfield sites, and on greenfield sites of less than 0.2 ha (gross) - the proportion of GI will be determined by site characteristics and local circumstances and will be agreed with the Local Planning Authority (LPA) on a case-by-case basis.

B. For employment and retail proposals (including mixed use commercial schemes), the proportion of GI will be determined by site characteristics and local circumstances and will be agreed by the LPA on a case-by-case basis.

C. For developments that fall within sections A and/or B of this policy:

- i. The precise form and function(s) of GI will depend on the wider strategic green network, site characteristics, the local context and the Worcestershire GI Strategy's priorities. Developers ~~should~~ are encouraged to discuss their proposals for GI with the local planning authority before submitting a planning application.
- ii. Developers will be required to demonstrate how the functionality and connectivity of existing and proposed GI features will be retained, protected and enhanced through the lifetime of the development.

~~iii. Strategic allocation sites² will be required to accord with the relevant GI Concept Plans³ and Concept Statements⁴ as developed by the Worcestershire GI Partnership in consultation and agreement with the relevant Local Planning Authority, once produced⁵. Any additional master planning processes and spatial~~

¹ Proposals will need to satisfy other SWDPR policies: e.g. SWDPR 01 – Climate Change; SWDPR 10 Health and Wellbeing; SWDPR 26 Design; SWDPR 27 Biodiversity and Geodiversity; SWDPR 35 Sustainable Drainage Systems; SWDPR 36 Water Resources; Efficiency and Treatment; SWDPR 43 Built Facilities and Community Buildings; SWDPR 45 Provision of Green Space and Outdoor Community Uses in New Development; SWDPR 46 Playing Fields.

~~² Worcestershire Parkway (SWDPR 51); Throckmorton (SWDPR 52), Rushwick (SWDPR 53) and Mitton (SWDPR 54).~~

~~³ Concept Plans: Detailed evidence base; key issues for each of the GI themes; evidence-based maps.~~

~~⁴ Concept Statements: Summary of detailed information in the Concept Plan; identify key GI priorities for the site; indicative of GI map; costs; and viability and funding.~~

~~⁵ The Worcester West and Worcester South Urban Extensions (SWDPR60) will be informed by the GI statements associated with their respective planning applications.~~

~~frameworks produced for the strategic allocation sites must also be informed by these Plans or Statements, where available.~~

~~iv. On all other sites, developers will be required to prepare proportionate GI appraisals in consultation with the Local Planning Authority.~~

D. Effective management arrangements must be clearly set out and will be secured by condition(s). Once a planning permission has been implemented, the associated GI will be protected as Green Space (SWDPR 44).

E. Other than specific site allocations in the SWDPR, development proposals that would have a detrimental impact on GI attributes within the areas identified as 'protect and enhance' or 'protect and restore' as identified on the Environmental Character Areas on the Policies Map (Figure xx below)⁶ will not be supported unless:

i. A robust, independent assessment of community and technical need (~~using recognised national methodology where available~~) clearly demonstrates that the specific GI typology is surplus to requirements in that location; and

ii. The loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location⁷.

F. Proposals on residential gardens will not be supported where development would cause harm to the local area (assessed on a case-by-case basis).

~~G. All major developments⁸ will be required to demonstrate compliance with standards set out in 'Building with Nature' or equivalent benchmarks and demonstrate how this standard will be maintained throughout the lifetime of the development⁹.~~

G. Opportunities for Areas of Informal Recreation (AIRS) will be sought to relieve pressure on existing vulnerable areas of Green Infrastructure such as the Malvern Hills SSSI, or where there are limited opportunities for informal recreation in the surrounding area.

H. To address recreational pressures associated with housing growth, developer contributions will be sought from all residential developments of one or more dwellings¹⁰ within the identified 25km zone of influence within South

⁶ See Chapter 4 of 'Planning for a Multifunctional Green Infrastructure Framework in Worcestershire – Green Infrastructure Framework 2' (Worcestershire County Council, Natural England and the Forestry Commission England, 2019). Individual Environmental Character Areas (ECA) profiles can also be viewed on [Worcestershire County Council's website](#).

⁷ A suitable location will be dependent on the need for, and the type of, facility being proposed.

⁸ Major development is defined as residential development of 10 units or more and non-residential development additional floorspace of 1,000 sq. m or more.

⁹ Compliance with 'Building with Nature', or equivalent benchmarking standards can be incorporated into a GI Concept Plan/Statement, where applicable.

¹⁰ Excludes Previously Developed Land (brownfield sites).

Worcestershire (as per the Policies Map) towards the delivery of the mitigation strategy¹¹ for the Malvern Hills SSSI, subject to viability.

I. Through the Local Plan Review, to help protect the Malvern Hills SSSI from recreational pressures, the SWCs will work with the Malvern Hills Trust, Natural England, local authorities, and other key stakeholders to build on the mitigation measures put forward in this plan and in line with further increased growth in the region. Any further required mitigation including the potential for in perpetuity funding will be based on significant scrutiny agreed by all stakeholders, with viability at its core.

~~Areas of Informal Recreation (AIRs) Allocations~~

~~I. The following locations have been allocated for new AIRs in south Worcestershire, as displayed on the SWDP Review Policies Map:~~

Table 3: ~~Locations allocated for new AIRs~~

Site Location	Local Authority	Site Area (Hectares)	Call for Sites Ref	Reg 19 Ref
Lower Hall Farm, Hampton Lovett	Wychavon	73.21	CP001	AIR01
Land south of Jennet Tree Lane, Deblin's Green	Malvern Hills	46.55	CP003	AIR02
Land north east of Blenheim Farm, Honeybourne	Wychavon	59.31	CP006f	AIR03

~~Proposed Site Use Descriptions~~

~~Land north east of Blenheim Farm, Honeybourne (CP006f/AIR03) — Creation of new woodland and associated habitats with new and enhanced access trails around the site. Provision of small scale car parking facilities.~~

Reasoned Justification for SWDPR 07

7.1 Green Infrastructure (GI) is the network of green and blue spaces and natural elements that helps intersperse and connect our cities, towns and villages with the wider environment. GI comprises many different elements including biodiversity, the landscape, the historic environment, the water environment and publicly accessible green spaces and informal recreation sites. Green spaces and natural elements do not exist in isolation. Considering networks in an integrated way achieves benefits that are far greater than when individual components are considered separately. There are many advantages to be gained from securing a critical mass of GI in a locality – creating a wide range of benefits that contribute to meeting the individual site priorities as listed at Environmental Character Area level within the Worcestershire Green

¹¹ Please refer to Appendix 2 of the Malvern Hills SSSI Recreation Mitigation Strategy Report (2022).

Infrastructure Partnership (2012) [and the](#) Worcestershire Green Infrastructure Strategy.

7.2 The NPPF (2023, paragraphs 96, 159, 181 and 192) recognises the need for inclusive and safe spaces that enable and support healthy lifestyles and help avoid increased vulnerability to the range of impacts arising from climate change. A strategic approach is required, which includes the provision of safe and accessible green infrastructure and suitable adaptation measures. GI provision and enhancement can deliver a range of benefits:

- a. Helping to mitigate extreme temperatures through limiting the urban heat island effect.
- b. Carbon capture and storage.
- c. Flood mitigation.
- d. Habitat protection and creation.
- e. Pollution reduction and improvements to air and water quality.
- f. Property value enhancement.
- g. Stimulating inward investment.
- h. Supporting health and wellbeing.
- i. Supporting employment growth, including tourism.

7.3 In most cases, planning for the protection, enhancement or inclusion of GI can deliver multiple benefits simultaneously. With regard to the overall quality of life, the promotion of active lifestyles and the stimulation of business investment, the availability of accessible high-quality GI is a positive and significant factor.

7.4 GI will need to be carefully planned into new developments from the outset. Successful delivery of GI will depend on the comprehensive consideration of all GI components - both within and neighbouring the site and in the immediate locality - to include biodiversity, landscape, historic environment, access and recreation, flood risk management, and water quality and quantity. To achieve this, any GI provision should accord with the relevant requirements of other [plan](#) policies, ~~as per footnote 1. in particular those in policies SWDPR 01 Climate Change Mitigation and Adaptation, SWDPR 10 Health and Wellbeing, SWDPR 26 Design, SWDPR 27 Biodiversity and Geodiversity, SWDPR 35 Sustainable Drainage Systems, SWDPR 36 Water Resources, Efficiency and Treatment, SWDPR 43 Built Community Facilities, SWDPR 45 Provision of Green Space and Outdoor Community Uses in New Development, and SWDPR 46 Playing Fields. Paragraph 72 of the NPPF (2023) provides the justification for seeking local policy protections for residential gardens.~~

7.5 Development of both greenfield and brownfield sites will be expected to retain, protect and enhance the integrity of the GI network and its connectivity. Key GI features such as Sustainable Drainage (SuDS), green roofs, green walls, tree planting (particularly in urban settings) and measurable biodiversity net

gain will be delivered wherever possible and integrated into the wider GI network. ~~Biodiversity net gain will be secured in all instances where mandated by the Environment Act 2021. The delivery of GI should be benchmarked against recognised approaches. Building with Nature is the SWC preferred example of such a standard, which can provide accreditation based on a specific framework of principles that assesses the quality, functionality and long-term management of GI, as well as the additional value that a scheme may bring to the economy, sense of place or health and wellbeing.~~

7.6 The policy supports the Worcestershire Green Infrastructure Strategy¹², which is informed by the Worcestershire Green Infrastructure Framework¹³. Together these documents identify the most appropriate actions (protect, enhance and/or restore) deemed necessary to maximise the multi-functional benefits of GI in those areas where this is most critical. In particular, development should show how the site context and development proposals complement and enhance strategic GI networks.

7.7 The GI Environmental Character Areas (ECA), [viewable on the Policies Map](#) have been developed for Worcestershire¹⁴. They are a synthesis of detailed evidence bases for each of the main GI attributes, including access and movement, landscape character, historic environment, blue infrastructure and biodiversity. They set an overall strategic approach for interventions within the areas based on the quality of the existing GI: a. Protect and enhance. b. Protect and restore. c. Restore and create.

7.8 Each ECA is also complemented by evidence highlighting overarching principle and primary objectives for each of the contributing GI characteristics. ECAs inform the appropriate provision of GI, including its type and functionality.

7.9 The current ECA analysis classifies urban areas as un-surveyed due to fragmented data availability. However, this does not mean that those urban areas do not have GI value (see SWDPR 44). It is anticipated that GI evidence relating to urban areas will be reviewed in a future update to the ECAs.

~~7.10 The 'Worcestershire GI Strategy' promotes the GI Concept Plan and GI Concept Statement approach for strategic development sites and seeks to promote collaborative working with developers. GI Concept Plans and Concept Statements establish principles for development that identify key GI assets and opportunities for their protection and enhancement in line with the Worcestershire GI Strategy and NPPF including the ECA priorities. Developers will be expected to prepare their schemes in accordance with GI Concept Plans~~

¹² The 'Worcestershire GI Strategy', prepared by the Worcestershire GI Partnership and endorsed by the SWC, is a non-statutory county-wide guidance document which aims to direct and drive the delivery of GI in Worcestershire and inform relevant strategies and plans of partner organisations. The Strategy is available at <http://www.worcestershire.gov.uk/GI>

¹³ The Worcestershire GI Framework consists of a number of evidence documents and guidance notes that inform the Worcestershire GI Strategy. All documents are available at the above link.

¹⁴ See Chapter 4 of 'Planning for a Multifunctional Green Infrastructure Framework in Worcestershire – Green Infrastructure Framework 2' (Worcestershire County Council, Natural England and the Forestry Commission England, 2019). Individual [Environmental Character Areas \(ECA\) profiles](#) can also be viewed on Worcestershire County Council's website.

~~and Concept Statements as produced by the Worcestershire GI Partnership in consultation and agreement with the relevant Local Planning Authority (LPA). When considering GI Concept Plans and Concept Statements in their schemes, developers should give due consideration to the wider site context, and how GI can link to existing green corridors and strategic green network sites.~~

~~7.11 Applicants will be required to prepare their own GI appraisals on all other sites that qualify under parts A and/or B of SWDPR 07 to demonstrate how their proposals will contribute to the successful delivery of GI. The exact format of the GI appraisal is not prescribed but it should be proportionate to the scale of the development and undertaken in consultation with the LPA. Some major development schemes may consider GI Concept Plans and Concept Statements as an appropriate mechanism through which to demonstrate this requirement.~~

7.10~~12~~ The policy also requires that effective management arrangements are put in place and it is accepted that a range of mechanisms can be employed to deliver this requirement, whether it is through a management company, a community led scheme, Conservation Covenant or the adoption of the GI by another organisation. Whichever approach is used, it should allow effective engagement of residents and others contributing to the management (directly or financially) over the effectiveness of the management regime and costs and dispute resolutions.

~~AIRs Allocations and the Malvern Hills SSSI Mitigation Strategy~~

~~7.13 The Worcestershire Green Infrastructure Framework 3: Access and Recreation Document (2020)¹⁵ highlighted limited opportunities to expand existing informal recreation sites across Worcestershire.~~

~~7.14 The report identified areas of search for sites for new recreation assets in the county, including three locations in south Worcestershire. The focus for these areas was on the creation of new, large strategic informal recreation sites that form part of a wider network of accessible greenspaces, and to take pressure off existing GI assets, such as the Malvern Hills Site of Specific Scientific Interest (SSSI) and Croome Court.~~

~~7.16 A range of recommendations relating to visitor management and access strategies and the related mitigation measures were identified, including the creation of alternative greenspace; 53% of interviewees indicated that they would use a new AIR or similar area of new greenspace. A mitigation strategy for the Malvern Hills SSSI has also been prepared by Footprint Ecology, which recommends ways to manage the impacts of increased recreational pressures on the Malvern Hills. The concerns related to increased pressure on the Malvern Hills SSSI have also been raised by Natural England as part of the SWDP Review process.~~

~~7.17 In a response to these evidence base updates and Natural England's concerns, the South Worcestershire Councils complemented the County Council's recommended areas of search with their own 'Call for Sites' consultation. As a~~

¹⁵~~Green Infrastructure Framework 3: Access and Recreation (worcestershire.gov.uk)~~

~~result of assessing all the submissions and suitable options, three new AIRs have been allocated. The allocations have been selected following detailed assessment taking into account considerations including land constraints, flood risk, access, heritage and landscape, and in consultation with Natural England; the detailed assessments have been published as part of the supporting SWDPR Evidence Base.~~

~~7.18 The delivery of the AIRs will involve the creation of informal publicly accessible land intended to increase the amount of natural green space available to local residents for their recreation and wellbeing. This will include development of routes and trails suitable for all visitors and provision of cycle and limited car parking facilities in the first instance. Opportunities to provide educational access may be explored in the future, as may the addition of other visitor facilities, such as toilets and refreshments, subject to further consultation on a site-by-site basis.~~

Malvern Hills SSSI Mitigation Strategy

~~7.115~~ Work undertaken by Footprint Ecology¹⁶ relating to recreational impacts on the Malvern Hills Site of Specific Scientific Interest (SSSI), including visitor surveys, established that there is a need to address recreational pressures on the Malvern Hills SSSI as a result of previous local plan growth and the growth planned in the SWDP Review, ~~and that this pressure has been potentially exacerbated by increased use during the Covid-19 pandemic.~~ It is recognised in the report that further housing growth will increase pressure on the Malvern Hills SSSI, and the role that strategic planning has in ensuring adequate protection.

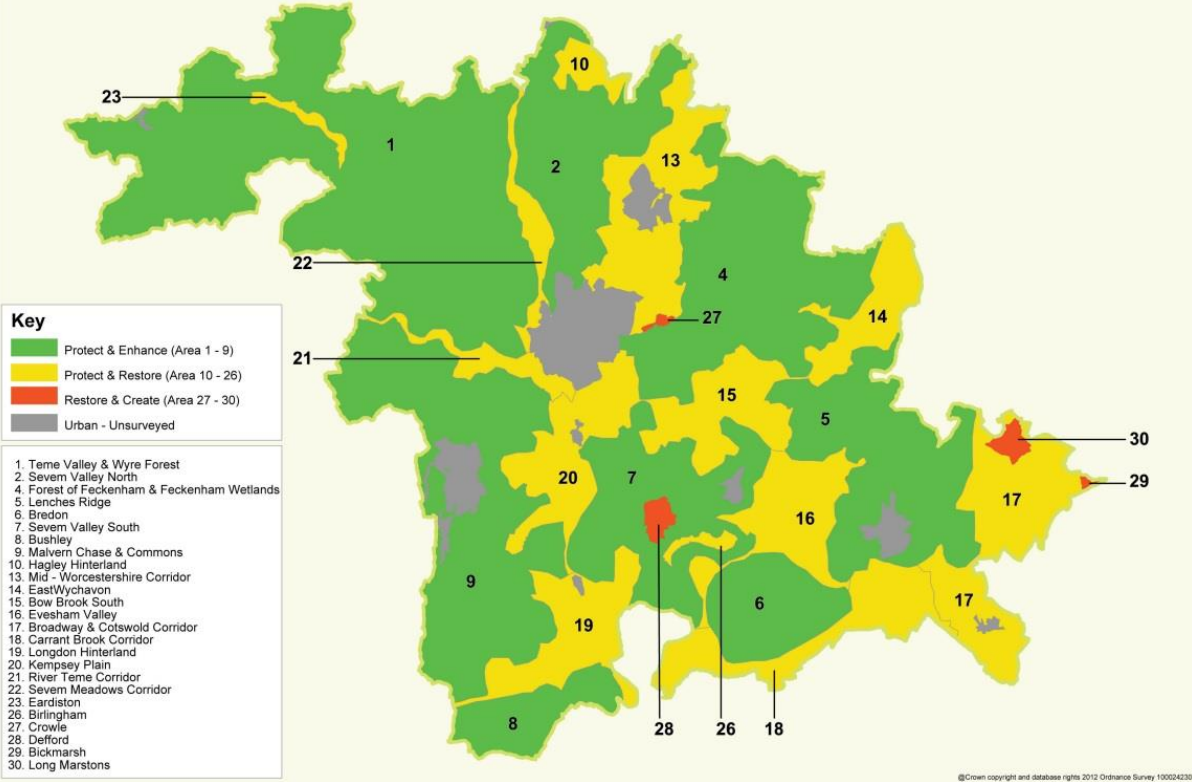
~~7.1220~~ A mitigation strategy¹⁷ for the Malvern Hills SSSI has been prepared by Footprint Ecology, which recommends ways to manage the impacts of increased recreational pressures on the Malvern Hills, ~~as reflected in part G of the policy. The mitigation strategy provides the evidence to support the requirement for developer contributions from new development which will be applied to all residential development of one or more dwellings within the 25km zone of influence of the Malvern Hills SSSI (exclusions apply), as per the Policies Map (subject to viability). Indicative costs associated with the delivery of the mitigation strategy have been set out in the Infrastructure Delivery Plan (2024) and have been factored into viability testing of the plan. Information relating to how the provision requirements translate into a developer contribution will be set out in an update to the South Worcestershire Developer Contributions SPD.~~

~~7.13 The Malvern Hills SSSI Mitigation Strategy is supported by the Areas of Informal Recreation (see policy SWDPR XX). The AIRs will provide informal publicly accessible land intended to increase the amount of natural green space available to local residents, and to offer alternative areas for recreational purposes, taking pressure off sensitive assets such as the Malvern Hills SSSI.~~

Figure xx: Environmental Character Areas Map

¹⁶ [Recreation Impacts on the Malvern Hills SSSI to inform the South Worcestershire Development Plan Review \(2021\)](#)

¹⁷ [Malvern Hills SSSI Recreation Mitigation Strategy Report \(2022\)](#).



Appendix 2 - SWDPR XX: Areas of Informal Recreation (AIRs) - proposed policy modifications

SWDPR XX: Areas of Informal Recreation (AIRs)

- A. Support will be given for AIRs to come forward throughout the plan period to provide attractive recreational greenspace to relieve pressure on existing vulnerable areas of GI such as the Malvern Hills SSSI, or where there are limited opportunities for informal recreation in the surrounding area.
- B. The following location has been allocated for a new AIR in south Worcestershire, as displayed on the SWDP Review Policies Map.

Table XX: New AIR Allocation			
Reference	Country Park CFS Reference	Name	Size
AIR03	CP006f	Land north-east of Blenheim Farm, Honeybourne	59.4 ha

Additional AIRs are sought within the zone of influence (25km radius) of the Malvern Hills SSSI; this is therefore the preferred location for an AIR.

- C. Approval of an AIR will only be permitted when;
 - i. Provision is made for approximately 50ha or more of land for informal recreation that is of an appropriate scale that is compatible with the surrounding landscape and uses;
 - ii. Provision is made for supporting ancillary uses, such as public conveniences, play equipment for all ages, ancillary retail or food outlets to support the sustainability of an AIR. Such provision will need to be sensitively sited and designed and make use of existing buildings where possible;
 - iii. Provision shall be made for trails and routes that accommodate the following uses:
 - i. Walking, including dog walking- including signage and wayfinding and opportunities for inclusion of public art features where appropriate
 - ii. Where appropriate, biking routes that offer an alternative experience to Mountain Biking on the Malvern Hills
 - iv. It should be located in close proximity to a public transport route to encourage sustainable travel to and from the AIR;
 - v. The number, design and layout of vehicle parking places proposed is appropriate for the location and expected levels of use;
 - vi. It can be provided with safe access and does not have an unacceptable impact on the local road network;
 - vii. Any adverse impacts upon the character, appearance or ecology of the landscape and / or any environmental, nature, planning or landscape designation will need be appropriately mitigated; and

- viii. It does not have a detrimental effect on the amenity of neighbouring properties and wider local area by reason of noise, overlooking, or other general disturbance.
 - ix. Planning applications will need to be accompanied by a Business Plan that demonstrates how the AIR is being planned on a sound financial basis, how the AIR will be funded both for initial set-up and for its continued running costs and maintenance.
 - x. Planning applications will need to be accompanied by a Management Plan for the AIR demonstrating how the proposal meets the requirements of this policy and how the AIR will be managed to ensure it continues to meet the objectives of AIRs provision.
- D. Major residential development proposals¹ will be expected to provide a contribution towards the cost of delivering AIRs infrastructure, unless this would render the development unviable.
- E. Planning conditions will be applied to secure the site as an AIR as part of the provision of any contributions for the set up and/or ongoing funding for an AIR.

Reasoned Justification

Purpose of the AIRs

- 1.1. The Worcestershire [Green Infrastructure Framework 3: Access and Recreation Document \(2020\)](#) highlighted limited opportunities to expand existing informal recreation sites across Worcestershire. This focused on the creation of new, large informal recreation sites to form part of a wider network of accessible greenspaces, and to take pressure off existing Green Infrastructure (GI) assets. This concept was taken forward as part of the SWDP Review and eventually formed the principle that came to be known as Areas of Informal Recreation (AIRs).
- 1.2. Areas of Informal Recreation (AIRs) are strategic, informal recreation sites that form part of a wider network of accessible greenspaces, providing additional recreational opportunities to alleviate pressures associated with growth in the plan and helping to take pressure off existing Green Infrastructure (GI) assets, including the Malvern Hills Site of Specific Scientific Interest (SSSI).
- 1.3. The delivery of the AIR sites will involve the creation of informal publicly accessible land intended to increase the amount of natural green space available to local residents for their recreation and wellbeing. This will include development of routes

Excluding affordable housing, developments on brownfield land, and strategic allocations providing a Community Park over 30 ha.

and trails suitable for all visitors and provision of cycle and appropriate levels of car parking facilities and may include other visitor facilities, such as toilets, cafe and refreshments. Opportunities to provide educational access may be explored.

Honeybourne AIR Allocation

- 1.4. One AIR is proposed for allocation through the plan (Criterion B). The allocation (AIR03- Land at Blenheim Farm, Honeybourne) would be required to demonstrate compliance with the criteria established in Part C of this policy.
- 1.5. The Honeybourne site is expected to establish the creation of new woodland and associated habitats with new and enhanced access trails around the site. Provision of small-scale car parking facilities will be required alongside low level signage and wayfinding posts to guide visitors.
- 1.6. The Footprint Ecology AIRs Report (2024) highlights a clear gap in the Evesham area (where the Honeybourne AIR is located) in terms of an existing population and access to natural greenspace. This highlights how the Honeybourne site is ideally located to fill a gap in existing natural greenspace provision.

Further Provision

- 1.7. This provision of recreational green spaces on the strategic sites, particularly at Worcestershire Parkway and Throckmorton New Settlement, will maximise self-containment within these settlements, allowing residents to utilise the onsite recreational provision instead of travelling outside of the settlement to destinations including the Malvern Hills SSSI. It is also likely that the high levels of variety and provision of recreational space within these new settlements may act as a destination in their own right for visitors.
- 1.8. The Honeybourne AIR, alongside the recreational greenspace provision within the strategic allocations and urban extension reallocations, provides significant quantities of green spaces across the plan area. Nevertheless, it is considered that there is potential for further AIRs to come forward throughout the plan period and this policy aims to provide an enabling mechanism to facilitate this.
- 1.9. The provision of further AIRs are sought, in particular near to the Malvern Hills, to relieve pressure on the Malvern Hills SSSI. The provision would offer a wide variety of uses ranging from formal parks and play areas to informal walking routes through semi-natural spaces as well as ancillary uses such as public conveniences, cafe and/or retail offering for example local food, plant, or craft produce and any such provision would accord with SWDPR 12.
- 1.10. Areas of Informal Recreation may be created from:

- existing open space with no existing public access or limited public access, which for the purposes of mitigation could be made fully accessible to the public
- existing open space, which is already accessible, but which could be changed in character so that it provides an alternative destination;
- land in other uses which could be converted into an AIR

Delivery

- 1.11. The provision of AIRs will be considered through the submission of a planning application but will need to demonstrate that the criteria within this policy can be met and that the proposal is in accordance with the other policies in the SWDPR.
- 1.12. Whilst the 'call for sites' process for the AIRs initially sought sites over 50 ha in size, AIRs below this threshold will be considered on a case-by-case basis.
- 1.13. Whilst AIRs should be relatively unintrusive on the landscape, delivering biodiverse and landscape led spaces, it is acknowledged that there may be components of built development that are required to enable delivery and functioning of the AIR. Limited and sensitive levels of ancillary built development may therefore be considered to support the deliverability and ongoing sustainability of an AIR.
- 1.14. Where there are designated and non-designated heritage assets within or in close proximity to a proposed AIR, planning applications will be supported where the AIR conserves and enhances these heritage assets, including assets of potential archaeological interest. AIRs have the potential to make a positive contribution to the setting and character of the landscape and sustain the historic quality, sense of place, environmental quality, and economic vibrancy of south Worcestershire.
- 1.15. The provision of AIRs should seek to avoid sites of high nature conservation value which are likely to be damaged by increased visitor numbers. Such damage may arise, for example, from increased disturbance, erosion (including erosion from human recreational activities), input of nutrients from dog faeces, and increased incidence of fires. Where sites of high nature conservation value are considered as an AIR, the impact on their nature conservation value should be assessed and considered alongside relevant policies contained within this development plan and the National Planning Policy Framework; and appropriate mitigation measures should be put in place where required.
- 1.16. AIRs should enhance opportunities for active travel. This could be through the enhancement of any existing Public Rights of Way on the site or the creation of new active travel routes. Active travel routes should be suitable and accessible for all users and must take account of the needs of cyclists, pedestrians, public transport

users, horse riders, and people whose mobility is impaired. Paths should be routed so that they are perceived as safe by users.

- 1.17. It is appreciated that an AIR will need adequate car parking with good information about the site and the routes available. Some subtle waymarking would also be expected for those visitors not acquainted with the layout of the site, accompanied by discretely placed benches or information boards.
- 1.18. Proposals should also ideally be located in close proximity to a public transport route to encourage sustainable travel to and from the site.

Malvern Hills SSSI

- 1.19. The Sustainability Appraisal and Habitats Regulation Assessment consider the likely significant effect upon Habitats sites in terms of increased public access and disturbance effects.
- 1.20. Policy SWDPR 07 Criterion G deals specifically with the Malvern Hills SSSI onsite mitigation and developer contributions required for this onsite mitigation.
- 1.21. The AIRs policy is designed to work in conjunction with SWDPR07 to deliver a range of complementary measures in the plan period to monitor, reduce and mitigate the impact of increased recreation arising from the SWDPR proposals, taking pressure off existing GI assets, including the Malvern Hills SSSI.
- 1.22. AIRs within the Malvern Hills SSSI Zone of Influence could seek to provide alternative destinations to a specific group of visitors who might otherwise visit the Malvern Hills SSSI, including low-level provision for day-to-day activities by new and existing residents.

Funding

- 1.23. Developer contributions will be sought to make sure that the necessary physical, social, public realm, economic and green infrastructure is in place to deliver the AIRs. Contributions will be used to mitigate the adverse impacts of development (including any cumulative impact).
- 1.24. Information relating to how the provision requirements translate into a developer contribution will be set out in an update to the South Worcestershire Developer Contributions SPD.
- 1.25. Subject to statutory processes and regulations, contributions may be collected towards:

- Capital costs for establishing an AIR;
- Ongoing revenue such as the management and maintenance of services and facilities;
- Any other infrastructure related costs permitted by law and identified as a local need.

1.26. Contributions will be collected through Section 106 agreements and / or through a Community Infrastructure Levy once an updated Charging Schedule is in place.

1.27. The Plan has been viability tested and is considered to be viable when costs associated with the AIRs are factored into contributions requirements from new development. The indicative costs factored into the viability assessment were set out in the Footprint Ecology AIRs Report (2024) and the Infrastructure Delivery Plan Update (December 2024).

1.28. Depending on the provision within the AIR, there may also be opportunities for funding through biodiversity net gain credits, carbon credits, nutrient credits, flood resilience and catchment services, and voluntary sector involvement.