

South Worcestershire Development Plan Review Draft Submission Plan

Regulation 22 (1) (c) Statement of Consultation

South Worcestershire
Development Plan Review



Sept 2023

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1. Introduction

1.1 This Statement has been prepared to support the submission of the South Worcestershire Development Plan Review 2041 (SWDPR), in accordance with Regulation 22 (1) (c) of the Town and Country Planning (Local Planning) (England) Regulations 2012. The Statement is a statutory requirement for a Local Planning Authority in the process of submitting a Local Plan to the Secretary of State. It outlines how the South Worcestershire Councils¹ (SWC) have complied with government requirements, in line with Regulation 18 and 19.

1.2 Regulation 22 requires a statement setting out:

(i) which bodies and persons the local planning authority invited to make representations under regulation 18;

(ii) how those bodies and persons were invited to make representations under regulation 18;

(iii) a summary of the main issues raised by the representations made pursuant to regulation 18;

(iv) how any representations made pursuant to regulation 18 have been taken into account;

(v) if representation were made pursuant to regulation 20, the number of representations made, and a summary of the main issues raised in those representation; and

(vi) if no representation were made in regulation 20, that no such representations were made.

1.3 The Statement sets out how the SWCs have involved the community and stakeholders in preparing the draft SWDPR Submission Plan and how this meets the requirements set out in each of the SWCs Statement of Community Involvement (2018) and accord with national regulations.

1.4 The report provides information on the following:

- An overview of the engagement activities, across individuals, groups, and stakeholders during each stage of the local plan making process, including which bodies and persons were invited to make representations under Regulation 18 and 19.
- Which engagement activities were used during each stage of the local plan making process (both informal and formal).
- How individuals, groups and stakeholders were invited to make representations to inform the local plan process.
- A summary of the main issues raised by representations received through the engagement activities.

¹ The South Worcestershire Councils are Malvern Hills District Council, Worcester City Council and Wychavon District Council that are working jointly for the purposes of plan making under the Duty to Cooperate requirements.

- How those main issues have been addressed in the local plan.

2. Consultation Strategy

- 2.1 The SWCs are committed to involving stakeholders and the local community in the preparation of the SWDP Review. The approach chosen sees the consultation as an on-going activity that is integral to the plan making process. The SWCs have used a range of methods to engage with stakeholders and the local community, in accordance with the Statement of Community Involvement 2018. Under the Covid-19 emergency regulations a temporary revised version was adopted in August 2020. The 2018 SCI can be accessed via the following link: [Statement of Community Involvement - South Worcestershire Development Plan \(swdevelopmentplan.org\)](http://swdevelopmentplan.org)
- 2.2 The SWCs have generated a comprehensive consultation database of statutory consultees, and other stakeholders and interested parties. These include residents/community groups, businesses, developers and agents, infrastructure providers, government agencies and individual members of the public. The database produced for the adopted SWDP was updated and cleansed in 2017 in advance of the formal announcement to undertake a review of the local plan in early 2018. In addition to individuals and third parties the statutory and general consultees were also updated including those identified at Appendix 2.
- 2.3 Cross boundary consultation has been carried out with adjoining unitary and two-tier local authorities, parish, and town councils.
- 2.4 Individuals or organisations wishing to be included on the SWDP Review database have provided details via the SWDP website consultation portal. All consultees on the database have been informed via email or letter of opportunities to become involved in the plan making process and a variety of options have been provided for responding including in writing, email or using the on-line consultation portal.
- 2.5 A consultation strategy was prepared at the commencement of the review which set out the overarching principles and approaches for each of the statutory consultation stages (Appendix 1). A range of difference approaches have been undertaken, including the following methods:
- Stakeholder meetings and briefings
 - Seminars and presentations
 - Workshops and roadshows
 - Drop in events
 - Exhibitions
 - Regular newsletter to parish and town councils

- Emails/letters/dedicated website
- Leaflets
- Social media, print media
- Summary documents
- Videos
- Public meetings

2.6 The following chapters set out the consultations undertaken at each stage of the plan preparation. These are as published on the consultation webpage at each stage of the consultation. Further details on the consultation processes, including a summary of the issues raised, are set out within the appendices of this statement.

2.7 The initial timetable for the SWDP Review (Table 1) has had to be amended since the process commenced in 2018, mainly as a result of the Covid-19 pandemic and associated impacts on the plan making process. This was reflected in appropriate updates in the Local Development Scheme (LDS), and the table below sets out the latest proposed timetable. This timetable is currently set out in a draft LDS that is at the time of writing, going through the committee cycles.

Table 1: The SWDP Review Timetable

Stage	Date
Evidence Gathering	Commenced late 2017
Issues and Options consultation Regulation 18 (i)	November/December 2018
Preferred Options consultation Regulation 18 (ii)	November/December 2019
Preferred Options SA targeted consultation Regulation 18 (iii)	March/April 2021
Publication – Regulation 19	November/December 2022
Submission – Regulation 22	September 2023
Examination – Regulation 24	January – March 2024
Main Modifications Consultation	June – July 2024
Inspector’s Report – Regulation 25	November 2024
Adopt – Regulation 26	December 2024

3. Regulation 18 (i) - Issues and Options Consultation (November 2018)

1. Introduction

1.1 The South Worcestershire Development Plan (SWDP) was adopted in February 2016 and provides the current adopted planning framework for the area covered by the South Worcestershire Councils (SWC) of Malvern Hills District Council, Worcester City Council and Wychavon District Council up to 2030. The process of joint working and the preparation, and eventual adoption of the SWDP, was commenced in 2007 on a basis of a joint working under the 2004 Planning and Compulsory Purchase Act with an understanding that a proportion of Worcester City Council's development needs would need to be met in the neighbouring rural districts of Malvern Hills and Wychavon. Along with the strategic development direction for south Worcestershire, the SWDP also includes a range of development management policies that apply across the area for determining planning applications by the three local planning authorities. As such the SWDP provides a single local planning document for the whole area.

1.2 However, despite the SWDP being less than two years old, it became clear from the direction of the Government's consultation on the NPPF from 2017 onwards, and the publication of the Housing White Paper 'Planning for the Right Homes in the Right Places' (2017) that a review of the SWDP would be required. There was concern around the requirement to maintain a 5-year housing land supply and the level of weight to be afforded to a local plan diminishing as the Plan moves further from its date of adoption. The NPPF also stipulated that a local plan is out of date if over five years old. Therefore, an earlier start on a review than that envisaged in SWDP 63 (which committed the SWC to commence a partial review of the SWDP by 2019), was required if a new plan was to be adopted by 2021.

1.3 The implications of these factors, along with the opportunity to take the SWDP plan period forward to 2041, led to the agreement amongst the SWCs to commence an earlier review at respective council meetings in November and December 2017. The timetable was set out in an updated Local Development Scheme (adopted in December 2017).

1.4 Central to the success of the initial stages of the Review was early, effective, and meaningful consultation with the wider community as well as specific interested parties and key service providers. This involvement from the outset assisted in producing a plan that reflects, as far as possible, community aspirations and needs by allowing issues to be identified and policy responses considered. Alongside this was

the consideration of the national planning direction that was given in the National Planning Policy Framework (NPPF), and other guidance, and evidence produced in support of the Review. Furthermore, a range of additional constraints also needed to be considered and reflected on such as landscape character, settlement pattern, housing, employment, retail and infrastructure capacities and physical characteristics of the plan area.

1.5 Unless provided in the appendix, all the referenced documents in this report can be viewed on the website for the South Worcestershire Development Plan Review www.swdevelopmentplan.org.

2. Preparatory Work

2.1 The governance structure for undertaking the review followed that of the SWDP. The South Worcestershire Joint Advisory Panel (JAP) comprising of councillors from the SWCs and Worcestershire County Council (the county council) continued to provide a steer and commentary on evidence gathering work streams as well as supporting recommendations that documents go forward to relevant council committees for approval.

2.2 The Officer Steering Group (OSG), led by the respective SWC heads of planning services and policy managers and includes an officer representing the county council, oversees the implementation of the project plan as well as topic specific officer working groups. This includes the Consultation Officer Team that led on each of the consultation stages of the Plan Review.

2.3 Prior to the publication of the Issues and Options consultation document in November 2018, the task of identifying a clear process for the preparation of documentation required at key stages in the process was put in place. This involved preparing and seeking approval from the JAP of the Consultation and Communications Strategy (Appendix 1).

2.4 The strategy clearly sets out the aims and objectives supporting the Review, covering the programme of consultation and engagement at each stage of the process. Effective and meaningful community participation and engagement is an essential element of the preparation of planning documents and the following principles underpin the approach to the Issues and Options as well as the later stages of the process. These are:

- Clear communication;
- Making it easy to get involved;
- Considering ideas and comments fairly; and
- Ensuring involvement is meaningful and effective.

- 2.5 Central to a coherent system of dialogue and engagement is an up-to-date database. The SWDP database was reviewed, updated, and amended as well as checked under the General Data Protection Regulations (GDPR) that was introduced in May 2018. The SWDP database now includes over 2,000 details of individuals, organisations, interest groups and statutory consultees with an interest in the process. Since the Issues and Options consultation further consultees have been added of those who have responded to the subsequent stages of the process
- 2.6 The SWCs also continued to subscribe to a licence to use the consultation software provided by Objective. This allows for the on-line consultation of documents, the submission of representations and management of the database. The SWDP website was also updated with dedicated webpages for the Review.

3. Raising awareness

- 3.1 Prior to the formal launch of the SWDP Review, district councillors were briefed in-house about the process in late 2017. Following this, the Review was formally launched on 31 January 2018 at The Guildhall in Worcester. The invited audience included district and county councillors as well as representatives from statutory consultees and providers, and range of other interested parties. Following a presentation from officers, those present engaged in a series of topic related workshops to begin an initial consideration of what the issues and options were that might be facing the Review. The launch was followed by the first of a series of press releases on 13 February 2018.
- 3.2 A similar briefing session provided an opportunity for all the parish and town councils across south Worcestershire held at County Hall in Worcester on 20 March 2018 to advise about the Review. The event was attended by a range of councillors from the rural parishes, towns and city with the event held in a similar format with workshops to inform the emerging issues and options paper.
- 3.3 For the remainder of the first half of 2018 the majority of the SWCs time was focused on preparing technical evidence and background work to enable the Issues and Options paper to be prepared for a six-week consultation in the autumn of 2018. However more formal briefings continued for district and city councillors in May 2018 and the beginning of October 2018.
- 3.4 On the 13 June 2018 a Sustainability Appraisal (SA) workshop was held in The Guildhall, Worcester. This was facilitated by the SA consultants Lepus, and attendees representing statutory bodies, infrastructure providers and other interested providers were able to help develop the SA framework.

3.5 In advance of the Issues and Options stage of the consultation the SWC engaged with neighbouring authorities and service delivery organisations. Details of that process can be found in the Duty to Cooperate report available via this link: [Minutes 13/05/2014, 19.30 \(swdevelopmentplan.org\)](https://www.swdevelopmentplan.org/minutes/13/05/2014_19.30)

4. Issues and Options public consultation

- 4.1 Following approval to publish the Issues and Options paper for consultation from the three Councils in October 2018, the six weeks consultation commenced on 5 November and closed on 17 December 2018. This was preceded by a press release the week before and all the organisations and individuals held on the SWDP database were formally provided with details of the Issues and Options consultation via email or post. Hard copies of the Issues and Options paper, summary document and response forms were placed in the Customer Service Centres and libraries across South Worcestershire, and the SWDP Review plan and electronic versions of the documents were placed on the SWDP website.
- 4.2 In regard to social media, a series of explainer videos were produced covering an overview of the Review; where development should go; as well as information on Housing and the Economy. These were available to view on the SWDP website Issues and Options consultation page.
- 4.3 An early briefing was provided for parish and town councils on 6 November 2018 on the Issues and Options process at County Hall. The consultation was supported by a series of staffed exhibitions held at the following locations (Table 2).

Table 2: Issues and Options consultation events

Location	District	Date of Event
Friary Walk, Worcester	Worcester City	10/11/18
Tenbury Wells	Malvern Hills	13/11/18
Droitwich Spa	Wychavon	15/11/18
Upton-upon-Severn	Malvern Hills	20/11/18
Pershore	Wychavon	21/11/18
Malvern	Malvern Hills	26/11/18
Evesham	Wychavon	29/11/18

4.4 The exhibitions were held in Worcester city over the course of a Saturday and in the main towns during a weekday from 2:00pm to 8:00pm. The

events were staffed by planning officers and included an exhibition explaining the need for a review of the SWDP and a summary of the Issues and Options paper.

- 4.5 During the summer of 2018 a Call for Sites exercise was undertaken as part of the Strategic Housing and Employment Land Availability Assessment (SHELAA) which provides an opportunity for interested parties to submit sites to be considered for housing and employment development. The sites submitted were shown on maps at the exhibition. Informal comments from those attending the events were also made on a 'Post-It' wall. Approximately 750 people attended the events.

5. Summary of Responses

- 5.1 A total of 4,482 representations from 435 consultees were received to the Issues and Options consultation. All the individual responses received to the consultation have been summarised and provided with an officer response. These were made available alongside the Preferred Options consultation in the autumn of 2019.

The nature of the feedback on the different sections of the Issues and Options paper was varied. Not surprisingly, several options received a significant level of attention, whereas other topics were more limited. A detailed summary of the issues and matters raised at this initial stage of the consultation can be found via the following link: [Cover \(swdevelopmentplan.org\)](http://Cover(swdevelopmentplan.org))

6. Towards Preferred Options

- 6.1 To build on the Issues and Options consultation and to maintain the profile of the Review process, a summary of progress was provided in the 2019 summer editions of the SWC residents' magazines. A summary of the responses to the Issues and Options was also published on the Regulation 18 Preferred Options consultation webpage.

- 6.2 Over the period to the launch of the Preferred Options consultation the SWCs engaged with key stakeholders and briefed district and county councillors as well as parish and town councils through a series of targeted briefing events. This included further parish and town council briefings in June 2019 and specific meetings providing an opportunity for relevant parish councils and residents to discuss each of the (at the time) proposed strategic site allocations in September 2019.

4. Regulation 18 Preferred Options (ii) and Targeted SA (iii) Consultations (November 2019 and March 2021)

1. Setting the Scene

- 1.1 The purpose of this section is to describe the extent of the public consultation for the Regulation 18 Preferred Options stage of the SWDP Review and provide a summary of the representations received during the six-week consultation period over November and December 2019.
- 1.2 The section also deals with a further stage of consultation specifically relating to the Sustainability Appraisal evidence base undertaken between March and April 2021. This additional stage, referred to as Regulation 18 iii provided greater clarification and updates to elements of the Sustainability Appraisal evidence base work.

2. Preparatory Work

- 2.1 The publication in November 2019 of the Preferred Options followed on from the analysis and consideration of representations made to the 2018 Issues and Options consultation document and was supported by an update to the consultation and communications strategy.
- 2.2 As with the Issues and Options stage, the SWDP database was reviewed, updated, and amended as well as checked under the General Data Protection Regulations that was introduced in May 2018. Prior to the consultation, the SWDP database included 1,718 details of parties that were directly informed of the Preferred Options consultation. This comprised 1,431 consultees (e.g., individuals and interested parties) and 287 agents and developers.
- 2.3 The SWDP website was also updated with dedicated webpages for this stage of the Review process. This was designed to raise awareness in the lead-up to the Preferred Options Stage and provide information on technical evidence and topic specific background papers, i.e., the interim Sustainability Appraisal Report consultation. Further information on this consultation is available via the following link: [SWDP Review Preferred Options Consultation - South Worcestershire Development Plan \(swdevelopmentplan.org\)](https://www.swdevelopmentplan.org/consultation-south-worcestershire-development-plan)

3. Preferred Options Raising Awareness and Consultation Summary

- 3.1 The SWDPR Preferred Options consultation was undertaken from the 4 November to 16 December 2019. The Preferred Options paper and supporting information was placed on deposit in the respective SWCs contact centres, libraries and available to view via the SWDP website. The consultation was supported by eleven staffed exhibitions in the main towns, and briefings to parish and town councils at the beginning of the consultation period on 6 November 2019.
- 3.2 Representations were encouraged via the online consultation portal provided on the Preferred Options webpage, forms were also available to download or print and representations were accepted either via email or in writing.

3.3 A marketing and social media campaign led up to and during the consultation period. This included press releases, use of social media platforms as well as the production of an explainer video. The focus of this campaign was to raise awareness of the Preferred Options document as part of the SWDP Review and how people could have their say via various roadshow events and online. The social media campaign was hosted on the SWC Facebook and Twitter pages. The posts consisted of various multimedia, including a series of informative videos, statistics, photos, and web links directing users to the SWDPR website.

3.4 In terms of the Preferred Options consultation events, table 2 below shows approximately 2,000 people attended the events as a whole. In several of the events the figures are likely to be a conservative estimate as officers were not able to retain an accurate record as a result of engagement with those in attendance.

Table 3: Preferred Options Consultation Events Summary

Event	Date	Attendance
Parish/Town Council briefings	6/11/2019	54
Bredon	11/11/2019	Approx 350
Tenbury Wells	12/11/2019	47
Pershore	13/11/2019	Approx 350
Droitwich Spa	14/11/2019	75
Worcester	16/11/2019	81
Upton-upon-Severn	19/11/2019	100
Malvern	20/11/2019	125
Norton-Juxta-Kempsey	21/11/2019	118
Rushwick	25/11/2019	150
Throckmorton	26/11/2019	Approx 250
Evesham	28/11/2019	209

3.5 The final total of representations submitted was 6,947 from 3,679 individual submissions comprising statutory consultees, organisations, agents, and individuals. This contrasts with the total of 4,470 representations received to the 2018 Issues and Options consultation. Of those 13% were made via the Objective on-line portal, 60% via email, and 26% via letter.

3.6 Analysis of the social media usage for Malvern Hills and Wychavon districts showed that the 57 posts that were released received 1,704 likes. For the Facebook posts for the Rushwick and Throckmorton consultation exhibitions, 895 and 435 people respectively engaged with the information provided, respectively. The explainer video received 163 'clicks' and generated 80 comments. It should be noted that the comments and views expressed via social media are not recorded as formal representations, but it

is reasonable to assume that they raised awareness, interest, and generated debate on the proposals during the Preferred Options consultation.

Main issues raised by statutory consultees and parish councils to the strategic policies in the Preferred Options

3.7 The following table provides an overview of comments made on the vision and objectives and the strategic policies, i.e., SWDPR1 to SWDPR7 of the Preferred Options document. This includes representations made, where applicable, by the three main statutory bodies, i.e., Historic England, Natural England, and the Environment Agency. Responses by the infrastructure providers and utilities; Highway Agency, Severn Trent, Western Power and National Grid is also included.

Table 4: Strategic Policies Main Issues Preferred Options

SWDPR Policy	Consultee	Nature of representation
Vision and Objectives	Natural England Parishes	<ul style="list-style-type: none"> • Consideration needs to be given on the impacts of the level of development proposed on publicly accessible visitor attractions, e.g., AONB. • Welcome reference to biodiversity net gain in the Objectives. • Objectives need to refer to the importance of farming industry. • Need to consider how villages can remain viable and sustainable. • More needs to be done to retain community assets.
SWDPR1 Employment, Housing and Retail Requirements	Parishes	<ul style="list-style-type: none"> • Unclear how housing numbers have been attributed to villages. • Housing need evidence shows lower numbers per annum for MHDC than generated by standard methodology. Further consideration required to minimise unneeded development in villages.

<p>SWDPR2 The Spatial Development Strategy and Associated Settlement Hierarchy</p>	<p>Natural England Parishes</p>	<ul style="list-style-type: none"> • Consideration needs to be given to the pressure on designated and non-designated recreation sites with public access. • Direct allocations to lower category villages to maintain sustainable populations and facilities. • Object to the unequal distribution of housing allocations between the two rural districts, weighted to Wychavon. • Critique of evidence base, e.g. Village Facilities Survey, Significant Gap study etc.
<p>SWDPR3 Strategic Transport Links</p>	<p>N/A</p>	<ul style="list-style-type: none"> • No specific comments recorded from statutory consultees.
<p>SWDPR4 Green Infrastructure</p>	<p>Natural England Environment Agency Sport England</p>	<ul style="list-style-type: none"> • Reference and consideration need to be given to Framework of GI Standards to be published by NE early 2020. • Policy needs to encourage use of SuDs in transport infrastructure. • Alignment required with Sport England's Playing Fields Policy and the NPPF.
<p>SWDPR5 Historic Environment</p>	<p>Historic England</p>	<ul style="list-style-type: none"> • Policy needs to be supported by the preparation of a Historic Environment Background Paper as stated in Issues and Options Paper.
<p>SWDPR6 Infrastructure</p>	<p>Sport England</p>	<ul style="list-style-type: none"> • The SWCs Playing Pitch Strategy and Built Sports Facilities Strategy is out of date. This evidence needs to be updated to inform level of POS in new settlements

SWDPR7 Health and Wellbeing	N/A	<ul style="list-style-type: none"> • No specific comments recorded from statutory consultees.
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4. Regulation 18 (iii) Sustainability Appraisal Consultation

- 4.1 Representations from the consultation to the SWDPR Preferred Options, identified several issues of a technical nature relating to the interim Sustainability Appraisal for the Preferred Options regarding the assessment of sites and consideration of the wider supporting assumptions in the appraisal document. To ensure that the Sustainability Appraisal was as robust as possible and technically correct, it was decided to undertake a further update to the interim Preferred Options Sustainability Appraisal and to undertake an additional round of targeted consultation on that document.
- 4.2 The Regulation 18 (III) Sustainability Appraisal update provided information to help clarify aspects of the report published during the previous Regulation 18 (II) Preferred Options consultation carried out in November/December 2019.
- 4.3 The Sustainability Appraisal (SA) report is a UK-specific procedure that examines the social, economic, and environmental sustainability of the sites and policies of a local plan in detail and proposes mitigation measures to overcome any negative impacts identified.
- 4.4 A central element of the Sustainability Appraisal is to facilitate the Strategic Environmental Assessment (SEA) Directive's required levels of environmental assessment, resulting in an integrated approach (the SEA Directive was transposed into English law by The Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations)). This includes transparency, by sharing assessment information and plan-making detail with a public audience, which provides the opportunity to influence the local plan.
- 4.5 In line with the Planning Policy Guidance and requirements of the SEA Directive, there is a need to provide a clear and transparent process of identifying, describing, and evaluating reasonable alternatives (Article 5(1) of the SEA Directive). This should be the case for any type of reasonable alternative raised through the plan making process.
- 4.6 Accordingly, the Sustainability Appraisal provided updates to the following sections of the SWDPR (as was submitted at the 2019 Preferred Options Regulation 18 (II) stage), and as relates to the analysis of, and reasoning for, the selection and rejection of reasonable alternatives:
- draft SWDPR policies.
 - proposed strategic location sites and reasonable alternatives.
 - proposed site allocations and reasonable alternatives; and
 - proposed SWDP reallocation sites.
- 4.7 A full Sustainability Appraisal (Environmental Report) was produced for the Regulation 19 stage of the plan making process. This version of the appraisal assessed the sustainability of the proposed submission version of the SWDP Review.

Consultation details – Regulation 18 (iii)

4.8 The public consultation ran for seven weeks from Monday 1 March to Monday 19 April 2021. It was important to recognise and convey the targeted nature of this extra stage of consultation. Therefore, it was essential that the document and supporting consultation material emphasised the technical nature in that:

- the consultation was not seeking views on an updated version of the SWDP Review; and
- this stage was not a further opportunity to make comments on proposed site allocations or policies published in the 2019 SWDP Review Preferred Options.

4.9 To support this an explainer video was prepared and made available on the SWDP consultation webpage. Given the technical nature of the document, and that the consultation period fell within the Covid-19 regulations relating to planning, which restricted any social interaction, there were no face-to-face meetings or events held during the seven-weeks.

4.10 However, an online briefing was held on the aspects and purpose of the consultation with district and city councillors prior to the 1 March 2021 and a further remote meeting was held for parish and town councils on the first day of the consultation period. This was attended by 81 representatives of the local community.

4.11 A total of 140 representations were received to the Regulation 18 (iii) consultation generating 344 individual representations. These have been summarised and responded to by officers and are available via the following link: [Reg 18 III Consultation Responses Report - Feb 2022 Final for Publishing.pdf \(swdevelopmentplan.org\)](#).

5. Conclusions on the Regulation 18 consultations

5.1 The SWCs held a series of consultation events across the three districts which aimed to inform the public and gather feedback on the proposed options. These events served as valuable platforms for engaging with the community and presenting the options for their consideration. In addition to these events, the SWCs employed a multi-media approach to inform the public about the proposals. This included the creation of mini videos that succinctly explained the key elements of the plans, in addition to publishing information on the website. This approach allowed the SWCs to reach a wider audience. Overall, the consultations were valuable and the feedback received shaped the proposals at the Regulation 19 stage.

5. Regulation 19 Publication Consultation (November 2022)

Introduction

- 5.1 The Regulation 19 Publication consultation commenced on 1 November 2022 and concluded on 23 December 2022. The consultation took place some three years after the main Regulation 18 Preferred Options consultation towards the end of 2019. This pause in the process was principally the result of the Covid-19 pandemic. This led both to inevitable timetable alterations, but also unavoidable delays to the gathering of supporting evidence given the abnormalities to the economy and everyday life over the latter period of plan making. However, in October of 2022, each of the SWCs agreed to the consultation on the SWDPR Publication document.
- 5.2 In much the same way as earlier in the process, the lead into the Regulation 19 consultation was supported by a series of press releases, parish/town and local authority councillor briefings. The consultation was supported by a revised version of the SWDPR, a summary document, and background evidence, all of which was displayed on dedicated webpages of the SWDP website. The opportunity to comment directly on-line was again made available. Prior to the start of the consultation, all stakeholders and interested parties held on the database were contacted by email or letter providing details about the process. The mailout content, via email, which included an update on the extension to the consultation period. Open rates range from 56.95% to 62.71% (as a guide 40 to 45% average, over 50%, good, over 60% fantastic, over 70% excellent). Hard copies of the main documents, i.e., the Publication document, summary paper, and Sustainability Appraisal were made available in a series of deposit locations across the plan area, mainly in public libraries and contact centres.
- 5.3 Publicity included the use of corporate social media, press releases, and targeted information events relating to the strategic development locations. The two press releases were issued during the period, which generated 11 pieces of news content. Regarding hits on the SWDP website, 2,415 people viewed the media statements on our website. The twelve social media posts across Facebook, Twitter, and Instagram generated 22,889 responses or likes. The SWDP consultation was also included in Malvern Hills and Wychavon's general e-newsletter to 2,189 residents, with an open rate of 58.34 per cent, generated an additional 39 visits to the consultation page.
- 5.4 Over the course of the first six weeks of the consultation, information events were held around the four main proposed strategic growth locations to help explain and support people wishing to learn more about these proposed developments. In addition, Droitwich Spa Town Council arranged a public question and answer sessions on the review

proposals for the parish area of Droitwich Spa. These were attended by approximately 734 people and the dates, times and venues are set out in table 4 below.

Table 5: Regulation 19 Consultation Events

Date and Time	Location	Plan Area of Focus	Number of Attendees
Thursday 3 November, 12pm – 8pm	Rushwick Village Hall	Rushwick	171
Wednesday 9 November, 12pm – 8pm	Norton Parish Hall	Worcestershire Parkway	149
Friday 11 November, 1pm – 8pm	Bredon Village Hall	Mitton	180
Monday 14 November, 1pm – 8pm	Bishampton Village Hall	Throckmorton	175
Monday, 21 November, 6pm	Droitwich Spa public meeting	Droitwich Spa	60

- 5.5 A total of 3,400 representations were made on the content of the Publication document. These were received via 1,536 individual submissions, 273 via the on-line portal, 1,180 emails and 83 letters. The summary of the representations and officer responses are available to view at Appendix 3.
- 5.6 The series of information events over November 2022 provided individuals with the opportunity to learn about the proposals, ask questions and understand how to participate in the consultation. In addition, the SWCs ensured easy access to information by making all resources available online in dedicated sections on the SWDP website. This section provided a suite of helpful documents including a summary document of SWDPR proposals and all evidence base documentation. Access to this information enhanced the transparency of the consultation process and allowed individuals to respond to the consultation with informed input.
- 5.7 The intention was that the consultation would be for a period of six-weeks from 1 November 2022. However, the consultation period was extended by a further two weeks (concluding on 23 December 2022) in the light of a minor tabulation/formatting issues to the housing supply table in the deposit hard copies of the Publication document. Accordingly, hard copies of the documents were amended and replaced at all the deposit locations with an accompanying note attached to explain the insertion of the additional material setting out

the correct information. A note was also placed on the consultation webpage. At the same time all those on the SWDP database and all those who responded to the consultation both to date and going forwards, were notified of the issue and the extension to the consultation period. It should be noted that the online version of the Plan was correct throughout the consultation period.

6. Conclusions on the Regulation 19 consultation

- 6.1 The SWCs have been committed to involving stakeholders and the local community in the development of the draft Submission version of the SWDP Review. This is clearly demonstrated by the range and breadth of consultation and involvement since work commenced on the review in 2018. Stakeholders and local communities have had a chance to influence the development of the draft SWDP Review. The preparation of the plan has been undertaken over the unprecedented Covid-19 pandemic, which has presented challenges in terms of adapting to different consultation approaches, timetable alterations and maintaining the awareness of the SWDP Review since the beginning of 2020.
- 6.2 The SWCs consider that the requirements of Regulation 22(1)(c) of the Town and Country Planning (Local Development) (England) Regulation 2012 (as amended) have been satisfied. The SWCs also believe that it can be demonstrated that the consultations have been undertaken in accordance with the SWCs Statement of Community Involvement.
- 6.3 The SWCs have employed a comprehensive range of consultation techniques to ensure stakeholders and local communities have been kept informed and involved. These have taken advantage of the opportunities presented by web-based consultation, including during the Covid-19 pandemic period, as well as using traditional methods such as direct mailing, press releases, articles, exhibitions, and public events.

Appendices

Appendix 1 – Consultation and Publicity Strategy

Appendix 2 – List of Statutory Consultees

Appendix 3 – Summary of main issues arising from the Regulation 19
Publication consultation [[link](#)]

Appendix 1 – Consultation and Publicity Strategy

South Worcestershire Development Plan Review - Consultation and Publicity Strategy

1. Introduction

This brief sets out how the consultation and publicity process will be delivered to ensure that the preparation of the consultation and promotional material for the preparation of the South Worcestershire Development Plan Review (SWDP Review) meets the statutory requirements and the appropriate soundness criteria set out in the National Planning Policy Framework (NPPF; 2023). Regard should be had to advice provided in National Planning Policy Guidance on plan making. It is also important that the process allows for more than consultation but goes beyond this level to deliver active community participation and engagement in producing the SWDP Review.

This element of the process is being led by the Consultation Officer Team (COT) details of which are provided below. In order that the overall process is manageable it is proposed to plan for the consultation and publicity for each stage of the SWDP Review process separately, although the work programme in Appendix 1 sets broad details up to adoption. This has been developed with the involvement of the Communications Officers from the South Worcestershire Councils (SWC).

In developing this approach weight has been given to the Statements of Community Involvement (SCI) prepared by each of the local authorities with the most recent in October 2018. This includes the identification of a range of communities, approaches to consultation, methodologies and feeding back on the progress. As part of the initial SWDP process the respective SCIs were aligned at the outset, drawing out different approaches and techniques to public participation and engagement.

The brief outlines key issues and areas of work and should be read with the overall consultation programme and detailed timetable for the preparation of the SWDP Review provided in Appendix 1 and 2 respectively. Detailed consultation plans will be prepared for each stage of the plan review.

2. Why, What, How - SWDP REVIEW Consultation

2.1 Awareness Raising

The principal element of any consultation strategy is to ensure that there is effective awareness raising that will translate into public participation and engagement. With the emphasis on the 'frontloading' of the Local Development Framework (LDF) it is essential that the preparation of the SWDP Review meet the soundness criteria set out in the NPPF:

- Positively prepared.
- Justified.
- Effective.
- Consistent with national policy.

Equally the quality of the evidence base and level of community participation in the process must be robust to contribute to informing the overall content of the SWDP Review, i.e. site identification, policies that direct development and protect the environment etc.

The initial awareness raising activities will include:

- Initial workshops with district and city councillors.
- Launch event to key stakeholders.
- Briefing to parish and town councils.

An assessment of the joint budget and careful costing of each aspect of the consultation process will be necessary through regular reports to the OSG from the officer team. Clearly the emphasis has been weighted towards the evidence gathering and consultation stages of the Issues and Options and Preferred Options consultations in November 2018 and November 2019 respectively. Then subsequently the SWDP Review Publication Regulation 19 documents, supporting evidence and public consultation from November 2022. However, it will be necessary to identify resources for the later phases, i.e., Submission, public examination and final adoption.

2.2 Audience Sectors

The nature of the communities that should be consulted is broadly identified by the SCI, and they fall within similar groups, which includes:

- Statutory and non-statutory consultees;
- Parish and town councils;
- Business/commercial sectors;
- Voluntary sector, e.g. CVS;
- Community Action Groups;
- BME groups;
- General public/wider community.

In order to take the process further, a number of key tasks need to be undertaken, incorporating:

- database cleanse and update – achieved March 2018;
- check for compliance with GDPR;
- check of non-statutory consultees and amenity groups;
- 'directory' search of the broad range of groups identified to ensure contact and address details are up to date.

2.3 Points of Contact for Editorial/Content/Sign-off Protocol

The nature of effective communications, consultation and community engagement is dependent on providing good quality information, with appropriate lead-in times and appropriately effective feedback to those involved in the process. Given the time required to put material together in terms of design, printing etc. together with the relatively tight time scale of the overall process, it is important that decisions on content etc. can be made quickly.

It is proposed that the Officer Steering Group (OSG) will have delegated authority to approve non-statutory consultation/communications material, website content, exhibition boards and press releases etc. The role of the Consultation Officer Team (COT) will be to ensure that material and content is prepared on time and to a standard that the OSG can approve. If appropriate, the opportunity will be provided for the Joint Advisory Panel (JAP) to review material or text etc. if agreed by OSG. The press protocol has been agreed by the group of councillors overseeing the review, the JAP where it was agreed that an elected member from each local authority be nominated as a point of contact for the press/media.

3. Photography

3.1 Determine images required.

Each local authority holds a library of images that may be selected for the design of communications material. Whilst Worcester City have commissioned a professional photographer to provide images for use at the wider corporate level, consideration will be given to using this material for the SWDP Review, if appropriate. Given the mixed urban and rural nature of the study area, it is important that there should be a balance of images representing and reflecting the character all three geographic local authority areas.

In addition to the individual district resources, alternative images can be obtained on-line from copyright free sites such as 'liquid library' if required.

4. Communications Material & Outreach

4.1. The aim will be to create a positive narrative around the review of the SWDP, with a focus on:

- Planning for the future
- Government policy
- The risks of not having an up-to-date plan will lead to adhoc development
- Material to be prepared in plain English summaries to sit alongside the formal documents.
- Chairman of the Joint Advisory Panel interviewed by local media and broadcasters.
- Social media explainer videos
- Roadshows/exhibitions

4.2 Launch Event/Awareness Raising for formal consultation stages

In addition to the overall launch of the review process to a range of interested parties, organisations, town/parish councils and communities involving briefing sessions at The Guildhall, Worcester in early 2018, it is also necessary to raise the profile of the formal consultation stages of the process. Since the completion of the first two statutory consultation stages, i.e., Regulation 18 Issues and Options and Preferred Options, the delivery of the SWDP Review timetable has been significantly impacted by the Covid-19 pandemic. Therefore, from March 2020 to April 2021, the nature of consultation has been restricted and directed by the Covid-19 emergency regulations for planning and in accordance with the temporary revisions to the Statement of Community Involvement.

4.3 Sustainability Appraisal Consultation

Government guidance and best practice is clear that not only should the Sustainability Appraisal (SA) provide the basis for informing the eventual content of any development plan but that effective public consultation should underpin the preparation of the SA.

Therefore, commencing with the initial consultation period on the SA scoping report (May 2018) with the three main statutory bodies, Natural England; Historic England and Environment Agency a programme will be developed with Lepus (the appointed SA consultants) along the following lines:

- Production of the SA Scoping Report (May 2018);
- Stakeholder event for invited stakeholders to include objective testing (summer 2018);
- Wider engagement on objective testing through two workshops involving stakeholders and general public (late 2018/19);
- Production of the SA report for the Regulation 18 (i) Issues and Options consultation (November 2018);
- Production of the SA report for the Regulation 18 (ii) Preferred Options consultation (November 2019);
- Production of the SA report for the Regulation 18 (iii) Technical Consultation on the SA (March 2021);
- Production of SA report for the Regulation 19 Publication consultation (November 2022).

The SA consultants Lepus, supported by the SA officer group will be responsible for planning these events with support from COT, as appropriate.

4.4 Advertising

Press notices will be placed in the local press advertising the publication of each SWDP Review consultation stage prior to the six-week statutory consultation exercise.

5. Web Site

Undertake a regular review of the SWDP website and refresh accordingly as well as the archiving of material relating to the preparation of the adopted SWDP.

6. Residents Magazines

Each of the respective SWCs should make use of existing resources to advertise consultation events. This will also ensure publicity costs are kept to minimum. Each local authority publishes a resident's magazine, either on-line or which is delivered to all households, through free newspapers and the post. It will be necessary to ensure that the deadlines and dates for publication is co-ordinated between each of the local authorities.

Each local authority will have access to the consultation and publication software provided by Objective. This will be used to provide an opportunity for on-line consultation on the relevant documents and the processing of responses. To facilitate this, all documents will be produced using the publisher facility in Objective and database management tool. The option to make representations to the documents in the traditional manner will also remain available.

An initial work stream involved the cleansing and updating of the SWDP database, as stored in Objective. Work on this was undertaken in Spring 2018.

7. Analysis Reporting/Feedback

As required by the Statement of Community Involvement and Regulation 22c of the Town and Country Planning (Local Planning) (England) Regulations 2012, a consultation report will be prepared for each of the statutory stages of the plan preparation process. Consideration should be given to database management and analysis of consultation material to ensure the evidence/consultation responses can be fed into the production of subsequent versions of the SWDP Review.

South Worcestershire Community Consultation and Publicity Programme

Three main stages:

1. **Awareness raising** of the South Worcestershire Development Plan Review (SWDP Review) and associated documents. This will involve:
 - the publication of a leaflet explaining the role of the SWDP Review, who is involved, the issues it will consider, timetable for involvement etc;
 - Member and parish/town council involvement;
 - agreement of a consultation strategy for inclusion within the overall Project Plan.
2. **Issues and Options.** This is the formal start of the process about the major planning issues facing future growth and development in south Worcestershire and suggesting possible ways or options for dealing with the issues.
3. **Preferred Options.** This stage builds on the Issues and Options consultation and participation undertaken from the autumn of 2018. The SWDP Review Preferred Options was published in the autumn of 2019 and the document was subject to six weeks consultation. A further Regulation 18 targeted consultation on the Sustainability Appraisal was undertaken in March 2021.
4. **Publication Consultation.** Consultation required on the pre-submission document but focuses on procedure rather than content. The Regulation 19 Publication version of the SWDP Review consultation was undertaken during November to December 2022.

The following criteria and tests of soundness (NPPF, 2021) will be particularly important to consider when designing the community involvement programme:

Under the Planning and Compulsory Purchase Act 2004 S 20(5) (a) an Inspector is charged with firstly checking that the plan has complied with legislation. This includes in particular checking that the plan:

- ***has been prepared in accordance with the Local Development Scheme and in compliance with the Statement of Community Involvement and the Regulations²;***
- ***has been subject to sustainability appraisal;***
- ***has regard to national policy;***

The NPPF (para. 35) requires a local planning authority to submit a plan for examination which it considers is “sound” – namely that it is:

- ***Positively prepared*** – *the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistency with achieving sustainable development.*
- ***Justified*** – *the plan should be the most appropriate strategy, when considered against reasonable alternatives, based on proportionate evidence;*

² Town and Country Planning (Local Development) (England) Regulations 2004 as amended.

- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with policies in the Framework.

Community Consultation and Publicity Programme

Consultation Activity	Target Group/Publicity method	By Whom	When
Awareness raising			
<p>1. Briefing sessions for SWC members, parish and town councillors and stakeholder groups.</p> <p>2. Prepare a series of leaflets, exhibition material, videos etc. to raise awareness of the SWDP Review. Articles in residents magazines. Also prepare and consult on SA Scoping Report.</p> <p>These will contain:</p> <ul style="list-style-type: none"> • Introduction to the SWDP Review role and its relationship to other documents. • Why we are reviewing the SWDP so soon after adoption. • Planning for south Worcestershire to 2041, the area covered, who is involved and overall timetable for delivery. • Facing the issues – identifying key issues that are likely to generate discussion and debate. • Plain English content to inc. issues as above, impact of appeal led development, pictures and responses from exhibitions and events. • Key challenges and issues identified by Officer Steering Group (OSG) so far. 	<p>Individual invites to events.</p> <p>Placed in accessible locations across south Worcestershire, including libraries, sports centres, council offices, village shops/post office etc.</p> <p>Information sent via SWDP database. Households reached through the residents' magazines, i.e. Parish Matters, View from the Hills, City Life and TWM prior to key stages in the process.</p> <p>Information to all parish/town councils.</p> <p>Social media.</p>	<p>COT</p>	<p>Autumn 2017/ Spring 2018 Summer/ autumn 2018 Autumn 2022</p>

<ul style="list-style-type: none"> • What happens next – key stages of community involvement towards adoption? <p>Set up events and with key service, infrastructure providers and stakeholders.</p> <p>Preparation of IDP – stakeholder workshops and engagement etc.</p>			<p>Summer/ autumn 2018/19/ 21 Spring/ summer 2022</p>
<p>3. Press releases/articles in local press. Interview of JAP Chair by local media and broadcasters.</p>	<p>Local newspapers/broadcasters.</p>	<p>COT/ Comms Officers</p>	<p>Spring/ autumn 2018 Autumn 2022</p>
<p>3. SWDP REVIEW information on website</p> <p>Update SWDP webpage to outline community consultation and publicity programme, awareness raising leaflet and updates on SWDP REVIEW progress.</p>	<p>All web users.</p>	<p>COT</p>	<p>Spring 2018 Autumn 2022</p>

4. Articles in each local authorities newsletter if timing permits – MHDC – View from the Hills, Parish Matters, Wychavon TWM, and Worcester City Life.	All households.	COT/ Comms Officers	March 2018 Autumn 2022
5. JAP briefings on format of strategy and approach for way forward as and when.	Members.	JOT	March 2018 Summer 2022
6. Parish and town council briefing seminars.	Parish and town councils.	COT/OSG	March 2018 Summer 2022
7. Plain English summaries of official documents	SWC	Topic groups	March 2018 Autumn 2022
8. Internal Consultation – to ensure effective member and cross council officer involvement in the development of the SWDP REVIEW.	All relevant Council departments.		March 2018 Summer 2022
9. Sustainability Appraisal Consultations.	Relevant stakeholders' workshop on the SA scope.	Lepus/SA officer team	June 2018 November 2018 November 2019

			March 2021 Autumn 2022
Issues and Options Consultation			
<p>10. Four-week publicity campaign prior to start of statutory consultation period. Launch event with press/media on publication of committee reports to Council. Publish Issues and Options Paper including sustainability appraisal for 6-week consultation period.</p> <p>Consultation: repeat 2 Press Release/adverts, 3 Web update, 4 E-mail letter to LDF consultees, Articles in LA publications, briefings to members/parish/town councils.</p> <p>Local Democracy Day October 2018 with young people in south Worcestershire. Explainer videos to be provide to schools in south Worcestershire.</p>	<p>Statutory Consultees. Stakeholders/Public. Members. Parish/town councils. .</p> <p>Ensure widespread publication of leaflet and opportunities for comment.</p> <p>Schools and youth groups across south Worcestershire</p>	<p>COT/OSG</p> <p>COT/Comms</p>	<p>Autumn 2018</p> <p>October 2018</p>
<p>11. Issues and Options Exhibition Roadshow</p> <p>Number will depend on resources available. Invite statutory consultees and LDF consultees to informal discussion evening.</p> <p>12. Feedback on process via website/media.</p>	<p>Requires accessible locations and consideration of events which allow for feedback on issues.</p>	<p>COT/OSG</p>	<p>Autumn 2018</p> <p>December 2018</p>

Preferred Options Consultation			
<p>13. Four-week publicity campaign prior to start of statutory consultation period. Launch event with press/media on publication of committee reports to Council. Publish Preferred Options Paper including sustainability appraisal for 6-week consultation period.</p> <p>Consultation: repeat 2 Press Release/adverts, 3 Web update, 4 E-mail letter to LDF consultees, Articles in LA publications, briefings to members/parish/town councils.</p> <p>Statutory advertisement.</p>	<p>Statutory Consultees.</p> <p>Stakeholders/Public.</p> <p>Members.</p> <p>Parish/town councils.</p> <p>.</p> <p>Ensure widespread publication of leaflet and opportunities for comment.</p>	COT/OSG	Autumn 2019
<p>14. Preferred Options Exhibition Roadshow</p> <p>Number will depend on resources available. Invite statutory consultees and LDF consultees to informal discussion evening.</p> <p>Feedback on process via website/media.</p>	<p>Requires accessible locations and consideration of events which allow for feedback on issues.</p>	COT/JOT	Autumn 2019 December 2019
Pre-Submission – Publication Regulation 19			
<p>15. Statutory consultation on process and test of soundness, rather than content. Six week consultation and advert in local press.</p>	<p>Notification letter to all statutory consultees, stakeholders and contacts on the SWDP Review database via post or e-mail.</p> <p>Members.</p>	COT	Autumn 2022

16. Further Internal Consultation – to ensure effective member and cross council officer awareness of reaching submission stage.		OSG/OSG	Summer 2022
14. Press Release – to announce the publication of the submission version of the SWDP Review Strategy and Sustainability Appraisal report, and the statutory six-week period of consultation on the documents.		Comms Officers	Autumn 2022
15. Submit to SoS – press release. Outline of next stages.	Stakeholders, members.	OSG/COT/ Comms Officers	Summer 2023

What happens after the SWDP Review is submitted to the Secretary of State?

- All representations received within the six-week consultation period will be sent to the Secretary of State. All comments will be placed on the SWDP Review website and be made available at agreed Deposit locations and local libraries for public inspection.
- Consultees to be informed of public examination.
- Consultees to be informed of the inspector's report.
- Consultees to be informed of adoption of SWDP Review.

Source: AF19/09/2023

Appendix 2 - List of Statutory Consultees and General Consultees

Statutory Consultees	General Consultees
All adjoining tiers of Local Authorities	Residents and local communities
All parish and town councils within and adjoining the SWDP plan area boundary	Local Economic Partnership
Environment Agency	Local business interest groups
Natural England	Developers, agents and landowners
National Highways	Schools and Further/Higher Education
Historic England	Public transport providers
Homes England	Charities
Health and Safety Executive	Community groups, including residents' associations etc.
The Coal Authority	Affordable Housing Providers
Network Rail	Sports bodies and groups
British Pipelines Agency	Environmental bodies and groups
Telecom providers	Historic Environment groups
Active Travel England	Design advice groups
Clinical Commissioning Group, NHS England, Acute Health Trusts	AONB Board – Cotswold National Landscape and Malvern Hills AONB Partnership
Office of Rail Regulation	Malvern Hills Trust
Sport England	Faith groups
Severn Trent Water	Care providers
National Grid	Aggregate and waste operators
West Mercia Police	
Hereford and Worcester Fire and Rescue Service	
The Theatres Trust	

Appendix 3 – Summary of main issues arising from the Regulation 19 Publication consultation

The main issues documentation is available to view on the SWDPR Examination Webpage: <https://www.localplanservices.co.uk/swdpreview>

Summary report of the main issues identified following consultation on the Regulation 19 stage of the SWDP Review

Policy	Respondents and Rep ID	Summary of Main Issue	Response
The SWDP Review			
The SWDP Review		No issues raised.	
Introduction	Proposed minor modification	<p>Delete paragraphs 3 to 7 and amend the first sentence of para 10 which refer to the Regulation 19 Publication and public consultation. Replace with text relating to the examination and adoption of the SWDPR to be agreed with the Inspector.</p> <p>Strategic policies for the examination of neighbourhood plans needs to be set out in the SWDPR.</p> <p>Insert new para 21 after Objectives as follows.</p> <p>"21. The SWDPR forms part of the development framework for south Worcestershire that also includes the Minerals Local Plan and Waste Local Plan</p>	<p>The opening section of the Introduction needs to be revised, with reference to the Regulation 19 Publication process deleted. New text inserted relating to the adoption of the SWDPR post examination.</p> <p>In response to the representation from Rural England, there is opportunity to set out the strategic policies for the purposes of neighbourhood plan examination. This can be included in an additional annex to the plan and finalised with the Inspector at the examination. It is proposed to include reference to the identified strategic policies for neighbourhood planning and include a full justification and list within a further annex.</p>

		<p>prepared by Worcestershire County Council. In addition, the development framework also includes any made (adopted) neighbourhood plans or orders prepared by local communities. For the purposes of preparing and examining neighbourhood plans, local planning authorities are required to identify and list the policies in this plan that are deemed to be 'strategic' and that any neighbourhood plan must be in general conformity with. These policies may include those in addition to the policies within the Strategic section of this document. A full list of policies and justification for their identification are provided in annex H".</p>	
Vision & Objectives			
Vision & Objectives	<p>Malcolm Downes Rep ID: 313</p>	Objectives contradict with the policies.	Noted.
	<p>Worcestershire Wildlife Trust Rep ID: 559</p>	Endorse the objectives set out under 'A Better Environment for Today and Tomorrow in this paragraph and consider that they are essential to delivering sustainable development.	Noted. Support welcome.
	<p>Bromford Developments Rep ID: 2206, 2224</p>	Support all the 20 key objectives in the draft plan, particularly objective 11.	Support noted.

	<p>Newman, Rep ID: 2970</p>	<p>Key Diagram could be clearer in hard copy of the SWDPR.</p>	<p>Noted. Minor cartographic Mod: to image of Key Diagram to enhance the graphic/visual quality of the image.</p>
	<p>L and Q Estates Rep ID: 3241</p>	<p>Broadly supportive of the vision and considers that the objectives of the adopted SWDP remain relevant and therefore supported. How the vision is achieving prosperous, attractive and strong rural communities is to be translated through the Plan into policy is currently absent. Vision does not seek to tackle the key issues of the urban/rural split of the borough and in particular the delivery of affordable and accessible housing for rural communities.</p>	<p>Noted.</p>
	<p>Worcestershire County Council, Rep ID: 1324</p>	<p>Welcome the vision and underpinning strategic objectives. Though note that the objectives do not currently refer to the need for the realisation of growth to be enabled by the phased delivery of transport interventions. Feel that the objectives could be strengthened by the inclusion of the aim to ensure that development and infrastructure needs are met in a timely and coordinated manner.</p>	<p>Noted. Support welcomed. Agree that Stronger Communities objective could be enhanced by reference to infrastructure delivery. Minor Mod: "Ensure that development and infrastructure needs are met in a timely and coordinated manner".</p>

	<p>West Mercia Police Rep: 913</p>	<p>Endorse the Secured by Design initiatives continuing to be supported in the Objectives.</p>	<p>Noted. Support welcomed.</p>
	<p>Kemerton Conversation Trust (KCT) Rep ID: 861</p>	<p>Welcome paragraph 19 which emphasises the importance of natural beauty and ecology in south Worcestershire.</p>	<p>Noted. Support welcomed.</p>
	<p>Canal and River Trust Rep ID: 651</p>	<p>Support the plan vision and objectives. Welcome the mention of the canals and rivers of South Worcestershire in the vision.</p>	<p>Noted. Support welcomed.</p>
	<p>Spitfire Bespoke Rep ID: 2107</p>	<p>Vision is supported but matters missing from the vision and missing how the vision is delivered through the plan. Objectives and development strategy is a concern – and whether these objectives are compatible with each other and vision. Minimum target set for the number of homes but feel allocations limit number of dwellings. Focus primarily on the ageing population of South Worcestershire rather than the implications of the rural/urban split on the distribution of housing to accommodate needs of the South Worcestershire population. Objectives need to be reviewed to ensure greater clarity on how dwellings will be delivered across South Worcestershire.</p>	<p>Comments noted. This may be something the Inspector may like to consider at examination.</p>

		Vision and objectives now have a greater emphasis on climate change. This principle is supported and aligns with Government aspirations but should not dominate vision and objectives.	
SWDPR 01			
SWDPR 01 Climate Change Mitigation and Adaption	Mr Paul Osborn Rep ID: 59 Mr Joel Merris (Vistry Group) Rep ID: 413 Maureen Williams Rep ID: 2774, 2777 Lindridge Parish Council Rep ID: 3552	Sites should be allocated on brownfield land and in big towns and cities. SWDPR should seek to allocate larger developments next to existing sustainable settlements including Droitwich Spa.	There is very limited brownfield land available in south Worcestershire that are suitable for development. The plan has identified sufficient housing and employment allocations in and around Droitwich Spa and other settlements.
	Mr Chris Rawlings Rep ID: 247	The need to define carbon neutral	This is defined within the Glossary.
	Mr Graeme Irwin Rep ID: 449	Reasoned Justification (para 1.3) should be updated following the Flood and Coastal Risk Section of the PPG being updated in August 2022.	Agreed.
	Mr Stephen Holloway (Fisher German LLP) Rep ID: 461 Landowner for land adjacent Galton Arms Himbleton Rep ID: 774	Cvii. requirement is unjustified and unclear how the 20% can be demonstrated at submission or in perpetuity.	This is something the Inspector may wish to consider at examination. The policy does not require standards over and above building regs and covers elements not covered by building regs. Some

	<p>Gleeson Land Rep ID: 945 Hollybrook Homes Rep ID: 1304 L AND Q Estates Rep ID: 1692</p>	<p>It has not been justified why the requirement goes beyond building regulations</p>	<p>minor mods have been proposed accordingly for SWDPR 05.</p>
	<p>Rooftop Housing Group Rep ID: 485, 625 Marches Homes Limited Rep ID: 1003 Michelle Alexander (Warndon Parish Council) Rep ID: 1229, 1230 Wyre Piddle Ltd Rep ID: 3142, 1342 Stonebond Ltd Rep ID: 2450, 3433 Areley Kings Ltd Rep ID: 3332 Hallow Stage 2 Ltd Rep ID: 3279 Deeley Homes Rep ID: 1738, 2374 St Philips Ltd Rep ID: 2136, 2275, 1962, 2031 Millstrand Properties Ltd Rep ID: 2309, 2129 Piper Homes Rep ID: 2063, 1861 Adam Hewitt Ltd</p>	<p>The policy does not reference energy storage</p>	<p>Whilst reference to battery storage could be included, this is not a soundness issue.</p> <p>Energy storage is not always associated with renewable or low carbon energy.</p>

	<p>Rep ID: 1992 Harris Land Management Rep ID: 1819 Evesham Heights Limited Rep ID: 1663 Malvern Estates Rep ID: 1517</p>		
	<p>Rooftop Housing Group Rep ID: 485, 625 Marches Homes Limited Rep: 1003 Michelle Alexander (Warndon Parish Council) Rep ID: 1230 Wyre Piddle Ltd Rep ID: 3142, 1342 Stonebond Ltd Rep ID: 2450, 3433 Areley Kings Ltd Rep ID: 3332 Hallow Stage 2 Ltd Rep ID: 3279 Deeley Homes Rep ID: 1738, 2374 St Philips Ltd Rep ID: 1962, 2031, 2136, 2275 Millstrand Properties Ltd Rep ID: 2129, 2309 Piper Homes Rep ID: 1861 Adam Hewitt Ltd</p>	<p>Policy is geared towards residential growth and more reference should be made to employment uses, in accordance with Para 153 of the NPPF</p>	<p>The policy makes adequate reference to employment uses as well as residential.</p>

	<p>Rep ID: 1992 Harris Land Management Rep ID: 1819 Evesham Heights Limited Rep ID: 1663 Malvern Estates Rep ID: 1517</p>		
	<p>Landowner for land adjacent Galton Arms Himbleton Rep ID: 774 Gleeson Land Rep ID: 945 Mr Mark Marsh (Avant Homes) Rep ID: 1155 Hollybrook Homes Rep ID: 1304 Sarah Milward (IM Land) Rep ID: 1391 Summix, Homes England, and Bellway Rep ID: 1433 Stuart Field Rep ID: 3242 University of Worcester Rep ID: 582 Mr Andrew Penna (BDW South West) Rep ID: 1504 L AND Q Estates</p>	<p>Point D is unsound – reference to standards outside of the planning process such as BREEAM should be avoided as these standards can change over time. The requirement is not flexible enough to allow for changes in building standards.</p> <p>The need for the Homes Quality Mark assessment has not been justified</p>	<p>The wording could be made more flexible for new or other standards. This is something the Inspector may wish to consider at examination.</p>

	<p>Rep ID: 1692 Mrs Emma Foster (Spitfire Bespoke Homes) Rep ID: 2108</p>		
	<p>Castlethorpe Homes Rep ID: 812</p>	<p>The plan is over reliant on large strategic allocations</p>	<p>This is addressed in SWDPR03 The Spatial Development Strategy and Settlement Hierarchy. The evidence for the South Worcestershire Councils' spatial strategy is set out in the Spatial Strategy Background paper, which was informed by extensive consultation to set the agreed spatial strategy. This is further supported by the Village Facilities and Rural Transport Study, which served to inform the settlement hierarchy. In turn the evidence for the selection of sites for allocation can be seen in the SHELAA and on the Site Assessment Spreadsheets. Further site selection analysis has also been undertaken through the Sustainability Appraisal process. The plan is therefore considered sound and legally compliant in this regard.</p>
	<p>Gleeson Land Rep ID: 945 Mr Sean Lewis Rep ID: 1099 Stuart Field Rep ID: 3242 Brandon Planning and</p>	<p>More explanation is needed to confirm when the requirements of part C will be needed. Must be justified that the requirements are flexible and in accordance with the NPPF.</p>	<p>This is something the Inspector may wish to consider at examination including whether the policy wording should be amended to clarify that this is a list of things that could be delivered, it is not supposed to be a requirement of all</p>

	<p>Development & Caddick Residential Ltd Rep ID: 2466 St Philips Land Ltd Rep ID: 1793 Mrs Emma Foster (Spitfire Bespoke Homes) Rep ID: 2108 Summix, Homes England, and Bellway Rep ID: 1433</p>		<p>sites/types of development – ‘where suitable/relevant’ Minor mod: addition of “where relevant” to the end of point C.</p>
	<p>Gleeson Land Rep ID: 945 Brandon Planning and Development & Caddick Residential Ltd Rep ID: 2466</p>	<p>Part A and B are restating the SWDPR Strategy without adding policy guidance and should therefore be removed.</p>	<p>Comment noted and disagreed. Parts A and B are important strategic policies that set out the overarching aim of SWDPR01.</p>
	<p>Gleeson Land Rep ID: 945 Hollybrook Homes Rep ID: 1304 Brandon Planning and Development & Caddick Residential Ltd Rep ID: 2466</p>	<p>Not clear whether the requirements have not been viability tested</p>	<p>The policy has been viability tested.</p>
	<p>Ainscough Strategic Land Rep ID: 1052 Lone Star Land Ltd Rep ID: 1061 / 1070 Mr Jonathan Parkes Rep ID: 2559 P L Marriott Estates Limited</p>	<p>Policy SWDPR 01 should be amended in line with the suggested modifications to draft Policies SWDPR 05 and SWDPR 33.</p>	<p>Comments noted but disagree. SWDPR05, SWDPR 33, and a “fabric first” approach is considered to be complimentary. Using a fabric first approach, the predicted energy requirement is reduced through energy efficiency and low energy design before meeting residual</p>

<p>Rep ID: 2198 The Rose Farm Partnership Rep ID: 1765</p>		<p>energy demand, first from renewable or low carbon sources and then from fossil fuels.</p>
<p>Mr Mark Marsh (Avant Homes) Rep ID: 1155 Sarah Milward (IM Land) Rep ID: 1391 Mr Keith Owens (Owl Partnerships Ltd) Rep ID: 1495</p>	<p>Criterion Civ proposes a blanket protection of green spaces without reference to quality or contribution that the open space makes towards green infrastructure provision or climate change objectives</p>	<p>Civ proposes protection and safeguarding of existing green spaces. The wording of C links all subparagraphs to the issue of climate change mitigation and adaptation. Green Infrastructure provision is covered separately under C.iv.</p>
<p>L AND Q Estates Rep ID: 1692 St Philips Land Ltd Rep ID: 1793 Lovell Partnerships Limited Rep ID: 2010 Summix, Homes England, and Bellway Rep ID: 1433</p>	<p>No justification for requirements duplicating or going beyond building regs, in particular point Cii</p>	<p>Providing EV charging points are consistent with the NPPF paragraphs 107, 112 and 113. This may be something the Inspector may like to consider at examination.</p>
<p>Severn Trent Water Rep ID: 696</p>	<p>Cv Protection of Green Open Space should include note: Development of flood resilience schemes within local green spaces will be supported provided the schemes do not adversely impact the primary function of the green space.</p>	<p>The current policy wording is considered sufficient and does not prohibit flood resilience schemes from being developed on local green space.</p>
<p>Mr Andrew Penna (BDW South West) Rep ID: 1504</p>	<p>Cxi embodied carbon is not justified and there is no evidence to show how the target can be achieved.</p>	<p>Comments noted. Developers are only required to prioritise the use of sustainable construction techniques</p>

			<p>and materials that involve the lowest embodied carbon and minimise their ecological and carbon footprints.</p> <p>Consistent data is not yet widely available for all life stages of a whole lifecycle carbon assessment. The target of <500kgCO₂e/m² is aligned with LETI best practice 2020 recommended target of how to achieve ultra low energy standards. Whereas it is appreciated that the LETI Climate Emergency Guides reference to 500kgco₂e/sqm is considered best practise for domestic building elements, the UK Green Building Council New Homes Policy Playbook (January 2021) says that 'Major developments should target <500kgco₂e/sqm upfront embodied carbon emissions (equating to the emissions covered by Modules A1-A5 of the RICS methodology).</p>
	<p>James Chatterton (William Davis Developments) Rep ID: 1909 Summix, Homes England, and Bellway Rep ID: 1433</p>	<p>There is no clear reason for the duplication of other policy requirements which is contrary to para 16f of the NPPF and therefore SWDPR01 should be deleted</p>	<p>Comment noted but disagree. SWDPR01 is an important strategic policy. Local planning authorities are bound by the legal duty in Section 19 of the 2004 Planning and Compulsory Purchase Act, as amended by the 2008 Planning Act, to ensure that, taken as a whole, planning policy contributes to the</p>

			<p>mitigation of and adaptation to climate change. This outcome-focused duty on local planning clearly signals the priority to be given to climate change in plan-making. Chapter 14 of the NPPF also concerns meeting the challenge of climate change, flooding and coastal change with local plans providing policies to support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts.</p>
	<p>Mrs Jenna Strover (Potter Space) Rep ID: 2092 Lindridge Parish Council Rep ID: 3552</p>	<p>Policy SWDPR01 should recognise that there are circumstances where development is required in less accessible locations due to the nature of the proposal</p>	<p>This is addressed in SWDPR03 The Spatial Development Strategy and Settlement Hierarchy. The evidence for the South Worcestershire Councils' spatial strategy is set out in the Spatial Strategy Background paper, which was informed by extensive consultation to set the agreed spatial strategy. This is further supported by the Village Facilities and Rural Transport Study, which served to inform the settlement hierarchy. In turn the evidence for the selection of sites for allocation can be seen in the SHELAA and on the Site Assessment Spreadsheets. Further site selection analysis has also been undertaken through the Sustainability Appraisal</p>

			process. The plan is therefore considered sound and legally compliant in this regard. For sites such as RCLE
SWDPR 02			
SWDPR 02 Employment, Housing and Retail Requirements	Lovell Partnerships Ltd Rep ID: 2012; Mr Andrew Penna (BDW South West) Rep ID: 1505; Ainscough Strategic Land Rep ID: 1053; Jo Hess (Taylor Wimpey Strategic Land) Rep ID: 936; Mr Joel Merris (Vistry Group) Rep ID: 417; Mr Nick Rawlings (Harris Lamb obo Bloor Homes) Rep ID: 765	Lapse rates are needed on all / some of the housing figures in SWDPR02	Lapse rates are applied to existing commitments in the table in SWDPR02. The allocation of dwellings above the housing requirement is to ensure that there is enough flexibility in the plan. It would not be appropriate to include a lapse rate on proposed allocations in the plan, as this is already built in.
	Lovell Partnerships Ltd Rep ID: 2012; Mrs Jenna Strover (Potter Space) Rep ID: 2093; Mr Mark Snape (Willow Construction) Rep ID: 2260; Reiss Sadler (Lone Star Land Ltd) Rep ID: 2403 / 2416; Laurie Abercrombie	The amount of employment land required in the SWDP Review is not correct	The evidence for support of the employment requirement is set out in the South Worcestershire Councils' Economic Development Needs Assessment, and the Plan is considered sound and legally compliant in this regard.

	<p>Rep ID: 3113; Kay Mason Rep ID: 3120; Mr Kevin Poole Rep ID: 3420; Land Partnerships Development Ltd Rep ID: 1954; Summix, Homes England and Bellway Rep ID: 1434; Mr Justin Parker (Chase Commercial Ltd.) Rep ID: 907; Laura Williams Rep ID: 68; Mr Mike Oakley Rep ID: 113; Mr Edward Atkin (Schroders UK Property Fund) Rep ID: 400; Mr Joel Merris (Vistry Group) Rep ID: 417; Stephen Goodenough (Malvern Hills Civic Society) Rep ID: 584; Lioncourt Homes Rep ID: 803; Mr H Wylie (McLoughlin Planning)</p>		
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	<p>Rep ID: 802; Mr Nick Rawlings (Harris Lamb obo Bloor Homes) Rep ID: 765</p>		
	<p>Lovell Partnerships Ltd Rep ID: 2012; Mrs Emma Foster (Spitfire Homes) Rep ID: 1283 / 2109; Lantar Developments Rep ID: 2256; Reiss Sadler (Lone Star Land Ltd) Rep ID: 2403 / 2416; Laurie Abercrombie Rep ID: 3113; Mrs Tracey France Rep ID: 3258; Richard Tesh Rep ID: 349; Land Partnerships Development Ltd Rep ID: 1954; The Rose Farm Partnership Rep ID: 1762; Mr Andrew Penna (BDW South West) Rep ID: 1505; Summix, Homes England and Bellway Rep ID: 1434; Ainscough Strategic Land</p>	<p>The housing requirement in the SWDP Review is not correct / should be revised</p>	<p>The Council have followed the standard method using the 2014 Household Projections, as set out in Planning Practice Guidance. The Plan provides a higher housing requirement than is suggested by the standard method minimum. This is to provide flexibility and to future-proof the plan. Evidence to support the housing requirement is set out in the South Worcestershire Councils' Housing Topic Paper, and the Plan is considered sound and legally compliant in this regard.</p>

	<p>Rep ID: 1053; Gleeson Land Rep ID: 946; Jo Hess (Taylor Wimpey Strategic Land) Rep ID: 936; Mr Joel Merris (Vistry Group) Rep ID: 417; Dr Stuart Cumella (Martley Parish Council) Rep ID: 478; Stephen Goodenough (Malvern Hills Civic Society) Rep ID: 584; Land & Partners Ltd. Rep ID: 920; Mactaggart & Mickel Group Rep ID: 914 / 1776; Castlethorpe Homes Rep ID: 813; Lioncourt Homes Rep ID: 803; Fisher Germain Rep ID: 462 (Land adj Pinvin Crossroads Rep ID: 767; Land adj Galton Arms Himbleton Rep ID: 775;</p>		
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	<p>Former Tolladine Golf Course) Rep ID: 752; Mr Nick Rawlings (Harris Lamb obo Bloor Homes) Rep ID: 765</p>		
	<p>Kingacre Estates Ltd Rep ID: 2059; Mrs Emma Foster (Spitfire Homes) Rep ID: 1283 / 2109; Mr J Robbins Rep ID: 2125; Hallam Land Rep ID: 2303 / 2354; Vistry Group Rep ID: 417; Adam Renn (Mackenzie Miller Homes) Rep ID: 2461; Brandon Planning & Development Ltd and Caddick Residential Ltd Rep ID: 2467; Richborough Estates Rep ID: 3318; Mr John Mill (Millstrand Properties) Rep ID: 1915; Mactaggart & Mickel Group Rep ID: 914 / 1776; The Rose Farm Partnership</p>	<p>The housing trajectory is too ambitious, especially for the strategic sites and / or should be included in the Policy</p>	<p>According to the National Planning Policy Framework (NPPF, 2021) Paragraph 74, it is appropriate for the SWC to set out a trajectory demonstrating the expected rate of housing delivery (anticipated rate of development) for specific sites. This has been prepared with reference to available evidence on the delivery of housing on large scale strategic development sites. This evidence included several studies which have investigated delivery rates on large scale developments including developments currently in the pipeline across the country, South Worcestershire, and sites elsewhere which are comparable to varying gradations. The trajectories have also been informed by discussions held with respective site promoters and developers. The Inspector may wish to consider an update to the trajectory as part of the examination.</p>

	<p>Rep ID: 1762; L & Q Estates Rep ID: 1693; Mr Keith Owens (Owl Partnerships Ltd) Rep ID: 1496; Victoria Demetriou-Smith (Gladman Developments) Rep ID: 1436; Mr Mark Marsh (Avant Homes) Rep ID: 1156; Lone Star Land Ltd and Attorneys for Land Owners Fleming Rep ID: 1081; Ainscough Strategic Land Rep ID: 1053; Gleeson Land Rep ID: 946; Mr Joel Merris (Vistry Group) Rep ID: 417; Mr Mark Behrendt (Home Builders Federation) Rep ID: 686; Land & Partners Ltd. Rep ID: 920; Castlethorpe Homes Rep ID: 813; Lioncourt Homes Rep ID: 803; Mr Scott Winnard</p>		
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<p>Rep ID: 710 / 1418; Mr Nick Rawlings (Harris Lamb obo Bloor Homes) Rep ID: 765</p>		
<p>Ian Butterworth Rep ID: 2101; Susan Abercrombie Rep ID: 2822; Mr Nick Rawlings (Harris Lamb obo Bloor Homes) Rep ID: 765</p>	<p>Brownfield land should be used first</p>	<p>The evidence on using previously developed land is set out in the South Worcestershire Councils' Housing Topic Paper document, where it states that 'despite maximising use of previously developed land, particularly within Worcester, there is still a substantial need for greenfield development to meet the minimum housing need identified under the standard method'. The Plan is considered sound and legally compliant in this regard.</p>
<p>Mrs Emma Foster (Spitfire Homes) Rep ID: 1283 / 2109; Reiss Sadler (Lone Star Land Ltd) Rep ID: 2403 / 2416; The Rose Farm Partnership Rep ID: 1762; L & Q Estates Rep ID: 1693; Lone Star Land Ltd and Attorneys for Land Owners Fleming Rep ID: 1081;</p>	<p>The Councils' windfall allowance is not correct</p>	<p>The evidence on windfall allowance is set out in the South Worcestershire Councils' Housing Topic Paper document, and the Plan is considered sound and legally compliant in this regard.</p>

	<p>Lioncourt Homes Rep ID: 803; Mr Nick Rawlings (Harris Lamb obo Bloor Homes) Rep ID: 765</p>		
	<p>Hallam Land Rep ID: 2303 / 2355; Reiss Sadler (Lone Star Land Ltd) Rep ID: 2403 / 2416; Mr Jonathan Parkes Rep ID: 2560; Stuart Field (L & Q Estates) Rep ID: 3243; Mr John Mill (Millstrand Properties Ltd) Rep ID: 1915; The Rose Farm Partnership Rep ID: 1762; L & Q Estates Rep ID: 1693; Mr Keith Owens (Owl Partnerships Ltd) Rep ID: 1496; Victoria Demetriou-Smith (Gladman Developments) Rep ID: 1436; Wain Homes West Midlands Rep ID: 1191;</p>	<p>The Council's buffer is not correct / should provide greater flexibility. A higher buffer is needed on the housing requirement, at least 10% on the total housing requirements</p>	<p>Paragraph 74 of the NPPF and relevant Planning Practice Guidance (PPG) refers to a minimum 10% buffer solely when confirming the five year housing supply as part of the Examination. This does not mean that the 10% buffer needs to be applied to the housing requirement for the whole plan period. The Plan is considered sound and legally compliant in this regard.</p>

	<p>Mr Mark Marsh (Avant Homes) Rep ID: 1156; Lone Star Land Ltd and Attorneys for Land Owners Fleming Rep ID: 1081; Ainscough Strategic Land Rep ID: 1053; St Phillips Land Ltd Rep ID: 967; Gleeson Land Rep ID: 946; Mr Joel Merris (Vistry Group) Rep ID: 417; Mr Mark Behrendt (Home Builders Federation) Rep ID: 686; Mr Scott Winnard Rep ID: 710 / 1418; Mr Nick Rawlings (Harris Lamb obo Bloor Homes) Rep ID: 765</p>		
	<p>Robert Hitching Ltd Rep ID: 1939; Land Partnerships Rep ID: 1954; Mrs Tamsin Almeida (Terra Strategic) Rep ID: 1109 - 1118; Mr Matthew Thompson Rep ID: 341</p>	<p>The 500 homes at Mitton are not needed any more/not a suitable site for allocation and should be removed from the SWDPR</p>	<p>The 500 dwellings at Mitton have been agreed as a necessity to meet the overall housing requirement in the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (Adopted December 2017) which was only found sound by the Inspector on this basis.</p>

	<p>Mr John Mill (Millstrand Properties Ltd) Rep ID: 1915; L & Q Estates Rep ID: 1693; Mr Paul Osborn Rep ID: 60; Mr Malcolm Downes Rep ID: 314; Mr Matthew Thompson Rep ID: 341; Mr Paul Esrich (Malvern Hills AONB Partnership) Rep ID: 441; Stephen Goodenough (Malvern Hills Civic Society) Rep ID: 584; Land & Partners Ltd. Rep ID: 920; Fisher Germain LLP (Land south Whittington Primary School) Rep ID: 788; Mrs Kerry Williamson (Rous Lench Parish) Rep ID: 715</p>	<p>Disagree with the Council's Spatial Strategy</p>	<p>The evidence for the South Worcestershire Councils spatial strategy is set out in the Spatial Strategy Background paper, which was informed by extensive consultation to set the agreed spatial strategy. This is further supported by the Village Facilities and Rural Transport Study, which served to inform the settlement hierarchy. In turn the evidence for the selection of sites for allocation can be seen in the SHELAA and on the Site Assessment Spreadsheets. Further site selection analysis has also been undertaken through the Sustainability Appraisal process. The plan is therefore considered sound and legally compliant in this regard.</p>
	<p>William Davis Rep ID: 1910; Lovell Partnerships Ltd Rep ID: 2012; Land Partnerships Development Ltd</p>	<p>The affordable housing need is approximately 70% of the housing requirement, the housing requirement therefore needs to increase to meet affordable housing need.</p>	<p>Housing requirements in the SWDP Review are established by the standard method for the entire plan period (2021-2041) when informing housing requirements for south Worcestershire. The councils have</p>

	<p>Rep ID: 1954; Mr Andrew Penna (BDW South West) Rep ID: 1505; Mr Joel Merris (Vistry Group) Rep ID: 417; Land & Partners Ltd. Rep ID: 920; Lioncourt Homes Rep ID: 803; Mr Nick Rawlings (Harris Lamb obo Bloor Homes) Rep ID: 765</p>		<p>followed the standard method using the 2014 Household Projections, as set out in Planning Practice Guidance. The evidence for support of the housing requirement is set out in the South Worcestershire Councils' Housing Topic Paper, and the Plan is considered sound and legally compliant in this regard.</p>
	<p>Mactaggart & Mickel Group Rep ID: 914 / 1776; The Rose Farm Partnership Rep ID: 1762; Lone Star Land Ltd and Attorneys for Land Owners Fleming Rep ID: 1081; Mr Joel Merris (Vistry Group) Rep ID: 417; Castlethorpe Homes Rep ID: 813; Lioncourt Homes Rep ID: 803</p>	<p>Concerns regarding the deliverability of outstanding 'deliverable' SWDP allocations</p>	<p>The local planning authority has engaged with the relevant landowners/developers in order to ensure that the most up-to-date information is available regarding deliverability/developability and phasing of reallocated sites. The plan is therefore considered sound and legally compliant in this regard.</p>
	<p>Mr Mark Behrendt (Home Builders Federation) Rep ID: 686;</p>	<p>The SWCs should have a greater number of small sites to meet the 10% minimum number of homes to be</p>	<p>The councils will review the number of small sites of less than one hectare. Depending on the outcome,</p>

	Owl Partnerships Ltd. Rep ID: 1496	delivered on sites of 1 hectare or less in accordance with Paragraph 69 of the NPPF.	this is something the Inspector may wish to consider.
	Spitfire Bespoke Homes Rep ID: 1283 / 2109	Potentially add addendum at the back with an illustrative housing trajectory, or mention the trajectory in the RJ of SWDPR02	Minor Mod: There is a need to include an illustrative housing trajectory – NPPF Para 74 “Strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites. ...”
SWDPR 03			
SWDPR 03 The Spatial Development Strategy and Settlement Hierarchy	Rooftop Housing Association Rep ID: 486 / 627; Fisher German LLP (Stephen Holloway) Rep ID: 463; St Philips Ltd Rep ID: 2032 / 2141 / 2276; Piper Homes Rep ID: 2064; Marches Homes Ltd Rep ID: 1004	The SWDPR is not addressing the unmet housing need from the greater Birmingham housing market area.	The plan review has been in ongoing discussions with neighbouring authorities as part of the duty to cooperate process to the potential need to address any unmet need. Only Tewkesbury Borough have identified that unmet need, of which 500 dwellings have been attributed at Mitton (SWDPR 54). South Worcestershire Councils are also not members of the GBBCHMA.
	Mike Oakley Rep ID: 114; Hazel Kemshall (Hallow Parish Council) Rep ID: 384;	Queries over a number of the significant gaps and whether they are appropriate.	The evidence for support of each significant gap and its boundary is set out in the South Worcestershire Councils Significant Gap Appraisal, which was updated in 2022, and the

	<p>Scott Winnard Rep ID: 709 / 711 / 1419 / 1420; Justin Parker (Chase Commerical Ltd) Rep ID: 906; Crowle Parish Council Rep ID: 1192</p>		<p>Plan is considered sound and legally compliant in this regard.</p>
	<p>Dr Peter King Campaign for the Protection of Rural England (CPRE) Rep ID: 1223 / 1224 / 1225 / 1227 / 1228</p>	<p>There is a need to set out what is strategic and non strategic so it is clear for neighbourhood plans: put some wording in introduction (line 278)</p>	<p>The strategic policies are set out on the contents page. However, more clarification may be required in the introduction to make this clear for neighbourhood planning. There are currently details about this on our website for the adopted plan for the purposes of neighbourhood planning.</p> <p>Minor Mod: Text inserted into the Introduction to clarify what the strategic policies are, and sign post to additional annex listing the strategic policies for neighbourhood plans.</p>
	<p>Ruth and Bryan Haines Rep ID: 3469 / 3472</p>	<p>SWDPR03 part C incorrectly refers to annex D. Annex D refers to Rural Workers Dwellings and live/work units, it is not a list of principle of developments outside development boundaries.</p>	<p>The Inspector may wish to consider part C to be reworded to list the policies rather than reference annexe D.</p>

	<p>Richborough Estates Rep ID: 979; Marches Home Ltd Rep ID: 1004; Michelle Alexander Rep ID: 1231; Malvern Estates Rep ID: 1518; Evesham Heights Limited Rep ID: 1664; Deeley Homes Rep ID: 1739 / 2375; Harris Land Management Rep ID: 1820; Piper Homes Rep ID: 1862 / 2064; St Phillips Ltd Rep ID: 1963 / 2032 / 2141 / 2276; Adam Hewitt Ltd Rep ID: 1993; Millstrand Properties Ltd Rep ID: 2130 / 2310; Stonebond Ltd Rep ID: 2449 / 3434; Wyre Piddle Ltd Rep ID: 1343 / 3143; Areley Kings Ltd Rep ID: 3333</p>	<p>Significant Gap and Green Belt are not the same, nor do they have the same weight and should not be included together. These should be reference separately.</p>	<p>The evidence for support of each significant gap and its boundary is set out in the South Worcestershire Councils Significant Gap Appraisal, and the Plan is considered sound and legally compliant in this regard. There is a separate policy on Green Belt, which identifies its significance and appropriate policy.</p>
SWDPR 04			
SWDPR 04 Green Belt	<p>West Mercia Police and H&W Fire and Rescue Service (1960)</p>	<p>It is unacceptable that the police and fire service have still to demonstrate</p>	<p>The council recognises the regional importance of the site to West Mercia Police and Hereford and</p>

		special circumstances for any development at Hindlip Park, their HQ.	Worcestershire Fire Services, but the site continues to be washed over by the Green Belt and the Reasoned Justification to the policy explains how very special circumstances can be demonstrated for proposals for emergency service development within the defined core area of Hindlip Park site.
	Sport England (213); Addison Rees Planning (349)	Objection to part D) which omits to include material changes in the use of land (such as changes of use for outdoor sport or recreation, or cemeteries and burial grounds), which is not consistent with para 150 of the NPPF	Comments noted. This may be something the Inspector may like to consider at examination. Although it is noted that local plans do not need to replicate the NPPF which is a material consideration in the determination of planning applications in its own right.
	John Garbett (370); RPS OBO Taylor Wimpey (938)	Green Belt Review is preventing housing sites, including those with better links and closer to Droitwich town centre, from coming forward.	The Green Belt Study is part of the evidence suite supporting the SWDPR and demonstrates that the majority of land within the Green Belt to the north and south of Droitwich makes a significant contribution to Green Belt purposes and the remainder makes a contribution – none is classed as making a limited or no contribution.
	Harris Lamb (402)	Hartlebury Trading Estate is shown as removed from the Green Belt and therefore the proposed allocations to extend it, namely sites CFS0061a,	Comments noted. This may be something the Inspector may like to consider at examination

		CFS0061b, CFS0061c and CS0061d also should be removed from the Green Belt.	
	Define Planning and Design OBO William Davis Dev (1912)	Policy should be shortened to say 'Applications relating to Green Belt land will be determined in accordance with the policy tests set out in the NPPF'.	Comments noted but it is considered helpful to include the Green Belt policy in the SWDPR and not to entirely rely upon the NPPF
SWDPR 05			
Design and Sustainable Construction	Rooftop Housing Rep ID: 488 / 629	The policy requirements overstep Building Regulations. No support for these in NPPF, national guidance, or National Design Guide. Contrary to NPPF para 16f. Not supported by evidence and raises issues relating to viability.	Comments noted. This may be something the Inspector may like to consider at examination.
	Fisher German Rep ID: 464; University of Worcester Rep ID: 583	Identified numerical values in the policy should be targets and not required standards. Reference to specific types of building industry standards and registered assessment, e.g., Homes Quality Mark should not be included in the policy wording. Risk is they will be superseded, and the policy will then become out of date. Better placed in the RJ or relevant SPD, design coding etc.	Comments noted. This may be something the Inspector may like to consider at examination.
		Repeats SWDPR1. Onerous layer of additional requirements not supported by evidence. Reference to local standards, definition is required as to what these are, e.g., design codes, neighbourhood plans etc.	Comments noted. This may be something the Inspector may like to consider at examination.

	<p>Proposed minor modification</p>	<p>Minor mods are proposed to the RJ to address issues relating to quantified standards, building regulations/standards, and alternative building industry energy assessment standards. Amend paragraph numbers accordingly.</p>	<p>Minor Mod: Reasoned Justification and paragraph numbers amended accordingly:</p> <p>4. In responding to and mitigating against climate change, the strategic policy adopts a 'fabric first' approach to building design. This involves encouraging sustainable construction practices and maximising the environmental performance of the buildings in order to minimise carbon emissions and reduce running costs.</p> <p>4. Consideration should be given to identifying a comprehensive approach to mitigating and adapting to climate change covering the full range of relevant issues. The application drawings and supporting information should show how the measures proposed form an integral part of the proposed design and the approach to green infrastructure.</p> <p>5. <u>The built environment is responsible for around a</u></p>
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			<p><u>quarter of the total greenhouse gas emissions in the UK. As such, new development has a critical role in enabling the country to achieve its requirement to reach net-zero emissions by 2050. In order to reduce emissions, new development must be designed and constructed to use energy as efficiently as possible and minimise the amount of energy needed to operate. However, it is also means lowering the carbon intensity of the materials and construction process used to build in the first place, as well as considering what happens to buildings at the end of their life. The Government plans to fully introduce the Future Homes Standard and Future Building Standard in 2025 which will increase the energy efficiency requirements for new buildings. This policy does not seek to expand on these requirements, but instead to cover additional aspects of lowering emissions and</u></p>
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			<p><u>energy use not dealt with through either of these standards.</u></p> <p>6. <u>Applications are required to demonstrate clearly how the proposal has complied with each of the provisions of this policy. This should be done through the submission of a sustainable design and construction statement, either as a stand-alone document or included within a design and access statement.</u></p> <p>7. <u>Embodied carbon, those emissions associated with the manufacture, transport, construction, repair, maintenance, replacement and deconstruction of building elements, makes up a significant proportion of the total lifecycle emissions of a building, currently around 20% of built environment emissions. It is therefore important that embodied emissions are limited as much as possible.</u></p>
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			<p><u>Applications for new development should be accompanied by details that demonstrate how these emissions are being reduced through both construction processes and techniques and material choices. New development should be constructed to meet best practice standards for low embodied carbon and aim to meet nationally recognised targets. For example, this includes target set out in RIBA's 2030 Climate Challenge, LETI's Climate Emergency Design Guide and UK Green Building Council's Net Zero Whole Life Carbon Roadmap.</u></p> <p>8. New developments should be built to high energy efficiency standards, following a 'fabric first' approach that reduces energy demand. <u>Designing to performance metrics such as energy use intensity and space heating demand are key ensuring that a development is using energy efficiently. Lowering</u></p>
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			<p><u>operational energy consumption is an important element of achieving net-zero carbon buildings as well as providing buildings that are comfortable for occupants and more cost effective to run. Therefore, new development should be constructed to meet best practice standards for energy demand and in particular aim to meet nationally recognised targets for both energy use intensity and space heat demand. Target metrics included in recognised standards such as RIBA's 2030 Climate Challenge, LETI's Climate Emergency Design Guide and UK Green Building Council's Net Zero Whole Life Carbon Roadmap should guide the design of new buildings. For example, new homes should aim for an energy use intensity of less than 35 kWh/sqm/year and a space heating demand of 15 kWh/sqm/year. Applications should detail the measures taken to reduce the energy demand of the</u></p>
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			<p>development. In line with the recommendations of the UK Green Building Council's 'New Homes Policy Playbook' and the Royal Institute of British Architects (RIBA) 'Sustainable Outcomes Guide', new homes should aim for an energy use intensity of less than 70 kWh/sqm/year operational energy use (including regulated and unregulated energy) in Gross Internal Area (GIA), excluding renewable energy contribution. However, this should reduce towards achieving less than 35 kWh/sqm/year by 2030. In addition, new homes should be built to a level of energy efficiency to deliver a space heat demand of 15-20 kWh/sqm/year. All development should consider the guidance and energy performance metrics set out within the RIBA Sustainable Outcomes Guide.</p> <p>9. <u>To ensure that all elements of carbon emissions sources through a building's</u></p>
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			<p><u>life are taken into account, including both operational and embodied carbon, a whole lifecycle carbon calculation should be undertaken. Applicants are encouraged to follow the Royal Institution of Chartered Surveyors (RICS) methodology for undertaking detailed carbon assessments to achieve this. This methodology has further been recommended by the Royal Institute of British Architects as the most comprehensive and consistent approach available to the industry. Applications should be accompanied by information setting out how emissions across the development's life cycle are being minimised.</u></p> <p>10. [no changes proposed to this paragraph]</p> <p>11. Major residential development will be expected to undertake a Home Quality Mark (HQM) assessment. <u>The policy does not place a</u></p>
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			<p><u>requirement to achieve a set score through the HQM process. The primary purpose is to</u> will help provide transparency and information to prospective households on the design quality of new homes, its environmental and energy performance and running costs. <u>It will also enable the performance of new homes to be easily compared using a nationally recognised standard as well as being a tool to help demonstrate compliance with this policy, SWDPR 01 Climate Change and other relevant SWDP policies.</u></p> <p>12. New major commercial developments are expected to undertake a BREEAM assessment and achieve an 'excellent' standard. The assessments will ensure that development engages thoroughly with the issues of sustainable design and construction. <u>Building to an alternative standard other than BREEAM may also be</u></p>
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			<p><u>acceptable providing that it can be demonstrated that it would achieve equivalent to a BREEAM 'excellent' rating through another nationally recognised assessment of sustainability. They will also be a tool to demonstrate compliance with this policy, SWDPR 01 Climate Change and other relevant SWDP policies. Furthermore, it will enable comparable performance.</u></p>
SWDPR 06			
SWDPR 06 Transport	Christian Evans (Worcester Civic Society) Rep ID: 12	Indent L not positively prepared it will just ensure a status quo of building in car dependency to new development.	Cars are still part of our everyday life and need to be provided for in development. However, the design and scope of these are set out in the Worcestershire Streetscape Design Guide.
	Ms Vivien Burdon (Director Worcester, Bromyard Leominster Community Interest Company) Rep ID: 318	The Worcester Bromyard Leominster disused rail line should be safeguarded in accordance with Clause F	Due to the timeframes of the review it is not possible to safeguard the railway within Clause F at this stage. Minor mod: make reference to the Worcester Bromyard Leominster

			disused rail line within the reasoned justification.
	<p>Stephen Holloway (Fisher German) Rep ID: 465 Rooftop Housing Rep ID: 489 / 630 Home builders' federations Rep ID: 668 Landowner of land adjacent to & west of the Galton Arms, Himbleton Rep ID: 778 Gleeson Land Rep ID: 949 Richborough Estates Rep ID: 982 Marches Homes Rep ID: 1007 Wyre Piddle Ltd Rep ID: 1346 / 3147 Sarah Milward (IM Land) Rep ID: 1378 Summix Homes Rep ID: 1477 Keith Owens (Owl Partnership) Rep ID: 499 Andrew Penna (BDW South West) Rep ID: 1507 Evesham Heights Limited Rep ID: 1668</p>	<p>Travel Plans/Packs not practical Seeks to remove EVCP due to building regs duplication. Transport Assessments for 10 or more dwellings isn't viable.</p> <p>Reference to Streetscape Design Guide SPD questioned.</p>	<p>The requirements within the policy including for travel plans, transport assessments and EV charging points are consistent with the NPPF paragraphs 107, 112 and 113. Active Travel encompasses a wide range of potential schemes that could be funded. As such, the policy does intentionally not specify active travel options. As such the policy is considered sound and legally compliant. Reference to SPDs within the main text of the policy is considered sound.</p>

	<p>L AND Q Estates Rep ID: 1697 Deeley Homes Rep ID: 1742 / 2378 Mactaggart & Mickel Group Rep ID: 1780 Harris Land Management Rep ID: 1823 Piper Homes Rep ID: 2067 James Chatterton (William Davis Developments) Rep ID: 1916 St Philips Ltd Rep ID: 2035 / 2150 / 2279 Adam Hewitt Rep ID: 1996 Spitfire Bespoke Homes Rep ID: 2112 Millstrand Properties Ltd Rep ID: 2313 Vistry Group Rep ID: 2347 RCA (CO Stonebond Ltd) Rep ID: 2453 / 3437 Brandon Planning & Development Ltd and Caddick Residential Ltd Rep ID: 2470 Areley Kings Ltd Rep ID: 3337 Hallow Stage 2 Ltd</p>		
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	<p>Rep ID: 3284</p> <p>Mr Robert Niblett (Gloucestershire County Council) Rep ID: 530</p>	<p>The SWDP states that developers will be required to demonstrate transport impacts on the M5 Junction 5-7 and the A46(T). This requirement should be expanded to include the M50 and the M5 Junctions 8 and particularly 9 at a strategic road network level. The impact on the local road networks in Gloucestershire should also be considered. With significant development south of Worcester, Pershore, Evesham and Mitton, Transport demand will increase in Gloucestershire, especially around Tewkesbury. This will lead to increased air pollution and potential safety issues.</p> <p>The scale of growth in Gloucestershire, in particular the Garden Town, must be considered alongside growth in South Worcestershire. From a high level review of SWDPR allocations a number of highways/junctions in Gloucestershire could be impacted by additional traffic.</p> <p>The SWDPR does not contain any transport modelling outputs which should be accompanied by a transport mitigation strategy.</p> <p>GCC has a paramics model which covers parts of Tewkesbury, and it is</p>	<p>WCC transport modelling is done at a strategic and local level and where necessary they will assess impacts on road networks outside of the county. The SWCs will take the findings into account in the plan making process.</p>
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		<p>recommended that the SWDP utilises this model, and extending it where necessary to model the impacts of the SWDP on GCCs network.</p> <p>SWDPR does not discuss the potential for the increased demand for public transport, this should be considered.</p> <p>SWDPR should also make reference to Mitton's likely rail-based demands and impacts on Ashchurch station.</p>	
	<p>Castlethorpe Homes Rep ID: 816</p>	<p>Part L and M require modification</p> <p>Definition of urban should be included</p>	<p>Part L and M are considered sound</p> <p>Urban areas are defined within the plan</p>

	<p>Duncan Bridges (Malvern Hills Trust) Rep ID: 870 / 895</p>	<p>Jacob's traffic impact report quantifies and models the allocations in and around Malvern and concludes that the volume of traffic generated will require junction improvements. This is in direct conflict with Para C of SWDPR06 and is therefore unsound.</p> <p>The mapping is not up to date.</p>	<p>Comments Noted - the sites within the plan at Malvern have undergone assessment and consultation in consultation with County Highways and Highways England and it is considered that the allocation of them will not have a significantly detrimental impact on the road network. Furthermore, they have also been assessed in consultation with landscape officers who have assessed their impacts on the Malvern Hills AONB. The details of these assessments can be found on the Site Assessment Spreadsheets.</p> <p>Minor mod: Updates to the mapping are required to ensure accuracy, but it is noted that the policy wording is accurate.</p>
	<p>Emily Barker (Worcestershire County Council) Rep ID: 1288 / 1326</p>	<p>In summary, as a minimum, in order for the transport evidence base to satisfy the requirements of NPPF, it is necessary to establish:- The transport impacts of the development allocations; The improvements necessary (across all modes) to ensure that the impacts are not severe or unacceptable; Any land required for the delivery of the necessary improvements; The cost of the necessary improvements; and Any other deliverability constraints.</p>	<p>SWCs look forward to receiving further transport modelling.</p> <p>It is not necessary to change the title of the policy.</p> <p>SWDPR06 is a strategic policy and point M is not intended to be prescriptive.</p>

		<p>Transport modelling has been provided but further modelling is now needed.</p> <p>The wording of requirement M should be reworded to be more in line with the NPPF and reflect the use of other mechanisms to secure and deliver necessary transport infrastructure improvements, including planning conditions and Section 278 (Highways Act 1980) agreements.</p> <p>Title of Policy SWDPR 06 may benefit from further expansion, to ~Travel (or Movement) and Transport to make it more inclusive and comprehensive.</p>	
	<p>Hollybrook Homes Rep ID: 1308 Cala Homes Rep ID: 2364</p>	<p>Rushwick and Throckmorton not viable due to funding gap because of transport infrastructure needed identified in the IDP.</p>	<p>IDP will be updated where required</p>
	<p>James Chatterton (William Davis Developments) Rep ID: 1916 Adam Renn (Mackenzie Miller Homes) Rep ID: 2463</p>	<p>SWDPR06 C is contrary to the policy tests set out in the NPPF, which does not set a different threshold or test for sites within specific areas such as National Landscape or AONB areas.</p>	<p>SWCS consider it necessary to include criterion C in order to protect AONBs and other landscapes in accordance with Para 176 of the NPPF.</p>
	<p>Paul Strange Rep ID: 2706 Anne Ridley Rep ID: 2859</p>	<p>Malvern Hills allocations will impact the traffic in and around the AONB which is contrary to SWDPR06 C</p>	<p>The traffic increase resulting from the Malvern allocations is not considered to result in a significant impact on the AONB. Furthermore,</p>

	Barbara Woods Rep ID: 2883 Valerie Woods Rep ID: 3385 Peter Holden Rep ID: 2950 Steven Wilkinson Rep ID: 2980 Tracey Layland Rep ID: 3177 Alison Hodge Rep ID: 3190 Alison Vincent Rep ID: 3211 John R Bradshaw Rep ID: 3327		Malvern is a town with many facilities which makes it a sustainable location for new development. Notwithstanding the special qualities of the AONB, which have been considered in the site assessment process, the allocations are considered to be in the most appropriate locations given the wider constraints of the area.
SWDPR 07			
SWDPR 07 Green Infrastructure	Ms Jennifer Liu (Welbeck Strategic Land LLP) Rep ID: 261	Footnote 11 should be amended to remove reference to strategic allocations which have secured outline planning permission, such as South Worcester Urban Extension, if GI statements or GI Concept Plans/ Concept Statements have been approved as part of the outline planning permission.	Minor mod: Footnote 11 to remove reference to the Worcester West and Worcester South Urban Extensions. Additional footnote to be added after 'once produced' under C iii to state that the Worcester West and Worcester South Urban Extensions will be informed by the GI statements associated with their respective planning applications. Further minor mod: add a footnote to part C (iii) of the policy, which states: <i>"The Worcester West and Worcester South Urban</i>

			<p><i>Extensions (SWDPR60) will be informed by the GI statements associated with their respective planning applications."</i></p> <p>This may be something the Inspector may like to consider at examination.</p>
	<p>Mr Graeme Irwin (Environment Agency) Rep ID: 450</p>	<p>Whilst not directly referenced within the specific Policy we do welcome reference to the benefits of Green Infrastructure as a method of flood mitigation, habitat protection and improvements to water quality. Within the Policy we would recommend the addition of the need to enhance blue infrastructure. Along with green infrastructure they help form an interconnected network of environmental enhancements within and across catchments. We would also welcome identification of opportunities for and measures to secure net gains for biodiversity, and other environmental improvements, in line with the NPPF recent revisions.</p>	<p>Comments noted. This may be something the Inspector may like to consider at examination.</p> <p>Minor mod: add 'and blue' to paragraph 7.1 of the Reasoned Justification to read as follows: 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."</p>
	<p>Mr Stephen Holloway (Fisher German LLP) Rep ID: 466</p> <p>Land adjacent Galton Arms Himbleton Rep ID: 779</p>	<p>It is considered that the policy introduces onerous requirements of new development, which has not been sufficiently justified in evidence. In particular, the requirement for major greenfield development to deliver 40% Green Infrastructure (excluding private</p>	<p>Comment noted. The SWCs consider the policy requirements to be deliverable.</p> <p>Minor Mod: to add 'Standards Framework' after 'Building with Nature' in part G of the policy.</p>

		<p>gardens). It is not clear how this requirement works in tandem with other policies, particularly SWDPR 15: Effective Use of Land which requires developments to achieve target densities. 2.17 Criterion G requires that all major developments will be required to meet compliance with 'Building with Nature' or equivalent benchmarks, and it will need to be demonstrated how this standard will be maintained throughout the lifetime of the development. No justification is provided for this requirement, other than it is the Council's preferred example of such a standard. This is not sufficient rationale for a planning requirement, particularly one which adds significant burden on a development in the planning stage, particularly given the requirement for it to be demonstrated how this requirement will be maintained through the entire lifetime of the development.</p>	<p>The additional comments in the representation may be something the Inspector may like to consider at examination.</p>
	<p>Rooftop Housing Association Rep ID: 532, 631</p> <p>Richborough Estates Rep ID: 983</p> <p>Marches Homes Limited Rep ID: 1008</p>	<p>2.11. C) The requirements of this point are quite onerous, and we also note that points C(ii) and D appear to be duplicates so would benefit from being revised. 2.12. E) We are supportive of this point however consider it would also be beneficial for some clarity to be given on Biodiversity Net Gain Areas as the policy does not mention BNG in its</p>	<p>Parts C (ii) and D - It is considered that points C(ii) and D are not a duplication of policy.</p> <p>Part E) – The plan requires SWDPR 7 to work in tandem with SWDPR 27 in delivering measurable net gains as part of the overall GI and biodiversity provision.</p>

	<p>Wyre Piddle Ltd Rep ID: 1347, 3148</p> <p>Malvern Estates Rep ID: 1522</p> <p>Marches Homes Rep ID: 1637</p> <p>Evesham Heights Rep ID: 1669</p> <p>Deeley Homes Rep ID: 1744, 2379</p> <p>Harris Land Management Rep ID: 1824</p> <p>Piper Homes Rep ID: 1866,2068</p> <p>St Philips Ltd Rep ID: 1968, 2036, 2160, 2280</p> <p>Adam Hewitt Ltd Rep ID: 1997</p> <p>Millstrand Properties Ltd Rep ID: 2135, 2314</p> <p>Stonebond Ltd</p>	<p>current form. 2.13. F) This requirement is unclear as it does not set out parameters to what would make development harmful. We consider that this point should be removed. 2.14. G) We are supportive of this point where it requires major developments to demonstrate compliance with standards set out in 'Building with Nature but would also be useful for this point to explain how it relates to Biodiversity Net Gain. 2.15. We consider that SWDPR 07 is not fully justified in its current form as some of the points are unclear. In our view, this should be addressed in order for it to meet the tests of soundness.</p>	<p>Part F) - The level of harm to residential gardens will be considered on a case-by-case basis through the planning application process.</p> <p>Part G) – The plan requires SWDPR 7 to work in tandem with SWDPR 27 in delivering measurable net gains as part of the overall GI and biodiversity provision. The Building with Nature Standards Framework can assist with this process.</p> <p>The plan should be considered and read as a whole when assessing these issues.</p> <p>Minor Mod: to add 'Standards Framework' after 'Building with Nature' in part G of the policy.</p>
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	<p>Rep ID: 2454, 3438</p> <p>Areley Kings Ltd Rep ID: 3339</p>		
	<p>Mr Steven Bloomfield (Worcestershire Wildlife Trust) Rep ID: 561</p>	<p>Support for the policy. However, it would be helpful to add further detail on funding and management mechanisms for the proposed AIRS. These are fundamental for the protection of existing high value environmental assets and so clarity and security around their implementation is required.</p> <p>Welcome the commentary set out in paragraph 7.5 but we believe that it would benefit from a specific reference to the Environment Act 2021 to emphasise the mandatory nature of Biodiversity Net Gain in this context.</p> <p>Welcome the commentary set out in paragraph 7.12 but we believe that it would benefit from a specific reference to Conservation Covenants, established under the Environment Act 2021, which could be a powerful mechanism for securing long term management of green infrastructure.</p> <p>We recommend amending the text of para 7.5 to <i>"and measurable</i></p>	<p>Comments noted. Propose for the Reasoned Justification to be updated as per the recommended policy wording for paragraphs 7.5 and 7.12.</p> <p>Update RJ paragraph 7.5 to state: <i>"and measurable biodiversity net gain will be delivered wherever possible and integrated into the wider GI network. This net gain will be secured in all situations mandated by the Environment Act"</i></p> <p>Update RJ paragraph 7.12 to state: <i>"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 Conservation Covenant, management company, a community led scheme or the adoption of the GI by another organisation."</i></p>

		<p><i>biodiversity net gain will be delivered wherever possible and integrated into the wider GI network. This net gain will be secured in all situations mandated by the Environment Act"</i></p> <p>We recommend adding the words 'Conservation Covenant' in the list of options available for management of GI in paragraph 7.12.</p>	<p>The additional comments in the representation be something the Inspector may like to consider at examination.</p>
<p>McLoughlin Planning on behalf of Mr H Wylie Rep ID: 805</p> <p>McLoughlin Planning on behalf of Castlethorpe Homes Rep ID: 817</p> <p>Vistry Group Rep ID: 2348</p> <p>Mactaggart & Mickel Group Rep ID: 1781</p>	<p>Part G requires major developments to demonstrate compliance with Building with Nature or equivalent benchmarking standards. In practice this is likely to be interpreted by decision makers as a requirement to apply for and attain Building with Nature Accreditation. In practice achieving Building with Nature accreditation can be extremely onerous as evidenced by the limited number of schemes that have achieved it. Such a requirement could lead to significant delays in the planning process and harm the deliverability of sites. As such we would suggest that direct reference to Building with Nature is removed from the main policy.</p>	<p>This may be something the Inspector may like to consider at examination.</p> <p>Minor Mod: add 'Standards Framework' after 'Building with Nature' in part G of the policy.</p>	
<p>Hayley Fleming (Natural England) Rep ID: 830</p>	<p>Policy SWDPR 07 Green Infrastructure includes the allocation of three Areas of Information Recreation (AIR). Natural England very much supports the inclusion of these AIRs. However, we advise that the SWDPR needs to set out</p>	<p>Comments noted. This may be something the Inspector may like to consider at examination.</p>	

		<p>how the AIRs are to be funded and delivered. As it stands the policy is not positively prepared as it does not meet the area's needs, or effective as it is not clear how it will be delivered.</p> <p>The reasoned justification for policy SWDPR 07 refers to the Malvern Hills SSSI Recreation Mitigation Strategy. Natural England realises that this strategy was published too late to be fully considered in the submission draft of the plan. However, we advise the measures it sets out need to be integrated into the plan as mitigation for its impacts. The strategy sets out measures necessary to address current impacts and to absorb the additional recreation use resulting from growth proposals in proximity to the Malvern Hills. This includes a 500m restriction and on-site mitigation measures to be funded by developer contributions collected from all new qualifying residential development within a 25km zone of influence.</p> <p>These measures are not set out in the SWDPR, either in policy SWDPR 07: Green Infrastructure, SWDPR 09: Infrastructure or SWDPR 64: Implementation and Monitoring. We therefore advise that the plan policy</p>	
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		does not deliver the environmental mitigation set out in its evidence base, and so is not positively prepared or effective. As the policy does not adequately protect SSSI, the plan is not compliant with the Wildlife and Countryside Act 1981 (as amended) or paragraph 180 of the National Planning Policy Framework.	
	Duncan Bridges (Malvern Hills Trust) Rep ID: 869	<p>The interactive policy mapping on the consultation website includes a layer Green Infrastructure, with a sublayer Green Space and Urban Biodiversity. Within this sublayer much of the land under the protection of the Malvern Hills Acts (1884-1995) has been identified and coloured green. However, the layer is only partially complete, and many parcels of Trust land have been omitted.</p> <p>The Green infrastructure mapping should be amended to incorporate accurate mapping of land in the ownership / jurisdiction of the Malvern Hills Trust and protected by Malvern Hills Acts, as is publicly available on the Trusts Website https://www.malvern hills.org.uk/looking-after/malvern-hills-map/ as well as on the Governments MAGIC mapping website.</p>	<p>Comments noted.</p> <p>Minor Mod: Mapping updates to be made to incorporate accurate mapping of land in the ownership / jurisdiction of the Malvern Hills Trust and protected by Malvern Hills Acts, as is publicly available on the Trusts Website https://www.malvern hills.org.uk/looking-after/malvern-hills-map/ as well as on the Governments MAGIC mapping website.</p>
	Duncan Bridges (Malvern Hills Trust)	The inclusion of Areas of Informal Recreation (AIRs) is a welcome addition	Comments noted.

	Rep ID: 871	<p>and supported. However, the Footprint Ecology report in the evidence base identifies such AIRs as one part of a strategy to mitigate the documented and predicted impacts on the Malvern Hills SSSI. The report also identified the challenge with this if used as a single stratagem (Para 4.28 of the report) and puts forward recommendations for other mitigation package elements that would be needed. Those other recommendations (as contained within sections 4.33 - 4.44 of the Footprint Ecology report and referenced in para 7.16 of the SWDP) aimed to establish a strategic set of mitigation measures for managing the pressures the Malvern Hills SSSI would receive from increased population and visitor pressures arising from housing allocations within the SWDPR. They have however not been captured fully within SWDPR 07.</p> <p>Amend SWDPR 07 to include specific mention of the delivery of those other impact mitigation strategy elements as put forward in the Footprint Ecology report. Amend policy to include subsection to ensure any new AIR should include appropriate and relevant facilities so as to minimise negative impacts they may bring on existing GI /</p>	This may be something the Inspector may like to consider at examination.
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		<p>Local Geological sites they lie in close proximity to and have access to.</p>	
	<p>Gleeson Land Rep ID: 950</p> <p>Brandon Planning and Development & Caddick Residential Ltd Rep ID: 2472</p>	<p>Objection as unsound. The imposition of 40% green infrastructure will render some sites unviable and increase the amount of greenfield site requirements since housing will be spread more thinly. It needs to be made clear in the policy that Biodiversity Net Gain (which will be subject to 10% gain from 2023) can be offset by the 40% GI requirement.</p> <p>Part D requiring developers to secure management arrangements coupled with the onerous 40% GI requirement is a clear move by the local authorities to pass on the routine costs of maintaining open space to landowners, developers and residents.</p> <p>Part F preventing development on residential gardens seems inappropriate within this policy and may not be spotted by residential applicants.</p> <p>Part G of the policy requires all sites above 10 dwellings to conform with the Building with Nature benchmark (or equivalent) which further raises the bar and means that developers will become providers and designers of public open spaces (in place of local authorities).</p>	<p>Comments noted. The adopted Green Infrastructure policy (SWDP 4) has proven effective in the delivery of green infrastructure across south Worcestershire and these elements have been carried forward as part of the SWDP Review. A full plan viability assessment has been undertaken in relation to planning policy requirements. Paragraph 71 of the NPPF (2021) provides the justification for seeking local policy protections for residential gardens.</p> <p>Part G) - The plan requires SWDPR 7 to work in tandem with SWDPR 27 in delivering measurable net gains as part of the overall GI and biodiversity provision. The Building with Nature Standards Framework can assist with this process. The plan should be considered and read as a whole when assessing these issues.</p>

<p>Ainscough Strategic Land Rep ID: 1056</p> <p>Lone Star Land Ltd Rep ID: 1066, 1075, 2405, 2420</p> <p>The Rose Farm Partnership Rep ID: 1767</p> <p>P L Marriott Estates Limited Rep ID: 2200</p> <p>Mr Jonathan Parkes Rep ID: 2563</p>	<p>Whilst housebuilders may seek Building with Nature accreditation to support the marketing of their product to prospective purchasers, to include this as a policy requirement in the assessment of all major planning applications is unjustified. As such, we recommend that draft Policy SWDPR 07 is amended to simply provide support for attainment of Building with Nature accreditation, where appropriate.</p>	<p>Comments noted. The plan requires SWDPR 7 to work in tandem with SWDPR 27 in delivering measurable net gains as part of the overall GI and biodiversity provision. The Building with Nature Standards Framework can assist with this process.</p> <p>The plan should be considered and read as a whole when assessing these issues.</p> <p>Minor Mod: add 'Standards Framework' after 'Building with Nature' in part G of the policy.</p>
<p>Ms Emily Barker (Worcestershire County Council) Rep ID: 1285</p>	<p>Legislative changes arising around Biodiversity Net Gain and the Environment Act (2021) now mean that wording within Reasoned Justification of policy SWDPR07 will benefit from a minor refinement so as to demonstrate closer alignment with new statutory requirements.</p> <p>Suggested alternative wording provided.</p>	<p>Minor mod: to update paragraph 7.5 of the RJ to state: <i>"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</i></p>

			<p><i>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."</i></p> <p><i>Also update paragraph 7.12 of the RJ to state: "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."</i></p>
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	<p>Madresfield Estate Trust Rep ID: 2106</p>	<p>Land south of Jennet Tree Lane, Deblins Green (46.55ha) (call for Sites Ref 003) (Reg 19 Ref AIR02) lies within the Estate's control. The land is proposed to be allocated as an Area of Informal Recreation (AIR). The Estate responded to the SWDP Review Country Park Call for Sites in July 2020. The submission put forward land off Jennet Tree Lane for consideration as a Country Park. Within the site submission letter it is noted that the Estate were prepared to discuss the allocation and delivery of a Country Park. The Estate in particular sought to discuss further detail with regard to the delivery, funding and management of a Country Park (now referred to as an Area of Informal Recreation, AIR). Such discussions have not been forthcoming and the Estate has significant concerns with regard these matters which require that it must formally object to the proposed allocation.</p> <p>Within Policy SWDPR 7 and the evidence base there is an absence of consideration and detail with regard to the delivery, funding and management of the AIR.</p> <p>It is further noted that a separate Malvern Hills SSSI Recreation Mitigation</p>	<p>The Council will be looking to undertake discussions in regard to this matter with Madresfield Estate and other landowners of the proposed AIRs, and to provide SoCGs to address matters of concern including deliverability.</p> <p>In addition, this may be something the Inspector may like to consider at examination.</p>
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		<p>Strategy (Footprint Ecology) has been prepared and identifies a series of costed mitigation measures which are to be funded through pooled contributions from development. The mitigation strategy also identifies a need for off-site mitigation in the form of alternative locations for people to visit.</p> <p>The strategy makes reference to these new recreation areas to be carefully designed and managed in terms of accessibility, parking and facilities and promotion. However, it is identified that the off site AIRs fall outside the costed measures and there is no consideration or reference to how the creation of the AIRs will be funded and managed.</p> <p>Without further discussion and detailed consideration of these matters, the estate considers that it must object to the proposed allocation of its land as a Country Park/AIR.</p> <p>Notwithstanding the above, and the Estate's overall objection, it also considers the policy wording is too inflexible to allow the development of a Country Park/AIR which is economically self-sustaining and the Estate suggest that the policy should be made more flexible and include reference to</p>	
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	<p>L AND Q Estates Rep ID: 1698, 3248</p> <p>Mrs Emma Foster (Spitfire Bespoke Homes) Rep ID: 2113</p>	<p>complementary visitor facilities which may assist with revenue generation.</p> <p>It is contended that as currently worded Policy SWDPR 07: Green Infrastructure, is exceedingly onerous on residential development and in light of other policy requirements is unnecessary to achieve a well-balanced and sustainable high-quality development. The requirement for greenfield sites over 1 ha to provide 40% Green Infrastructure (and greenfield sites between 0.2 and 1ha to provide 20% GI), particularly given this Green Infrastructure provision is to exclude private gardens, severely impacts on the viability of such sites to deliver a suitable scheme which makes efficient use of land, whilst also meeting all other policy and infrastructure requirements.</p> <p>With regards to Part G of the draft Policy, using the 'Building with Nature' toolkit is not specifically referred to within any national guidance. Reliance on such a tool does not allow for sufficient flexibility and adaptability to ensure the delivery of much needed housing and employment land. Part E of the policy is considered unnecessary and onerous and should be deleted.</p>	<p>Comments noted. The adopted Green Infrastructure policy (SWDP 4) has proven effective in the delivery of green infrastructure across south Worcestershire and these elements have been carried forward as part of the SWDP Review. Biodiversity net gain is covered under policy SWDPR27.</p> <p>The plan requires SWDPR 7 to work in tandem with SWDPR 27 in delivering measurable net gains as part of the overall GI and biodiversity provision. The Building with Nature Standards Framework can assist with this process.</p> <p>The plan should be considered and read as a whole when assessing these issues.</p> <p>A full plan viability assessment has been undertaken in relation to planning policy requirements.</p> <p>Minor Mod: add 'Standards Framework' after 'Building with Nature' in part G of the policy. This may be something the Inspector may like to consider at examination.</p>
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	Proposed minor modification		Minor mod: to the Reasoned Justification after paragraph 7.12 to update the sub-title header as " <i>AIRs Allocations and the Malvern Hills SSSI Mitigation Strategy</i> ".
	Proposed minor modification		Minor mod: update footnote 20 to Green Infrastructure Framework 3: Access and Recreation (worcestershire.gov.uk) from Worcestershire Green Infrastructure Framework documents Worcestershire County Council
	Proposed minor modification		Minor mod: update footnote 21 to: Recreation Impacts on the Malvern Hills SSSI to inform the South Worcestershire Development Plan Review (2021) from: Recreation Mitigation Strategy—SWDP Review Evidence Base—South Worcestershire Development Plan (swdevelopmentplan.org)
	Proposed minor modification		Minor mod: to paragraph 7.16 of the Reasoned Justification to state: <i>"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</i>

			<p><i>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."</i></p> <p>Further minor modification to add a new paragraph (7.19) to the Reasoned Justification, which states: "A specific 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".</p> <p>Also add an additional footnote to new paragraph 7.19 to state: Malvern Hills SSSI Recreation Mitigation Strategy Report (2022)</p>
SWDPR 08			

SWDPR 08 Historic Environment	Bottomley 124; Skipper 1372; Strange 2708; Holden 2948; Bradshaw 3326	Several of representations received relate to site allocations in the SWDPR on the basis that SWDPR 08 policy requirements provide the basis for site assessment and selection for allocation.	Comments noted.
	Rooftop Housing 533, 632; Richborough Estates 984; Marches Homes Ltd 1009, 1638; Warndon Parish 1233; Wyre Piddle Ltd 1348; Evesham Heights 1670; Deeley Homes 1743; Harris Lamb 1825; Piper Homes 1867; St Philips Ltd 1969; Millstrand Properties 2315; Vistry Group 2349; Wyre Piddle Ltd. 3149; L&Q Estates 3249; Areley Kings Ltd 3340; St Modwen 3508	It has been suggested that setting should not be applied to non-designated heritage assets.	Comments noted. It is considered unnecessary to amend the policy as proposed in these representations. NPPF para 194/195 do not differentiate between designated and non-designated heritage assets. Reference is to "any heritage asset".
	Lewis, 1148; Warndon Parish 1233; Wyre Piddle Ltd 1348; Summix Homes 1479;	Representations have raised issues that are addressed by SWDPR 29.	Comments noted.
SWDPR 09			
SWDPR 09 - Infrastructur e	Residents (Councillor Richard Morris Rep ID: 246,	<ul style="list-style-type: none"> Concerns over delivery of education, healthcare, transport, and affordable housing both across the plan and 	All infrastructure providers have been engaged with, and the current capacity constraints and all known requirements associated with the

	<p>Malvern Environment Protection Group Rep ID: 924, Richard Pitman Rep ID: 13, Elizabeth Scott Rep ID: 78, Richard Cox Rep ID: 88, Adam Stamfield Rep ID: 161, Roger Steven Rep ID: 241, Chris Rawlings Rep ID: 248, Michael Hodges Rep ID: 483, Anthony Peachey Rep ID: 541, Antony Mason Rep ID: 611, Alison Skipper Rep ID: 1370, Janet Thwaites Rep ID: 2682, Gary Margerison Rep ID: 2909, The Venerable Christopher Liley Rep ID: 2928, Gabrielles Mercer Rep ID: 2953, John and Penny Kitchener</p>	<p>sites and capacity of existing resources</p> <ul style="list-style-type: none"> • Impact of aging population on social care provision and healthcare • Parts D and E are too vague. • Financial contributions should be collected and invested before occupation of any new development. • Out of date data used 	<p>proposed growth are set out in the accompanying IDP. Where necessary development will be required to contribute towards or develop new infrastructure. The requirements associated with growth and development are set out in the Infrastructure Delivery Plan (IDP) that supports the Plan. Where appropriate triggers for when infrastructure is required are included in the IDP. As the IDP is a living document it will be updated to reflect any changes in requirements emerging from updated evidence, for example highways modelling, Acute Care requirements once they are further refined. The information in set out in the Infrastructure Delivery Plan that supports the Plan. The methodology for calculating contributions will be specified in relevant policy areas and within an updated developer contributions SPD. Section 106 agreements can be used to specify triggers for when infrastructure is required, and these will vary by development.</p>
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<p>Rep ID: 3087 / 3094 / 3098, Laurie Abercrombie Rep ID: 3112, Alison Vincent Rep ID: 3213, Tracey France Rep ID: 3233 / 3260, Roger Davis Rep ID: 3495 Lindridge Parish Council Rep ID: 3552</p>		
<p>Environment Agency (Graeme Irwin) Rep ID: 451</p>	<ul style="list-style-type: none"> • Support integrated approach to infrastructure • In Part B, development could recommend contributions to new or existing flood defences. 	<p>Comment noted. This is something the Inspector may wish to consider at examination.</p> <p>Add 'flood defence infrastructure' to list at Part D. Amend paragraph 9.5 in RJ to read 'and flood defence infrastructure' instead of 'and flood protection'.</p>
<p>Rooftop Housing Association Rep ID: 534 / 633; Adam Hewitt Ltd Rep ID: 1999; St Philips Ltd Rep ID: 2038 / 2162 / 2282; Piper Homes Rep ID: 2070;</p>	<ul style="list-style-type: none"> • Affordable Housing is described as infrastructure which it is not and is adequately covered in other policies • No reference to energy infrastructure to accord with NPPF p.153. 	<p>Comment noted. Affordable Housing is not infrastructure but contributions where necessary will be sought. Modification could remove reference to affordable housing in Part D and paragraph 9.5. and insert footnote at paragraph 9.5 to state "Contributions will also be sought</p>

	<p>Deeley Homes Rep ID: 1745; Wyre Piddle Ltd Rep ID: 1349 / 3150; Hallow Stage 2 Ltd Rep ID: 3286; Areley Kings Ltd Rep ID: 3341 / 3342; Stonebond Ltd Rep ID: 3439; St Modwen (Andrea Caplan) Rep ID: 3509; Fisher German LLP (Stephen Holloway) Rep ID: 467; Landowners (Land adj. Pinvin Crossroads Rep ID: 772, Land adj. Galton Arms, Himbleton Rep ID: 780); Richborough Estates Rep ID: 985; Marches Homes Ltd Rep ID: 1010; Warndon Parish Council (Michelle Alexander) Rep ID: 1234; Wyre Piddle Ltd Rep ID: 1349 / 3150; Malvern Estates</p>		<p>for off-site affordable housing in accordance with policy SWDPR 18".</p> <p>Energy provision is identified in the accompanying Infrastructure Delivery Plan but contributions are not sought for this as they are funded either by the utilities provider and/or the developer directly.</p>
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	<p>Rep ID: 1524; Evesham Heights Ltd Rep ID: 1671; Deeley Homes Rep ID: 1745 / 2382; Piper Homes Rep ID: 2070; St Philips Ltd Rep ID: 2038 / 2162 / 2282; Millstrand Properties Ltd Rep ID: 2316</p>		
	<p>H. Wylie Rep ID: 806, Castlethorpe Homes Rep ID: 818; Mactaggart & Mickel Group Rep ID: 1783; Vistry Group Rep ID: 2350</p>	<ul style="list-style-type: none"> • Part C, D, and E is not consistent with CIL. Proposed changes are the three tests of the NPPF p.57 • Part F should read development instead of infrastructure 	<p>Comment noted. It is not considered necessary to repeat paragraph 57 of the NPPF and outline the three tests.</p> <p>Minor mod: amend Part F change the word infrastructure to read "development".</p>
	<p>Natural England (Hayley Fleming) Rep ID: 831</p>	<ul style="list-style-type: none"> • Point D states that contributions will be sought towards delivery of GI and green spaces • Expect specific reference to AIR's and Malvern Hills SSSI Recreation Mitigation Study and should be set out in policy. • Reference to Natural England's GI Standards could be included in RJ 	<p>Comment noted. It is not considered necessary to go into detail in this policy as D refers to Green Infrastructure and open space, whilst Part C refers to improvements to infrastructure. AIRs and Malvern Hills SSSI Mitigation are both referenced in the Infrastructure Delivery Plan. Open Space and SSSI mitigation</p>

			contributions have been subject to viability testing.
	Worcestershire Acute Hospitals Trust Rep ID: 890	<ul style="list-style-type: none"> • Policy wording too ambiguous as to what infrastructure actually means. Add a definition into policy box. • Part C does not correspond with CIL Regulations • Do not support continued use of 2018 SPD • Update wording of 9.6 to reflect types of development identified in IDP 	<p>Comments noted. Infrastructure is defined within the glossary of the SWDPR.</p> <p>Developer contributions do not solely refer to CIL, so it is not required for Part C to correspond with CIL Regulations.</p> <p>It is not considered necessary to change the reasoned justification as the developer contributions SPD will be updated to reflect the IDP and CIL Review and any subsequent replacement mechanism.</p>
	West Mercia Police (Andrew Morgan) Rep ID: 916	<ul style="list-style-type: none"> • Makes no reference to emergency services so is not justified, effective, or sound 	<p>Comments noted. Where development necessitates new physical emergency services infrastructure this may be conditioned as part of the planning permission. The SWC have tested a contribution toward policing infrastructure and in some cases, this may be viable and could be sought where it is compliant with Regulation 122 tests. Consultation with the Ambulance Service and the Fire and Rescue Service have not resulted in a request for any additional infrastructure therefore</p>

			<p>this has not been tested or specified in the IDP.</p> <p>Potential major modification: Add emergency services to the list at Part D. This is something the Inspector may wish to consider at examination.</p>
	<p>Gleeson Land Rep ID: 951; Brandon Planning & Development Ltd and Caddick Residential Ltd Rep ID: 2475</p>	<ul style="list-style-type: none"> • S.106 Agreements should be negotiated with developers only when not covered by CIL and not required. • S.106 and CIL should not result in 'double-dipping' by LPA's. 	<p>SWDPR 09 clearly states that planning obligations will be sought where a development proposal will create a need to provide additional, or improvements to, infrastructure that is directly related to the development. National legislation clearly sets out the tests required for S.106 Agreements and CIL to avoid 'double-dipping'.</p>
	<p>Worcester County Council (Emily Barker) Rep ID: 1289 / 1327 / 1335</p>	<ul style="list-style-type: none"> • Welcomes collaboration • Preparing transport modelling to identify transport infrastructure requirements • Part E- change 'infrastructure' to 'development' • Proposes changes to IDP 	<p>Support noted. SWC have not yet received the updated transport modelling as of June 2023.</p> <p>Minor mod: Amend Part E as suggested.</p>
	<p>L&Q Estates Rep ID: 1700; Spitfire Homes (Emma Forster) Rep ID: 2114</p>	<ul style="list-style-type: none"> • No objections but overly wordy • Inclusion of GI may impact on viability and Part E can be deleted 	<p>Comments noted. The requirements set out in the plan have been viability tested and are considered deliverable. Disagree regarding deletion of Part E. This is considered necessary to ensure that infrastructure is delivered in a</p>

			timely manner to meet the needs of the development.
	Sport England (Stuart Morgans) Rep ID: 215	Supports inclusion of explicit reference to sport and recreation in Part D.	Support noted.
	National Highways (Neil Hansen) Rep ID: 265	<p>Welcomes SWC working with partners including Highways England to bring forward infrastructure required.</p> <p>Will consider necessary improvements to SRN to facilitate development as critical infrastructure.</p> <p>Will work together to identify suitable mechanisms for funding and delivery</p>	<p>Comments and support noted. It is not considered necessary to list all partners at point A.</p> <p>With regard to point F the SW Councils welcome National Highways confirmation to work in partnership to consider necessary improvements to the SRN to facilitate development as critical infrastructure, and to identify suitable mechanisms for funding and delivery of necessary improvements.</p>
	Bromyard Leominster Community Interest Company (Vivian Burdon) Rep ID: 320	Well defined policy that seeks contributions towards delivery of infrastructure	Support noted.
	Canal & River Trust (Jane Hemnell) Rep ID: 656	<p>Support breadth of types in Part D</p> <p>Consult on future iterations of IDP</p>	Support noted.
	British Horse Society (Wendy Bannerman) Rep ID: 721	Supports inclusion of bridleways and byways within the list of infrastructure	Support noted.

<p>Malvern Environment Protection Group (Katherine Harris) Rep ID: 924</p>	<p>Concerns over lack of healthcare, education, transport, waste infrastructure at present and the impact of new development on these</p> <p>Impact on AONB in Malvern resulting from any upgrades.</p> <p>Impact on tourism if no facilities available.</p>	<p>All infrastructure providers have been engaged with and the current capacity constraints and all known requirements associated with the proposed growth are set out in the accompanying IDP. Where necessary development will be required to contribute toward or develop new infrastructure.</p>
<p>Agent (Worcester Parkway) (Sean Lewis) Rep ID: 1149</p>	<p>Support need for infrastructure policy</p> <p>Must meet tests</p>	<p>Support noted. National legislation clearly sets out the tests required for S.106 Agreements and CIL.</p>
<p>Hollybrook Homes Rep ID: 1310; Cala Homes (Midlands) Ltd Rep ID: 2365</p>	<p>Questions the deliverability of infrastructure at Throckmorton.</p> <p>Questions delivery of rail infrastructure at Throckmorton and Rushwick.</p>	<p>All infrastructure providers have been engaged with and the current capacity constraints and all known requirements associated with the proposed growth are set out in the accompanying IDP. Where necessary development will be required to contribute toward or develop new infrastructure.</p>
<p>Landform Estates Ltd (Eric Pagano) Rep ID: 1458; William Davis Developments (James Chatterton) Rep ID: 1921</p>	<p>Omission Site SWC need to be clear about what is funded through CIL and what is through S.106 Agreements. SWC should create a Reg.123 List to specify exact scope of CIL contributions.</p>	<p>Comments noted. Regulation 123 lists have now been replaced with a requirement for local authorities (including those who have not implemented CIL) to provide an annual infrastructure funding statement by 31 December each year.</p>
<p>Summix, Homes England, and Bellway</p>	<p>No modifications requested but stress the need for further evidence to</p>	<p>Comments noted.</p>

	Rep ID: 1480	underpin and support the IDP (Worcester Parkway) and update viability evidence for this.	
	Tesni Properties Ltd Rep ID: 1704	Support policy Query deliverability of strategic sites	Comments on the site are noted. The SWDP Review has been informed by several rounds of consultation relating to call for sites submissions, which were subject to analysis, assessment and consultation with both internal and external consultees. The details of this assessment, along with information as to why sites have been selected for allocation can be seen in the SHELAA and on the Site Assessment Spreadsheets. Further site selection analysis has also been undertaken through the Sustainability Appraisal process. By virtue of the assessment process, the SWCs have identified a sufficient amount of sites to deliver the housing and employment requirements needed for the SWDPR plan period, including the identification of reasonable alternatives. As such, the plan is considered sound and legally compliant in this regard and it is not considered necessary to allocate any further sites.
SWDPR 10			

<p>SWDPR 10 – Health and Wellbeing</p>	<p>Mrs Emma Foster (Spitfire Bespoke Homes) Rep ID: 2115</p>	<p>Part B of the draft Policy should be reviewed to allow greater flexibility with the wording of the policy revisited to read “Support will be given to proposals that, where appropriate contribute to”, rather than the existing wording “Support will be given to proposals that provide”.</p>	<p>This may be something the Inspector may like to consider at examination.</p>
	<p>Worcestershire Acute Hospitals NHS Trust Rep ID: 891</p>	<p>WAHT support the inclusion of this policy, however the justification text in its current form (10.1-10.16), would not correctly identify to the decision maker that secondary healthcare should be considered. Therefore, the policy is unsound. A specific change to the policy is not required, instead changes to the justification text would resolve this particular issue.</p> <p>Paragraph 10.12 refers back to the IDP and that it will be informed by a HIA, we have already identified the shortcomings of the HIA and that it would need to be addressed so that it can identify issues within secondary care.</p> <p>Paragraph 10.12 should also be modified to include words to the effect of: <i>“and it is expected that major housing development will incorporate new primary health care facilities or the</i></p>	<p>Health Care is considered through SWDPR09 and the associated IDP.</p> <p>This may be something the Inspector may like to consider at examination.</p>

		<i>extension of existing facilities and contribute to secondary health care infrastructure (in consultation with Worcestershire Acute Hospital Trust and the Herefordshire and Worcestershire ICB)."</i>	
	<p>Rooftop Housing Association Rep ID: 535, 634</p> <p>Marches Homes Limited Rep ID: 1011, 1641</p> <p>Wyre Piddle Ltd Rep ID: 1350, 3151</p> <p>Malvern Estates Rep ID: 1525</p> <p>Evesham Heights Limited Rep ID: 1672</p> <p>Deeley Homes Rep ID: 1746, 2383</p> <p>Harris Land Management Rep ID: 1827</p> <p>Piper Homes Rep ID: 1869, 2071</p> <p>St Philips Ltd Rep ID: 1971, 2039, 2283</p>	<p>We note that the threshold for triggering the requirement of a Health Impact Assessment has been reduced from 25 dwellings to 10 dwellings, however there does not appear to be a reasoning for why this has been done? Resultantly, Point D and E are considered unnecessary if the threshold for these requirements has been reduced. We therefore consider this reduction should be further justified in order to meet the tests of soundness.</p>	<p>Comments noted. The thresholds for when a Health Impact Assessment will be required in the policy have been aligned with the government's definition of major development in the NPPF.</p>

	<p>Adam Hewitt Ltd Rep ID: 2000</p> <p>Millstrand Properties Ltd Rep ID: 2139, 2317</p> <p>Hallow Stage 2 Ltd Rep ID: 3287</p> <p>Areley Kings Ltd Rep ID: 3343</p> <p>Stonebond Ltd Rep ID: 3440</p>		
	<p>Mr Mark Behrendt (Home Builders Federation) Rep ID: 689</p>	<p>The requirement for a HIA for all residential developments of 10 or more dwellings without any specific evidence that an individual scheme is likely to have a significant impact upon the health and wellbeing of the local population is not justified by reference to the PPG. Any requirement for a HIA Screening Report and / or a full HIA should be based on a proportionate level of detail in relation the scale and type of development proposed. It is suggested that HIA Screening Report will only be required for applications for large strategic residential developments. If a significant adverse impact on health and wellbeing is identified only then should a</p>	<p>Comments noted. The thresholds for when a Health Impact Assessment will be required in the policy have been aligned with the government's definition of major development in the NPPF.</p>

		full HIA be required, which sets out measures to substantially mitigate the impact.	
	<p>Gleeson Land Rep ID: 952</p> <p>Brandon Planning and Development & Caddick Residential Ltd Rep ID: 2477</p>	<p>Objection as unjustified. We welcome the fact that this policy is more positively written than during the Preferred Options stage, however we are concerned that Part C of the policy is still extremely onerous in requiring that all proposals of 10 dwellings or more will have to provide Health Impact Assessments (HIAs). This goes well beyond the advice in the NPPF and Planning Practice guidance which takes an advisory approach by suggesting that public health bodies could be consulted and establish the value of encouraging the promotion of health and wellbeing and hence should be applied in a proportionate way. The policy to seek an HIAs should therefore be restricted to larger sites (including the strategic sites) rather than imposing additional costs on smaller scale SME builders.</p>	<p>Comments noted. The thresholds for when a Health Impact Assessment will be required in the policy have been aligned with the government's definition of major development in the NPPF.</p>
	<p>Mr Mark Marsh (Avant Homes) Rep ID: 1160</p> <p>Sarah Milward (IM Land) Rep ID: 1382</p> <p>Mr Keith Owens</p>	<p>Part C of Policy SWDPR 10 states that a Health Impact Assessment (HIA) must be undertaken on residential development sites of 10 or more dwellings. The requirement for a HIA for all residential developments of 10 or more dwellings is not founded on any evidence. The normal position is to screen for the requirement for an HIA</p>	<p>Comments noted. The thresholds for when a Health Impact Assessment will be required in the policy have been aligned with the government's definition of major development in the NPPF.</p>

	(Owl Partnerships Ltd) Rep ID: 1501	and it is generally accepted that smaller schemes do not require a full HIA and that only if a significant adverse impact on health and wellbeing is identified then a full HIA should be undertaken.	
	L AND Q Estates Rep ID: 1701, 3251	<p>Overall, the provisions of Policy SWDPR 10 appear to be an unnecessary duplication of policies that are covered off elsewhere within other draft policies of the Development Plan. If Policy SWDPR10 is to be kept however it is important that the policy cross references other relevant draft policies at Part B.</p> <p>Part B of the draft Policy should also be reviewed to allow greater flexibility with the wording of the policy revisited to read: "Support will be given to proposals that, where appropriate contribute to:" The policy as currently drafted could be interpreted as all provisions set out at B i)-ix)) being required as part of new developments in order to gain support.</p>	Comments noted. This may be something the Inspector may like to consider at examination.
	Tesni Property Ltd Rep ID: 1705	Tesni does not support the requirement for all schemes over ten new homes to provide a Health Impact Assessment. This requirement would place an undue burden on smaller housing schemes as it would be disproportionate to the scale of development, likely causing the delivery timeframe of smaller housing	Comments noted. The thresholds for when a Health Impact Assessment will be required in the policy have been aligned with the government's definition of major development in the NPPF.

		schemes to be increased. The requirement of a Health Impact Assessment would be more proportionate to any schemes that require an Environmental Impact Assessment.	
	Mactaggart & Mickel Group Rep ID: 1784	Whilst the Respondent is generally supportive of those items listed under Part B, it is not reasonable to expect every site to deliver all elements (as recognised under Part C) and would thus suggest an amendment to the wording of Part B as follows: "Support will be given to proposals that provide, where appropriate:" Moreover, it is not considered that standalone, site-specific Health Impact Assessments for all developments are justified as there is no evidence that such assessments are required or what the outcomes would be.	Comments noted. This may be something the Inspector may like to consider at examination.
	Vistry Group Rep ID: 2351	Whilst the Respondent is generally supportive of those items listed under Part B, it is not reasonable to expect every site to deliver all elements (as recognised under Part C) and would thus suggest an amendment to the wording of Part B as follows: "Support will be given to proposals that provide, where appropriate:" Further clarity on the requirements and expected outcomes of Health Impact Assessments would also be welcomed.	Comments noted. This may be something the Inspector may like to consider at examination.

	<p>Lovell Partnerships Limited Rep ID: 2017</p>	<p>We object to Part C of the policy that requires a health impact assessment to be submitted in respect of residential/mixed use developments of 10 or more dwellings or on residential sites with an area of 0.5 hectares or more. Lovell suggest that instead of having to submit a Health Impact Assessment (HIA) that a Health Impact Assessment Screening Assessment is required instead.</p> <p>We consider that the policy is not justified on the basis that submitting a full HIA on a small to medium size residential development would be an onerous requirement on developers and that a more appropriate response would be to submit a screening assessment instead. Such an approach is advocated in relation to non-residential development as set out in Part D of the Policy. We believe that this should also apply to residential development as well.</p>	<p>Comments noted. The thresholds for when a Health Impact Assessment will be required in the policy have been aligned with the government's definition of major development in the NPPF.</p>
	<p>Janet Butterworth (Drakes Broughton and Wadborough with Pirton Parish Council) Rep ID: 386, 1409</p> <p>Miss Maureen Williams Rep ID: 2444</p>	<p>There is no indication as to how the Royal Worcestershire Hospital and other hospital facilities are to be scaled up to meet the demand of a new town.</p>	<p>Comments noted. Health infrastructure is considered under SWDPR 09 and through the associated Infrastructure Delivery Plan evidence base.</p>

	<p>John and Penny Kitchener Rep ID: 3093</p> <p>Annette Crouchman Rep ID: 3391</p> <p>Mr John Driscoll Rep ID: 3423</p> <p>Laurie Abercrombie Rep ID: 3110</p> <p>Tina Pell Rep ID: 3559</p>		
	<p>Kay Mason Rep ID: 3137</p>	<p>IDP - Health and Social Care Page 43 of the IDP states: "Worcestershire Royal Acute Hospital Trust (WAHT) will require significant redevelopment within the Plan Period. Consultation with the Trust suggests they believe this this will lead to the requirement for further expansion of the proposed Urgent Treatment Centre (UTC) which is required to meet existing demand". No assurances have been presented in the SWDR that this will actually be done, when and by whom.</p> <p>The plan outlines a developer contribution in terms of funds required however there is no assurance give that any money allocated will in fact be used</p>	<p>Comments noted. Health infrastructure is considered under SWDPR 09 and through the associated Infrastructure Delivery Plan evidence base.</p>

		<p>to enhance the Worcester Royal Hospital and its services. The IDP is wholly inadequate in terms of provision of hospital services and despite the length of time it has taken to develop this plan, since 2019, there is considerable uncertainty about the provision of hospital services and, despite the plans stating that at Worcester Royal acute beds are filled 92% of the time (closer to 100% during COVID), no proper assessment has been concluded as to the increase provision required, the costs and how it will be funded.</p> <p>The IDP also clearly states that there are no plans by the ambulance service to set up a hub within the proposed site area. They currently operate out of a Worcester hub and plan to continue to do so, but acknowledge it is already operating beyond capacity. Likewise, the fire service have no plans to provide a local hub/station within the proposed site boundary.</p>	
SWDPR 11			
SWDPR 11 - Providing the Right Land and Buildings for Jobs	Mr Edward Atkin (Schroders UK Property Fund) Rep ID: 398	The policy restricts employment use to Classes E(g), B2 and B8 of the allocated sites identified in policies SWDPR 61 - 63. This may be unduly restrictive on quasi employment uses or sui generis uses which have all the characteristics	Comments noted. This may be something the Inspector may like to consider at examination.

		<p>of Class B uses but for some specific factors are classed as sui generis.</p> <p>The consultee supports the principle of the policy but notes that the policy itself does not refer to sui generis uses which, in all other respects, provide economic employment opportunities. The consultee states that given that some uses will need to be located on the employment allocations, but which are sui generis, the policy should refer to this.</p>	
	<p>Johnson Brothers Rep ID: 705</p>	<p>Part A refers specifically to the allocation of employment sites to meet South Worcestershire's employment land requirements as evidenced by the supporting Economic Development Needs Assessment (EDNA) 2022. The policy cross references policies SWDPR 51 to 63 which identify the Employment Allocations across the three authority areas. However, the policy refers specifically to and appears to restrict these allocations, as currently written, for E(g)(B1), B2 and B8 uses.</p> <p>The draft Policy SWDPR 11 as currently written does not allow for sufficient flexibility for businesses to address the potential economic challenges of the future, enabling investment, expansion</p>	<p>This may be something the Inspector may like to consider at examination.</p>

		<p>and adaption as required to ensure local economic conditions are not stifled. As a result, this policy is unsound as it is ineffective and not consistent with national policy.</p> <p>The provisions set under Policy SWDPR 11 Part B are considered to be unnecessary and overly onerous with an appropriate level of protection for employment allocations provided through the provisions of Paragraph 123 of the NPPF which sets out that 'Local planning authorities should also take a positive approach to applications for alternative uses of land which is currently developed but not allocated for a specific purpose in plans, where this would help to meet identified development needs'.</p> <p>In addition, Policy SWDPR11 Part F) continues to list 'Strategic Employment Sites'. There is no explanatory text provided within either the Policy itself or supporting policy text which sets out any clear justification as to why particular sites are specifically identified as Strategic Sites and distinguishable from the other employment allocations leaving the policy ambiguous and requiring greater clarity.</p>	
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	<p>Ms Emily Barker (Worcestershire County Council) Rep ID: 1290</p>	<p>Policy SWDPR 11: Providing the Right Land and Buildings for Jobs provides that the Strategic Employment Sites to be brought forward through the Plan.</p> <p>It remains unclear as to whether 'strategic locations' comprises the 13 Strategic Employment Sites listed above, or the strategic allocations outlined in section 8 of the Draft Plan and clarification would be helpful.</p>	<p>Comments noted. This may be something the Inspector may like to consider at examination.</p> <p>Minor Mod: correct the text in part D of the policy to state: <i>"To ensure businesses can start-up, grow and relocate within south Worcestershire, applications for non-E(g), non- B2 or non-B8 uses on the strategic employment sites listed below and shown on the SWDP Review Policies Map..."</i></p>
	<p>Summix, Homes England, and Bellway Rep ID: 1481</p>	<p>Support for Part A of SWDPR 11.</p> <p>In accordance with our submissions on Policy SWDPR 02, the SWDPR recognises that Worcestershire Parkway (WP) has the capacity to deliver more than 50ha of employment within the plan period to contribute to meeting identified needs. Observes that the scale of the employment land development at WP is comparable or greater than a number of the Strategic Employment Sites listed at Part F of the policy. As such, the list under Part F should be extended to include a reference to future employment at WP to ensure consistency.</p>	<p>This may be something the Inspector may like to consider at examination.</p>

	Mrs Jenna Strover (Potter Space) Rep ID: 2097	Policy SWDPR11 should be amended to identify Potter Group Site 7 as a Strategic Employment Site.	Comments noted. This may be something the Inspector may like to consider at examination.
	Proposed minor modification		Minor mod: to part B of the policy read as follows: " <i>B. The development of sites allocated for employment uses will not be supported for alternative residential uses. Where no progress has been made to deliver such sites for employment, then the site's suitability and availability will be re-considered during a plan review, alongside all other available sites.† Aa site may then be removed from the plan where there is little or no prospect of being delivered for the allocated employment use."</i>
SWDPR 12			
SWDPR 12 - Promotion of Town, District and Local Centres	Mr Christian Evans (Worcester Civic Society) Rep ID: 15	Part B of Policy SWDPR 12, below Table 4, states: New centres are planned for Worcestershire Parkway (SWDPR 51), Throckmorton Airfield (SWDPR 52) and Rushwick (SWDPR 53) and these will eventually be included on the Defined Centres Hierarchy. We are concerned that this ambiguity could lead to an abstraction of key retail anchor tenants in Worcester City Centre, pulling footfall and vitality away from the City Centre and primary shopping area. As it is not	Comments noted. This may be something the Inspector may like to consider at examination.

		explicitly stated, it is unclear or even impossible to make assumptions as to what the composition of the Council's proposed retail hierarchy will look like and how this responds to the settlement hierarchy.	
	Mr Sean Lewis Rep ID: 1166	The policy should make reference to the strategic development proposed within the plan delivering centres to serve those communities. Our clients are conscious that the proposed town centre at Worcestershire Parkway is not included in the table at criterion B, and should be acknowledged.	Comments noted. This may be something the Inspector may like to consider at examination.
	Mr Peter King (Campaign to Protect Rural England) Rep ID: 1247	We are concerned that this policy does not provide a mechanism for adequately managing retail decline, with shops standing empty for long periods (even in primary frontage). We are not clear to what extent a review has been undertaken of how far a primary frontage designation remains appropriate.	Comments noted. The fundamental objective of SWDPR12 is to promote the vitality and viability of the Defined Centres in South Worcestershire.
	Summix, Homes England, and Bellway Rep ID: 1482	We consider that the Defined Centres Hierarchy (Table 4) would benefit from the explicit inclusion of Worcestershire Parkway to tie in with the reference to the inclusion of a planned main town centre within Policy SWDPR 51. SWDPR 12 would benefit from additional supporting text to this effect to explain the importance of the 'Town Centre	Comments noted. This may be something the Inspector may like to consider at examination.

		First' approach at Worcestershire Parkway. We request that the main town centre at Worcestershire Parkway be placed in the second tier.	
	Proposed minor modification		Minor mod: add table headers to Table 4 Defined Centres Hierarchy, titled ' Location and Designation ' (column 1) and ' Areas Covered ' (column 2).
SWDPR 13			
SWDPR 13 - Non - Allocated Employment Development	<p>Marches Homes Rep ID: 1012, 1642</p> <p>Richborough Estates Rep ID: 987</p> <p>Deeley Homes Rep ID: 1747, 2384</p> <p>Evesham Heights Rep ID: 1673</p> <p>Harris Land Management Rep ID: 1828</p> <p>Piper Homes Rep ID: 1870</p> <p>Adam Hewitt Ltd Rep ID: 2001</p> <p>St Philips Ltd</p>	<p>Part A of the policy is quite unclear in reference to A(ii) and would benefit from greater clarity. We also consider that the requirements for A(ii4) require further clarity as the scope to access the site conveniently and safely on foot, by cycle and the availability of public transport services needs greater explanation as it isn't clear in its current wording. Similarly, we note that (ii5) does not read well and would benefit from rewording.</p> <p>In reference to SWDPR 13 b, we would question the legality of this as it is not advisable for decision takers to strip out Permitted Development rights unless exceptional circumstances exist. We do not consider this policy is aligned to para 82 of the NPPF.</p>	Comments noted. This may be something the Inspector may like to consider at examination.

	<p>Rep ID: 1972, 2040, 2164, 2284</p> <p>Millstrand Properties Ltd Rep ID: 2318</p> <p>Wyre Piddle Ltd Rep ID: 1351, 3152</p> <p>Hallow Stage 2 Ltd Rep ID: 3288</p> <p>Areley Kings Ltd Rep ID: 3344</p> <p>Stonebond Ltd Rep ID: 3441</p> <p>Rooftop Housing Association Rep ID: 536, 635</p>		
	Proposed minor modification		Minor mod: correct the spelling error in part A ii (4) of the policy to state: "4. <i>Scope to assess access the site conveniently and safely on foot, by cycle and the availability of public transport services;</i> "
SWDPR 14			
SWDPR 14 - Employment in Rural Areas	St Philips Ltd Rep ID: 2285, 2041	We consider that the requirements of SWDPR 14 are unworkable in practice therefore meaning that they would not be effective under the tests of	Comments noted. This may be something the Inspector may like to consider at examination.

	<p>Rooftop Housing Association Rep ID: 537, 636</p> <p>Richborough Estates Rep ID: 988</p> <p>Marches Homes Limited Rep ID: 1013, 1643</p> <p>Wyre Piddle Ltd Rep ID: 1352, 3153</p> <p>Malvern Estates Rep ID: 1527</p> <p>Deeley Homes Rep ID: 1748</p> <p>Evesham Heights Rep ID: 1674</p> <p>Harris Land Management Rep ID:</p> <p>Adam Hewitt Ltd Rep ID: 2002</p> <p>Piper Homes Rep ID: 2073</p> <p>Hallow Stage 2 Ltd Rep ID: 3289</p>	<p>soundness. We have noted a number of points which would need further consideration as follows:</p> <p>Point C (i) states that proposals for live / work accommodation will be permitted providing: i. They are located within or adjacent to a town. Being located within or adjacent to a town does not relate to rural areas so therefore does not integrate well within the policy.</p> <p>Furthermore, in relation to point D, where planning permission is required for the residential conversion of isolated rural buildings, it will only be granted where a marketing exercise has shown that employment, tourism or leisure and recreation uses are unviable. This needs greater justification as to why it is required. How long does the marketing exercise need to be carried out for?</p>	
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	<p>Areley Kings Ltd Rep ID: 3345</p> <p>Stonebond Ltd Rep ID: 3442</p> <p>Millstrand Properties Rep ID: 2319</p>		
	<p>Mr David Addison Rep ID: 351</p>	<p>The restrictions on live/work units will completely put a stop to any future unit coming forward. Not one single live/work unit that has been approved under the current SWDP policy in the past 6 years would comply with this proposed policy.</p> <p>Firstly, land adjoining a town or large village is at a premium (as will either be held on to or sold at a very high price as there will always be hope value that the land will be suitable for residential development at some point). Secondly, requiring the business to have been operating and profitable for 3 years is unrealistic - typically a live/work unit is for new or very young businesses that help the business grow. The first three years of that business would have reasonably required permanent workspace anyway. Thirdly, the 100sq.m restriction on the live</p>	<p>Comments noted. This may be something the Inspector may like to consider at examination.</p>

		<p>floorspace would mean no person with a family could have a live/work unit - people with children will reasonably require greater live floorspace.</p>	
	<p>Mr Rob Jolly Rep ID: 2647</p>	<p>This representation relates to sub-clause C which concerns proposals for Live/Work accommodation. Two criteria have been inserted into the Policy both of which make the likelihood such development unnecessarily restrictive and less likely to occur. The first is Clause i. This now states that Live/Work will only be permitted if located within or adjacent to a Category 1,2 or 3 village. There is little point in limiting live work to within village settlement boundaries as it would be likely to be granted inside village envelopes anyway. As for the requirement (alternatively) for live /work to be on sites adjacent to Category 1,2 or 3 villages, no clue or assistance is given as to what constitutes adjacent either in the Policy itself or in the Reasoned Justification (WJ).</p> <p>The original SWDP Policy 8G has worked well for some 6 years since its introduction in 2016. Secondly, sub clause ii now requires that the work element relates to an existing established and economically viable business that has been trading for at</p>	<p>Comments noted. This may be something the Inspector may like to consider at examination.</p>

		<p>least three years. This is completely at odds not only with Framework (paragraph 82) and with the RJ which at paragraph 4.5 clearly states that live/work units can help support small and start-up businesses... Start-up businesses are by definition not established. To expect every such unit to have been trading for 3 years is unreasonable.</p> <p>Criterion iii also causes concern. No good reason is given as to why the live and work sections need to be incorporated into one building.</p> <p>If growth is to be encouraged, then Policies such as SWDPR14 need to be loosened, especially as regards the requirement for business to have been established for 3 years and to go through a viability exercise.</p>	
	<p>Proposed minor modification</p>		<p>Minor mod: add the word 'and' to part C. (ix) to read as follows:</p> <p><i>"ix. The proposed use does not involve the sale of goods to visiting members of the public or fall within the E(b), B2, C1 and C2 use classes, or drinking establishments or hot food takeaways (Sui Generis) and does not relate to equestrian activities."</i></p>

SWDPR 15			
<p>SWDPR 15 Effective Use of Land</p>	<p>Marches Homes Rep ID: 1014, Evesham Heights Limited Rep ID: 1675, St Philips Ltd Rep ID: 2042 / 2166 / 2286, Piper Homes Rep ID: 2074, Millstrand Properties Rep ID: 2320, John and Penny Kitchener Rep ID: 3091, Hallow Stage 2 Limited Rep ID: 3290, Areley Kings Ltd Rep ID: 3346, Stonebound Ltd Rep ID: 3443, Deeley Homes Rep ID: 2386, Harris Land Rep ID: 1830, Rooftop Housing Group Rep ID: 538 / 637, Richborough Estates Rep ID: 989. Fisher German LLP also mention first point (Rep ID. 468). Mr Mark Behrendt from Home Builders also</p>	<p>SWDPR15D would benefit from clarity on which major sites are being referred to.</p> <p>Assessing characteristics should not be used as a measure of land use efficiency and consider reference should be removed.</p> <p>Concern around Criterion G and suggest removal as relates to monitoring objectives not a policy.</p> <p>Point H – suggest BMVAL should come forward on basis of sequential preference in accordance with Footnote 58 of NPPF.</p> <p>Suggest Removal of Point I are is unclear.</p> <p>Further regard should be had to GI requirements and other policy requirements that will reduce net developable area of the site and will have implications for the density levels that can be achieved.</p>	<p>Comments noted. This may be something the Inspector may like to consider at examination.</p>

	<p>question part G (Rep ID 690) Joel Merris, Vistry Group. Rep ID: 418</p>		
	<p>Malvern Hills AONB Rep ID: 431</p>	<p>Suggest changing part E.V text to 'Development densities immediately adjacent and close to such areas should be'.</p>	<p>Comments noted. Alteration of wording would introduce a degree of uncertainty and the policy wording would be vague. For the decision maker it would introduce a degree of uncertainty in terms of where you would draw the line of defining the proximity of 'near to'.</p>
	<p>Fisher German LLP Rep ID: 468</p>	<p>Suggests policy should include 'the sensible and efficient use of sites' to ensure that suitable levels of housing can be achieved, having regard for design layout and other considerations.</p> <p>Suggests it should be explicit within the policy that it may not always be possible or appropriate to meet this target density.</p>	<p>Sites are thoroughly assessed and selected through the SHELAA and all windfall sites are assessed against other development management policies in the plan such as Design.</p> <p>The Loss of BMVAL is a criterion in the SHELAA that assesses all sites submitted to be considered as site allocations.</p>
	<p>Martley Parish Council Rep ID: 476</p>	<p>Suggest each proposed allocation should include an estimate for the total area of BMVAL lost to agriculture.</p>	<p>Comments noted. Stating the estimate for the total area of BMVAL lost would not provide any purpose. The SHELAA has already assessed the loss of BMVAL and this has informed the allocations. It would not aid the decision maker as the site has been assessed and is an allocation.</p>

	Cotswold Conversation Board Rep ID: 507	Supportive of policy and note all recommendations at Preferred Options have been incorporated.	Support noted.
	Natural England Rep ID: 833	<p>Advises the policy does not adequately protect soils and therefore inconsistent with national policy set out in Para 17a of NPPF.</p> <p><u>Advises the following additions which would further mitigate impacts.</u></p> <p>Plan allocations (and subsequent planning applications) over 5ha in size and on agricultural land should have a site-specific Soils Management Plan informed by a detailed Agricultural Land Classification (ALC) and soil resource survey, in line with best practice guidance: the Defra Code of practice for the sustainable use of soils on construction sites. The plan should recognise that development (soil sealing) has a major and usually irreversible adverse impact on soils. Mitigation should aim to minimise soil disturbance and to retain as many ecosystem services as possible through careful soil management during the construction process. Further information can be found in Natural England's Technical Information Note 049 on Agricultural Land Classification</p>	Comments noted. This may be something the Inspector may like to consider at examination.

		(ALC). The policy should support developments that enhance soils, avoid soil sealing and provide mitigation to avoid soil disturbance.	
	Gleeson Land Rep ID: 953, Holly Brook Homes Rep ID: 1311, Brandon Planning and Development Ltd and Cannick Residential Ltd Rep ID: 2480, Land Partnerships Ltd Rep ID: 1955	Express concern that there is an inherent contradiction and conflict between this policy which seeks to drive densities higher and policy SWDPR07 which aims to impose 40% green space. Minimum net densities are unrealistic as the Nationally Described Space Standards make it harder to achieve higher densities. The consequence is that houses are built to higher densities with little gardens. Also contradicts SWDPR10 as living conditions will be poorer. Suggest that the minimum density standards in Policy SWDPR15 should be used as a basis for establishing capacity of allocation sites Regard needs to be had to the GI requirements and other policy requirements for the plan that will reduce net developable area.	Policy SWDPR15 considers other policy requirements in the plan.
	Marches Homes Rep ID: 1014 / 1644	Policy is supported, welcome minimum requirement figures.	Support welcomed.
	Campaign to Protect Rural England Rep ID: 1250	Welcome policy.	Support welcomed.

	Millstrand Properties Rep ID: 2320	Concerned that windfall sites are only permitted in defined settlements and these are tightly drawn to limit or prohibit development, rather than facilitate it.	Comments noted. All development boundaries have been fully assessed in line with the Development Boundaries Review methodology, which was consulted on in 2018, included in the Issues and Options consultation and finalised thereafter. The important contribution of windfall sites is recognised (NPPF, Para 69), however, these boundaries are in place to direct windfall development (non-allocated housing development) to built up areas thereby prevent encroaching into the open countryside.
	Lovell Partnerships Ltd Rep ID:2018	The policy is not clear as to what the search radius would be when looking for alternative sites. A clarification as to where and how wide the alternative sites should be assessed would be helpful.	Comments noted. The appropriate radius will be subjective with each application. The DM officer will make this judgement. This may be something the inspector may wish to consider at Examination.
	Hallam Land Management Rep ID: 2293, Vistry Group Rep ID: 2352	Supportive of policy.	Support noted.
SWDPR 16			
SWDPR 16 Housing Mix and Standards Part A	Natasha Styles OBO McCarthy and Stone (301)	The council should recognise that older persons' housing cannot be simply regarded as standard housing.	Comments noted. It is acknowledged that housing for older people includes a wide spectrum of housing types (refer Table 5.3 in the SHMA 2021 update) but the SHMA also indicates that most older

			people wish to stay in their own home (para 5.13) or move to a smaller property (para 5.14) and therefore there should be sufficient supply of 'general' housing to allow this to happen.
	Acres Land & Planning OBO Gleeson Land (954) and Fosse Planning Ltd OBO Brandon Planning and Development & Caddick Residential Ltd (2481)	Tantamount to imposing variety for its own sake and is completely unrealistic for such small sites, I.e. from 5 upwards.	Comments noted but it is appropriate for smaller sites to provide a range of house sizes and types rather than uniformity to help meet the varying needs of local communities. Furthermore, this approach was accepted by the Inspector for the adopted SWDP.
SWDPR 16 Housing Mix and Standards Part B	Harris Lamb OBO Vistry Gp (419); Lichfields and Partners OBO St Philips Land Ltd (968); Tetlow King Planning OBO West Mids Housing Association Planning Consortium (1035); Savills OBO Hollybrook Homes (1312); George Ducker OBO Tesni Property Ltd (1706); Pegasus Group OBO Land Q Estates (1709), Spitfire Bespoke Homes (2118), L & Q Estates (3252); Lichfields OBO Terra Strategic) (1812, 2266);	Insufficient justification for all new homes to meet the Nationally Described Space Standards.	The housing background paper will be amended to include further justification.

	<p>Define Planning and Design Ltd OBO William Davis Developments (1925); PlanIt Planning and Development OBO Land Partnerships Developments Ltd (1956); Harris Lamb OBO Lovell Partnerships Ltd (2020); David Lock Associates OBO Hallam Land Management (2294); Andrea Caplan OBO Cala Homes (Midlands) Ltd (2366) and St Modwen (3510)</p>		
	<p>Marrons Planning OBO Lone Star Ltd (1065, 1076, 1083, 2427), The Rose Farm Partnership (1768), P L Marriott Estates Ltd (2201)</p>	<p>Are supportive of the NDSS being used to influence the standard of housing developments. However, there may be instances where greater flexibility is required in order to meet need.</p>	<p>Comments noted</p>

	Fisher German (469)	Standards will affect viability of schemes and increase cost of new homes.	The NDSS does not create excessively large homes instead its purpose is to ensure that homes have adequate habitable space which is not an unreasonable requirement.
	Acres Land & Planning OBO Gleeson Land (954) and Fosse Planning Ltd OBO Brandon Planning and Development & Caddick Residential Ltd (2481)	Will be replaced by the Future Homes Standard when this is implemented in 2025 and so will be superfluous.	Comments noted.
SWDPR 16 Housing Mix and Standards Part C	Natasha Styles OBO McCarthy and Stone (301); Home Builders Federation (691); Acres Land & Planning OBO Gleeson Land (954) and Fosse Planning Ltd OBO Brandon Planning and Development & Caddick Residential Ltd (2481); George Ducker OBO Tesni Property Ltd (1706); Pegasus Group OBO Land Q Estates (1709), Spitfire Bespoke Homes (2118), L & Q Estates (3252);	The council should recognise that the proposed changes in building regulations will require all homes to be built to part M4(2) of the Building Regulations. This will remove the need to reference this in the local plan and should be removed.	Comments noted. It is proposed to retain part C until the Building Reg requirements are operative for all new dwellings.

	Harris Lamb OBO Lovell Partnerships Ltd (2020)		
	David Lock Associates OBO Hallam Land Management (2294)	Too onerous, not supported by any technical evidence that suggests it responds to an identified need and does not affect the overall viability of schemes.	Comments noted.
SWDPR 16 Housing Mix and Standards Part D	Natasha Styles OBO McCarthy and Stone (301)	Housing built to M4(3) standard will not meet the needs of older people - these needs can be better met by e.g. extra care housing.	Comments noted. Part D is considered necessary to meet the needs of those with physical disabilities who want to live in a dwelling, with the projected increases in older people across the plan area (para 5.12 of the SHMA 2021 update) and an increase in people with mobility issues (para 5.41) which includes but is not exclusively older people.
	Fisher German (469, 770 & 782), Home Builders Federation (691); Katie Parsons OBO Marches Homes Ltd (1646), Deeley Homes (1750, 2387) and Luke Cottrell OBO Evesham Heights Ltd (1676);	Insufficient justification for the 5%	Comments noted. Part D is considered necessary to meet the needs of those with physical disabilities who want to live in a dwelling, with the projected increases in older people across the plan area (para 5.12 of the SHMA 2021 update) and an increase in people with mobility issues (para

	George Ducker OBO Tesni Property Ltd (1706); Pegasus Group OBO Land Q Estates (1709), Spitfire Bespoke Homes (2118), L & Q Estates (3252); Define Planning and Design Ltd OBO William Davis Developments (1925); Harris Lamb OBO Lovell Partnerships Ltd (2020); David Lock Associates OBO Hallam Land Management (2294)		5.41) which includes but is not exclusively older people.
	Acres Land & Planning OBO Gleeson Land (954) and Fosse Planning Ltd OBO Brandon Planning and Development & Caddick Residential Ltd (2481);	In practice builders will normally provide facilities for the disabled if they are required. A better solution is to enable buyers to negotiate with developers to build in facilities (whether for wheelchairs or other forms of disability) which meet their needs.	Comments noted.
SWDPR 16 Housing Mix and Standards Part E	Natasha Styles OBO McCarthy and Stone (301)	Self and Custom Build are not appropriate for older persons housing schemes because of dense nature of the scheme, located often on brownfield sites and marginal viability. Suggests threshold is over a certain area for example 1 hectare rather than a specific number of dwellings.	Comments noted. It is considered that the threshold of 20 dwellings remain in the policy.
	Harris Lamb OBO Vistry Gp (419),	No justification for 5% which will lead to too many self-build plots coming	Comments noted. Part E self/custom builds – this is

	<p>Fisher German (469, 770 & 782), RCA obo Rooftop (540), (638), Richborough Estates (990), Marches Homes Ltd (1015), Wyre Piddle Ltd (1354 and 3155), Malvern Estates (1531), Harris Land Management (1831), Piper Homes (1873, 2020), St Philips Ltd (1975, 2043, 2167, 2188), Millstrand Properties (2144, 2321), Hallow Stage 2 Ltd (3291), Areley Kings (3347), Stonebond Ltd (3444); Home Builders Federation (691); Savills (793); McLoughlin Planning OBO Castlethorpe Homes (821), Vistry Group (2353); Acres Land & Planning OBO Gleeson Land (954) and Fosse Planning Ltd OBO Brandon Planning and Development & Caddick Residential Ltd (2481);</p>	<p>forward in the plan area overall and on e.g. strategic sites; Significant financial, design and health and safety implications for developers which will harm deliverability of new housing; Will complicate decision making process by requiring hybrid applications to include outline for self-build plots; Will not satisfy most self-builders because they do not want to be located on a housing site; The demand for self-build plots is exaggerated because people can join more than one register; Plots should revert to developer in a shorter time period – e.g. 6 months, 12 months; Part E should be deleted; Policy threshold should be significantly increased.</p>	<p>considered a reasonable way of meeting the demand for self and custom build plots by spreading both the cost and the location of self-builds so that they are not focussed only in a couple of areas, such as at Worcs Parkway or Rushwick. This also provides those on the self-build register more choice. Generally, it is anticipated that the utility connections would be provided to the edge of the self- build plots as suggested in the NPPG. The marketing of self-build plots can start as soon as planning permission is granted and this would give ample time to find potential purchasers before sites are built out, even sites as small as 20 units. Furthermore, the number on the self-build register will not remain static but increase as more people join and therefore the demand will increase over time. The requirement for 5% self-build on sites of 20 or more dwellings has been tested as part of the overall local plan viability assessment and found to be viable. Plots can be located to minimise disruption to the build of the rest of the site and to ensure they can be accessed safely.</p>
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	<p>Marrons Planning OBO Ainscough Strategic Land (1057); Marrons Planning OBO Lone Star Ltd (1065, 1076, 1083, 2427), The Rose Farm Partnership (1768), P L Marriott Estates Ltd (2201); Terra Strategic (1131); Barton Willmore OBO Avant Homes (1161), IM Land (1383), Owl Partnerships Ltd (1567); RPS OBO BDW South West (1508) Katie Parsons OBO Marches Homes Ltd (1646), Deeley Homes (1750, 2387) and Luke Cottrell OBO Evesham Heights Ltd (1676); George Ducker OBO Tesni Property Ltd (1706); Pegasus Group OBO Land Q Estates (1709), Spitfire Bespoke Homes (2118), L & Q Estates (3252); Define Planning and Design Ltd OBO William Davis Developments (1925);</p>		
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	<p>PlanIt Planning and Development OBO Land Partnerships Developments Ltd (1956); Harris Lamb OBO Lovell Partnerships Ltd (2020);</p>		
	<p>Inchbald Day planning and Development Ltd OBO Ms Janine Yates (1104), Mrs Louise and Sarah Taylor (1107); Custom Build Homes (1572) Mike Simpson (1617)</p>	<p>Should explicitly cross reference (within a footnote) that flexibility will be applied for the strategic allocations, where it is recognised that individual development parcels may take the form of those listed at footnote 41 and contribute to the overall development numbers and that proven need at any one point in time is unlikely to justify the full application of 5% of the total development.</p>	<p>Comments noted. It is considered that the strategic allocations should not be specifically referenced as the policy allows for some flexibility by reason of criterion SWDPR 16 E.</p>
	<p>Roman Summer Assoc Ltd OBO Elan Homes (1368) Gladman Developments (1440); Stantec UK Ltd & Barton Wilmore OBO Landform Estates (1460); Lioncourt Homes (1944) Turley OBO Summix, Homes England and Bellway (1484)</p>	<p>Plots should revert to developer in a shorter time period – e.g. 6 months, 12 months</p>	<p>Comments noted. The marketing of self-build plots can start as soon as planning permission is granted but it is considered that 6 or 12 months would be too short a time period for the reversion of plots back to the developer. The policy needs to ensure sufficient time is given to enable potential self-builders a realistic opportunity to purchase the plot(s).</p>
	<p>Barton Willmore OBO Avant Homes (1161), IM</p>	<p>New exceptions policy required to allow self-build plots on edge of villages,</p>	<p>Comments noted. Part E self/custom builds – this is</p>

	<p>Land (1383), Owl Partnerships Ltd (1567); Custom Build Homes (1572) Mike Simpson (1617)</p>	<p>permissive infilling in rural areas and redevelopment and infill development beyond settlements Specific sites should be allocated for self-build plots.</p>	<p>considered a reasonable way of meeting the demand for self and custom build plots by spreading both the cost and the location of self-builds so that they are not focussed only in a couple of areas, such as at Worcs Parkway or Rushwick. This also provides those on the self-build register more choice. Generally, it is anticipated that the utility connections would be provided to the edge of the self-build plots as suggested in the NPPG. The marketing of self-build plots can start as soon as planning permission is granted and this would give ample time to find potential purchasers before sites are built out, even sites as small as 20 units. Furthermore, the number on the self-build register will not remain static but increase as more people join and therefore the demand will increase over time. The requirement for 5% self-build on sites of 20 or more dwellings has been tested as part of the overall local plan viability assessment and found to be viable. Plots can be located to minimise disruption to the build of the rest of the site and to ensure they can be accessed safely.</p>
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	Custom Build Homes (1572); Tufnell Town and Country Planning OBO Millstrand Properties (1920)	The Self Build Registers significantly underestimate demand.	Comments noted.
SWDPR 16 Housing Mix and Standards General	Paul Esrich Malvern hills AONB Partnership (435); Little Malvern & Welland PC (739)	Concern about the absence of a reference to the AONB and NL and requests inclusion in this policy of the sort of principles set out in SWDPR19 A vi (1-3) (Rural Exception sites).	Comments noted but the plan should be read as a whole and therefore decisions on applications within the AONB, or within its setting, will consider the AONB policy.
	Planning Prospects Ltd OBO University of Worcester (596)	Consider that SWDPR still fails to recognise, and adequately plan for, the demand / need for specialist or purpose-built housing for students, as an important component of the City's (in particular) wider housing mix.	Comments noted. It is considered that student accommodation is best located close to the University or college - most of these are located within the Development Boundaries for Worcester or the towns where opportunities exist for conversion of existing buildings or redevelopment of brownfield sites.
	McLoughlin Planning OBO Castlethorpe Homes (821), Vistry Group (2353);	Overall policy requirements are too burdensome on developers.	Comments noted
SWDPR 17			

SWDPR 17 Sub-division, Multiple Occupation and Changes of Use of Dwellings	Worcester Civic Society. Rep ID: 14	Consider policy legally compliant and sound.	Comments noted.
	Malvern Hills Civic Society. Rep ID: 588	Concerned that policy may facilitate wide-scale conversion/change of use of buildings into sub-standard accommodation that is poor quality.	Comments noted.
	Campaign to Protect Rural England. Rep: 1251	Concerned there is no policy covering what is acceptable as an extension to a domestic house.	Comments noted. The design policy can be used for extensions to dwellings.
SWDPR 18			
SWDPR 18 Meeting Affordable Housing Needs Part A	RCA OBO Rooftop (544) and others inc Wyre Piddle Ltd (3156); Hallow Stage 2 Ltd (3292); Areley Kings Ltd (3349); Stonebond Ltd (3445); Lichfields OBO St Philips Land (1029); Katie Parsons OBO Warndon PC (1238) and others;	Point A needs rewording to address any cumulative impact on sites with contiguous boundaries.	Comments noted. Part A is the same wording as in the adopted plan and has been interpreted and implemented successfully.
disused	David Addison (352); Home Builders Federation (692);	In line with national policy, remove requirement for affordable housing on schemes under 10no. Units.	Comments noted. No change - in accordance with para 64 of the NPPF, councils can seek affordable

			housing on smaller schemes in Designated Rural Areas.
	Savills (794); Acres Land and Planning OBO Gleeson Land (955); Savills OBO Hollybrook Homes (1313); Lioncourt Homes Ltd (1945); Fosse Planning Ltd obo Brandon Planning and Development & Caddick Residential Ltd (2485); Andrea Caplin OBO St Modwen (3511)	40% is overly ambitious and will prevent sites coming forward; should be set as targets not absolutes; 40% should not be applied to sites of less than 15 dwellings; Strategic sites will not be viable at 40% because of the amount of other infrastructure they have to provide;	Comments noted. Part B clearly sets out the policy requirements for the level of affordable housing to be provided on sites of different sizes. This is countered by Criterion G which does not prevent an application on greenfield sites from being accompanied by a viability assessment but it is considered reasonable and fair to suggest that generally it is expected that only Brownfield sites can demonstrate such viability issues. Greenfield sites of less than 15 dwellings have been tested at 40% and found to be viable.
	Pegasus Gp OBO Land Q Estates (1710), Spitfire (2119), L&Q Estates	Should be clarified that only the AONBs are DRA	Comments noted. The Designated Rural Areas are not just the Cotswolds and Malvern Hills AONBs but also include most of the rural parishes in Malvern Hills and Wychavon – refer The Housing (Right to Buy) (Designated Rural Areas and Designated Regions) (England) Order 2016 (legislation.gov.uk)
	Cotswolds Conservation Board (508)	Recommends that a viability assessment should be undertaken specifically to look into the viability of requiring a higher level of affordable housing provision in	Comments noted. The policy requirement is for on-site 40% AH on sites of 5 and over – it is this figure that has been tested for the viability study. This is considered a

		<p>the two AONBs, including for developments of: 10 or more dwellings 6-9 dwellings 5 or fewer dwellings If 50% affordable housing is shown to be viable in the AONBs then the policy should be changed to reflect this.</p>	<p>reasonable requirement to ensure that sites continue to come forward for development.</p>
<p>SWDPR 18 Meeting Affordable Housing Needs Part C</p>	<p>No comments received.</p>	<p>No comments received.</p>	<p>No comments received.</p>
<p>SWDPR 18 Meeting Affordable Housing Needs Part D</p>	<p>Tetlow King Planning OBO WM Housing Association Planning Consortium (1036)</p>	<p>Policy should not require all affordable housing to remain in perpetuity as this is only applicable to Rural Exception housing.</p>	<p>Comments noted. Part D allows for the subsidy to be recycled if the AH is sold off – this is the same approach as in the adopted SWDP</p>
<p>SWDPR 18 Meeting Affordable Housing Needs Part E</p>	<p>Fisher German (470) and OBO several other landowners/developers; RC A OBO Rooftop (544) and others inc Wyre Piddle Ltd (3156); Hallow Stage 2 Ltd (3292); Areley Kings Ltd (3349); Stonebond Ltd (3445); Lichfields OBO St Philips Land (1029);</p>	<p>Criterion E should specifically reference intermediate housing, rather than 'other forms of affordable home ownership'</p>	<p>Comments noted. The glossary and para 65 of the NPPF refer to 'affordable home ownership' and it is a less specific term than 'intermediate housing'.</p>

	Katie Parsons OBO Warndon PC (1238) and others		
	Marrons Planning OBO Ainscough Strategic Land (1058) and several others; Lone Star Planning obo Mr Jonathan Parkes (2565)	Should not be specific but provide a range.	Comments noted but Part E allows for alternative AH tenures where the mix (as stated in Part E) is not viable or local need indicates a need for an alternative AH tenure.
	Gladman Developments (1441)	Mix is too prescriptive and should be informed by local needs.	Comments noted but Part E allows for alternative AH tenures where the mix (as stated in Part E) is not viable or local need indicates a need for an alternative AH tenure.
	Fosse Planning Ltd obo Brandon Planning and Development & Caddick Residential Ltd (2485)	Seeking 69% social rented is too high, unjustified and too costly for private developers to fund,	Part E - there is a preference for social rented properties because this tenure helps to meet the needs of those in greatest need whereas other forms of affordable housing tenure are often unaffordable to the majority in need of affordable housing. This has been tested through the plan-wide viability assessment. Alternative AH tenures may be acceptable where the mix is not viable or local need indicates a need for an alternative AH tenure.
SWDPR 18 Meeting Affordable	RCA OBO Rooftop (544) and others inc Wyre Piddle Ltd (3156); Hallow Stage	Point F should clarify exactly which parts of the guidance published by the Cotswolds Conservation Board and	Comments noted but it is not reasonable to detail which parts of the guidance from the Cotswolds CB

Housing Needs Part F	2 Ltd (3292); Areley Kings Ltd (3349); Stonebond Ltd (3445); Lichfields OBO St Philips Land (1029); Pegasus Gp OBO Land Q Estates (1710), Spitfire (2119), L&Q Estates	Malvern Hills AONB Partnership needs to be followed	and the Malvern Hills AONB Partnerships.
	Home Builders Federation (692); Savills (794); Acres Land and Planning OBO Gleeson Land (955); Gerald Eve LLP OBO Combined Landowners at WP (1424); Gladman Developments (1441); Turley OBO Summix, Homes England and Bellway (1485); Fosse Planning Ltd obo Brandon Planning and Development & Caddick Residential Ltd (2485); Andrea Caplin OBO St Modwen (3511)	The exceptions test applies to any site and to state that it usually only applies to brownfield development should be removed.	Comments noted but part G does not prevent an application on greenfield sites from being accompanied by a viability assessment however it is considered reasonable and fair to suggest that generally it is expected that only Brownfield sites can demonstrate such viability issues.
SWDPR 18 Meeting Affordable Housing Needs Part G	CPRE (1252)	Some means is needed to ensure that a developer cannot over-pay for land and then argue this excessive price means that the requirements of this policy render his site unviable.	Comments noted.

SWDPR 18 Meeting Affordable Housing Needs Part H	Acres Land and Planning OBO Gleeson Land (955); Define Planning and Design Ltd obo William Davis Dev (1926); Fosse Planning Ltd obo Brandon Planning and Development & Caddick Residential Ltd (2485)	SPD should not set new policy especially those with a cost implication.	Comments noted. Part H – it is not proposed to make 'new' policy through the SPD but to explain how the policy will be applied.
SWDPR 18 Meeting Affordable Housing Needs (General)	McCarthy Stone (302)	Update the viability study to ensure up to date assumptions including sales values and build costs reflect the current market conditions	Comments noted.
	Malvern Hills AONB Partnership (437); Little Malvern and Welland PC (740)	Requests that the sort of principles set out in SWDPR19 A vi (1-3) (Rural Exception sites) are also considered for inclusion in this policy.	Comments noted but the plan should be read as a whole and therefore decisions on applications within the AONB, or within its setting, will consider the AONB policy.
	Harris Lamb OBO Lovell Partnerships Ltd (2019)	Need for affordable housing is so acute that more sites should be allocated for housing.	It is noted that these comments concern the level of housing supply and not the affordable housing policy itself.
	Ridge LLP obo DBL (2192); Bromford Developments (2215)	Affordable housing need is particularly acute in Worcester City.	Comments noted.
SWDPR 19			
SWDPR 19 Rural	Tetlow king Planning obo West Mids Housing Assoc	Delete reference defining small as '5% or 1Ha' because it is too prescriptive	Comments noted but 5% of the size of the settlement, up to a max of

Exception Sites Part A	Planning Consortium (1037); Lone Star Planning obo Mr Jonathan Parkes (2566);	and onerous and is only applicable to Entry Level Exception Sites; may result in sites too small to be of interest to Registered Providers.	1Ha, is considered a reasonable figure and is one that is used in the NPPF albeit for Entry-level exception sites. It is felt that the size constraint is necessary to ensure that sites are not out of scale but are proportionate to the existing settlement.
	RCA obo Rooftop Housing Association (545) and others	5% is too low - amend to say that rural exception sites will be permitted to meet demand if evidence is overwhelmingly demonstrated;	Comments noted but 5% of the size of the settlement, up to a max of 1Ha, is considered a reasonable figure and is one that is used in the NPPF albeit for Entry-level exception sites. It is felt that the size constraint is necessary to ensure that sites are not out of scale but are proportionate to the existing settlement.
	RCA obo Rooftop Housing Association (545) and others	Reference to built-up area would benefit from a definition.	<p>Comments noted. This may be something the Inspector may like to consider at examination.</p> <p>Minor mod: add explanation of main built-up area to RJ so first sentence of para 5.2 reads: The policy refers to small sites, which the accompanying footnote critterion Aiv) explains should not exceed whichever is the lesser of 5% of the number of dwellings within the main built-up area of the village (i.e.,</p>

			excluding any outlier dwellings) or 1ha.
	RCA obo Rooftop Housing Association (545) and others	Part Ai) also should include housing needs assessments or developers surveys as constituting evidence. These have repeatedly been accepted in support of applications and appeals and it is not clear why they would not be specifically cited in this policy.	Comments noted. Part Ai) already states 'e.g.' so could include developers assessments
	RCA obo Rooftop Housing Association (545) and others	Part Aiv) duplicates footnote 59 so we consider that it is not required and should be either revised or removed.	Comments noted. Minor Mod: delete footnote 59 which is unnecessary because it is a repeat of SWDPR 19 (Aiv) and amend para 5.2 of RJ accordingly.
	RCA obo Rooftop Housing Association (545) and others	Part Av) the reasonable access referred to here could include 'village clusters' for instances where a rural exception site is within accessible distance of a number of villages and their associated facilities.	Comments noted.
	Tetlow king Planning obo West Mids Housing Assoc Planning Consortium (1037)	Part Avi4) Nothing contained in the NPPF or PPG that suggests an alternative interpretation of Rural Exception Sites policy for sites within the AONB is justified.	Regarding point Avi4) of SWDPR19, Para 176 of the NPPF explains the importance of e.g. AONBs and that the scale and extent of development within them should be limited. It is therefore considered reasonable that affordable housing to serve the needs of sites beyond the AONBs should be located outside of the AONB.

	CPRE (1253)	Add definition of development boundary to glossary	Comments noted. This may be something the Inspector may like to consider at examination.
	CPRE (1253)	Part A.vi There should be an additional condition that it is not reasonable to meet the need outside the NL or AONB.	Comments noted. Part A.vi) already makes it clear that housing needs for settlements outside of the AONBs should not be met within the AONBs.
	Pegasus Gp obo Land Q Estates (1711)	Part Aii) is an attempt to introduce a sequential test to the process, which is unduly onerous.	Comments noted. The requirement Part Aii) of SWDPR 19 is not considered unreasonable and provides local communities some reassurance that the presence of any existing alternative suitable sites will be taken into account in the decision- making process. It is in the adopted plan and rural exception sites have successfully come forward and been approved.
SWDPR 19 Rural Exception Sites Part B	Acres Land & Planning obo Gleeson Land (956); Fosse Planning Ltd obo Brandon Planning and Development & Caddick Residential Ltd (2487);	Appears to omit the opportunity (formerly within Part B of Preferred Options policy SWDPR18) to allow cross subsidy with a small degree of market housing where 100% affordable housing cannot be achieved.	This remains in the policy but excludes sites in Cotswolds National Landscape and AONBs.
SWDPR 19 Rural	No comments received.	No comments received.	No comments received.

Exception Sites Part C			
SWDPR 19 Rural Exception Sites Part (General)	Malvern Hills AONB Partnership (432)	Suggest minor modification (to achieve consistency) to SWDPR19 RJ Para 5.4 as follows: Therefore, Rural Exception Site proposals within "settlements that fall within or partly within" the Cotswolds National Landscape...	Comments noted. This may be something the Inspector may like to consider at examination.
SWDPR19A			
SWDPR19A First Homes Exception Sites Part A	RCA Regeneration on behalf of Several clients (e.g. 993);	Part A seeks to limit First Homes sites to sites "adjacent to the Development Boundaries of Worcester, the towns and villages" – which appears to go beyond what the Written Ministerial Statement said, which stated that first homes should "be adjacent to existing settlements	Comments noted. The Written Ministerial Statement requirements include that FH Exception sites are adjacent to existing settlements and the SWC consider that to ensure the sites are in relatively sustainable locations they should be located adjacent to the development boundaries of Worcester, the towns and villages and not adjacent to settlements e.g. without development boundaries which often have no or very limited services or facilities.
	Barton Willmore obo IM Land (1384) and Owl Partnerships Ltd (1568); Fosse Planning Ltd (2488)	Part Aiii) Delete reference defining small as '5% or 1Ha' because it is too prescriptive and onerous and is only applicable to Entry Level Exception Sites;	Comments noted. 5% of the size of the settlement, up to a max of 1 Ha, is considered a reasonable figure and is one that is used in the NPPF albeit for Entry-level exception sites. It is felt that the size constraint is necessary to ensure that sites are not out of scale but are proportionate to the existing settlement.

	RCA Regeneration on behalf of Several clients (e.g. 993)	Part Aiv) is in excess of national policy requirements and is therefore onerous.	Comments noted.
	RCA Regeneration on behalf of Several clients (e.g. 993)	Part Ai) No reference within the NPPG to having to demonstrate 'need': national policy only requires 'need' to be demonstrated if the LPA wishes to set a different percentage or price cap than that set out in national policy, or if the developer wants to add market housing or different affordable housing tenures to the site as well.	Comments noted.
SWDPR19A First Homes Exception Sites Part B	No comments received.	No comments received.	No comments received.
SWDPR19A First Homes Exception Sites Part C	No comments received.	No comments received.	No comments received.
SWDPR19A First Homes Exception Sites Part D	No comments received.	No comments received.	No comments received.
SWDPR19A First Homes Exception Sites (general)	Malvern Hills AONB Partnership (436)	Requests that the sort of principles set out in SWDPR19 A vi (1-3) (Rural Exception sites) are also considered for inclusion in this policy.	Comments noted. The policy specifically excludes First Homes Exception Sites from being located in the AONB and in Rural Designated Areas which together cover most areas within or close to the AONB and therefore it is not

			considered necessary to add the extra criteria given in the Rural Exception policy SWDPR19 (Criteria Aiv. 1-3)
SWDPR 20			
SWDPR 20 Meeting the Needs of Travellers and Travelling Showpeople Part A	No comments received.	No comments received.	No comments received.
SWDPR 20 Meeting the Needs of Travellers and Travelling Showpeople Part B	No comments received.	No comments received.	No comments received.
SWDPR 20 Meeting the Needs of Travellers and Travelling Showpeople Part C	No comments received.	No comments received.	No comments received.
SWDPR 20 Meeting the Needs of Travellers	Andrew Bishop (621)	The plan should be revisited removing the need for another travellers site in Pinvin.	Comments noted regarding suggested location of Traveller site at Throckmorton strategic allocation.

and Travelling Showpeople Part D			
	Ridge and Partners obo Barwood Strategic Land II (703); Turley obo Summix, Homes England and Bellway (1486)	Overall, it has not been demonstrated the Strategic Allocations would be a suitable location to deliver additional Traveller sites, and indeed the recent experience at West of Worcester demonstrates that more detailed assessment is required before reliance is placed on the Strategic Allocations to deliver this need. The inclusion of this requirement is not considered to be justified or effective.	Comments noted. Worcestershire Parkway, Rushwick and Throckmorton are strategic allocations with a range of land uses and it would be remiss to exclude meeting the needs of Traveller on these sites. Additionally, it would be a failure of plan-making to leave the identification of Traveller sites to a later stage when this approach has so far failed to bring forward Traveller pitches at Worcester South and Worcester West.
	Sean Lewis (1170)	As part of the evidence to support the draft Traveller and Travelling Showpeople DPD, the stakeholder consultation reveals that the gypsy and traveller community has a preference to reside in semi-rural or rural locations, away from established settlements. Our clients therefore support the proposed location for the traveller and showpeoples sites at WP, situated to the east of the proposed Community Park in a semi-rural location.	Comments noted.
	Turley obo Bellway Homes Ltd (2261), (2270)	There is no evidence or justification for land north of the A4103 being proposed as a Traveller site for the Rushwick	Comments noted. The discussions are on-going between officers, the landowner, Bellway Homes and the

		<p>strategic allocation. Indeed, the land has never been promoted for this use and is not available for this use. The allocation of a Traveller site on this land should be deleted.</p>	<p>Travelling Showpeople community about delivering the site as proposed in the Concept Plan. This issue may be addressed via a Statement of Common Ground with the parties above.</p>
<p>SWDPR 20 Meeting the Needs of Travellers and Travelling Showpeople Part E</p>	<p>LRM Planning Ltd obo Bloor Homes and Hallam Land (393)</p>	<p>All of the land which is shown on the SWDP's Policies Map is subject to the various permissions granted, thus there is no residual land. But in any event the financial contributions that have been secured (towards the provision of new Traveller pitches) exceed the amount required for the 10 pitches identified in Policy SWDP45/2, Worcester West, in any event.</p> <p>Plainly the approach in RJ paragraph 7.10 does not reflect the circumstances that exist with the planning permissions at SWDP45/2. Accordingly, the reference to SWDP 45/2 should be deleted from Criterion E and paragraph 7.10 should be amended as follows: "Planning permissions granted at the West of Worcester strategic allocation SWDP45/2 have each included by way of a planning obligation financial contributions towards the costs of acquiring a site and installing infrastructure to provide a new or extend an existing Traveller Site. The financial contributions secured are equivalent to 10 pitches specified in</p>	<p>Comments noted. The reference to SWDP45/2 should remain in Part E unless all of the planning permissions on all of the developable land in SWDP45/2 Worcester West have been commenced.</p>

		Policy SWDP45/2 and contribute towards the requirement listed in Policy 20."	
	Maireed Stibbs obo St Modwen Properties Ltd (1818)	And a similar objection raised in regard to Worcester South.	Comments noted. The reference to SWDP45/1 should remain in Part E unless all of the planning permissions on all of the developable land in SWDP45/1 have been commenced.
	Matthew Williams obo Mr Roger Lethem (2698)	S106 monies has been agreed for a new Traveller site at SWDP45/1 Worcester South but no land identified. Respondent suggests new Traveller site at land off Broomhall Way (A4440), Worcester. Unless land at Broomhall Way is secured for a gypsy and traveller site, the Site Allocations DPD is unsound as it is neither justified or effective i.e. the council cannot dispense of their duty to identify a supply of deliverable Traveller sites to provide 5 years' worth of sites against locally set targets, and sufficient developable sites, or broad locations, for years 6 to 10 and, where possible, for years 11 to 15.	Comments noted.
SWDPR 20 Meeting the Needs of Travellers and	No comments received.	No comments received.	No comments received.

Travelling Showpeople Part F			
SWDPR 20 Meeting the Needs of Travellers and Travelling Showpeople Part G	No comments received.	No comments received.	No comments received.
SWDPR 20 Meeting the Needs of Travellers and Travelling Showpeople Part H	No comments received.	No comments received.	No comments received.
SWDPR 20 Meeting the Needs of Travellers and Travelling Showpeople (General)	Environment Agency (452)	No objections to selected sites and welcome the reference to the vulnerability of caravans to flood risk as detailed in the PPG.	Comments noted.
	Rous Lench PC (717)	Concerned that policy does not fit with PPTS definition and seek clearer definition as to who is regarded as a traveller.	Comments noted. Recent appeal decisions have suggested that, in light of the Lisa Smith Court of Appeal judgement, it is the accommodation needs for those who meet the ethnic definition that

			should be used to inform decision making. As a result of the judgement some appeal Inspectors consider that the PPTS definition is tainted by discrimination.
	Terra Strategic (1137)	Suggest a new Traveller site at Old Hills, Callow End in Malvern Hills.	Noted. Call for Sites consultations were undertaken as part of the production of the Traveller and Travelling Showpeople Site Allocations DPD. Site allocations to meet the identified needs of Travellers and Travelling Showpeople were subsequently identified and proposed in the DPD.
	CPRE (1255)	There should be an overriding policy that new GTAA sites should only be provided according to the same criteria as for the settled community, for example, not in Green Belt or open countryside. In the case of NL and AONB, subject to the same criteria that limit new houses for the settled community there.	Comments noted. New Traveller development has different requirements to housing and has its own national policy document PPTS which does not restrict new Traveller development beyond development boundaries but does require LPAs to strictly limit it in the open countryside that is away from existing settlements (para 25). It also states that (para 16) Traveller sites in the Green Belt are inappropriate development. Subject to the best interests of the child, personal circumstances and unmet need are unlikely to clearly outweigh harm to the Green Belt

			<p>and any other harm so as to establish very special circumstances.</p> <p>Also, to note (para 27) where LPAs cannot demonstrate a 5yrs of deliverable sites, this should be a significant material consideration when considering applications for the grant of temporary planning permission unless within e.g. Green Belt or AONBs.</p> <p>Furthermore, the council, in its site selection of Traveller sites, assessed each suggested Traveller site against a series of planning criteria – refer Further Revised Site Assessment Background Report (Sept 2022) South Worcestershire (swdevelopmentplan.org) and in the accompanying Sustainability Appraisal South Worcs TTSD SA Report 4 Oct 2022.pdf (swdevelopmentplan.org).</p>
	<p>Matthew Williams obo Mr Roger Lethem (2698)</p>	<p>In light of the Lisa Smith Court of Appeal judgement Case Number: CA-2021-001741 (31st October 2022) considers that the SWDPR should be seeking to meet the full need of ethnic travellers and not a reduced need as is currently identified in the South Worcestershire Gypsy and Traveller Accommodation Assessment Final</p>	<p>Comments noted. The council, in its site selection of Traveller sites, assessed each suggested Traveller site against a series of planning criteria – refer Further Revised Site Assessment Background Report (Sept 2022) South Worcestershire (swdevelopmentplan.org) and in the accompanying Sustainability</p>

		Report October 2019 and expressed in Policy SWDPR20.	Appraisal South Worcs TTSD SA Report 4 Oct 2022.pdf (swdevelopmentplan.org)
SWDPR 21			
SWDPR 21 Replacement Dwellings in the Open Countryside	No comments received on this policy	No comments received on this policy	No comments received on this policy
SWDPR 22			
SWDPR 22 Dwellings for Rural Workers	Mike Oakley. Rep ID: 143	Di and Dii are not the only circumstances in which an occupancy condition will be removed. Account should also be taken of other elements. Glossary definition of rural worker is unusual. The phrase 'pastoral worker' should be removed and replaced with 'other land-based occupation that requires a rural location' or similar.	Comments noted however these are the main circumstances where it may be acceptable to remove an occupancy condition. Comments noted regarding the glossary. This may be something the Inspector may like to consider at examination.
	Peter King, Campaign to Protect Rural England. Rep ID: 1256	Concerned that there is not a definition for Rural Enterprise Related Dwellings and would like to see a definition or further explanatory text so fisheries (fish farms) are included.	Comments noted. This may be something the Inspector may like to consider at examination.
	Parsonson Planning Rep ID: 1571	SWDPR22A is unsound as lacks precision. Contradicts SWDPr D Para 9.6 and Annex D all of which refer to need in the area/locality and seeks to control land ownership which is not a function of planning law or planning policy. Feel	Comments noted but the tying of new rural dwellings to the rural enterprise is in the adopted plan and is not considered unreasonable as the dwelling was granted permission because of the specifics

		occupancy conditions should not restrict occupation of a dwelling to a specific enterprise.	needs of the rural enterprise. There is not a contradiction with SWDPR22A Part D or Para 9.6 because this part of the policy is not considering new dwellings but existing rural dwellings with a restriction on them.
SWDPR 23			
SWDPR 23 Class C2 Housing for People with Special Needs	AONB Unit Rep ID: 438	Concerned about the absence of a reference to the AONB and the NL in the policies (as opposed to reasoned justifications to policies). To minimise risk and provide consistency between policies, request that the principles in Policy 19Avi (1-3) are also considered for inclusion in in this policy.	Comments noted. This may be something the Inspector may like to consider at examination.
	University of Worcester Rep ID: 608	The importance of purpose-build student accommodation should be recognised in the Policy to ensure that the need for PBSA can be appropriately met. Suggest adding in 'students' in part A.	Comments noted. This may be something the Inspector may like to consider at examination.
	Northwick Developments Limited Rep ID: 1430	It is uncertain the number of care homes that will be delivered over the plan period. Suggest that there should be specific allocations for older people's housing and should be stated in this policy for the development plan to be sound. Allocations will ensure that the housing needs of this particular sector are met.	Comments noted but where evidenced this exceptions policy enables the provision of specialist C2 housing to help meet an identified shortfall on sites outside of the development boundaries with good access to public transport, healthcare, shopping and other community facilities.

	Brodie Planning Rep ID: 1807	Suggests that policy should include use Class C3 for people with supported living needs. Use Class C2 does not capture those people in need of supported living, e.g. homelessness, drug and alcohol abuse, mental illness, and disabilities. The omission of supported living housing (Use Class C3) would fail to meet the social objective of sustainable development as set out in paragraph 8 of the NPPF	Comments noted. This may be something the Inspector may like to consider at examination.
SWDPR 24			
SWDPR 24 Reuse of Rural Buildings	Ms Louisa Davidson Rep ID: 623	Suggest in Part iii after 'full construction 'conversions using traditional building materials and methods'	Comments noted. This may be something the Inspector may like to consider at examination.
	Mr M Smith Rep ID: 1196	Policies 14, 24 & Annex B unnecessarily remaining unused/vacant to the detriment of the building/landowner/viability of any existing business and presupposes a new use and user would be compatible both in terms of existing uses in the immediate locality and legal/letting/tenant arrangements. In addition, the limitation on proposed policies for live/work units to be in proximity to a town or Cat 1, 2 and 3 settlements only is unjustified and too restrictive. It is contrary to NPPF para 60 which supports the provision of	Comments noted. This may be something the Inspector may like to consider at examination.

		<p>housing that meets the needs of groups with specific housing requirements. It is also contrary to NPPF paras 78 and 79 which taken together supports housing development that reflects local needs, and recognises that sustainable development in rural areas can include housing in one village where residents will support local services and facilities in another nearby.</p> <p>Proposed change: A. ix where the development would re-use redundant or disused buildings and enhance its immediate setting; or the development would involve the subdivision of an existing residential building; Marketing Requirements (SWDPR 11, SWDPR 14, SWDPR 22, SWDPR 24 and SWDPR 43) Annex B. Proposed change: Marketing Requirements (SWDPR 11, SWDPR 22, and SWDPR 43) Annex B. In addition the above, all associated references in the Reasoned Justification paragraph(s) to be removed or amended where necessary and appropriate.</p>	
	<p>Brodie Planning: Wendy Hopkins Rep ID: 1808</p>	<p>Policy is welcomed but is 'overly restrictive' and should in principle apply to all rural buildings to fully comply with policy set out in the NPPF in regard to building a strong, responsive and competitive economy, supporting a</p>	<p>Comments noted. This may be something the Inspector may like to consider at examination.</p>

		prosperous rural economy, making effective use of land, minimising waste and pollution and mitigating and adapting to climate change, including moving to a low carbon economy, boosting the supply of homes and specifically paragraph 80c. Therefore, suggest inclusion of all redundant or disused rural buildings not just those defined as traditional rural buildings.	
SWDPR 25			
SWDPR 25 Extensions to Residential Curtilages beyond a Defined Development Boundary	West Mercia Police Rep ID: 926	Welcome and support policy.	Support noted.
SWDPR 26			
SWDPR 26 Design	Rooftop Housing Rep ID: 547 / 642; Marches Homes Ltd Rep ID: 1019; Avant Homes Rep ID: 1150; Worcestershire Wildlife Trust Rep ID: 562; St Philips Ltd Rep ID: 2292;	Oversteps building regulations. Standards referenced in the policy should be targets and not requirements. Places additional onerous burdens on developers.	Comments noted. This may be something the Inspector may like to consider at examination.

	University of Worcester Rep ID: 614; Castlethorpe Homes Rep ID: 823; Holybrook Homes Rep ID: 1314		
	University of Worcester 614; ...	In appropriate to include named building industry standards, e.g., Homes Quality Mark in the policy. Better located in Reasoned Justification.	Comments noted. This may be something the Inspector may like to consider at examination.
	Fisher German 471; Rooftop Housing 547; Richborough Estates 944; Marches Homes Ltd 1019; Avant Homes 1150; Wyre Piddle Ltd 1358; Warndon Parish Council 1239; Summix Homes 1488; Owl Partnership 1569; Evesham Heights 1680; Marches Homes Ltd. 1651	Policy requires greater clarify/focus and is overly generic. There would be benefit in shortening the policy.	Comments noted. This may be something the Inspector may like to consider at examination.
	William Davis 1928;	Repeats NPPF and National Design Guide.	Comments noted. This may be something the Inspector may like to consider at examination.
	Rooftop Housing 547;	Criteria relating to gull and advertising control not appropriate for this policy and should be relocated elsewhere in the plan.	Comments noted. This may be something the Inspector may like to consider at examination.

	Worcestershire Wildlife Trust 563.	Specific concern raised to the gull control element of the policy. Worded to strongly, and not in accordance with relevant legislation and policy given some species of gulls are in decline. Alternative wording offered.	Comments noted. This may be something the Inspector may like to consider at examination.
	Worcester Civic Society 5.	Query emphasis on promoting contemporary design. Not justified or supported by NPPF/Building Beautiful Commission report.	Comments noted.
SWDPR 27			
SWDPR 27 - Biodiversity and Geodiversity	Hayley Fleming (Natural England) Rep ID: 834	Supports the inclusion of this policy. The policy could be further improved by adding a requirement for the provision of at least a 10% net gain in biodiversity. This will be set as a national requirement through the Environment Act. However, requiring this locally now would allow the local authority to explore and test application for BNG prior to legislative requirements, and avoid applications being submitted in a rush in advance of the mandatory roll out, which is expected next year. There is further evidence to support this, including example policies from other LPAs, on the Planning Advisory Service page on Biodiversity Net Gain in Local Plans and Strategic Planning.	Comments noted. This may be something the Inspector may like to consider at examination. However, it is likely that the 10% biodiversity net gain requirement will have become mandatory (November 2023) by the time the plan reaches the independent examination stage.
	John Mills (Cotswold Conservation Board) Rep ID: 511	In order to make the Plan legally compliant and sound, we recommend that Policy SWDPR 27 should require	Comments noted. This may be something the Inspector may like to consider at examination. However,

		development to: deliver a minimum of 10% BNG across the Plan area and, if viable, 20% BNG; deliver a minimum of 20% BNG across in the Cotswolds National Landscape and the Malvern Hills AONB. It may also be appropriate to require high (20%+) levels of BNG in areas that form the Plan areas nature recovery network.	it is likely that the 10% biodiversity net gain requirement will have become mandatory (November 2023) by the time the plan reaches the independent examination stage.
	Steven Bloomfield (Worcestershire Wildlife Trust) Rep ID: 563	Support this essential policy and the requirements it sets out for development. We believe that the policy requirements are justified by the evidence base presented by the councils and we welcome the references to LNRS, which will be live and important documents, to which development will need to respond, very soon. We make some minor recommendations for enhancements to the policy. Noting the requirements set out in the Environment Act 2021, we recommend that Part K be amended to read: " <i>Development must secure the effective management and monitoring of relevant biodiversity features, both on and off-site for a period of at least 30 years.</i> "	Comments noted. This may be something the Inspector may like to consider at examination.
	Steven Bloomfield (Worcestershire Wildlife Trust) Rep ID: 564	While we welcome the commentary set out in paragraph 2.1, we consider that it could be helpfully amended to better reflect the requirements of the Environment Act 2021. Section 102 of the act amends Section 40 of the	Comments noted. Minor mod: to paragraph 2.1 of the Reasoned Justification proposed to state:

		<p>Natural Environment and Rural Communities Act (2006) biodiversity duty so as to require public authorities to consider both the conservation and enhancement of biodiversity. Paragraph 2.1 should therefore be amended to reflect this strengthened biodiversity duty.</p> <p>While we welcome the intent of Paragraph 2.4 it is likely to be somewhat out of date in relation to the requirements of the Environment Act 2021 by the time the plan is adopted. With that in mind we recommend some amendments to wording below.</p> <p>While we welcome the commentary set out in paragraph 2.9, we consider that some minor amendments would help to clarify the requirements regarding lighting. We also believe that this would be a good place to provide guidance on dealing with the impacts of other pollutants in relation to biodiversity. We note that the adverse impacts of noise and other issues covered under SWDPR 31 only relate to the effect on human amenity. These forms of pollution may also have an adverse impact on flora and fauna and directly compromise the function of protected sites and ecological corridors. Accordingly, it</p>	<p>"2.1 Conserving and enhancing the natural environment is one of the NPPFs core planning principles and Section 15 sets out how planning policy should achieve this. The Natural Environment and Rural Communities (NERC) Act (2006) as amended by the Environment Act requires public bodies to have regard to the purpose of conserving and enhancing biodiversity. The Environment Act (2021) sets out the government's agenda for environmental reform and is considered key to delivering commitments made in the 25 Year Environmental Plan and achieving Net Zero Carbon Emissions by 2050."</p> <p>Minor mod: to paragraph 2.4 of the Reasoned Justification proposed to state: "2.4 The Environment Act (2021) places a statutory requirement on development to provide at least 10% Biodiversity Net Gain. A range of opportunities exist to help achieve this. In addition to required habitat gains, there is also an expectation that the built environment will achieve benefits for fauna through</p>
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		<p>would be helpful to provide guidance on the need to consider these issues in relation to biodiversity.</p> <p>We recommend that the paragraph 2.1 be reworded to read as follows. <i>"Conserving and enhancing the natural environment is one of the NPPFs core planning principles and Section 15 sets out how planning policy should achieve this. The Natural Environment and Rural Communities (NERC) Act (2006) as amended by the Environment Act requires public bodies to have regard to the purpose of conserving and enhancing biodiversity".</i></p> <p>We recommend that paragraph 2.4 be amended to read: <i>"The Environment Act (2021) places a statutory requirement on development to provide at least 10% Biodiversity Net Gain. A range of opportunities exist to help achieve this. In addition to required habitat gains, there is also an expectation that the built environment will achieve benefits for fauna through simple measures such as bird boxes or bat roosting features integrated into new buildings and new planting to support pollinators and/or to improve habitat connectivity. Site-wide biodiversity mitigation and enhancement schemes should seek to restore existing</i></p>	<p>simple measures such as integrated bird boxes or bat roosting features integrated into new buildings and new planting to support pollinators and/or to improve habitat connectivity.</p> <p>There is an expectation that biodiversity net gain will be built into development and a range of opportunities to achieve this exist. This could, for example, be as simple as through the provision of a bird box or bat roosting feature integrated into a new householder extension, new planting to support pollinators and/or to improve habitat connectivity. It could also be achieved through a specifically designed site-wide biodiversity mitigation and enhancement scheme restoring existing and creating new habitats, Site-wide biodiversity mitigation and enhancement schemes should seek to restore existing and create new habitats, whilst integrating sustainable drainage systems and building on enhancing ecological networks and assets in the area."</p>
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		<p><i>and create new habitats, whilst integrating sustainable drainage systems and enhancing ecological networks and assets in the area. Local Nature Recovery Strategies (LNRS), in delivering a Nature Recovery Network, will put spatial planning for nature on a statutory footing and will support important existing habitats and provide opportunities to create or restore others. LNRS can be used to help inform the most appropriate biodiversity net gain measures, where they apply. More detailed guidance will be provided through additional technical information and / or through an SPD."</i></p> <p>We recommend re-wording the paragraph 2.9 to read "<i>Outline Lighting Strategies or more detailed lighting schemes and boundary treatment shall be submitted with planning applications to demonstrate how dark corridors and permeability to wildlife will be achieved, as and where appropriate. Careful consideration of ecological corridors and of sensitive features for wildlife, such as designated sites of nature conservation value, woodlands, wetlands and watercourses (for example, as identified in the Worcestershire Habitat Inventory) should inform Lighting Strategies so as to avoid or minimise adverse</i></p>	<p>Minor mod: to paragraph 2.10 of the Reasoned Justification proposed to state: "2.10 Outline Lighting Strategies or more detailed lighting schemes and boundary treatment shall be submitted with planning applications to demonstrate how dark corridors and permeability to wildlife will be achieved, as and where appropriate. Careful consideration of ecological corridors and of sensitive features for wildlife, such as designated sites of nature conservation value, woodlands, wetlands and watercourses (for example, as identified in the Worcestershire Habitat Inventory) should inform Lighting Strategies so as to avoid or minimise adverse environmental impacts of artificial light. Details of lighting schemes and boundary treatment shall be submitted with planning applications to demonstrate how dark corridors and permeability to wildlife will be achieved, as and where appropriate. Lighting strategies on GI masterplans for larger schemes should also be</p>
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		<p><i>environmental impacts of artificial light. Submitted strategies and information shall follow currently recognised professional guidance. More detailed guidance will be provided through additional technical information and/or through an SPD."</i></p> <p>In addition, we recommend that further wording be added to the paragraph to pick up on other nuisances that may have an adverse impact on biodiversity. Drawing from commentary under SWDPR 31 we propose the following wording: "<i>Developers must consider whether habitats and species may be subject to any adverse environmental effects from exposure to the agents of nuisance -noise, light, odours, smoke, effluvia, etc. that have a potential to cause an adverse impact. Consideration should include direct impacts on individuals / species (such as the effect of noise on singing birds for example) and the potential for components of the local ecological network to be significantly compromised by these nuisances."</i></p>	<p>considered. Submitted strategies and information shall follow currently recognised professional guidance. The garden boundaries of new housing developments should be appropriately designed to ensure there is ecological permeability for wildlife species such as hedgehogs, nesting birds, roosting bats, invertebrates etc. This is to ensure the protection and enhancement of existing wildlife corridors and the provision of new connections across the site. Developers must also consider whether habitats and species may be subject to any adverse environmental effects from exposure to the agents of nuisance -noise, light, odours, smoke, effluvia, etc. that have a potential to cause an adverse impact. Consideration should include direct impacts on individuals / species (such as the effect of noise on singing birds for example) and the potential for components of the local ecological network to be significantly compromised by these nuisances. More detailed guidance will be provided through</p>
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			<p>additional technical information and/or through an SPD.”</p> <p>This may be something the Inspector may like to consider at examination.</p>
	<p>Sean Lewis Rep ID: 1173</p>	<p>The Environment Act 2021 establishes that a minimum of 10% BNG will be required from November 2023. Instead of seeking measurable net gains in biodiversity, the policy should set out that net gains to biodiversity are provided in accordance with the requirements of the above legislation.</p>	<p>Comments noted. This may be something the Inspector may like to consider at examination. However, it is likely that the 10% biodiversity net gain requirement will have become mandatory (November 2023) by the time the plan reaches the independent examination stage.</p>
	<p>Emily Barker (Worcestershire County Council) Rep ID: 1284</p>	<p>Schedule 14 of the Environment Act requires the effective maintenance of Biodiversity Net Gain secured through planning consent for a period of at least 30 years. Schedule 7A of the Environment Act is clear that the post-development biodiversity value of onsite habitats will, by virtue of planning condition, planning obligation or conservation covenant, be maintained for a period of at least 30 years after the development is completed. It would therefore appear prudent to modify Policy SWDPR27 to capture this expectation for maintenance of relevant biodiversity features.</p>	<p>Comments noted.</p> <p>Minor mod: to paragraph 2.5 of the Reasoned Justification proposed to state: "2.5 Local Nature Recovery Strategies (LNRS), in delivering a Nature Recovery Network, will put spatial planning for nature on a statutory footing and will support important existing habitats and provide opportunities to create or restore others. LNRS can be used to help inform the most appropriate biodiversity net gain measures, where they apply. The Worcestershire Habitat Inventory which, alongside site-</p>

		<p>Section 102 of the Environment Act amends Section 40 of the Natural Environment and Rural Communities Act (2006) biodiversity duty to as to require public authorities to consider both the conservation and enhancement of biodiversity. Paragraph 2.1 should therefore be amended to reflect this strengthened biodiversity duty.</p> <p>Similarly, Paragraph 2.4 of the Reasoned Justification appears outdated due to recent legislative changes. It would therefore be prudent to separate treatment of habitats (which will be managed towards achieving measurable Biodiversity Net Gain in compliance with Schedule 7A of the Environment Act) from those measures intended to benefit notable/protected fauna, such as integrated bird and/or bat boxes, invertebrate boxes and hedgehog highways in new developments. These should not be treated as interchangeable requirements.</p> <p>Additionally, to align with the explicit and quantifiable Biodiversity Net Gain target of >+10%, an expectation for measurable provision of measures which benefit wild fauna should also be articulated within the SWDPR.</p>	<p>specific ecology surveys, will assist in determining the pre-development biodiversity net gain 'baseline' values. More detailed guidance will be provided through additional technical information and / or through an SPD."</p> <p>This may be something the Inspector may like to consider at examination.</p>
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		<p>Local Nature Recovery Strategies (LNRS), in delivering a Nature Recovery Network, will put spatial planning for nature on a statutory footing and will support important existing habitats and provide opportunities to create or restore others. LNRS can be used to help inform the most appropriate biodiversity net gain measures, where they apply.</p> <p>Paragraph 2.4 continues to describe spatial aspirations for biodiversity. In the context of the preceding text, this has particular relevance in the scenario of biodiversity offsetting. However, the detail of spatially targeting nature recovery is then abrogated either to a forthcoming Local Nature Recovery Strategy, additional technical information and/or through an SPD. Consequently, the second part of Paragraph 2.4 doesn't add significantly to the value of prior text, and as such it could be separated into a subsequent new paragraph. Here, the SWDPR could helpfully steer developers to the Worcestershire Habitat Inventory which, alongside site-specific ecology surveys, will assist in determining the pre-development biodiversity net gain baseline values.</p>	
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		<p>Paragraph 2.9 of the Reasoned Justification appears to interchange terms lighting scheme and lighting strategy and in the absence of a glossary term this could lead to misunderstanding or misinterpretation as to the technical detail expected.</p> <p>While detailed guidance in a future technical informative or SPD is welcomed, it would be helpful to establish an expectation that sensitive ecological corridors (as identified in the Worcestershire Habitat Inventory) will be carefully considered, protected and enhanced through provision of an outline Lighting Strategy.</p> <p>The following new sentences, which could be appended to paragraph 2.9, will provide suitable detail to help clarify expectations for the creation and maintenance of measures protecting and promoting permeability for terrestrial wildlife: "<i>The garden boundaries of new housing developments should be appropriately designed to ensure there is ecological permeability for wildlife species such as hedgehogs, nesting birds, roosting bats, invertebrates etc. This is to ensure the protection and enhancement of existing</i></p>	
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		<p><i>wildlife corridors and the provision of new connections across the site."</i></p> <p>We note that Policy SWDPR31 controls unacceptable adverse impacts arising from these agents only upon residents, human health and amenity, and as such will not address effects of these pollutants on ecological receptors. Given these pollutants can cause direct and significant adverse impact as well as playing a role in undermining the cohesion and exacerbating severance effects on ecological corridors, it would be prudent to explicitly encapsulate these effects within the Reasoned Justification of SWDPR27.</p>	
	<p>Malvern Estates Rep ID: 1536; Marches Homes Rep ID: 1652; Evesham Heights Limited Rep ID: 1681; Deeley Homes Rep ID: 1755, 2392; Rooftop Housing Association (Rooftop Housing Group) Rep ID: 548; Harris Land Management Rep ID: 1836; Piper Homes Rep ID: 1879, 2080; St Philips Ltd Rep ID: 1980, 2048, 2173, 2295; Adam</p>	<p>We consider that biodiversity should have a standalone policy separately to geodiversity. We also consider that Net gains needs a target (of say 10%) and needs to specify what developments this would be applied to or relates to in order to be consistent with paragraph 16 of the NPPF.</p>	<p>Comments noted. This may be something the Inspector may like to consider at examination.</p>

	<p>Hewitt Ltd Rep ID: 2005; Millstrand Properties Ltd Rep ID: 2152, 2326; Wyre Piddle Ltd Rep ID: 3162; Hallow Stage 2 Ltd Rep ID: 3297; Areley Kings Ltd Rep ID: 3353; Stonebond Ltd Rep ID: 3449</p>		
	<p>Duncan Bridge (Malvern Hills Trust) Rep ID: 894</p>	<p>The interactive policy mapping on the consultation website completely omits the Malvern Common SSSI from the Environment / SSSI layer. This site, being in the ownership of the Malvern Hills Trust, is also protected under the Malvern Hills Acts, and lies within the Malvern Hills AONB. The boundary of this site should have been accurately shown in the mapping and, along with its associated Risk Impact Zones, properly considered in the development of several policies and elements of the SWDPR.</p> <p>Policy SWDPR 27 states that developments impacting SSSIs will not be supported unless there are wholly exceptional reasons and a suitable compensation strategy exists. The impact zones for this SSSI cover land that has been put forward for Employment Land allocation.</p>	<p>Comments noted.</p> <p>Minor mod: Mapping updates to the Malvern Hills Common SSSI.</p> <p>For all other points, these may be elements the Inspector may like to consider at examination.</p>

		<p>The background documentation for the site selection process for Employment Land allocations leading to the sites Park Farm (SWDP new 105 /CFS0117) and Land adjoining Blackmore Park (TBC /CFS0141b / MHPE05) does not appear to have included any proper consideration of Malvern Common SSSI.</p> <p>No suitable compensation strategy appears to have been considered in the site selection process. No reference to Malvern Common and Natural England's national guidance document for planners Impact Risk Zones for Sites of Special Scientific Interest appears in the background documentation to the Employment Site Allocation process.</p> <p>The Malvern Common SSSI should be accurately shown on the Policies Map.</p> <p>The site selection process for Employment Land Allocations should be repeated to properly consider Malvern Common in their assessments and the inclusion should be duly amended to recognise and eliminate any impacts of the allocations on the SSSI. Paragraph SWDP27E should be amended to bring it into line with national planning policy.</p>	
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		Development likely to have an adverse effect on nationally important sites, including a Site of Special Scientific Interest (SSSI) will only be considered where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest.	
	Proposed minor modification		Minor modifications to paragraph 2.7 of the Reasoned Justification proposed to state: "2.7 Biodiversity Metric 3.0 4.0 (as updated) has been developed by Natural England for DEFRA and provides a way of measuring and accounting for biodiversity losses and gains resulting from development or land management change. It is the recognised metric for measuring biodiversity, as proposed in the Environment Act (2021). Additionally, a Small Sites Metric (SSM) has also been designed to help calculate biodiversity net gain on smaller development sites."

			<p>Also update footnote 90 to <u>The Biodiversity Metric 4.0 - JP039</u> (naturalengland.org.uk) from The Biodiversity Metric 3.0 - JP039 (nepubprod.appspot.com)</p>
	Proposed minor modification		<p>Minor modifications to paragraph 2.11 of the Reasoned Justification proposed to state:</p> <p>"2.11 Urban Biodiversity Corridors have been identified within the city and towns of south Worcestershire as part of enhancing the wider green infrastructure and biodiversity networks. These corridors will continue help to protect existing biodiversity within the urban areas, provide opportunities for habitat restoration and creation, reaffirm the benefits of permeable, connected urban landscapes for wildlife and local communities and, alongside SWDPR 44 Green Space, help maintain the greening of the urban environment. These corridors, alongside other Green Infrastructure and biodiversity supporting components, will help to connect habitat fragments, allowing for</p>

			wildlife to move between spaces. A larger, more connected green infrastructure, allied with biodiversity networks (on both site specific and wider spatial scales), allows for more wildlife to be supported, improving biodiversity and species dispersal within the urban landscape.”
SWDPR 28			
SWDPR 28 The Cotswolds National Landscape and Malvern Hills Area of Outstanding Natural Beauty	Mr Paul Esrich (Malvern Hills AONB Partnership) Rep ID: 430 / 439 John Mills (Cotswold Conservation Board) Rep ID: 512 Hayley Fleming (Natural England) Rep ID: 835	There is no mention in the policy of the AONB management plans.	The policy already contains a reference to “good practice guidance produced by the Cotswolds Conservation Board and the Malvern Hills AONB Partnership”. This would include the AONB management plans.
	Mr Paul Esrich (Malvern Hills AONB Partnership) Rep ID: 430 / 439	Concern about the absence of a reference to the AONB and NL in the policies	The development plan must be read as a whole and repeating wording in different policies would be redundant.
	James Chatterton Rep ID: 1929 Adam Renn Rep ID: 2464	The policy fails to reflect the nuance contained in NPPF paragraph 177 and, therefore, is contrary to the NPPF and its key tests in relation to the NL / AONB	The policy wording is not exactly the same as the NPPF but does include an element of flexibility.
SWDPR 29			
SWDPR 29 Management of the Historic Environment	Summix, Homes England (1489); ...	Elements of the policy do not conform with the NPPF: <ul style="list-style-type: none"> Requirement to preserve and enhance conservation areas is not a requirement under the NPPF. 	Comments noted. This may be something the Inspector may like to consider at examination.

SWDPR 30			
SWDPR 30 Landscape Character	Mr Stephen Holloway Gleeson Land Rep ID: 472	The Policy should provide a clear and concise set of policies and circumstances which would commensurately necessitate the requirement for an LVIA	It is not appropriate to provide specific guidance in this policy as it would be over-prescriptive and lack the flexibility to deal with all cases.
SWDPR 30 Landscape Character	Stephen Goodenough (Malvern Civic Society) Rep ID: 590	Reference to SWDPR 8 within this section might be helpful	The plan is designed to be read as a whole, so reference to another policy would be redundant.
SWDPR 31			
SWDPR 31 Amenity	Sport England Rep ID: 217	Expand the policy so that where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity in respect of noise, light etc, the applicant (or "agent of change") should be required to provide suitable mitigation before the development is completed, in line with the wording of para 187 of the NPPF.	Comments noted. This may be something the Inspector may like to consider at examination.
	Richborough Estates Rep ID: 997, Rooftop Housing Rep ID: 550 / 645, Marches Homes Rep ID: 1022, Wyre Piddle Ltd Rep ID: 1361 / 3164, Malvern Estates Rep ID: 1538,	The Policy isn't needed as it repeats Building Regulations.	Noted. Building Regs are separate to the Planning Process and it is considered necessary to have the Policy in accordance with the NPPF.

	<p>Evesham Heights Ltd Rep ID: 1683, Deeley Homes Rep ID: 1757 / 2394, Harris Land Management Rep ID: 1838, Piper Homes Rep ID: 2082, St Phillips Ltd Rep ID: 2050 / 2175 / 2298, Millstrand Properties Ltd Rep ID: 2328, Hallow Stage 2 Ltd Rep ID: 3299, Arley Kings Ltd Rep ID: 3356, Stonebound Ltd Rep ID: 3452</p>		
	<p>Proposed minor modification</p>		<p>Minor mod: To amend the wording of part Di) to refer to sport and recreational purposes. To expand the policy so that where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity in respect of noise, light etc, the applicant (or agent) should be required to provide suitable mitigation before the development</p>

			is completed, in line with the wording of para 187 of the NPPF.
SWDPR 32			
SWDPR 32 Telecommunications and Broadband	<p>Vistry Group Rep ID: 2356, Lioncourt Homes Rep ID: 1947, Hollybrook Homes Rep ID: 1315, Home Builders Federation Rep ID: 693, Castlethorpe Homes Rep ID: 824, Gleeson Land Rep ID: 959, Savills Rep ID:</p>	<p>Supports the provision for full fibre gigabit capable network infrastructure Fibre but it must be assessed on a site-by-site basis as it depends on the proximity of services and is not always within the control of the developer to deliver and is also dependant on the infrastructure being available in the area to provide a connection to the site.</p>	<p>As is explained within the RJ of the Policy, in some exceptional locations outside urban areas, an equivalent alternate solution may be acceptable if developers are unable to facilitate an FTTP solution, although FTTP is the preferred option and the burden of proof lies with the developer as to why an alternative solution is required. In any case developers must, as a minimum, make sure that broadband services reach ultrafast speeds and are made available to all premises</p>
	<p>BDW South West Rep ID: 1509, Hollybrook Homes Rep ID: 1315, Home Builders Federation Rep ID: 693</p>	<p>This policy goes beyond the requirements of Part R of the Building Regulations and as such is not consistent with national policy meaning that it is unsound .</p>	<p>Comment noted – just because the Policy goes beyond the requirements of Building Regulations it does not make the Policy inconsistent with the NPPF or the Plan unsound.</p>
SWDPR 33			
SWDPR 33 Renewable and Low Carbon Energy	<p>Mike Oakley Rep ID: 146</p>	<p>Providing a detailed energy assessment for a 100sqm+ building is not feasible as it cannot reasonably demonstrate what the energy requirements for that extension will be (as it is internally connected to the existing building).</p>	<p>No change. Calculating energy requirement for 100 sqm extension can be undertaken. Installing renewable energy may make extension unviable.</p>

		Amend the policy to apply to new dwellings/ buildings over 100sqm	
	Hallow Parish Council (Hazel Kemshall) Rep ID: 383	Requirements for energy generated for renewable or low-carbon sources should be 100%	No change. 20% requirement has been costed and tested in Viability Assessment.
	Vistry Group (Joel Merris) Rep ID: 420; Gleeson Land Rep ID: 960; Castlethorpe Homes Rep ID: 825; Ainscough Strategic Land Rep ID: 1059; Lonestar Land Ltd (Reiss Sadler) Rep ID: 2430; Lonestar Land Ltd and Attorneys for Land Owners Fleming Rep ID: 1086; Sean Lewis Rep ID: 1178; Rose Farm Partnership Rep ID: 1770; Land Partnerships Development Ltd Rep ID: 1957; Potter Space (Jenna Strover) Rep ID: 2099; P L Marriott Estates Ltd Rep ID: 2203	Requirements for energy generated for renewable or low-carbon sources will impact on viability. Should be a 10% requirement.	No change. 20% requirement has been costed and tested in Viability Assessment. It is considered that in most instances the 20% requirement could be achieved through the installation of a single technology. Given that paragraph 155 of the Framework says that plans should provide a positive strategy for energy from renewable or low carbon sources and evidence indicates that a 20% requirement would not adversely impact on the viability of development, it is considered that SWDPR 31 would be justified and effective.

	<p>Cotswold Conservation Board (John Mills) Rep ID: 520</p>	<p>Where identifying suitable areas for wind development, the methodology should include a LVIA.</p>	<p>No change. Standalone renewable energy schemes (including wind turbines) should take account of guidance in Renewable & Low Carbon Energy SPD, which states that a LVIA must be undertaken.</p>
	<p>Rooftop Housing Association Rep ID: 551 / 646; Richborough Estates Rep ID: 998; Marches Homes Ltd Rep ID: 1023; Warndon Parish Council (Michelle Alexander) Rep ID: 1241; Wyre Piddle Ltd Rep ID: 1362 / 3166; Malvern Estates Rep ID: 1540; Evesham Heights Ltd Rep ID: 1684; Deeley Homes Rep ID: 1758 / 2395; Harris Land Management Rep ID: 1839; Piper Homes Rep ID: 2083; St Philips Ltd Rep ID: 2051 / 2299 / 2300; Adam Hewitt Ltd Rep ID: 2007;</p>	<p>Broadly supportive but Point B lacks definition in how to examine potential for DHN Point C needs to reference energy storage as part of the standalone energy and renewable carbon schemes</p>	<p>No change. 1. Renewable & Low Carbon Energy SPD explains how opportunities for decentralised energy should be examined. 2. SWDPR 33 relates to energy generation, not storage. Most large-scale electricity generating schemes likely to feed into the grid, not store energy</p>

	<p>Piper Homes Rep ID: 2083; Millstrand Properties Ltd Rep ID: 2329; Hallow Stage 2 Ltd Rep ID: 3300; Areley Kings Ltd Rep ID: 3357; Stonebond Ltd (RCA Ltd- Chris Lane) Rep ID: 3453</p>		
	<p>Canal & River Trust (Jane Hennell) Rep ID: 663</p>	<p>RJ should include consideration of canal water for heating and cooling</p>	<p>No change. SWDPR 33 cannot require consideration of canals for heating and cooling, but does not preclude them being considered.</p>
	<p>Castlethorpe Homes Rep ID: 825; Gleeson Land Rep ID: 960; William Davis Developments (James Chatterton) Rep ID: 1930; Lovell Partnerships Ltd Rep ID: 2022</p>	<p>Onerous burden on developers Should take into account Future Homes Standards/ building regulations</p>	<p>No change. SWDPR includes reference to the Future Homes Standard consultation. The consultation did not consider amendments to parts of Planning & Energy Act 2008 that enable LPA's to impose requirements related to proportion of developments predicted energy being sourced from renewable or low carbon energy.</p>
	<p>Ainscough Strategic Land Rep ID: 1059; Lonestar Land Ltd (Reiss Sadler) Rep ID: 2430;</p>	<p>Improving energy-efficiency through design should be enough to reduce energy required.</p>	<p>Renewable and low carbon energy relates to the supply of energy from renewable or low carbon sources and is measured in terms of the amount of energy generated (usually kWh). Energy efficiency relates to reducing the demand for</p>

	<p>Lonestar Land Ltd and Attorneys for Land Owners Fleming Rep ID: 1086; Rose Farm Partnership Rep ID: 1770; Jonathan Parkes Rep ID: 2567</p>		<p>energy to deliver the same service in buildings. The technologies and planning issues related to the generation of energy are very different from those related to energy efficiency. Energy efficiency is addressed by Building Regulations and Policy SWDPR 25. Policy SWDPR 33 relates to the generation of energy from renewable and low carbon energy sources. The Framework (paragraph 155) states that plans should provide a positive strategy for energy from renewable and low carbon energy and identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers. In addition to seeking to meet the requirements of paragraph 155 of the Framework, SWDPR 33 is a key means of promoting energy security for the future and reducing vulnerability to rising fuel costs. SWDPR 33 and a "fabric first" approach is considered to be complimentary. Using a fabric first approach, the predicted energy</p>
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			<p>requirement is reduced through energy efficiency and low energy design before meeting residual energy demand, first from renewable or low carbon sources and then from fossil fuels. Installing energy efficiency measures will mean that predicted energy requirement for a development will decrease. This, in turn, will reduce the level of renewable or low carbon energy generation necessary to meet the 20% requirement.</p>
	<p>Rural England (Peter King) Rep ID: 1273</p>	<p>Solar panels should be on roofs and above car parks not on agricultural land. Large solar arrays adjacent to new and expanded settlements are unacceptable.</p>	<p>Paragraph 155 of the Framework says that plans should provide a positive strategy for energy from renewable or low carbon sources. The South Worcestershire Renewable and Low Carbon Energy SPD identifies the issues, including agricultural land quality, that should be taken into account when determining solar farm planning applications. It should be noted that SWDPR33 highlights that micro-generation in new and existing developments offers the largest opportunity for renewable energy.</p>
	<p>Hollybrook Homes Rep ID: 1316</p>	<p>20% of predicted energy requirements is total predicted energy use (both regulated and unregulated).</p>	<p>The "predicted energy requirement" is the total predicted energy used in</p>

		<p>Unregulated energy is not included in Building Regs Part L and know of no other policies that expect this.</p>	<p>a building - i.e., both regulated and unregulated energy. Regulated energy is covered by the Building Regulations and includes that used for space heating, hot water, lighting, and to run pumps and fans. Unregulated energy is the remaining energy and includes that used to run appliances / equipment and for cooking. Unregulated energy use (used for cooking and appliances) typically accounts for 30 to 40% of energy consumption in a new build domestic dwelling. The adopted SWDP 27 relates to "predicted energy requirement" (i.e. regulated and unregulated energy) and it is proposed that SWDPR 33 do likewise.</p>
	<p>Landform Estates (Erik Pagano) Rep ID: 1466</p>	<p>Planning Policy should not seek to duplicate Building Regs</p>	<p>Paragraph 151 of the Framework say that plans should identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co- locating potential heat customers and suppliers. A heat network would only be required if it was practical and viable. It is recognised that if new residential development is built to the 2025 Future Homes Standard with lower</p>

			heat demand that a heat network is likely to be less viable.
Summix, Homes England and Bellway Homes Rep ID: 1490	Part B of Policy SWDPR 33 be modified as follows: B. Large scale development proposals mixed-use proposals including more than 1,000 dwellings should examine the potential for a decentralised energy and heat network. If the residential dwellings will be constructed to the 2025 Future Homes Standard then it is assumed that there is insufficient heat demand for such a network . If practical and viable, a decentralised energy and heat network should be provided as part of the development.	Paragraph 151 of the Framework say that plans should identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co- locating potential heat customers and suppliers. A heat network would only be required if it was practical and viable. It is recognised that if new residential development is built to the 2025 Future Homes Standard with lower heat demand that a heat network is likely to be less viable.	
Tesni Properties Rep ID: 1707	No national target in place and SWC should avoid setting outright standards that are not derived from national policy/ law.	The Planning and Energy Act (2008) allows local planning authorities' policies to impose reasonable requirements for a proportion of energy used in developments to be from renewable and low carbon sources in the locality of the development. The Building Regulations set out requirements for specific aspects of building design and construction, including maximum targets for carbon dioxide (CO2) emissions. SWDPR 31 relates to the supply / generation of energy from renewable or low carbon sources	

			(kWh). Requiring a proportion of a proportion of the developments predicted energy to be sourced from renewable or low carbon energy sources is not inconsistent with Building Regulations or NPPF.
SWDPR 33 Renewable and Low Carbon Energy	Bromford Development Rep ID: 1845 / 1904 / 2220 / 2239; DBL (Ian Humphries) Rep ID: 2197; BFP Developments Ltd Rep ID: 2252	Support requirements	Support noted
	Vistry Group Ltd Rep ID: 2357	Redraft policy to take account of Future Homes Standard and any further publications by the Government	The Building Regulations set out requirements for specific aspects of building design and construction, including maximum targets for carbon dioxide (CO2) emissions. SWDPR 31 relates to the supply / generation of energy from renewable or low carbon sources (kWh). Requiring a proportion of a proportion of the developments predicted energy to be sourced from renewable or low carbon energy sources is not inconsistent with Building Regulations or NPPF. The Reasoned Justification for SWDPR 33 includes reference to the Government's proposed Future Homes Standard.

			<p>The Government's Future Homes Standard consultation did not propose amendments to those parts of the Planning and Energy Act which enable local planning authorities to impose requirements related to a proportion of the developments predicted energy requirements being sourced from renewable or low carbon energy sources.</p> <p>The 5-year review period of the local plan will also allow for any further publications to be included in the future.</p>
	<p>Stock Green Residents & RWSFOG Rep ID: 2942</p>	<p>Renewable Carbon and Low Energy SPD (adopted July 2018) is out of date and should have been subject to a consultation at the same time as the plan. Failure to consult on the SPD is a breach of the SCI</p>	<p>In accordance with legislation (Town and Country Planning (Local Planning) (England) Regulations 2012), the councils undertook public consultation on the Renewable Carbon and Low Energy SPD, under Regulation 13, according to the following timetable:</p> <ul style="list-style-type: none"> • Commencement of evidence gathering / drafting of SPD - January 2017 • A consultation on a Scoping Report for this SPD from 13th February 2017 to 27th March 2017.

			<ul style="list-style-type: none"> • Public consultation (Regulation 13) for 6 weeks Friday 2nd February to Friday 16th March 2018 • Consideration of responses and redrafting of SPD, April to June 2018. • Adoption (Regulation 14) on 26th July 2018.
SWDPR 34			
SWDPR 34 Management of Flood Risk	Environment Agency (Graeme Irwin) Rep ID: 454	<p>With regards A-i the Functional Floodplain (3b) is defined within the PPG, and considered within the SFRA, and not directly by the Environment Agency.</p> <p>3b is not identified on the Flood Map for Planning. Developers should refer the Level 2 SFRA for information on the Functional Floodplain where available. As stated above the PPG was updated in August 2022 and this included an alteration to the 3b classification (now land having a 3.3% or greater annual probability of flooding). Following recent changes to the PPG, and in reference to A-i, Essential Infrastructure (that has passed the Exception Test) and Water Compatible development in 3b is now required (para 79 notes) to be designed and constructed to: remain operational and safe for users in times of flood; result in no net loss of floodplain</p>	Comments noted. This may be something the Inspector may like to consider at examination.

		<p>storage; not impede water flows and not increase flood risk elsewhere. Point A-ii should also confirm that residential development is permitted subject to, firstly, the Sequential Test and, only after consideration of alternative sites at a lower risk of flooding, passing the Exception Test. This could be reworded, similar to that included in the Policy at the Preferred Options stage, to read ~If the Sequential Test has been satisfied residential development in Flood Zone 3a (High Probability) can be permitted, subject to the proposal passing the Exception Test.</p> <p>Section C (Flood Risk Assessments) should include reference to the setting of appropriate floor levels. This could be a footnote to C-v which could reference the EAs Area Climate Change guide and our flood risk assessment guidance notes, similar to footnotes 127 and 128.</p> <p>Advise that, where appropriate, the site specific development could recommend contributions towards new or existing flood defence infrastructure maintenance and/or improvement where necessary and flood warning contributions where development is</p>	
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		<p>reliant upon that service, in accordance with the PPG tests for such obligations.</p> <p>In reference to point L caravans, mobile homes and park homes with a permanent residential use with Flood Zone 2 would also need to satisfy the Exception Test.</p>	
	<p>Fisher German (Steve Holloway) Rep ID: 473; Rooftop Housing Rep ID: 552 / 647; Richborough Estates Rep ID: 999; Marches Homes Rep ID: 1024; Wyre Piddle Ltd Rep ID: 1364 / 3167; Malvern Estates Rep ID: 1541; Evesham Heights Ltd Rep ID: 1685; Deeley Homes Rep ID: 1759 / 2396; Piper Homes Rep ID: 2084; Harris Land Management Rep ID: 1840; St Phillips Ltd Rep ID: 2052 / 2179, Adam Hewitt Ltd Rep ID: 2008;</p>	<p>The Policy is silent on 1 in 100-year flood risk scenarios. Guidance should be included in relation to this to ensure compliance with national policy, particularly NPPF paragraph 161.</p>	<p>Comments noted. This may be something the Inspector may like to consider at examination.</p>

	<p>Piper Homes Ltd Rep ID: 2084; Millstrand Properties Ltd Rep ID: 2330; Hallow Stage 2 Ltd Rep ID: 3301; Areley Kings Ltd Rep ID: 3358; Stonebond Ltd Rep ID: 3454</p>		
	<p>Canal and Rivers Trust Rep ID: 664</p>	<p>The policy justification should mention that the Canal and River Trust can provide flood risk data for our waterways. The Trust do not automatically require a minimum 8m access strip adjacent to the top of both banks. This should be mentioned as further clarification.</p>	<p>Noted. It will be considered whether or not to include this within the RJ.</p> <p>Minor mod: Remove ampersand from Canal and River Trust name throughout document.</p>
	<p>Rebecca Mclean (Severn Trent) Rep ID: 877</p>	<p>Regarding section H, it is recommended that it is specified that foul drainage is included within the drainage master plan and phasing plan. Regarding section J 2) we are supportive of this wording and encourage it to go further by including wording that emphasises that betterment may also include removing existing connections of surface water to the combined sewerage system. We recommend that the following policy wording is included in your plan to ensure that surface water discharges are connected in accordance with the</p>	<p>Comments noted. This may be something the Inspector may like to consider at examination.</p>

		<p>drainage hierarchy: Drainage Hierarchy Policy New developments shall demonstrate that all surface water discharges have been carried out in accordance with the principles laid out within the drainage hierarchy, whereby a discharge to the public sewerage system is avoided where possible.</p> <p>Supporting Text: Planning Practice Guidance Paragraph 80 (Reference ID: 7-080-20150323) states: Generally the aim should be to discharge surface water run off as high up the following hierarchy of drainage options as reasonably practicable: into the ground (infiltration); to a surface water body; to a surface water sewer, highway drain, or another drainage system; to a combined sewer.</p> <p>To enable planning policy to support the principles of blue green Infrastructure, biodiversity and protecting local green open spaces we recommend the inclusion of the following policies: Blue and Green Infrastructure Policy Development should where possible create and enhance blue green corridors to protect watercourses and their associated habitats from harm.</p> <p>Supporting Text: The incorporation of Sustainable Drainage Systems (SuDS) into blue green corridors can help to improve biodiversity, assisting with the</p>	
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		<p>wider benefits of utilising SuDS.</p> <p>National Planning Policy Framework (2018) paragraph 170 States:</p> <p>œPlanning policies and Decisions should contribute to and enhance the natural and local environment by: a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their Statutory Status or identified quality in the development plan); b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services “ including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland; c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate; d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures; Green Open Spaces Policy Development of flood resilience schemes within local green spaces will be supported provided the schemes do not adversely impact the primary function of the green space. Supporting Text: We understand the need for protecting Green Spaces, however open spaces can</p>	
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		provide suitable locations for schemes such as flood alleviation schemes to be delivered without adversely impacting on the primary function of the open space. If the correct scheme is chosen, the flood alleviation schemes can result in additional benefits to the local green space through biodiversity and amenity benefits. Water Quality and Resources Good quality watercourses and groundwater is vital for the provision of good quality drinking water.	
	Proposed minor modification		Minor mod: Reference to and further guidance on 1 in 100 year flood risk events to be given in reason justification.
SWDPR 35			
SWDPR 35 Sustainable Drainage Systems	Severn Trent (Rebecca Mclean) Rep ID: 875 Worcestershire Wildlife Trust (Steven Bloomfield) Rep ID: 566 Natural England (Hayley Fleming) Rep ID: 836 Savills (Sean Lewis) Bromford Rep ID: 1180	Generally Supportive	Support noted.
	Severn Trent (Rebecca Mclean) Rep ID: 875	Error of including a repetition of section ii) within section iii).	Minor mod: remove repetition.

		Set out some Policy wording regarding SuDs that can be added to existing Policy.	This might be something that the inspector wants to take into account at examination.
	Gleeson Land Rep ID: 961 Brandon Planning Rep ID: 2489	With density pressures SuDs are not always feasible. Major concerns with Part Ei requiring developers to secure long term maintenance of SuDs as cost may be passed on to residents.	Noted. Part Ei is in accordance with guidance provided by Water UK
	William Davis Rep ID:1932	Aii and Eiii are repetitive. The policy is too prescriptive in detail and places potentially conflicting guidance on how the approach to SuDS must be justified in conjunction with development, notably at F. As such, the policy is not clearly written or unambiguous, contrary to NPPF paragraph 16d, and is unsound.	Noted. It is not considered that the policy is overly prescriptive and neither does it offer conflicting guidance.
SWDPR 36			
SWDPR 36 Water Resources, Efficiency and Wastewater Treatment	Environment Agency (Graeme Irwin) Rep ID: 448 / 455	The Plan needs to be satisfied, supported by the WCS, that there is sufficient detail to confirm that the growth can come forward in the short, medium and long term. Development needs to be planned carefully so that it does not result in deterioration or further pressure on the water environment and compromise Water Framework Directive (WFD) objectives.	This might be something that the inspector wants to consider at examination.

		<p>It is imperative to ensure adequate foul drainage provision and infrastructure is provided so resultant development does not adversely affect the water environment.</p> <p>We have confirmed that we are satisfied that there are no likely significant barriers to growth from an environmental (water quality) waste water capacity perspective within the Plan period albeit that upgrades to some works will be required within the Plan period, in discussion with Severn Trent Water.</p> <p>The following minor modifications to the WCS (Phase 2) should be considered. Section 4.3.3 " This section correctly amends the detail for the Severn Corridor ALS following its update and re-publication subsequent to the Phase 1 study. However the maps for the tributary ALS catchments (Figs 4.3 to 4.6) will need amending in accordance with the changes to the ALSs mentioned above. Section 4.5.3 " The Phase 2 study updates the information relating to water stress to report that the classification for STWs strategic grid is ~ provisionally at serious water stress rather than moderate water stress for the purposes of water resource</p>	
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		planning. This is now confirmed rather than provisional; with further details available within the July 2021 Defra report.	
	Environment Agency (Graeme Irwin) Rep ID: 448 / 455	Minor modification proposed to Reasoned Justification text (5.2) could include reference to WFD data which is available from the Environment Agency's Catchment Data Explorer tool at: http://environment.data.gov.uk/catchment-planning/RiverBasinDistrict/9	Minor mod: to include suggested change to reasoned justification at 5.2
	Severn Trent (Rebecca Mclean) Rep ID: 879 / 1199	It should be considered that this is reworded to consider whether the Environment Agency will provide the licence for private treatment or the need to consider potentially long distances of new sewer to be laid at the developers cost to the nearest public sewer network. Within section 5.7 in the reasoned justification discusses the results of the WCS in identifying a number of Wastewater Treatment Works where ~Good Ecological Status cannot be achieved due to current technology limits and that developers should therefore use natural flood management to avoid a deterioration in status. This statement is fundamentally untrue, and we strongly recommend that it is removed.	This might be something that the inspector wants to consider at examination.

		Supportive of the use of water efficient design of new developments fittings and appliances and encourage the optional higher water efficiency target of 110 litres per person per day within part G of building regulations. Delivering against the optional higher target or better provides wider benefits to the water cycle and environment as a whole. Wording is recommended.	
	Gleeson Land Rep ID: 962 Brandon Planning Rep ID: 2490	Part A is a requirement of the water company and it is they who have an obligation to supply water to homes. The planning system should not be used to transfer that responsibility to the development industry. The requirement within Part F of the policy that all development will be required to incorporate grey water recycling into their proposals is unrealistic and expensive and should be deleted.	Noted.
	Cala Homes St Modwen Rep ID: 2367 / 3512	Part C of the Policy is not justified as it is repetition of Building Regulations. Wording changes are proposed for both C and F.	Noted.
SWDPR 37			
SWDPR 37 Air Quality	Hayley Fleming, Natural England Rep ID: 838	Natural England recommends that this policy / the reasoned justification specifically covers the impacts of air quality and aerial deposition / emissions on biodiversity (e.g. protected sites and	SWDPR37 requires air quality assessments are undertaken on the development types proposed in the response, with thresholds set to reflect a measurable impact.

		<p>ancient woodland). We suggest that the policy refers to the following development types that could impact on the natural environment include: ☐ new transport infrastructure likely to generate increased traffic ☐ new housing and commercial developments likely to generate increased traffic ☐ agricultural development likely to generate ammonia emissions ☐ energy generation. The reasoned justification could include reference to all assessments of air quality impacts on biodiversity should be carried out in accordance with Natural Englands guidance on assessing the implications of road traffic on European Sites. Reference could also be made to the Air Quality PPG</p>	<p>SWDPR 27 Biodiversity and Geodiversity address the implications of development on the natural environment alongside SWDPR 34 which addresses the aquatic environment.</p> <p>This may be something that the Inspector wants to consider at examination.</p>
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	<p>Richborough Estates Rep ID: 1000</p>	<p>We consider that SWDPR 34 and SWDPR 37 should be moved to section 6 Environmental Quality and Resources. We also note that point A(i) in SWDPR 34: Air Quality is missing some brackets which should be included as follows marked in bold: ~Where the site is Functional Floodplain (Flood Zone 3b) (as defined by the Environment Agency for both fluvial and pluvial flood risk). 2.59. We also note that this policy does not mention 1 in 100 year flood risk so some further guidance should be included in relation to this in order for the policy to be consistent with paragraph 161 of the NPPF.</p>	<p>Substantive matters raised refer to SWDPR 34 A(i) and not SWDPR 37 as stated in the comment.</p> <p>Proposes that SWDPR 37 should be moved to section 6. Noted.</p>
	<p>Campaign to Protect Rural England (Peter King) Rep ID: 1258</p>	<p>The policy should be expanded to cover both air and water pollution. The air quality policy should specifically mention ammonia, because this has not hitherto been a priority but should be. An assessment from the developers should be required of the effect of the disposal of waste generated by intensive units for poultry and anaerobic digesters (possibly other things too). This must show that the development will not worsen pollution in rivers and other watercourses. This must include indirect consequences, as a result of others disposing of waste generated by</p>	<p>Proposed air quality assessments referenced in the policy include a requirement for the assessment of ammonia. Specific mention is made of poultry units, and biomass boilers.</p> <p>SWDPR 34 includes policy for the "Protection and Enhancement of Water Courses" although there is not a specific reference to water pollution.</p> <p>This may be something that the Inspector wants to consider at examination.</p>

		the application site, in a manner which tends to worsen pollution.	
	Tesni Property Ltd Rep ID: 1715	SWDPR 37: AIR QUALITY Tesni does not agree with the requirement for an Air Quality Assessment for housing developments of 100 or more dwellings as this is not a national requirement and not justified by supporting evidence. Implementing this requirement could increase the risk of developments becoming unviable as there will be an additional cost and time taken to carry out the Air Quality Assessment.	The threshold for air quality assessment has been set based on the advice of air quality specialists and represents a fair and reasonable approach, with developments of this size being capable of having an impact on air pollution.
	Adam Henwitt Ltd Rep ID: 2009	SWDPR 34: Management of Flood Risk and SWDPR 37: Air Quality (Joint Comment) We consider that SWDPR 34 and SWDPR 37 should be moved to section 6 Environmental Quality and Resources. We also note that point A(i) in SWDPR 34: Air Quality is missing some brackets which should be included as follows marked in bold: I here the site is Functional Floodplain (Flood Zone 3b) (as defined by the Environment Agency for both fluvial and pluvial flood risk) . We also note that this policy does not mention 1 in 100-year flood risk so some further guidance should be included in relation to this in order for the policy to be consistent with paragraph 161 of the NPPF.	Substantive matters raised refer to SWDPR 34 A(i) and not SWDPR 37 as stated in the comment. Proposes that SWDPR 37 should be moved to section 6. Noted.

	St. Philips Ltd, Millstrand Properties. Rep ID: 2301	We consider that SWDPR 34 and SWDPR 37 should be moved to section 6 Environmental Quality and Resources. We also note that point A(i) in SWDPR 34: Air Quality is missing some brackets which should be included as follows marked in bold: Where the site is Functional Floodplain (Flood Zone 3b) (as defined by the Environment Agency for both fluvial and pluvial flood risk). .We also note that this policy does not mention 1 in 100 year flood risk so some further guidance should be included in relation to this in order for the policy to be consistent with paragraph 161 of the NPPF	Substantive matters raised refer to SWDPR 34 A(i) and not SWDPR 37 as stated in the comment. Proposes that SWDPR 37 should be moved to section 6. Noted.
SWDPR 38			
SWDPR 38: Land Stability and Contaminated Land	Environment Agency Rep ID: 456	Whilst no sites are located within SPZ1, they have asked for a cross-reference to their Groundwater Protection Position Statement in RJ or policy.	No development is proposed in SPZ1 and any development (such as windfall sites) that fall within SPZ1 would be subject to the EA guidance.
	Canal & Rivers Trust Rep ID: 666	Part B should consider that development may cause instability on adjoining land and remediation or controls on working practices should be considered.	Comments noted. Part B of this policy covers when development is proposed on or adjacent to unstable or potentially unstable land, and sets out that the applicant must submit an assessment that determines the stability of the site and details of proposed remedial, mitigation or treatment measures. Proposals will only be supported

			where land is, or can be made, suitable for the proposed use.
SWDPR 39			
SWDPR 39: Minerals and Waste Safeguarding	Johnson Brothers Rep ID: 706	The current wording of SWDPR39 places too great an emphasis on minerals infrastructure and waste management facilities without taking into account the size, scale, and specific function of the associated businesses. Parts C and E should be deleted as consideration of existing minerals infrastructure and waste management facilities can be addressed through B & D. Annex G contains a reference to SWDPR38 not SWDPR39	Minor mod: Annex G relates to SWDPR 39, not SWDPR 38 and update to ensure all site references are correct. No change regarding criterion B and D.
	Natural England Rep ID: 839	The policy does not consider soils so is out of line with NPPF para 174 (a & e) and the Government's 25 year Environment Plan. The policy should require soil resources to be conserved and managed in a sustainable way and require a Soils Management Plan to be produced with reference to DEFRA Code of Practice for the Sustainable Use of Soils on Construction Sites. This can be cross-referenced to SWDPR15.	It is considered that protection of soils and minerals safeguarding are separate issues and reference to soil protection / management in SWDPR 39 is not necessary to meet the tests of soundness.
	Natural England Rep ID: 839	There is also a missed opportunity to reference the restoration of minerals sites in line with GI aspirations. The GI Framework 3: Access and Recreation highlights opportunities from restoring sand and gravel extraction.	SWDPR07 Green Infrastructure Part C iv. states that on all other sites, developers will be required to prepare proportionate GI appraisals in consultation with the Local Planning Authority.

	<p>Worcestershire County Council Rep ID: 1286</p>	<p>Concerns over accuracy of terminology used in Part B of the policy. It would be inappropriate and disproportionate for Part B to extend to all areas of search as it would not be consistent with MLP 42 of the Minerals Local Plan Policy which provides for specific sites and preferred areas to be safeguarded.</p> <p>Further amendments to Annex G to ensure that all safeguarding requirements for all relevant SWDPR allocations are accurately recorded.</p> <p>Conflicts between solar farm developments and minerals resources. Those within or adjacent to a Minerals</p>	<p>An allocation is "land that has been identified for a specific use in the current development plan" (see SWDPR Glossary). "Areas of search" and "preferred areas" are extensive general designations, they are not allocations. "Areas of search" and "preferred areas" for minerals cover an estimated 20% of south Worcestershire, including most of the towns and larger settlements and it is not considered appropriate, proportionate or justified for all development proposals within these areas to undertake a minerals impact assessment. For clarity, and the avoidance of any doubt, it is considered that as part of the Duty to Cooperate discussions the Minerals Planning Authority should provide a map which clearly identifies the "minerals allocations" to which they consider SWDPRB would apply.</p> <p>Minor mod: Annex G needs to be updated to indicate which SWDPR allocations will be required to address minerals or waste safeguarding and which allocations have been ruled out from safeguarding through the Duty to</p>
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			<p>Cooperate process, Including proposed solar farms.</p> <p>The South Worcestershire Councils consider that there is not an obvious conflict between SWDPR 59 (Renewable & Low Carbon Energy Site Allocations) and minerals safeguarding. Solar farms would be granted consent on a temporary basis and by their very nature would not permanently sterilise mineral resources.</p> <p>Proposed solar farms within minerals or waste safeguarding areas may be required to assess the potential impact on sterilising mineral resources under SWDPR 39 (Minerals and Waste Safeguarding).</p>
	Gladman Developments Rep ID: 1442	Policy wording should be revised to ensure that the sterilisation of minerals by development sites is included within the planning balance rather than a blanket restriction on sites that may have impact.	Policy SWDPR 39 has been drafted in consultation with the Minerals Planning Authority (WCC) and seeks to be in accordance with the adopted Policy MLP 41 (Safeguarding Minerals Resources).
SWDPR 40			
SWDPR 40 Tourist Development	Malvern Civic Society Rep ID: 591, Malvern Hills Economy Officer	Concerns about impact of development and increasing levels of tourism. Impact of AirBnb on housing stock.	Policy SWDPR 40 relates to proposed new Tourism development, rather than proposed housing and employment

	Rep ID: 3400, and Residents		<p>allocations. Proposed housing and employment allocations have been subject to assessment against various contextual analysis/mapping as detailed in the SHELAA.</p> <p>Setting out a requirement that tourist accommodation is required to register with the Tourism Information Centre teams is beyond the scope of the South Worcestershire Development Plan.</p>
	Canal and Rivers Trust Rep ID: 667	To increase canal-based tourism, additional facilities may be required in areas where new development may not normally be welcomed under this policy.	Policy SWDPR 40 is to be read as part of the plan as a whole. Any proposal for additional facilities in areas where development is not normally welcomed will be determined against all policies within the plan.
	The British Horse Society Rep ID: 725	Promote equestrian access to support equestrian industry including tourism.	Policy SWDPR 40 makes appropriate provision for access for all model transports and that consideration is given to the delivery of alternative, easy and safe active travel routes to the site.
SWDPR 41			
SWDPR 41 Visitor Accommodation	Peter King Rural England Rep ID: 1259	Concerned wording of Part B is liable to open the conversion of farm buildings to accommodation with large extensions.	This has not been an issue in previous iterations of the development plan and can be managed at the planning application

		Not clear which items in list are compulsory and which are alternatives	stage through the use of planning conditions.
	Robert Jackson Rep ID: 2529	Remove constraint that development will only be permitted if not in Flood Zone.	Modification is not needed. This does not outrightly exclude seasonal campsites within the flood risk area but asks for an Exception test to be carried out. This also reflects Policy L in SWDPR 34 Flood Risk.
SWDPR 42			
SWDPR 42 Static and Touring Caravans, Chalets and Camping Sites (Holiday Accommodation)	Peter King Rural England Rep ID: 1260	Define what is meant by a small site as 30 units is not considered small. Recommend 5 as the limit for chalet/ semi-permanent structures. New policy for larger sites.	This policy is applicable to new small sites that are proposing up to 30 permanent pitches for the types of holiday accommodation listed in criteria A of the policy. When considering extensions under criteria B, a maximum of 30% uplift in pitches to the existing number on site will be considered to constitute small scale development for the purposes of this policy. This means the total number of pitches across the whole site would then not exceed 40 pitches in total.
	David Addison Rep ID: 354	Criticises requirement for secure cycle parking on holiday sites. Wording of SWDPR 42 Part A vii implies responsibility of sites to provide sustainable active transport routes.	There are a number of strategic travel corridors in south Worcestershire, and ensuring new holiday accommodation includes secure and sheltered cycle parking will allow for those arriving by bicycle to access these routes. Minor mod: Amend SWDPR 42 A vii:

			Change wording to 'easy, safe, and alternative travel routes to the site are encouraged, and that secure overnight cycle storage is provided'
SWDPR 43			
SWDPR 43 - Built Community Facilities	Mr Stuart Morgans (Sport England) Rep ID: 210	Amend the wording of the reasoned justification in paras 4.1 and 4.6 to reference any successor documents to the Playing Pitch and Outdoor Sports Facilities Strategy (2021) and the Indoor and Built Sports Facilities Strategy (2021), since the evidence of need will need to be updated/replaced before the end of the plan period to ensure this remains up to date and robust in accordance with the guidance in para 98 of the NPPF and Sport England's Assessing Needs and Playing Pitch Strategy Guidance.	Comments noted. Minor mod: to paragraphs 4.1 and 4.6 of the Reasoned Justification to refer to successor strategies of the Playing Pitch and Outdoor Sports Facilities Strategy (2021) and the Indoor and Built Sports Facilities Strategy (2021),
	Jem Teal (Community Development Officer, Wychavon District Council) Rep ID: 242	The current wording of SWDP 43 doesn't address discussions with developers related to the seeking of Off-site Built Sports contributions. Something similar to part F should be stated for built sports facilities. The South Worcestershire Councils have invested in a Built Facilities strategy highlighting the current state of play, including the requirements resulting from population	This may be something the Inspector may like to consider at examination.

		<p>growth and indeed we do set out the mechanism for quantifying required contributions by utilising Sport England's Facilities calculator, on page 150. For the provision of built sports facilities and built form relating to formal sports pitches/courts, due regard will be given to the Playing Pitch and Outdoor Sports Facilities Strategy (2021) and the Indoor and Built Sport Facilities Strategy (2021) in ascertaining the level and type of provision required so that provision can be appropriately altered or refined to take account of local circumstances.</p>	
	<p>Ms Rowan Gilbert (NHS Property Services Ltd) Rep ID: 743</p>	<p>In order to enable the NHS to be able to promptly adapt its estate to changing healthcare requirements, it is essential that all planning policies enable flexibility within the NHS estate. On this basis, NHSPS would advise the Council that policies aimed at preventing the loss or change of use of community facilities and assets, where healthcare is included within this definition, can have a harmful impact on the NHSs ability to ensure the delivery of facilities and services for the community.</p> <p>Where such policies are overly restrictive, and particularly where marketing periods are required, the</p>	<p>Comments noted. Emergency services are included under paragraph 4.2 of the Reasoned Justification as part of a list which outlines what comprises Built Community Facilities for the purposes of the policy.</p>

		<p>disposal of surplus and unsuitable healthcare facilities for best value can be prevented or delayed. This in turn delays vital re-investment in the NHS estate.</p> <p>Where it can be demonstrated that health facilities will be changed as part of a wider NHS estate reorganisation programme it should be accepted that a facility is neither needed nor viable for its current use.</p> <p><i>Alternative policy wording has been suggested by the consultee.</i></p>	
	Mr Mike Oakley Rep ID: 149	SWDPR 43 B should clarify that loss of part of a site that is a built community facility is also covered by this policy.	Comments noted. This may be something the Inspector may like to consider at examination.
	Mrs Sarah Blain (Land and Planning Coordinator Lioncourt Homes Ltd) Rep ID: 1948	Part F of this policy is questionable. Contributions to Community Centres and Village Halls will not be necessary for all developments over 10 dwellings. Whilst the formula behind the calculation is agreed, if there is not a need or recognised development scheme in which the money will be spent, it is questionable whether this part of the policy is CIL compliant.	<p>Comments noted. The policy states that provision should be made: "<i>in accordance with the relevant policy tests</i>".</p> <p>As per part G of the policy: "<i>Information relating to how the provision requirements set out in table 8 translate into a developer contribution will be set out in an update to the South Worcestershire Developer Contributions SPD</i>".</p>

			Footnote 154 states: <i>"For indicative provision requirements and associated costs, please refer to the Infrastructure Delivery Plan (2022)"</i> .
SWDPR 44			
SWDPR 44 - Green Space	Mr Stuart Morgans (Sport England) Rep ID: 211	<p>Sport England notes the various amendments that have been made to the wording of this policy since we made representations at Preferred Options stage, in particular to ensure that parts Bii), Biii) and Biv) accord with para 99 of the NPPF.</p> <p>However, we continue to have objection to part Bi) of the policy, which in our view is not consistent with para 99 of the NPPF since this would seem to permit other types of community uses that are not sport related (e.g. a medical centre, community hall, library, scout hut etc), and that in respect of proposals affecting playing fields, the wording of the policy would not be consistent with Sport England's Playing Fields Policy. Since only one of the criteria Bi)-Biv) inc would need to be met to comply with the policy, compliance with part Bi) and non-compliance with parts Bii)-iv) inc could result in permitting loss of playing fields for a (non-sports) community/recreational use to the</p>	This may be something the Inspector may like to consider at examination.

		<p>detriment of the loss of the use for sport, which may be unintentional, but would be permitted by the wording of the policy.</p> <p>It may be that this part of the policy is intended to address the provision of ancillary facilities (such as changing rooms, car parking etc) to the use of playing fields, but it does not expressly state this? In so far as the policy relates to a broad range of open space typologies, we can clarify that our objection in respect of Part Bi) solely relates to the potential implication for the loss of playing fields. To address this, we would recommend either that part Bi) of the policy be deleted or the policy wording be amended if this is intended to relate to ancillary facilities to the use of the green space.</p> <p>Alternatively, if Part Bi) is to be retained as currently drafted, that a footnote is added that in respect of playing fields that part Bi) of the policy does not apply and that the relevant criteria to be considered are parts Bii), Biii) and Biv) only. This will ensure the policy accords with para 99 of the NPPF and Sport England's Playing Fields Policy and Guidance.</p>	
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	<p>Hayley Fleming (Natural England) Rep ID: 840</p>	<p>Policies SWDPR 44 and SWDPR 45 set out standards of provision that are behind current thinking and will not deliver on the aspirations of SWDPR 07: Green Infrastructure. The open space standards set out in Table 9 fall short of Natural England’s recommendations regarding Accessible Natural Greenspace Standards (ANGSt).</p> <p>ANGSt was developed in the early 1990s and was based on research into minimum distances people would travel to the natural environment. ANGSt recommends that everyone, wherever they live, should have accessible natural greenspace:</p> <ul style="list-style-type: none">• of at least 2 hectares in size, no more than 300 metres (5 minutes walk) from home;• at least one accessible 20 hectare site within two kilometre of home;• one accessible 100 hectare site within five kilometres of home; and• one accessible 500 hectare site within ten kilometres of home; plus• a minimum of one hectare of statutory Local Nature Reserves per thousand population.	<p>This may be something the Inspector may like to consider at examination.</p>
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		<p>The ANGSt are currently being updated and are due to be published on the Green Infrastructure Framework - Principles and Standards for England website on 31st January 2023.</p> <p>We recommend you review the final publication version as it will future proof the draft version that was sent to you during earlier consultation. Reference should also be made to the Open space, sports and recreation facilities, public rights of way and local green space PPG.</p>	
	<p>L AND Q Estates Rep ID: 1718</p>	<p>The requirements of Policy SWDPR44 are considered to be extremely onerous where a development may involve the loss of an incidental area of landscaping for example, particularly where the requirements of Draft Policy SWDPR4 and the provision of 20/40% GI is requested. To enable greater flexibility and to ensure the delivery of new housing developments isn't unnecessarily impeded through an overly restrictive policy. This is particularly relevant in respect to phased/future developments which may look to extend upon existing developments following changing local circumstances for example.</p>	<p>The typology requirements relating to SWDPR45 fall within and form part of the overall green infrastructure percentage requirements set out under SWDPR07. Further, any new applicable green infrastructure secured under SWDPR07 (or related policies 27, 35, 36, and 45) will be designated and protected as Green Space, once implemented. The open space typology standards have been informed by the Open Space Assessment evidence base report (2019).</p>

		<p>It is suggested that Draft Policy SWDPR44 Part C is deleted and the relevant parts of SWDPR 7, 27, 35, 36 and 45 amended to reflect this change. As a minimum however it is considered that Part B should allow for replacement Greenspace to be incorporated within the provision of high-quality comprehensive GI/Greenspace as part of any new residential development with the emphasis being placed on quality not quantity of GI/Greenspace provision being delivered.</p>	
	<p>Bromford Developments Rep ID: 1844</p>	<p>Land South of Leopard Hill - WODEAL01 (SWDP 43/1). We note that the Regulation 19 consultation deallocates SWDP43/1 for residential development in the draft plan due to its impact on Green Space. The client team object to the allocation of the site for Green Space especially as there is a clear surplus for Green Space within Worcester City. It is considered that through design, the wider green space allocation would not be hindered and can still offer the associated qualities for existing and future residents.</p>	<p>Planning applications relating this site (this covers the remaining part of adopted site SWDP 43/1, as reallocated as part of SWDP Review site SWDP NEW 7 in the Regulation 18 consultation, prior to SWDP NEW 7 (WODEAL01) being deallocated in the Regulation 19 consultation) have been refused (20/00632/FUL, 21/00767/FUL) and application 20/00632/FUL was dismissed on appeal APP/D1835/W/21/3280719.</p>
	<p>Mrs Emma Foster (Spitfire Bespoke Homes Rep ID: 2122 Stuart Field</p>	<p>It is important that a pragmatic view is taken on the areas of Green Infrastructure (GI) to be protected as Greenspace under policy SWDPR44, and a blanket approach to protected new GI</p>	<p>The typology requirements relating to SWDPR45 fall within and form part of the overall green infrastructure percentage requirements set out under</p>

	<p>(L & Q Estates) Rep ID: 3256</p>	<p>is avoided. Given the lack of evidence base and onerous nature of this policy it is suggested that Draft Policy SWDPR44 Part C is deleted and the relevant parts of SWDPR 7, 27, 35, 36 and 45 amended to reflect this change. As a minimum, however, it is considered that Part B should allow for replacement Greenspace to be incorporated within any new residential development, with the emphasis being placed on quality not quantity of GI/Greenspace provision being delivered. See attachment for full representation.</p>	<p>SWDPR07. Further, any new applicable green infrastructure secured under SWDPR07 (or related policies 27, 35, 36, and 45) will be designated and protected as Green Space, once implemented. The open space typology standards have been informed by the Open Space Assessment evidence base report (2019).</p>
	<p>University of Worcester Rep ID: 581, 615</p>	<p>The University's land at its St Johns (off Henwick Road), at its Lakeside Campus (land adjacent to Top Barn Farm) and off Evendine Close (SHELAA site CFS0261, and indicated through the attached Title Plan) should not be identified as 'Open Space' for the purposes of draft Policy SWDPR44 in the SWDPR Policies Map.</p> <p>Notwithstanding the above, and in any event, in some circumstances built development such as in the form of supporting facilities and infrastructure can often form an essential component of recreational open space and playing pitch provision, and draft Policy SWDPR44 Part B) must recognise this within its wording to be sound.</p>	<p>Comments noted. No changes are proposed to the Green Space layer of the Policies Map in these locations.</p> <p>Built form related to proposals impacting green space will be considered on a case-by-case basis when assessing compliance with the policy as per SWDPR 44, part B.</p>

		<i>Alternative policy wording suggested by the consultee.</i>	
	<p>Mr Paul Rouse (Director, Savills) Rep ID: 795</p>	<p>There is inconsistency between the evidence base defining landscape character and the Greenspace boundary at the southern tip of Great Malvern east of Wells Road to the railway line.</p> <p>SWDPR03 D) requires development to be of appropriate scale and type with regard to landscape character cross referenced to SWDPR30 A) requires account to be taken of the Landscape Character Assessment (LCA), and development to integrate with the character of the setting, and to conserve and where appropriate enhance the primary characteristics defined in the LCA and important features of the Land Cover Parcel (LCP). Clearly then, LCP and the LCA are intended to influence and lead the form of development. Within the LCA, LCP MW38b is defined as urban area.</p> <p>Our related objection to the alignment of the settlement boundary explains that the settlement boundary should follow the southern boundary of LCP MW38b in the area east of Wells Road. For that same part of the defined urban area at the southern tip of LCP MW38b</p>	<p>Comments noted. No changes are proposed to the Green Space layer of the Policies Map in this location.</p>

		<p>outside the draft settlement boundary, the proposals map identifies part as white land without specific allocation, whilst another part is allocated as Green Space. Land between Wells Road and College Grove is therefore split between two designations, when that land has the same character and functions as a single holding and enclosure. They comprise a single area of land. The whole of that combined area is defined by the Councils evidence base as urban in character.</p> <p>Accordingly, there is no justification for part of the land to be allocated as Green Space.</p> <p>The proposals map should be amended to remove the Green Space designation from land which does not have a Green Space function within the urban area defined by LCP MW38b. The white land unallocated designation should extend over the land between Wells Road and College Grove in the area highlighted.</p>	
SWDPR 45			
SWDPR 45 - Provision of Green Space and Outdoor Community	Mr Stuart Morgans (Sport England) Rep ID: 209	Sport England supports the amendments made to policy SWDPR 45 in respect of expressly dealing with requirements for playing pitches separately under SWDPR 46.	Support noted. Proposed Changes (suggested by the SWCs): As policy SWDPR46 relates specifically to Playing Fields, the reference referring the Playing

<p>Uses in New Development</p>			<p>Pitch and Outdoor Sports Facilities Strategy (2021) is proposed to be removed from Part B of the policy. A footnote to part B of the policy is also to be added to make it clear that Table 9 of the policy has been informed by the South Worcestershire Open Space Assessment (2019). Paragraph 6.4 of the RJ is also to be removed from the policy as this also specifically relates to Playing Fields, which is covered by SWDPR 46.</p> <p>This may be something the Inspector may like to consider at examination.</p>
	<p>Hayley Fleming (Natural England) Rep ID: 841</p>	<p>Policies SWDPR 44 and SWDPR 45 set out standards of provision that are behind current thinking and will not deliver on the aspirations of SWDPR 07: Green Infrastructure. The open space standards set out in Table 9 fall short of Natural England’s recommendations regarding Accessible Natural Greenspace Standards (ANGSt).</p> <p>ANGSt was developed in the early 1990s and was based on research into minimum distances people would travel to the natural environment. ANGSt recommends that everyone, wherever</p>	<p>This may be something the Inspector may like to consider at examination.</p>

		<p>they live, should have accessible natural greenspace:</p> <ul style="list-style-type: none">• of at least 2 hectares in size, no more than 300 metres (5 minutes walk) from home;• at least one accessible 20 hectare site within two kilometre of home;• one accessible 100 hectare site within five kilometres of home; and• one accessible 500 hectare site within ten kilometres of home; plus• a minimum of one hectare of statutory Local Nature Reserves per thousand population. <p>The ANGSt are currently being updated and are due to be published on the Green Infrastructure Framework - Principles and Standards for England website on 31st January 2023.</p> <p>We recommend you review the final publication version as it will future proof the draft version that was sent to you during earlier consultation. Reference should also be made to the Open space, sports and recreation facilities, public rights of way and local green space PPG.</p>	
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	<p>Stuart Field (L & Q Estates) Rep ID: 1719, 3257</p> <p>Mrs Emma Foster (Spitfire Bespoke Homes) Rep ID: 2123</p>	<p>It is important that the draft Policy places emphasis not only on the quantitative provision but also qualitative provision and how new developments are able to deliver high quality green spaces or alternatively contribute towards the enhancement of existing green spaces where there is demonstrated to be a need for improvements. There should be flexibility within the policy to enable, where deemed appropriate, the provision of green space to be determined on a site-by-site basis.</p> <p>Further, where the draft policy requires 'large scale proposals' to deliver most typologies on site, further clarity is also required. The size of 'Large scale proposals' is not clearly defined within either the policy itself or the supporting policy text and therefore the provisions of the policy are unclear and ambiguous. It is unclear whether 'larger developer proposals' refers to 'Major Developments' of 10 units or more or whether this relates specifically to larger strategic housing developments.</p>	<p>Comments noted. The typology requirements relating to SWDPR45 fall within and form part of the overall green infrastructure percentage requirements set out under SWDPR07. Further, any new applicable green infrastructure secured under SWDPR07 (or related policies 27, 35, 36, and 45) will be designated and protected as Green Space, once implemented. The open space typology standards have been informed by the Open Space Assessment evidence base report (2019).</p> <p>'Large scale proposals' is to be considered as per the NPPF definition of major development ('For housing, development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more. For non-residential development it means additional floorspace of 1,000m² or more, or a site of 1 hectare or more, or as otherwise provided in the Town and Country Planning (Development Management Procedure) (England) Order 2015.'). Table 13.11 of the Infrastructure Delivery Plan (p191) provides an</p>
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		<p>There should be the ability for all new developments to provide off site contributions where on site provision is not considered to be viable.</p>	<p>indicative breakdown of Open Space Requirements.</p> <p>Part D of the policy states that "<i>in cases where it would be impractical or inappropriate to deliver all the open space typologies on site, developer contributions towards off-site provision will be sought and secured through legal agreement.</i>"</p>
SWDPR 46			
SWDPR 46 - Playing Fields	Mr Stuart Morgans (Sport England) Rep ID: 212	<p>Supports the addition of a separate policy for the provision of playing fields.</p> <p>In respect of part A of the policy, we would recommend a minor wording amendment to refer to the Playing Pitch and Outdoor Sports Facilities Strategy (2021) or to any successor strategy, since the PPOSS will need to be updated or replaced before the end of the plan period to remain robust and up to date in accordance with para 98 of the NPPF, and Sport England's Playing Pitch Strategy Guidance.</p> <p>Whilst we support the explanation provided in paras 7.1-7.4 that provision to meets the needs of the development could include both on site and/or off-site contributions, guided by the evidence in</p>	<p>Comments noted.</p> <p>Minor mod: to paragraph 7.2 of the Reasoned Justification proposed in order to refer to successor strategies of the Playing Pitch and Outdoor Sports Facilities Strategy (2021) and to add "Provision requirements will be established through Sport England's Playing Pitch Calculator tool" at the end of the paragraph to provide further context around the calculation of contributions.</p>

		<p>the PPOSS, the reasoned justification does not explain how such contributions are to be calculated.</p> <p>We would recommend adding reference to the Councils intended approach which could use Sport England's Playing Pitch Calculator Tool. The tool uses locally derived data from the Playing Pitch Strategy to calculate the demand generated by new developments, and then provides the estimated cost of meeting this demand through new provision using Sport England's annually updated cost guidance.</p> <p>We support Part B of the policy which accords with para 99 of the NPPF and is in general accordance with the wording of Sport England's Playing Fields Policy.</p>	
	<p>Mr Peter King (Campaign to Protect Rural England) Rep ID: 1261</p>	<p>This policy seems to proceed on the assumption that an indoor facility (such as a gym) might in some circumstances be an acceptable replacement for outdoor sports pitches. We consider that should not be the case. This is the basis on which countless school sports pitches were developed for housing in past decades, under discredited past policies. Add 'outdoor' to SWDPR 46.B.iii.</p>	<p>Comments noted. This may be something the Inspector may like to consider at examination.</p>
<p>SWDPR 47</p>			

SWDPR 47 Waterfronts	Jane Hennell (Canal and River Trust) Rep ID: 668	The policy could be improved by mentioning the elements that comprises good waterway design rather than referring to our guidance. Reference to SWDPR26 should be made.	Comments noted. Reference to guidance is considered sufficient, this is not an issue of soundness. The SWDPR should be read as a whole and therefore reference to other policies are not always necessary.
	Messrs Peter and Oliver Surman Rep ID: 1034	The policy should include reference to a scheme with an extant planning permission in Upton-upon-Severn	Comments noted. The policy makes reference to Upton-upon-Severn more generally, this is considered sufficient.
	Mr Peter King (Campaign to Protect Rural England) Rep ID: 1262	SWDPR47.A.ii-v should apply generally to developments on the banks of all major rivers as well as canals.	Comments noted. The policy relates to existing waterfront locations and the policy is considered sound without the need for further clarification.
SWDPR 48			
SWDPR 48 Marinas & Moorings	Mr Neil Cocksedge (Worcestershire Inland Waterways Association) Rep ID: 343	The policy should include provision for more environmentally friendly electric boats.	This is not a soundness issue and therefore it is not considered necessary to update the policy wording. A note in the RJ could be added to reference electric boats.
	Jane Hennell (Canal and River Trust) Rep ID: 669	The policy should make it clear when moorings do and do not require planning permission	Minor mod: RJ to be amended at 9.6 to make it clear that there is a difference between mooring a boat

			on the mainline canal or mooring facility.
SWDPR 49			
SWDPR 49 Residential Moorings	Mr Peter King (Campaign to Protect Rural England) Rep ID: 1263	The policy should be limited to sites adjacent to Category 3 villages and above.	The policy only supports residential moorings in urban locations or settlements or as part of a marina or basin. This is considered sound and amendments are not required.
	Jane Hennell (Canal and River Trust) Rep ID: 670	A(i) should be amended to include the Canal and River Trust's operational requirements as well as those of the EA	RJ 10.4 notes the guidance and policies published by the Canal and River Trust. This is considered sufficient.
SWDPR 50			
SWDPR 50 Equestrian Development	Mr Mike Oakley Rep ID: 152	The policy should make reference to loss of best and most versatile agricultural land.	Comments noted. The Plan should be read as a whole as this is noted in Policy SWDPR 03.
	Ms Wendy Bannerman (British Horse Society) Rep ID: 726 Mr Peter King (Campaign to Protect Rural England) Rep ID: 1265	It should be made clear that equestrian facilities will not be regarded as PDL.	It is not possible for the LPA to determine what will be considered PDL at this stage.
	Wendy Hopkins (Brodie Planning) Rep ID: 1809	Criterion vii is unrealistic and undeliverable. Most equestrian development will be located in areas that are not accessible by walking, cycling or public transport.	Vii relates only to commercial equestrian developments where it is expected that locational sustainability will be a material consideration.
SWDPR 51			
SWDPR 51 Worcestershire Parkway	Please refer to the separate	Please refer to the separate Worcestershire Parkway Table.	Please refer to the separate Worcestershire Parkway Table.

	Worcestershire Parkway Table.		
SWDPR 52			
SWDPR 52 Throckmorton SGA	Residents (Thomas McLoughlin) Rep ID: 80 (Josie Lovett) Rep ID: 83 (Robert Averis) Rep ID: 93 (Richard Wood) Rep ID: 97 (Mike Oakley) Rep ID: 101 (James Cannon) Rep ID: 147 (Diana Ward) Rep ID: 151 (Eric Jones) Rep ID: 186 (Richard King) Rep ID: 191 (Keith Hodgson) Rep ID: 231 (Patricia Smith) Rep ID: 277 / 325 (Ray Marsh) Rep ID: 280 (David Brown) Rep ID: 289	<p><i>Land contamination issues</i></p> <ul style="list-style-type: none"> Contaminated land (Foot and mouth burial site, MOD use, illegal waste dump). Landfill/ tip. The current Concept Plan is questionably viable because of the area of housing directly by the tip and also on farmland known to be contaminated (prosecutions for use as an unlicensed waste facility). Houses will be effected from the smell from the nearby landfill site. Houses will be built too close to foot and mouth burial site. A large part of the land for phase 1 at Ridgeway Farm is unsuitable for housing due to the amount of waste being tipped there. <p><i>Employment issues</i></p> <ul style="list-style-type: none"> Not enough employment Net loss of employment land <p><i>Surrounding settlements</i></p> <ul style="list-style-type: none"> Impact on surrounding settlements and coalescence of communities and villages. 	<p>The Concept Plan will be assisted by further masterplanning and consultation with relevant bodies that will ensure the Landfill site, Foot and Mouth Burial site, MOD site and Waste dump site are either not developed on or only developed after such a time where contamination will not impact the public. Appropriate buffers can also be utilised to ensure that contamination does not cause harm to future residents. It is not considered that leaving some of these parcels undeveloped will result in an unviable development</p> <p>In accordance with the SWDPR2 it is considered that there is enough Employment Land being delivered.</p> <p>With 6,000 new homes, employment land and other amenities and facilities being delivered at Throckmorton the immediate locality and area will</p>

	<p>(Steve Davies) Rep ID: 293 / 3265 (Fionan Nunan) Rep ID: 296 (Elizabeth Teasdale) Rep ID: 298 (Melanie Clemmey) Rep ID: 324 (Alastair Jones) Rep ID: 333 (Nigel Harrison) Rep ID: 336 (Sally Logan) Rep ID: 339 (Annabel Heath) Rep ID: 344 (Nigel Harrison) Rep ID: 336 (Belinda Whitehead) Rep ID: 346 (Sheila Clark) Rep ID: 348 (Mark Haynes) Rep ID: 347 (Mike Skull) Rep ID: 350 (Annette Bufton) Rep ID: 360 (Robert Teasdale) Rep ID: 361 (Richard Barrett)</p>	<ul style="list-style-type: none"> • Large scale urbanisation of the countryside. • Loss of identity • Impact on Pershore town centre • How will Pershore be able to market itself to tourists with a new town being built. • Pershore has recently had heavy development in the north • Tilesford hamlet missing from concept plan • Impact of construction on nearby residents and settlements <p><i>Traffic and Transport</i></p> <ul style="list-style-type: none"> • Increase in congestion and traffic, especially on A44. • Increase in air and noise pollution. • Public transport is poor and bus services inadequate. • Too far from train station. • Infrequent and unreliable train services. • Very few people will use sustainable transport to access train station. • No rail links to Stratford/Warwick/Coventry • Poor links to London. • There are no plans to dual the Cotswold railway line. 	<p>experience a change in character. Through detailed master planning and sympathetic design, it is considered that surrounding settlements and their character can be safeguarded and coalescence avoided by using Policy tools such as Green Space, buffers and Significant Gaps. It is not considered that the new settlement at Throckmorton will have a significantly detrimental impact on the character of Pershore.</p> <p>Transport modelling suggests that the local and wider strategic road network can accommodate the additional journeys that will be made. Furthermore, upgrades to Pershore railway station along with additional car parking, a shuttle bus service and cycle friendly active travel routes to and from the new settlement will encourage the use of more sustainable modes of transport. It is envisaged that with greater demand, there will be service improvements on the Cotswolds Line which will result in improved services to and from Worcester and London.</p>
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	<p>Rep ID: 369 (Edward Pearce) Rep ID: 357 (Joe Oxpsring) Rep ID: 376 (Pam McAdam) Rep ID: 493 (Nicola Merritt) Rep ID: 495 (Simon Price) Rep ID: 528 (Anthony Peachey) Rep ID: 543 (Andrew Bishop) Rep ID: 622 (Hamilton Comely) Rep ID: 747 (H Wylie) Rep ID: 808 (David Qubain) Rep ID: 882 (Clare Elwell) Rep ID: 1375 / 1377 / 2846 (Peter Carling) Rep ID: 1511 (Philip Rowe) Rep ID: 1615 (Kim Everett) Rep ID: 1656 (Jacqueline Davis)</p>	<ul style="list-style-type: none"> • The rail-focused strategy is attractive but is aspirational rather than backed with any active management plan. • Existing residents should be encouraged to make changes to their travel methods rather than waiting for several thousand more people to arrive. • People will use surrounding villages as a rat run. <p><i>Flood Risk/ Water Management</i></p> <ul style="list-style-type: none"> • Increase risk of flooding. • Site will increase surface water run off which will impact Piddle Brook and River Avon. • No fully developed flooding investigation has taken place with regard to development at the airfield and subsequent water flow into Piddle book. • Groundwater boreholes on site <p><i>Sustainability</i></p> <ul style="list-style-type: none"> • Most development in greenfield not brownfield. • No specific plans for site to be Carbon Neutral and how it will be achieved. • Loss of best and most valuable agricultural land 	<p>Improvements to the Cotswold Line are outlined in the County Councils LTP4.</p> <p>The vast majority of the site is located on areas of low flood risk and surface water flooding risk. Severn Trent, The Environment Agency and the Councils in house land drainage engineers have been consulted and SFRAs have also been completed. It is not considered that development of the site will cause a significant impact to flooding.</p> <p>The strategic settlement will develop both Greenfield and Brownfield sites. There is an energy statement being prepared that will explain how Carbon Neutrality will be achieved. During the Issues and</p>
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	<p>Rep ID: 1788 (J Robbins) Rep ID: 2126 (Carol Wood) Rep ID: 2516 (Andy Batchelor) Rep ID: 2517 (Karen Beard) Rep ID: 2520 (Anne Matthews) Rep ID: 2583 (Victoria Evans) Rep ID: 2597 (Allan Brown) Rep ID: 2606 (David Cox) Rep ID: 2636 (Thomas Underwood) Rep ID: 2658 (Gillian Thorne) Rep ID: 2673 (Stephen Preston) Rep ID: 2710 (James Fergusson) Rep ID: 2727 (Willie Arnold) Rep ID: 2734 (Matthew Lloyd) Rep ID: 2742 (Jeremy Taber) Rep ID: 2752</p>	<ul style="list-style-type: none"> • Loss of food production • Prefer to have 2000 homes dispersed throughout settlements instead of one new settlement. • The selection of the site does not conform to the criteria and scoring as outlined in the 2021 Sustainability Report for identifying appropriate locations for development of such scale. • Site already contains renewable energy provision nearby- why is more needed? • Brownfield first approach needed • Land for Phase 2 would be better utilised for supplying the nearby biomass plant • Previous planning applications on site refused • Sustainability Report 'discredited' • How will Zero Carbon be achieved? Will carbon offsetting off-site be allowed? Which neutral body will oversee monitoring? <p><i>Heritage</i></p> <ul style="list-style-type: none"> • Will destroy local character and historic environment • Harm to heritage assets. • Iron Age Fort and Roman Farmstead 	<p>Options, it was decided that the best strategy for south Worcestershire to accommodate further growth would be via a rail based strategy. Throckmorton scored particularly highly when choosing strategic locations to accommodate the aforementioned growth.</p> <p>Master and Concept Planning have and will continue to seek to safeguard the special quality of the</p>
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	<p>(Maureen Williams) Rep ID: 2788 (Noeleen Taber) Rep ID: 2798 (Dr. Rosemary Rowe) Rep ID: 2800 (Derrick Barker) Rep ID: 2842 (Clare Elwell) Rep ID: 1375 / 1377 / 2846 (Hilary Hornbrook) Rep ID: 2857 (Michael Morris) Rep ID: 2866 (Gillian Griffin) Rep ID: 2918 (Christopher Churchill) Rep ID: 2932 (David Nuttall) Rep ID: 2934 (John Tarplee and Natalie Jones) Rep ID: 2945 / 3028 (Karen Morel) Rep ID: 2962 (John Scott) Rep ID: 2964 (Peter Burnham) Rep ID: 2989 (Margaret Cashmore)</p>	<ul style="list-style-type: none"> • Harm to national significant Archaeology on the site which is naturally significant "Roman and Bronze Age settlements". These should be scheduled monuments. • Is the plan sound against the prohibitive costs of both the Archaeological digs and the extensive decontamination that will be required for the proposed site? • Need for archaeological investigation <p><i>Infrastructure</i></p> <ul style="list-style-type: none"> • Development will overwhelm infrastructure including sewerage, water, schools, and healthcare. • Questions over timing of infrastructure delivery- should be in place in before housing • There is nothing in SWPDPR52 to ensure that the Strategic Infrastructure and Improvements will be delivered before a quantifiable number of houses. • Nothing says how many houses can be built before the strategic infrastructure or improvements. • How is the movement (roadway) infrastructure going to be funded and delivered ahead of the housing? 	<p>nearby historic environment and heritage assets through sympathetic design and, where necessary, using buffers to ensure no harm is done to the surrounding historic environment. Archaeological costs have been taken into consideration by landowners and further investigative works will commence at the application stage.</p> <p>The IDP can be read in tandem with the Concept Plan and sets out how various infrastructure that will be required to deliver the Strategic Expansion at Throckmorton will be phased and funded. This includes schools, healthcare, sewerage, transport, highways.</p>
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	<p>Rep ID: 3014 (Chris Middlebrook)</p> <p>Rep ID: 3018 (Richard & Gill Buttle)</p> <p>Rep ID: 3027 (John Tarplee and Natalie Jones)</p> <p>Rep ID: 2945 / 3028 (Beverly Churchill)</p> <p>Rep ID: 3041 (Gary Robinson)</p> <p>Rep ID: 3054 (Graham Avison)</p> <p>Rep ID: 3064 (Gillian Thorne)</p> <p>Rep ID: 2673 (Peter Chatterton)</p> <p>Rep ID: 3096 (Lisa Yeates)</p> <p>Rep ID: 3106 (Michael Newitt)</p> <p>Rep ID: 3173 (Christopher Oakley)</p> <p>Rep ID: 3189 (John Kellett)</p> <p>Rep ID: 3237 (Steve Davies)</p> <p>Rep ID: 293 / 3265 (Helen Oldham)</p> <p>Rep ID: 3276 (Vanessa Charles)</p>	<ul style="list-style-type: none"> • How are offsite infrastructure improvements going to delivered and funded? Whats the strategy for ensuring future developers pay for this and implement it ahead of starting? • The site would be in direct competition with Parkway affecting the commercial viability of both the sites. • Schools on site may not be able to accommodate or be first choice for parents resulting in pressure on existing schools and commuting by car. • Lack of GP surgery <p><i>Ecology</i></p> <ul style="list-style-type: none"> • Loss of woodland and trees • Loss of rare unimproved grassland • Impact on rare migrating birds • Impact on bats and other protected species <p><i>Landscape</i></p> <ul style="list-style-type: none"> • Impact on surrounding landscape • Increased light pollution <p><i>Design</i></p>	<p>Ecological and Landscape experts have been consulted throughout the Concept Planning process and will continue to be consulted into the application stage to ensure woodland, trees, grasslands and species are protected. They will also ensure that the surrounding landscape is protected and that Throckmorton’s impact on the landscape is limited whilst also ensuring the design of the</p>
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	<p>Rep ID: 3316 (Richard Charles) Rep ID: 3320 (Nigel Balchin) Rep ID: 3323 (ME Hayes) Rep ID: 3371 (Mary Arnold) Rep ID: 3376 (Mary Rimell) Rep ID: 3377 (William Arnold) Rep ID: 3380 (Tim Cole) Rep ID: 3407 (Paul Jeanes) Rep ID: 3466 (Nigel Smith) Rep ID: 3560</p>	<ul style="list-style-type: none"> • New development is often poorly designed and not in keeping with surrounding areas and heritage 	<p>settlement itself is in keeping with the locality.</p>
	<p>Worcestershire County Council Rep ID: 1294 / 1320 / 1332 / 1334</p>	<p><u>Phasing</u> WCC considers that in order to promote and maximise self-containment within the settlement, understanding the phasing of land uses and how it is intended for the development to be managed within the first phase of delivery up to 2041, will be critical. The intended phasing of the first 2000 homes to be brought forward in this Plan period, alongside employment land, other on-site land uses and the delivery of on-site transport infrastructure will</p>	<p>Comments on Phasing are noted.</p>

		<p>need to be included in the transport assessment, with any necessary development phasing requirements and wider transport infrastructure improvements signposted in policy SWDPR 51 and included within an updated IDP. WCC accepts that the proposed car park could attract car-based travel to the Railway Station, and this will need to be included within the updated transport assessment and evidence base.</p> <p><u>Transport</u> WCC notes the absence of a policy requirement regarding a transport monitor and manage strategy or approach for Throckmorton Airfield and requests clarification in this regard. WCC welcomes the signposting to a development management strategy for the Throckmorton Airfield in Policy Requirement F. However this requirement may benefit from revised wording which more positively provides the criteria for planning permission to be granted, such as new development will only be permitted where appropriate opportunities to promote sustainable and active transport modes can be, or have been, taken up. WCC requests clarification as to how strategic policy SWDPR 06: Transport</p>	<p>Noted. The inspector may wish to consider adding a Policy requirement to add a transport monitor and manage strategy.</p> <p>Noted. The inspector may wish to consider revised wording for Requirement F.</p>
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		<p>(requirement M), SWDPR 09: Infrastructure, SWDPR 64: Implementation and Monitoring, and SWDPR 52: Throckmorton (requirements D(xii) and G) are intended to work together.</p> <p>WCC continues to work with the District Councils and National Highways to progress the transport evidence base supporting the SWDPR and anticipates that further and more comprehensive transport assessment work, utilising the CTM, will be reported in the New Year. It is intended that this work clearly distinguishes between the quantum of development to be brought forward through the SWDPR Plan period up to 2041, and the wider vision for further development of Worcestershire Parkway and Throckmorton Airfield beyond the Plan period. The requirement for site specific infrastructure and interventions necessary to successfully deliver the sustainable development of each SGA should be clearly identified and/or signposted within the relevant site allocation policy and included with an updated IDP.</p> <p>Several links and junctions, particularly those around Worcester and Evesham, are already constrained at peak times, resulting in adverse congestion and safety impacts. In accordance with the</p>	<p>The comments on the Transport Assessment work are noted.</p>
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		<p>NPPF 2021 and emerging strategic transport policy SWDPR 06: Transport, WCC would take the view that any new development which results in a severe congestion or unacceptable highway safety impacts would be required to bring forward necessary transport infrastructure/interventions to mitigate those impacts to an acceptable level. The transport evidence base will need to consider the impact of the proposed allocations, including residual allocations still to be brought forward, on the highway network across the South Worcestershire Plan area and identify any required improvements over and above those already planned and committed. Any necessary infrastructure improvements should be included within an updated IDP/transport strategy and clearly signposted in Plan policy. As we work to progress the transport evidence base and subsequent transport strategy for the SWDPR, we will also consider how the delivery of development across the Plan area will be managed such that necessary infrastructure is in place in a timely manner to ensure severe and unacceptable safety impacts do not occur on the highway network. The early transport evidence and assessment, contained within</p>	<p>The comments on transport infrastructure/interventions to mitigate impacts are noted.</p>
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		<p>Publication Evidence, provides an indication of those areas of the highway network that are likely to be a key concern, where strategic site allocations along the principal county highway network could significantly increase demand at constrained junctions and links, particularly during network peak periods. Work is continuing with the District Councils and National Highways to identify those locations where severe and unacceptable highway safety impacts may occur as a result of planned new development and to identify the necessary sustainable transport and highway interventions required to support the successful and sustainable delivery of the Plan.</p> <p><u>Ecology</u> Re-iterate that the proposed close co-location of development next to botanically important and sensitive grasslands will present risk of future conflicts of use which could, if unmitigated, undermine the ability to maintain, restore and improve the grasslands biological value if public access and recreational pressures are unmanaged. We therefore recommend inclusion of an explicit expectation that the development ensures planned management of adverse anthropogenic</p>	<p>Comment on close co-location of development next to grasslands is noted. The Inspector may wish to consider the proposed additional Policy wording.</p>
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		<p>effects on priority habitats present. This could be secured either within Reasoned Justification or, more preferably, within policy SWDPR52.D.x.2.</p> <p><u>Archeaology</u></p> <p>There are a number of medium and high-risk areas within the proposed development and further work must be done to understand the costs, viability and appropriateness of developing those areas. There are also concerns around the setting of the historic village of Throckmorton and the scheduled monument: Moated site and medieval settlement remains at Throckmorton (national ref: 1016938). The plan has largely mitigated this risk through the allocation of open space adjacent to the village, but development is still within the proximity, and there is a risk of further below-ground archaeological remains associated with the designated medieval settlement. There is a high-risk that archaeology of national significance will be identified within the plan area. The full nature and extent of such archaeology has not been defined. National Planning Policy Framework (200: footnote 68) makes clear that substantial harm or loss of undesignated remains deemed to be of equivalent status to a scheduled monument shall be wholly exceptional. There is also a</p>	<p>The comments on Archaeology are noted. The allocation is supported by a Heritage Risk Register, Wider Site Heritage Appraisal and a Heritage Site Appraisal. The Masterplan has sought to reduce risk where possible by making use of open space but it is accepted that there may be some Archaeological risk to development. It is considered that this can be mitigated at application stage.</p>
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		<p>risk that archaeology may be deemed of less than national significance, but still of a complexity and density that results in mitigation through excavation being prohibitively expensive. Further, the impact of more detailed archaeological evaluation may be that the proposed number of houses is not deliverable, which will impact on the viability of the allocation by making it unviable in current form and infrastructure aspirations.</p> <p><u>Concept Plan</u> Development in the southern part of Parcel 1, eastern part of Parcel 5 and Northern part of Parcel 6 will harm the setting of the existing settlement of Throckmorton. The Throckmorton Concept Plan has largely avoided this risk through the allocation of open space provision, with the exception of Parcel 5 where the plan shows both an area of residential development and a school immediately adjacent to western bounds of the existing settlement of Throckmorton.</p>	<p>The comments on the Concept Plan are noted. It is considered that Throckmorton village is sufficiently safeguarded from development. The Concept is only a Concept and will be refined and changed through the Master Planning process.</p>
	<p>Sport England (Stuart Morgan) Rep ID: 201</p>	<p>Support clustering and co-location to encourage linked trips</p> <p>Support reference to developers being required to demonstrate maintenance and management of these facilities</p>	<p>Comments noted.</p> <p>Minor mod: Policy to be updated accordingly.</p>

		<p>Support reference to Sport England calculator tools</p> <p>Support reference to part xii) to securing new contributions</p> <p>Would like to engage further in respect of IDP</p> <p>Add reference to sport and recreation facilities to Part G of the policy.</p>	
	<p>Ann Dobbins (Pershore PC) Rep ID: 193</p>	<p>No mitigation against Throckmorton village or Pershore.</p> <p>Cumulative traffic generation of both Throckmorton and Parkway have not been taken into account.</p> <p>There is a lack of infrastructure in Phase 1 which will impact services in Pershore, particularly medical services and Schools.</p>	<p>Comments noted. Traffic generation has been factored in and will be further understood and outlined once further modelling has been received. Infrastructure provision, including the need for schools, has been considered in consultation with County Council.</p>
	<p>Neil Hansen (Highways England) Rep ID: 268</p>	<p>The site impact the SRN. Highways England must be consulted on this.</p> <p>Suitable mitigation measures may be needed to mitigate impact on SRN with assessments needing to cover wide area.</p> <p>National Highways are working with SWCs to understand the cumulative</p>	<p>Comments and support noted.</p>

		<p>transport implications of the site allocations.</p> <p>Welcome the wording of the Regulation 19 document that states "Transport Assessments and Travel Plans are required for all major developments."</p> <p>Transport Assessments will need to be agreed at application stage.</p> <p>Welcome sections in the policy which relate to infrastructure requirements.</p> <p>Welcome plans for developments to provide electric vehicle charging infrastructure.</p> <p>Aware that the developers consultant and WCC are planning to use a combination of the Worcestershire Transport Model (WTM), Pershore and Evesham models for the traffic evidence base at this site, but that discussions are ongoing about the potential use of the county wide model.</p>	
	<p>Naunton Beauchamp Parish Council Rep ID: 401</p>	<ul style="list-style-type: none"> • Will have a significant impact on the residents and farms in and around Naunton Beauchamp. • The strategic growth area boundary falls within 1km of the curtilage of the village and the additional traffic during and after 	<p>The Throckmorton new settlement will inevitably change the character of the area and this includes in and around Naunton Beauchamp. However, through the use of buffers, significant gaps and open green space, it is envisaged that the</p>

		<p>construction will have a detrimental impact of the village and surrounding countryside.</p> <ul style="list-style-type: none"> • Lack of transparent/open discussion on the selection of Throckmorton as a development site within the SWDP • There has been insufficient opportunity to lobby district and county councillors as the decision made to include Throckmorton • Traffic/transport element of the plan has not been sufficiently considered in the proposal. • Plans to mitigate/demonstrate to local communities traffic issues and concerns could be addressed are not guaranteed, realistic or viable. • Landscape buffers to protect the integrity of local villages are not guaranteed • The rail strategy appears unsound. • Existing roads in the area already congested and to assume that impact will be lessened by householders commuting via the network is naive. • There are no firm plans to improve the single-track railway line and services are not reliable. 	<p>impact on residents and the surrounding landscape can be mitigated.</p> <p>Throckmorton was chosen as a Strategic Settlement based on thorough and careful analysis based on the outcome of the Issues and Options Consultation in 2018. The site assessment of each potential Strategic Settlement can be viewed on the Councils Evidence Base.</p> <p>Whereas development of the site will result in more traffic on the local road network, the site was partly chosen due to it's close proximity to Pershore Railway Station. As such, in line with the SWDPRs Rail Based Strategy, the development of the site will be accompanied by improvements to Pershore Railway Station, improvements to the Cotswold Line in accordance with LTP4 and active travel routes to and from the new settlement which will ensure that residents have genuine sustainable transport options available to them and can make more of the journey using sustainable modes of transport.</p>
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		<ul style="list-style-type: none">• Traffic will use rat-run routes leading to disruption, and congestion on roads not designed to deal with this.• Site development claims for the brown field use are not accurate and misleading.• There are known contamination issues.• It will Increase pressure on local hospitals, doctors, social care and mental health support• Disruption to local villages, farms and businesses during the development• The construction of a development on this scale will cause major disruption to the local area and roads.	<p>Development of the site will partially utilise brown field sites but for a proposal of this scale it is inevitable that green field sites will also be used.</p> <p>The contamination issues surrounding the site are well known and through concept and master planning will be mitigated against.</p> <p>The additional upgrades and expansion of existing and/or new facilities and infrastructure associated with healthcare have been taken into account as the Council has and will continue to consult with the CCG and NHS Trust. The requirements associated with growth and development are set out in the Infrastructure Delivery Plan (IDP) that supports the Plan. Where appropriate triggers for when infrastructure is required are included in the IDP. As the IDP is a living document it will be updated to reflect any changes in requirements emerging from updated evidence, for example highways modelling, Acute Care requirements once they are further refined.</p>
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	<p>Environment Agency (Graeme Irwin) Rep ID: 458</p>	<ul style="list-style-type: none"> • Throckmorton assessed in overarching Level 2 SFRA and its own specific Level 2 assessment. D-viii-5 makes reference to ensuring no built development within areas at a high risk of flooding as defined in the latest SFRA. This could be worded in consideration of a sequential approach to steer all built development to land at the lowest risk of flooding (Flood Zone 1). • Reference to the specific SFRA for Throckmorton and opportunities for additional flood storage through green and blue infrastructure and contributions to flood alleviation plans to provide flood risk betterment where feasible would be welcomed. • D-viii-6 the Level 2 SFRA for Throckmorton states that current land uses may require site ground investigations to determine the extent of the contamination and the impact this may have on SuDS. • There is a large landfill, DEFRA burial site and recycling centre in the southern third of the site which will make this a key requirement on those parts of the 	<p>Comment noted. This is something the Inspector may wish to consider at examination.</p> <p>Comment noted. This is something the Inspector may wish to consider at examination.</p> <p>Comments noted. There has been a Level 2 SFRA published for Throckmorton Strategic Settlement. Comment noted. This is something the Inspector may wish to consider at examination.</p> <p>Comments Noted.</p>
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		<p>site impacted. The IDP makes reference to potential infrastructure that will be required to be elevated through a flood risk area, working around any watercourses they may cross, so as not to impede flows, cause adverse flood risk or lose floodplain storage volume. This will need to be accompanied by a detailed Flood Risk Assessment to robustly demonstrate no impact on third parties.</p> <ul style="list-style-type: none">• Point D-viii-8 highlights the need for appropriate construction standards to ensure no run off of sediments/pollutions to the river. It would be recommended to consider any pollution impacts to the groundwater which may be more prevalent considering some existing land uses across the Throckmorton site.• DEFRA Foot and Mouth site: not directly addressed within the Policy or Reasoned Justification. The site lies immediately adjacent to both Phase 1 and Phase 2 residential development. This burial site still generates landfill liquor which is a liquid leachate containing the breakdown products of animals carcasses and	<p>Comment noted. This is something the Inspector may wish to consider at examination.</p> <p>Comments Noted.</p>
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		<p>is still monitored for any migration of this liquor into nearby ditches and watercourses through a surface and groundwater monitoring programme. Gas is also collected onsite as another breakdown product. Possibility of pathogens which need to be kept contained within the site.</p> <ul style="list-style-type: none">• From a controlled waters risk assessment point of view, the Preliminary Conceptual Site Model as presented in our view is very simplistic and generic not necessarily looking at specific activities such from the risks posed specifically from the DEFRA Foot & Mouth burial site nor the Hill and Moor Landfill.• Recommend an exclusion area to be placed around the foot and mouth burial site area, burial locations and leachate collection drain system, which should be kept free from any redevelopment as both leachate and gas can migrate further afield through underlying strata.• Regular monthly monitoring of the site takes place by consultants on behalf of DEFRA and access will still need to be	<p>Comments Noted, the Preliminary Conceptual Site Model is being refined with more detail added.</p> <p>Comments Noted – The Concept Plan is just a Concept and further detail including exclusion zones and access to sites can be added.</p> <p>Additional wording to strengthen the Policy in regards to future monitoring and management of the land fill site may be something that</p>
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		<p>made for monitoring purposes by consultants and restrictions should be put in place for access.</p> <ul style="list-style-type: none"> • Hill and Moor Landfill: generates landfill leachate and landfill gas which is monitored onsite as part of the Environmental permit. D-xvi references the landfill and the need to ensure development on the allocation considers operations and post restoration of the landfill. Will need to be monitored and managed by the site owners for several years after closure. • It should be noted that no operational landfill would be likely to be completely odour free, as to capture all the gas generated from the landfill would be extremely difficult. Therefore, due to the proximity of any proposed development, residents may and are likely to experience unpleasant odours on occasions. • Recommend extensive and detailed ground surveys and potentially restrictions on the construction methodology of any works near the landfill boundary. • Ridgeway Park Farm has been operating without the benefit on an Environment Permit. The 	<p>the Inspector may wish to consider at examination.</p> <p>Comments Noted – This wording is something the Inspector may wish to consider at examination. Comments Noted.</p> <p>Comments Noted.</p> <p>Comments Noted.</p> <p>Comments Noted.</p>
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		<p>interaction with this facility will need to be considered as the Throckmorton development is progressed. We note para 2.12 and the need for development proposals with 250m to demonstrate they not impact on the existing facility and, conversely, that the existing operations would not have an adverse impact on any proposed development.</p> <ul style="list-style-type: none">• The Environment Agency are not a ~statutory consultee on planning applications for development adjacent to a waste deposit site or similar regulated site which may be causing, or may give rise to, emission issues due to its proximity. We used to be consulted on such under the 2010 Development Management Procedure Order. This was removed in subsequent amendments to the DMPO.• New developers should ensure that occupants of those new homes and users of any other amenities are suitably protected by effective mitigation measures from impacts from the existing facility.	<p>Comments Noted</p> <p>Comments Noted.</p>
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		<ul style="list-style-type: none"> Any subsequent redevelopment of this site would need to be accompanied by a full intrusive ground and site investigation to identify any buried wastes, these would have to be tested for hazardous properties and waste acceptance criteria. There is also a risk if these were disturbed and placed near to a watercourse, contaminants may be mobilised and cause further pollution. 	Comments Noted.
	<p>Pinvin Parish Council (Tiffany O'Dell) Rep ID: 484</p>	<ul style="list-style-type: none"> Location of some housing along the A44 and west of Piddle Brook is not in keeping with the rest of the settlement (in particular blocks 12, 13 and 30), being isolated from the rest of the housing and infrastructure. Increased strain on Pinvin and the A44. The parcel of land on the west of Piddle Brook in particular is problematic because it has been given for development as part of the financial package to build the road into the settlement. There is no NPFF or legal reason for this to be a decision and instead creates a small village with no services, isolated from the services in the potential new town by a geographical barrier. 	<p>The Concept Plan is only a concept and will be refined through further Master Planning work. Justification for how the Concept Plan has been drawn can be seen in the accompanying Narrative published on the Council's website.</p> <p>The requirements associated with growth and development are set out in the Infrastructure Delivery Plan (IDP) that supports the Plan. Where appropriate triggers for when infrastructure is required are included in the IDP.</p> <p>As the IDP is a living document it will be updated to reflect any changes in requirements emerging from updated evidence, for example highways modelling, Acute Care requirements once they are further refined.</p>

		<ul style="list-style-type: none"> • Chance of many of these proposed isolated parcels of land being developed but with services coming later, or not being provided at the right time. • Increased pressures on existing service providers. • If second phase does not come forward, then how will Phase 1 be integrated into existing infrastructure? • Support the submission by the joint Pinvin ward councils that specifically question the development of homes in Phase 1, blocks 12, 13 and 30, with there being little space between the village of Pinvin and the new development. • Impacts the rural nature of the village, with no services or infrastructure to support increase in population. • Some of the evidence base is now over 5 years old. • Transport models focus on the main roads so the impact on minor roads has not been modelled. • Current evidence base lacks modelling to determine the impact of the new towns on traffic flows through the villages 	<p>The information set out in the Infrastructure Delivery Plan supports the Plan.</p> <p>The methodology for calculating contributions will be specified in relevant policy areas and within an updated developer contributions SPD. Section 106 agreements can be used to specify triggers for when infrastructure is required, and these will vary by development.</p> <p>Whereas development of the site will inevitable result in more traffic on the local road network, the site was partly chosen due to it's close proximity to Pershore Railway Station. As such, in line with the SWDPRs Rail Based Strategy, the development of the site will be accompanied by improvements to Pershore Railway Station, improvements to the Cotswold Line in accordance with LTP4 and active travel routes to and from the new settlement which will ensure that residents have genuine sustainable transport options available to them and can make more of their journey using sustainable modes of transport. The Councils cannot force people to use the railways, but a rail based strategy will encourage more</p>
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		<ul style="list-style-type: none"> • Large levels of commuting by car and modal shift is not happening. • Modal shift ranking activity does not take into account current actions of residents today. • Lack of bus services to the new Parkway station (and their regularity) and residents cannot commute to Birmingham easily from Pershore station. • A rail-based strategy around Pershore would require a change in the rail network and availability. No plans for this or clear dates and the line is already under considerable pressure. • The Sustainability Appraisal Volume 3 Appendix D.11 clearly states that the sustainable distance for train stations must be within 2km of a railway station. Much of the town is beyond 2km of the railway station so active transport is less attractive to pedestrians and cyclists. • Building a new 500 space car park at Pershore train station further highlights the fact that the council is anticipating more road traffic. 	<p>people to use it and provide a better opportunity to do so. Further Transport Modelling is being produced and will be available as evidence at examination. Brownfield Land will be utilised for some development but due to the size of the proposal it is inevitable that Greenfield Land will also be used.</p> <p>Ecological constraints of the site and area have been taken into consideration in the drafting of the Concept Plan. As part of the Evidence Base an Ecological Constraints and Opportunities Map and Preliminary Ecological Appraisal Report have both been published and both support the allocation. The site is large and it is being proposed to keep a couple of the hangers that currently house existing businesses. It is not a planning matter to determine commercial agreements between businesses and land owners.</p>
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		<ul style="list-style-type: none">• The proposed cycling routes do not appear to follow best practice (LTN 1/20) and are too narrow.• All the growth scenarios in rail that have been used for the modelling are pre-Covid.• There is no evidence that a modal shift to rail will happen.• A roundabout will be required at the access to the new town off the A44. This is not in the concept map.• The concept plan also lacks a second road into the town, despite this being required by highways recommendations.• Post-2041 the town may require a northern road link, onto Long Lane. This road is notoriously narrow and would need serious work and should be factored into the viability of the project.• The Pinvin junction will need completely remodelling.• The county council is conducting the Major Road Networks Scheme review for A44/A4538 using modelling data is neither accurate nor reflective of the evidence on the ground.• No modelling for North-South movements	
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		<ul style="list-style-type: none">• No modelling conducted by Highways for the A46 or M5• Support the suggestion that the archaeology on this site should become a scheduled monument.• Issues of contaminated land- ongoing use of the landfill site and will reduce the viability• Much of brownfield land is not being built on• Ecology of the site is rich and abundant. Support the report submitted by the joint councils of Pinvin ward, which extensively shows the potential damage to the local environment in the area.• Allocation of employment does not consider the loss of land and existing businesses on the site.• Loss of nationally important employment centre.• No evidence that the allocated land will be able to accommodate the existing businesses and there is actually considerable evidence that the area may actually lose businesses.• It is also estimated that the loss of the airfield as an employment site would actually have a net loss of land.• Loss of potentially good agricultural land.	
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	<p>Wildlife Trust (Steven Bloomfield) Rep ID: 568</p>	<ul style="list-style-type: none"> • Welcomes Part X commentary • Essential policy seeks to retain existing features of high biodiversity value • Justified by evidence base • Risk of anthropogenic impacts damaging grassland. • Recommend policy (Part D. x.2) be amended to include specific commentary on the need to protect Priority Habitat Grassland from adverse impact and to secure appropriate management throughout the lifetime of the development 	<p>This is something that the Inspector may wish to consider at Examination.</p>
	<p>British Horse Society (Wendy Bannerman) Rep ID: 728</p>	<ul style="list-style-type: none"> • Access for users other than pedestrians in this area is currently limited • Opportunity to protected PRow and upgrade footpaths to extend to other user groups (including cyclists, equestrians, and wheelchair users). • New active transport bridge over A44 should be future-proofed for all vulnerable users including equestrians 	<p>Comments Noted.</p>
	<p>Bishampton and Throckmorton Parish Council (James Boscock) Rep ID: 746</p>	<ul style="list-style-type: none"> • Consider more appropriate areas for housing development that are not near small market towns, have public transport links, are not near junctions reaching 	<p>The Concept Plan is only a Concept and will be refined through further Master Planning work. Justification for how the Concept Plan has been drawn can be seen in the</p>

		<p>capacity, and can be confined entirely to brownfield sites.</p> <ul style="list-style-type: none"> • Would welcome Throckmorton being used for further agricultural and employment use • First modification is to remove Throckmorton New Town entirely • If not delete Blocks 7, 10 11, 12, 13, 16, 17, 27, 27A, 30 • Owner of major glass house does not wish to move 	<p>accompanying Narrative, published on the Councils website.</p> <p>The site is large and it is being proposed to keep a couple of the hangers that currently house existing businesses. It is not a planning matter to determine commercial agreements between businesses and land owners.</p>
	<p>Natural England (Hayley Fleming) Rep ID: 843</p>	<ul style="list-style-type: none"> • Supports BNG and GI requirements 	<p>Support and comments noted</p>
	<p>Worcestershire Acute Hospitals NHS Trust Rep ID: 898</p>	<p>Within all the new allocations for the strategic sites specific reference is made to contributions for health care facilities. In some of the policy boxes, which cover allocations within the extant SWDP, healthcare is sometimes not referred to. WAHT, consider that this inconsistent approach is ambiguous, and therefore un-sound as it is not consistent with national policy. In some of the newly proposed allocations, specific reference is given to primary health care facilities to be delivered on site, however reference is then made to health care contributions.</p> <p>To address both above soundness issues, WAHT suggest a wording modification to ensure the same text 34</p>	<p>Comments Noted. This is something that the Inspector may wish to consider at Examination.</p>

	<p>Bishampton and Throckmorton PC Rep ID: 746</p>	<p>is included in all proposed allocation boxes and extant allocation boxes.</p> <p>Removal of open countryside used for agriculture, its effect on biodiversity.</p> <p>The effect on the local communities of Pinvin, Lower Moor, Throckmorton and Bishampton as they are swallowed up by huge developments.</p> <p>New retail areas will adversely affect Pershore's independent traders and the character of the town and surrounding villages.</p> <p>The threat to local waterways due to increased run off from impermeable surfaces. There is currently very poor public transport serving the villages affected.</p> <p>The lack of improvement to existing roads in the proposal means huge volumes of traffic on surrounding roads.</p> <p>The new homes are too far from the train station.</p>	<p>Ecological and Landscape experts have been consulted throughout the Concept Planning process and will continue to be consulted into the application stage to ensure woodland, trees, grasslands and species are protected. They will also ensure that the surrounding landscape is protected and that Throckmortons impact on the landscape is limited whilst also ensuring the design of the settlement itself is in keeping with the locality.</p> <p>With 6,000 new homes, employment land and other amenities and facilities being delivered at Throckmorton the immediate locality and area will experience a change in character. Through detailed master planning and sympathetic design, it is considered that surrounding settlements and their character can be safeguarded and coalescence avoided by using Policy tools such as Green Space, buffers and Significant Gaps. It is not considered that the new settlement at Throckmorton will have a</p>
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			<p>significantly detrimental impact on the character of Pershore.</p> <p>The centres provided at Throckmorton are designed to meet the needs of residents, providing them access to essential services within active travel distance.</p> <p>In compliance with Policy SWDPR 27, proposals will be required to ensure no adverse impact upon the site integrity of any European site, or associated functionally linked land or watercourses, either alone or in-combination with other plans or projects Water quality and surface water flooding will also be protected and managed through SWDPR policies 34, 35, and 36.</p> <p>Traffic generation has been factored in and will be further understood and outlined once further modelling has been received. Infrastructure provision, including the need for schools, has been considered in consultation with County Council.</p> <p>In line with the SWDPRs Rail Based Strategy, the development of the site will be accompanied by improvements to Pershore Railway</p>
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			<p>Station, improvements to the Cotswold Line in accordance with LTP4 and active travel routes to and from the new settlement which will ensure that residents have genuine sustainable transport options available to them and can make more of their journey using sustainable modes of transport. The policy also requires the provision of an electric shuttle bus (or equivalent) linking the site with Pershore Railway Station, Worcestershire Parkway and nearby settlements as part of the active travel network</p>
	<p>Woodlands Trust (Ben Green) Rep ID: 1396</p>	<p>Concerned about loss of notable and veteran trees Secondary woodland should be retained to ensure that ecological networks are retained and enhanced.</p>	<p>Where possible, through the master planning process, notable and veteran trees will be safeguarded and retained.</p> <p>Ecological constraints of the site and area have been taken into consideration in the drafting of the Concept Plan. As part of the Evidence Base a Ecological Constraints and Opportunities Map and Preliminary Ecological Appraisal Report have both been published and both support the allocation.</p>

	<p>Councillor Charles Tucker Rep ID: 355 / 516</p>	<ul style="list-style-type: none"> • No evidence that residents will use rail significantly • Use of greenfield land for majority of development • No account of impact on Pershore and its sustainability • Significantly higher levels of road traffic especially between Throckmorton and Parkway • Delivery rate questioned • Delivery of social housing depends on government funding and uptake by RSLs is unlikely to compensate on sluggish private housing sales • Houses around access road are isolated and have no services indicated on concept plan so suggests dormitory development • Use of Grade 2 and 3A BMVAL • Contravenes SWDPR 26 Design as would not integrate effectively with surroundings or complement existing character • Housing along access road would be cut off from services and have to use car to access infrastructure • Not an appropriate scale or strategy • Development along access road is unlikely to form part of the new town • Existing businesses are nationally significant and do not wish to relocate 	<p>Whereas development of the site will inevitably result in more traffic on the local road network, the site was partly chosen due to its close proximity to Pershore Railway Station. As such, in line with the SWDPRs Rail Based Strategy, established as part of the Issues and Options, the development of the site will be accompanied by improvements to Pershore Railway Station, improvements to the Cotswold Line in accordance with LTP4 and active travel routes to and from the new settlement which will ensure that residents have genuine sustainable transport options available to them and can make more of their journey using sustainable modes of transport. The Councils cannot force people to use the railways, but a rail based strategy will encourage more people to use it and provide a better opportunity to do so.</p> <p>The Concept Plan is only a Concept and will be refined through further Master Planning work. Justification for how the Concept Plan has been drawn can be seen in the accompanying Narrative, published on the Councils website.</p>
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		<ul style="list-style-type: none"> • Housing located in close proximity to landfill and foot and mouth burial site. Odour and effluvia concerns. Landfill expected to be active until 2038. • Enforcement issue ongoing • Land may be unstable • Impact on ecology- especially bird and bat population • Concept plan makes provision for enlarged sewage works discharging to brook. Discharge will increase phosphate levels, impact ecology, and decrease water quality. • Impact on heritage assets • Pershore is a 'Gem Town' and should warrant special consideration • Additional pressures on Pershore's infrastructure until new town centre is developed 	<p>It is proposed that the settlement is self sustainable with services contained within the settlement. and as such the impact on Pershore would be minimal.</p> <p>Ecological constraints of the site and area have been taken into consideration in the drafting of the Concept Plan. As part of the Evidence Base a Ecological Constraints and Opportunities Map and Preliminary Ecological Appraisal Report have both been published and both support the allocation.</p> <p>Comments on delivery rate, social housing, land use, enforcement issues all noted.</p>
	<p>Councillor Liz Tucker Rep ID: 362</p>	<ul style="list-style-type: none"> • Highly unusual viability costs • Cannot guarantee Phase 2 will go ahead if circumstances change • Requires Phase 2 to be a sustainable new town • Contaminated land clean-up costs • Enforcement breaches on site and unknown waste dumping • Site has a proud history • Malvern Optical has specialist facilities and cannot relocate 	<p>Whereas development of the site will inevitably result in more traffic on the local road network, the site was partly chosen due to it's close proximity to Pershore Railway Station. As such, in line with the SWDPRs Rail Based Strategy, established as part of the Issues and Options, the development of the site will be accompanied by improvements to Pershore Railway Station, improvements to the</p>

		<ul style="list-style-type: none"> • Much of the brownfield land is already in use for employment and new proposed greenfield Employment is less • Unlikely to reduce car use as much development is too far from station for active transport • Objects to ribbon development along access road as isolated and incongruous • Access road should be from a new roundabout and not a slip road • Needs a second access road serving the town onto the A44 • No improvements to existing road network • Area of National Archaeological Importance- roman marching route along the river flood plain • Narrow green buffer around west of Throckmorton hamlet • Coalescence of existing communities 	<p>Cotswold Line in accordance with LTP4 and active travel routes to and from the new settlement which will ensure that residents have genuine sustainable transport options available to them and can make more of their journey using sustainable modes of transport. The Councils cannot force people to use the railways, but a rail based strategy will encourage more people to use it and provide a better opportunity to do so.</p> <p>The contamination issues of the site are well known and the various landowners are aware of the issues that the land uses in situ pose.</p> <p>The site is large and it is being proposed to keep a couple of the hangers that currently house existing businesses. It is not a planning matter to determine commercial agreements between businesses and land owners. Brownfield Land will be utilised for some development but due to the size of the proposal it is inevitable that Greenfield Land will also be used.</p>
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			<p>Through the use of policy tools such as green space, significant gaps and buffers, it is hoped to avoid the coalescence of the new settlement with surrounding villages and towns.</p> <p>The comments on Archaeology are noted. The allocation is supported by a Heritage Risk Register, Wider Site Heritage Appraisal and a Heritage Site Appraisal. The Masterplan has sought to reduce risk where possible by making use of open space but it is accepted that there may be some Archaeological risk to development. It is considered that this can be mitigated at application stage.</p>
	<p>Councillor Dan Boatwright Rep ID: 557</p>	<ul style="list-style-type: none"> • Supports submission of Pinvin Parish Councils • Planners have little understanding of how landfill is managed and long term likelihood site will operate throughout plan period • Homes would be within 200m of landfill • Concept plan shows only one access road into the town and a second road would be required but this would create a dangerous pinch point 	<p>The contamination issues of the site are well known and the various landowners are aware of the issues that the land uses in situ pose. The Inspector may wish to consider further buffers or wording within the Policy to ensure contamination does not occur.</p> <p>The site is large and it is being proposed to keep a couple of the hangers that currently house</p>

		<ul style="list-style-type: none"> • Landfill would be dangerous to health and wellbeing • Noise from generators near landfill • Landfill operation throughout plan period could impact second access road • Most residents will not use train as main mode of transport • Active transport unlikely as most residents will live over 2km away from station • Heritage and archaeology- serious implications for viability. Need for excavation with history spanning early prehistoric to modern period • Archaeology of national importance onsite • Scheduling of Ancient Monument 	<p>existing businesses. It is not a planning matter to determine commercial agreements between businesses and land owners. Brownfield Land will be utilised for some development but due to the size of the proposal it is inevitable that Greenfield Land will also be used.</p> <p>Through the use of policy tools such as green space, significant gaps and buffers, it is hoped to avoid the coalescence of the new settlement with surrounding villages and towns.</p> <p>The comments on Archaeology are noted. The allocation is supported by a Heritage Risk Register, Wider Site Heritage Appraisal and a Heritage Site Appraisal. The Masterplan has sought to reduce risk where possible by making use of open space but it is accepted that there may be some Archaeological risk to development. It is considered that this can be mitigated at application stage.</p>
	<p>Campaign to Protect Rural England Rep ID: 1267</p>	<p>Concerned that the site will increase congestion and pollution on the local road network and is not well connected</p>	<p>Transport modelling suggests that the local and wider strategic road network can accommodate the</p>

		<p>to local bus services and that proposed improvements to bus services are too limited and uncertain to mitigate this. Furthermore it is not close enough to Pershore Station.</p> <p>Concerned about the impact of the site on the landscape, biodiversity and heritage as well as on BMV areas of farmland beyond the airfield.</p> <p>Consider the size of the site to be excessive and that the housing beyond the plan period should be removed. Much of the site is undeveloped.</p> <p>The fact that the land has been in Ministry of Defence ownership is no reason why it should be developed.</p> <p>A significant gap should be kept between the proposed new settlement and Pinvin, Wyre Piddle, Lower Moor and Pershore.</p> <p>Renewable energy plants should be on the roofs of the area to be developed (and on other appropriate hard surfaces), so that as little open countryside is lost to this kind of development as possible.</p>	<p>additional journeys that will be made. Furthermore, upgrades to Pershore railway station along with additional car parking, a shuttle bus service and cycle friendly active travel routes to and from the new settlement will encourage the use of more sustainable modes of transport. It is envisaged that with greater demand, there will be service improvements on the Cotswolds Line which will result in improved services to and from Worcester and London. Improvements to the Cotswold Line are outlined in the County Councils LTP4. The policy also requires the provision of an electric shuttle bus (or equivalent) linking the site with Pershore Railway Station, Worcestershire Parkway and nearby settlements as part of the active travel network.</p> <p>Ecological and Landscape experts have been consulted throughout the Concept Planning process and will continue to be consulted into the application stage to ensure woodland, trees, grasslands and species are protected. They will also ensure that the surrounding landscape is protected and that</p>
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			<p>Throckmorton's impact on the landscape is limited whilst also ensuring the design of the settlement itself is in keeping with the locality.</p> <p>Throckmorton was chosen as a Strategic Settlement based on thorough and careful analysis based on the outcome of the Issues and Options Consultation in 2018. It was put forward by the landowners and the site assessment of each potential Strategic Settlement can be viewed on the Councils Evidence Base alongside the evidence supporting housing need and delivery.</p> <p>Through detailed master planning and sympathetic design, it is considered that surrounding settlements and their character can be safeguarded and coalescence avoided by using Policy tools such as Green Space, buffers and Significant Gaps.</p> <p>Renewable energy provision will be delivered throughout the site</p>
	<p>Savills Rep ID: 1201; William Davis</p>	<p>Concerned regarding the viability of the site due to infrastructure and other abnormal costs</p>	<p>The requirements associated with growth and development are set out in the Infrastructure Delivery Plan</p>

	<p>Developments (James Chatterton) Rep ID: 1934; Brandon Planning & Development Ltd and Caddick Residential Ltd Rep ID: 2492</p>		<p>(IDP) that supports the Plan. Where appropriate triggers for when infrastructure is required are included in the IDP. As the IDP is a living document it will be updated to reflect any changes in requirements emerging from updated evidence, for example highways modelling, Acute Care requirements once they are further refined. The information set out in the Infrastructure Delivery Plan supports the Plan</p>
	<p>Vistry Group (Joel Morris) Rep ID: 422; Land Partnerships Development Ltd Rep ID: 1958; Bellway Homes Rep ID: 2262; Cala Homes Ltd Rep ID: 2368</p>	<p>Significant concerns regarding the deliverability of Throckmorton Airfield. Throckmorton is expected to deliver 5,000 dwelling in total, 2,000 of which are expected in the plan period ending 31 March 2041. The development of the first phase of homes is not expected to take place until 2030.</p> <ul style="list-style-type: none"> • The policy explains that that this is due to the requirement for the ~critical movement and ~educational infrastructure to be provided before the occupation of any houses. • The provision of the ~critical infrastructure and education facilities will be a significant upfront development cost. There will be no income from the development until 	<p>It is considered that the delivery of Throckmorton is realistic and achievable. The Plan, overall, has a sufficient number of smaller sites that have the potential to come forward more quickly.</p> <p>The requirements associated with growth and development are set out in the Infrastructure Delivery Plan (IDP) that supports the Plan. Where appropriate triggers for when infrastructure is required are included in the IDP.</p>

		<p>the first phase of houses and employment land is sold. We have significant concerns that this infrastructure will not be fundable at the start of the development.</p> <ul style="list-style-type: none"> • There is insufficient information available to demonstrate that this site is a financially viable proposition. The infrastructure costs are skewed so that the first phase of development has a disproportionality costly infrastructure burden. • Have significant concerns that the scheme may not be viable. • There is a lack of evidence it is deliverable. 	
	<p>Rooftop Housing Association Rep ID: 553 / 648, Marches Homes Rep ID: 1025 / 1659, Malvern Estates Rep ID: 1542, Deeley Homes Rep ID: 1760 / 2397; Harris Land Management Rep ID: 1841; Piper Homes Rep ID: 1884 / 2085; St Philips Ltd Rep ID: 1985 / 2053 / 2181 / 2302;</p>	<ul style="list-style-type: none"> • Site is isolated and poor option for major growth • No easy access by active transport to Pershore Railway station or other facilities • Undermines strategy of allocating proportionate growth to existing sustainable settlements 	<p>The site was partly chosen due to its close proximity to Pershore Railway Station. As such, in line with the SWDPRs Rail Based Strategy, the development of the site will be accompanied by improvements to Pershore Railway Station, improvements to the Cotswold Line in accordance with LTP4 and active travel routes to and from the new settlement which will ensure that residents have genuine sustainable transport options available to them and can make more of the journey using sustainable modes of transport.</p>

	<p>Millstrand Properties Ltd Rep ID: 2157 / 2332; Stonebond Ltd (RCA Ltd - Chris Lane) Rep ID: 3455; Hallow Stage 2 Ltd Rep ID: 3302; Areley Kings Ltd Rep ID: 3359</p>		
	<p>Bloor Homes/ Harris Lamb (Nick Rawlings) Rep ID: 762; Lovell Partnerships Ltd Rep ID: 2026</p>	<ul style="list-style-type: none"> • Concerns over deliverability of Throckmorton • Concerns over viability and believe infrastructure will not be fundable at the start of the development. Infrastructure costs are skewed so that the first phase has a disproportionately high infrastructure burden 	<p>Comments Noted. Details on infrastructure funding can be seen within the IDP.</p>

	<p>Castlethorpe Homes Rep ID: 827</p>	<ul style="list-style-type: none"> • Concerns over deliverability of Throckmorton • Need immediate delivery of small scall housing sites to sustain the short-term housing supply in Wychavon • Greenfield agricultural land so is a major negative impact on natural resources • Has not been justified against an appropriate strategy and so not in accordance with NPPF and is unsound • Many residents will drive to rail station • Availability of land required to develop critical movement infrastructure is unknown • Infrastructure requirements are very significant • Requires a comprehensive masterplan • Unlikely detailed consents will be secured 	<p>It is considered that the delivery of Throckmorton is realistic and achievable. The Plan, overall, has a sufficient number of smaller sites that have the potential to come forward more quickly.</p> <p>The requirements associated with growth and development are set out in the Infrastructure Delivery Plan (IDP) that supports the Plan. Where appropriate triggers for when infrastructure is required are included in the IDP.</p> <p>Throckmorton was chosen as a Strategic Settlement based on thorough and careful analysis based on the outcome of the Issues and Options Consultation in 2018. It was put forward by the landowners and the site assessment of each potential Strategic Settlement can be viewed on the Councils Evidence Base alongside the evidence supporting housing need and delivery. SWDPR03 sets out the spatial strategy for the SWDPR, building from the Issues and Options consultations, and is considered sound.</p>
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			<p>In line with the SWDPRs Rail Based Strategy, established as part of the Issues and Options, the development of the site will be accompanied by improvements to Pershore Railway Station, improvements to the Cotswold Line in accordance with LTP4, the provision of an electric shuttle bus or equivalent, and active travel routes to and from the new settlement which will ensure that residents have genuine sustainable transport options available to them and can make more of their journey using sustainable modes of transport. The Councils cannot force people to use the railways, but a rail based strategy will encourage more people to use it and provide a better opportunity to do so.</p> <p>The site consists of both brownfield and greenfield development. Brownfield Land will be utilised for some development but due to the size of the proposal it is inevitable that Greenfield Land will also be used.</p> <p>The Concept Plan is only a Concept. Because it is not considered that Throckmorton will be delivered until</p>
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			<p>late 2020s at the earliest, the Master Planning process has not yet begun. Detailed Master Plans will be produced as the site progresses.</p> <p>The landowners have confirmed that the site is available and deliverable and are working with SWC. Detailed consents would be secured at a later stage in the development process and there is no evidence to suggest that they would not be able to be secured.</p>
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	<p>Taylor Wimpey (Jo Hess) Rep ID: 939</p>	<p>Policy SWDPR 52 provides no clarity on how the existing landfill operation will be taken into account during phase 1 (up to 2041) of delivery on the site. This is because the SWCs own evidence points to potential geo-technical and contamination issues that could affect delivery at Throckmorton notably in Table 4.1 and 4.3 of the Phase 1 Geo-Environmental Assessment (GEA) May 2022. These issues have been highlighted in in the SHELAA Site Assessment proforma for the Throckmorton site.</p> <p>No evidence of any ground investigation assessments have been provided as part of the Regulation 19 consultation. Consequently, at this point the necessary mitigation measures to address these issues, if they are needed, have not been determined, contradicting the SHELAA methodology. Therefore, the proposed allocation at Throckmorton is not justified or sound. If the Inspectors determine that it is appropriate to allocate the site at Throckmorton with these issues unresolved, then the policy criteria should be modified to require that any risk to human health from the potential sources of contamination identified must be suitably mitigated once the landfill site ceases to operate or, alternatively,</p>	<p>The contamination issues of the site are well known and the various landowners are aware of the issues that the land uses in situ pose. he Concept Plan will be assisted by further master planning and consultation with relevant bodies that will ensure the Landfill site, Foot and Mouth Burial site, MOD site and Waste dump site are either not developed on or only developed after such a time where contamination will not impact the public. Appropriate buffers can also be utilised to ensure that contamination does not cause harm to future residents. It is not considered that leaving some of these parcels undeveloped will result in an unviable development. The Inspector may wish to consider further buffers or wording within the Policy to ensure contamination does not occur.</p>
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		<p>prior to commencement of any residential units.</p> <p>Significant concerns regarding the lack of evidence on the likely impact of development at Throckmorton on the strategic road network (SRN). It therefore remains uncertain what the scale of the impact on the SRN is likely to be from the Throckmorton site. This further undermines the claims made by the SWCs in Policy SWDPR 03 that development at Throckmorton represents one of the ~best locations for delivering supporting infrastructure. On this basis, the SWDPR is not justified and so is not soundly-based.</p> <p>The proposed trajectory assumes is too ambitious or a complex site like Throckmorton. If the Inspectors decide that the Throckmorton site is a soundly-based allocation, then the build out rate should be reduced to at least 160dpa. This would reduce the assumed delivery on the site from 2,000 down to 1,680 dwellings (a reduction of 320 dwellings) during the plan period to 2041.</p>	<p>Traffic generation has been factored in and will be further understood and outlined once further modelling has been received. Infrastructure provision, including the need for schools, has been considered in consultation with County Council.</p>
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	<p>Gleeson Land Rep ID: 964</p>	<p>Policy SWDPR 52 is unsound in terms of delivery. Gleeson Land are sceptical that the achievement of 2,000 dwellings within a new village in the timescale of the SWPDR to 2041, with a further 3,000 in the following plan period is wholly unrealistic.</p> <p>The proximity to Worcestershire Parkway is likely to stifle the development of the scheme, even after the many infrastructure problems and costs of promoting the site have been overcome.</p>	<p>Comments Noted. It is considered that the delivery of Throckmorton is realistic and achievable.</p> <p>The site meets the needs of south Worcestershire and meets the SWDPR Development Strategy. It is considered that the site is viable and deliverable.</p>
	<p>Wyre Piddle Ltd Rep ID: 1363 / 3169</p>	<p>Throckmorton is too isolated and is a poor option for major growth Does not facilitate easy walking/ cycling to station or other services/ facilities Prefer allocating proportionate growth to existing settlements</p>	<p>Whereas development of the site will result in more traffic on the local road network, the site was partly chosen due to it's close proximity to Pershore Railway Station. As such, in line with the SWDPRs Rail Based Strategy, the development of the site will be accompanied by improvements to Pershore Railway Station, improvements to the Cotswold Line in accordance with LTP4 and active travel routes to and from the new settlement which will ensure that residents have genuine sustainable transport options available to them and can make more of the journey using sustainable modes of transport. It is envisaged that the</p>

			settlement will be largely self contained, with new facilities, shops and infrastructure to ensure people can access services within the settlement.
	Evesham Vale Growers (Andrew Bille) Landowner Rep ID: 1397	Support allocation of land at Throckmorton Regular landowner meetings Promotional Heads of Terms agreed with Pinnacle Some policy requirements are yet to be fully justified by evidence-base Important SWDPR52 does not pre-empt master planning and technical work including IDP	Noted.
	Pinnacle International Capital Rep ID: 1425 / 1426 / 1427 / 1428	<ul style="list-style-type: none"> • Paragraph A – delivery of critical infrastructure does not reflect the planned phased delivery of the development and is insufficiently flexible • Reference to carbon neutral requires clarifying that it relates to operation of the settlement and not construction of • Provide flexibility in provision of local renewable energy to allow for phased delivery • Paragraph D- specific forms of public transport is too precise as delivery is outside developers control 	<p>Comments noted. As the IDP is a living document it will be updated to reflect any changes in requirements emerging from updated evidence, for example highways modelling, Acute Care requirements once they are further refined. This should ensure flexibility in delivery.</p> <p>Comments Noted – This wording is something the Inspector may wish to consider at examination.</p> <p>Comment noted. This is something the Inspector may wish to consider at examination.</p>

		<ul style="list-style-type: none"> • Mobility hubs are too precise • Delivery of new link road and active transport is too precise • Provision of employment land is too precise • Private nursery accommodation is not required • Paragraph D(vi) is too prescriptive and needs simplifying • Do not agree with proposed location of traveller site on concept plan • Paragraph D(viii) must be flexible. May not be possible for 100% energy demand to be provided by renewable and low-carbon sources • Should be clear that this is operational energy demand not construction • Design codes must be prepared in consultation with developer to ensure deliverable • D(ix)- GI should be reflective of the type of development it relates to. A reduced level of provision is appropriate for commercial uses. 	<p>Comment noted. This is something the Inspector may wish to consider at examination.</p> <p>Comment noted. This is something the Inspector may wish to consider at examination.</p> <p>Comment noted. This is something the Inspector may wish to consider at examination.</p> <p>Comment noted. This is something the Inspector may wish to consider at examination.</p> <p>Comments Noted – The Concept Plan is just a Concept and further detail can be added or adjusted.</p> <p>Comment noted. This is something the Inspector may wish to consider at examination.</p> <p>Comment noted. This is something the Inspector may wish to consider at examination.</p> <p>Design codes will be prepared in consultation with the developer but should be compliant with SWDPR52 and SWDPR05. SWDPR05 has been viability tested so should be achievable and deliverable at Throckmorton.</p> <p>Comment noted. This is something the Inspector may wish to consider at examination.</p>
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	<p>Owl Partnerships Ltd (Keith Owens) Rep ID: 1451 / 1452</p>	<p>Queries deliverability of strategic sites (particularly rate of housing delivery) and argues there is a need for more smaller sites to come forward in case SGA's are delayed. Want to reduce quantum of housing deliverable with plan period at Throckmorton to 1,000 homes</p>	<p>It is considered that Throckmorton is deliverable. The Plan, overall, has a sufficient number of smaller sites that have the potential to come forward more quickly.</p>
	<p>Summix, Homes England, and Bellway Rep ID: 1493</p>	<p>No objections in general but specific objection to D.1.3 and the provision of an electric shuttle bus linking site to Pershore Station and Worcester Parkway. WCC Transport Modelling will need to determine if Throckmorton will need to make proportionate contribution to access road at WP. Wording is not clear as could be a link to new settlement at WP and/or WP station. Ambiguity could imply a need for WP to provide same service in return and this is not in WP IDP. If interpretation is that link is from Throckmorton to WP station then it should be made explicit to comply with NPPF para 16.</p>	<p>Comments noted. The wording of this policy is something the Inspector may wish to consider at examination.</p>
	<p>MacTaggart & Mickel Group Rep ID: 1786</p>	<p>Concerns over whether Throckmorton is achievable related to the sustainability of its location and its deliverability within the plan period.</p>	<p>It is considered that the delivery of Throckmorton is realistic and achievable.</p>

		<p>Throckmorton SGA does not comply with SWDPR 03 (A. vi.) as it primarily greenfield land. Large areas of development within the SGA will be outside of the walking catchment and even the cycling catchment of Pershore Train Station so Throckmorton SGA does not comply with SWDPR 01 (C. i.).</p> <p>The Throckmorton Concept Plan shows a development road including public transport and providing a link road between the new town and Pershore Train Station with a new traffic island on the A44, and dedicated active travel route . However, delivery of this critical movement infrastructure is reliant on land (CFS0166 and CFS1249), the availability of which is unknown as set out in the SHELAA. If this land is not available then the entire SGA is not deliverable.</p> <p>The infrastructure requirements for the Throckmorton SGA, as set out in the Infrastructure Delivery Plan, are very significant with total 106/infrastructure cost of £50,243, the highest of the proposed strategic growth areas. The Strategic Sites Viability Assessment finds the Throckmorton SGA to be viable. However, it acknowledges that</p>	<p>The site consists of both brownfield and greenfield development. Brownfield Land will be utilised for some development but due to the size of the proposal it is inevitable that Greenfield Land will also be used. The site complies with the SWDPR rail-based strategy outlined in SWDPR03 D.</p> <p>Upgrades to Pershore railway station along with additional car parking, a shuttle bus service and cycle friendly active travel routes to and from the new settlement will encourage the use of more sustainable modes of transport.</p> <p>CFS0166 and CFS1249 were assessed as part of the Site Assessment process under Pinvin and are confirmed by the landowners as available and deliverable.</p> <p>As stated, the Strategic Sites Viability Assessment finds the Throckmorton SGA viable. As the IDP is a living document it will be updated to reflect any changes in requirements emerging from updated evidence, for example highways modelling, Acute Care</p>
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		<p>further detailed investigation is required to identify and cost infrastructure. The Infrastructure Delivery Plan states that no assessment of the impacts or potential mitigation on the Strategic Highway Network has been undertaken.</p> <p>It is understood that National Highways are currently building a model covering the M5 junctions 6 & 7 and will utilise this model to assess the impacts and identify any necessary infrastructure required on their network. This may impact on modelling work and mitigation requirements identified in the Infrastructure Delivery Plan and require Worcestershire County Council to undertake further modelling work.</p> <p>Rail enhancements to services on the North Cotswold Line and facilities at Pershore Railway Station by 20230 are central to the justification for proposing significant development at the Throckmorton SGA.</p> <p>The NCLTF SOBC-2019 stated that the NCLTF Outline Business Case and Single Option Report (NCLTF OBC SOR) appears to have been delayed with no updates online.</p> <p>High infrastructure costs of the Throckmorton SGA is further</p>	<p>requirements once they are further refined.</p> <p>The information set out in the Infrastructure Delivery Plan supports the Plan.</p> <p>Traffic generation has been factored in and will be further understood and outlined once further modelling has been received.</p> <p>The NCLTF published their SOBC-2019. It has since been debated in Parliament and it is envisaged that with greater demand, there will be service improvements on the Cotswolds Line which will result in improved services to and from Worcester and London.</p> <p>Improvements to the Cotswold Line are outlined in the County Councils LTP4.</p>
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		<p>complicated by the multiple landowners and the higher EUVs on the brownfield elements. All the key landowners / site promoters need to confirm their EUV, premium, minimum land value requirements to demonstrate that the land is deliverable. It is also recommended that a Memorandum of Understanding is required to confirm the willingness of the key landowners to deliver the planned development including landowners for CFS0166 and CFS1249 must be included.</p> <p>The Housing Trajectory at 31 March 2021 assumes that housing completions will begin to be delivered in 2030/31. The assumed delivery trajectory is overly optimistic given the complexities of the site, its landownership and the extent of upfront infrastructure required. The assumed build out rates are overly optimistic and not supported by the available evidence.</p>	<p>As stated, the Strategic Sites Viability Assessment finds the Throckmorton SGA viable. Statements of Common Ground are being drawn up between landowners, site promoters, and the SWC.</p> <p>It is considered that the delivery of Throckmorton is realistic and achievable.</p>
	<p>Mary Rimell Rep ID: 2456</p>	<p>Paragraph E of policy SWDPR 52 is not currently worded so as to ensure the development of a new settlement is planned and implemented in a coordinated way. The Policy wording refers to a 'master plan' being compliant with the 'concept plan' and being prepared in collaboration and agreement with the LPA, but is silent on</p>	<p>The Concept Plan is only a Concept. Because it is not considered that Throckmorton will be delivered until late 2020s at the earliest, the Master Planning process has not yet begun.</p>

		involvement with the significant landowners.	
	Proposed minor modification	Change reference to Gypsy and Traveller site so that definition falls in line with national definition.	Minor mod: change reference to Gypsy and Traveller site.
SWDPR 53			
SWDPR 53 Rushwick Expanded Settlement	Scone, S 23; Atfield, P 33; Hemsworth, S 34; Hughes, S 63; Hemsworth, E 106; Ballinger, J 141; Buckland, K 183; Sport England 203; Highways England 269; Vistry Group 269; Environment Agency 459; Rushwick Parish Council 480; Prout, S 497; Bryant, D 748; Bloor Homes 763; Worcester Acute NHS 899; Glesson Land 965; Terra Strategic 1134, 1815; Savills 1202; CPRE 1268; Hollybrook Homes 1318; Bishop L, 1338; Custom Land Ltd 1429; Gladman Developments 1444; Lambert L, 1502; Foreman, K 1546; Rastall, Y 1610; Rastall, A 1611; Tomms, S 1772; William Davis 1935; Land Partnership 1959; Lovell Partnership 2027; Robins,	<ul style="list-style-type: none"> • More evidence required that the railway station is deliverable within the plan period and whether there is an economic case, e.g., to support the signalling work at Worcester Shrub Hill. • WCC Transport assessment still to be received. • Land for Travelling Showpeople plots as shown on the Concept Plan may not be available. • SA should be updated to reflect policy wording changes. • WCC suggest transport interventions may need to be signposted in the policy. • Natural England suggest reference to impact on migratory fish and HRA needed. • Environment Agency comment re flooding. Sport England ask for reference to maintenance of sport facilities. • Reference to design codes required in the policy. 	The substantive issues relate to the delivery of the rail station and availability of the land for the Travelling Showpeople site. In terms of the rail station, it is intended to enter into a Statement of Common Ground with Network Rail and Worcestershire County Council. This will set out a timetable for delivery and safeguarding of the land for the station in the interim. In regard to the Travelling Showpeople site, discussion are on-going between officers, the landowner, Bellway Homes and the Showpeople community about delivering the site as proposed in the Concept Plan. Again, this issue may be addressed via a Statement of Common Ground with the parties above. These issues, and the others identified are something that the Inspector may wish to consider at Examination.

	M 2127; Cala Homes 2369; Brandon Planning & Development Ltd and Caddick Residential Ltd 2493; Webb, S 2648; Codd, A 2660; Worcester Civic Society 8		
SWDPR 54			
SWDPR 54 Mitton		<ul style="list-style-type: none"> - Awaiting Transport Modelling – anticipated July - Awaiting site specific Level 2 SFRA as requested by Environment Agency. - Concern raised by Kemerton Conservation Trust, now agreed with by Natural England, regarding impact of allocation on curlews at Bredons Hardwick gravel pits. - Also, NE advise Carrant Brook itself is important for SPA species such as lapwing. - Sport England suggest mod to say planning applications will be expected to demonstrate how the new sports facilities will be managed/operated and maintained and to demonstrate the proposed phasing of delivery of the sports facilities and add the footnote that provision will be set in accordance with the PPOSS and BFS and calculated using Sport 	There is ongoing work regarding the Transport Modelling, Site Specific SFRA level 2 and the curlews which can be considered via a Statement of Common Ground with the various parties. Similarly, a Statement of Common Ground can be pursued with Sport England. These issues, and the others identified are something that the Inspector may wish to consider at Examination.

		<p>England's Playing Pitch Calculator and Sports Facilities Calculator. Expand the reasoned justification to reference that the provision of new playing pitches (including provision at the proposed primary school) should be designed to ensure they are suitable for community use and that it is expected that community use will be secured via a community use agreement.</p> <ul style="list-style-type: none"> - Significant local opposition to the allocation. - Inspector dismissed appeal (18/00771/OUT) for 500 homes on southern part of site because insufficient information to assess whether would result in a severe residual cumulative impact on the road network, or that the tranquillity of the AONB would not be unacceptably harmed. Application recently resubmitted (refer 23/00682/OUT). 	
SWDPR 55			
SWDPR 55 Cales Farm, Malvern	Residents (Julia Clark) Rep ID: 2730 (Peter Clark) Rep ID: 286	<ul style="list-style-type: none"> • Impact of traffic. • Lack of reliable public transport. • Loss of agricultural land. • Flood risk. 	The Highways Authority (Worcestershire County Council) are also consulted on transport and access issues. The County Council have not raised significant concerns

	<p>(Rachel Bennett) Rep ID:2657 (Sarah Ellis) Rep ID:185</p>	<ul style="list-style-type: none">• Impact on AONB and Special Wildlife Sites (Mills Brook and Whippets Brook).	<p>regarding the capacity of the local road network.</p> <p>The site is approximately 400m from the nearest bus stop and the County Highways have not raised significant concerns regarding public transport provision.</p> <p>The proposed site is not Grade 1 or Grade 2 agricultural land.</p> <p>The site is not within Flood Zones 2 or 3. Pockets of surface water should be managed on site through SuDS or to watercourses/ponds where available.</p> <p>The SWCs have been in liaison with landscape experts to ensure that none of the proposed developments (including MHPH02) around Malvern will have a significant detrimental impact on Malvern Hills AONB, including proposed allocations of new Areas of Informal Recreation to relieve recreational pressure on Malvern Hills AONB. This dialogue will continue through the plan making process and into the application process.</p> <p>The proposed allocation has been reduced in size from 23 ha to 12.5 ha and from 400 to 200 dwellings to provide a buffer from the Malvern Hills AONB and Mills Coppice Special Wildlife Site. The draft SWDPR</p>
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			policy also proposes a landscape edge along the northern boundary to maintain a physical separation from Whippets Brook Special Wildlife Site.
	Malvern Civic Society (Stephen Goodenough) Rep ID: 592	Civic Society welcomes the reduction in dwellings, the provision of buffers and separation to Special Wildlife Sites through the smaller cut.	Support for reduction in size from 23 ha to 12.5 ha and from 400 to 200 dwellings to provide a buffer from the Malvern Hills AONB and Mills Coppice Special Wildlife Site noted. The draft SWDPR policy also proposes a landscape edge along the northern boundary to maintain a physical separation from Whippets Brook Special Wildlife Site.
	British Horse Society (Wendy Bannerman) Rep ID: 731	PROW should be made accessible for equestrians as well as cyclists.	Following the Preferred Options consultation, the proposed site area has been reduced from 23 ha to 12.5 ha. On the reduced area proposed for development PROW's border the west and eastern boundaries of the site, but no PROW's now cross the site. The proposal will develop any necessary transport infrastructure including, but not limited to access from Sawyers Avenue, public transport, safe pedestrian and cycle routes and new and improved cycle and footpaths to Malvern Vale. Policy SWDPR 06 Transport, part D states that development proposals

			<p>will be required to provide, or contribute financially to, a package of active travel infrastructure and services according to their nature, scale and likely impact on the highway network. Active Travel encompasses a wide range of potential schemes that could be funded. As such, the policy deliberately does not specify active travel options.</p>
	<p>Natural England (Hayley Fleming) Rep ID: 846</p>	<p>Impact on AONB. The evidence base document The Landscape and Visual Sensitivity Study concludes that the site is High/ Medium. Development would lead to the erosion of landscape character within the immediate setting of the AONB and have a suburbanising effect. NE do not believe that this can be mitigated and that the site conflicts with NPPF p.176 and 174a, NPPG, and SWDPR 28.</p>	<p>The proposed allocation has been reduced in size from 23 ha to 12.5 ha and from 400 to 200 dwellings to provide a buffer from the Malvern Hills AONB and Mills Coppice Special Wildlife Site. The draft SWDPR policy also proposes a landscape edge along the northern boundary to maintain a physical separation from Whippets Brook Special Wildlife Site. The SWCs have been in liaison with landscape experts to ensure that none of the proposed developments (including MHPH02) around Malvern will have a significant detrimental impact on Malvern Hills AONB, including proposed allocations of new Areas of Informal Recreation to relieve recreational pressure on Malvern</p>

			Hills AONB. This dialogue will continue through the plan making process and into the application process.
	Worcestershire Acute Hospitals Trust Rep ID: 901	Hallam Land Management (landowners) support allocation but have concerns over DHN and GI provision	The proposal has been reduced in size from 400 dwellings to 200 dwellings. Under Policy SWDPR 09 Infrastructure, development will be required to provide or contribute toward the provision of infrastructure necessary for the development, including healthcare.
	Hallam Land Management Rep ID: 2296	Hallam Land Management (landowners) support allocation but have concerns over DHN and GI provision	Support for Cales Farm noted. It is considered that 200 dwellings (or up to 200 dwellings) provides greater clarity for decision makers compared with "approximately 200 dwellings". Whilst the site allocation itself will not provide the green buffer between the AONB and Whippets Brook, reference to the buffers is important to explain why development is limited to land on site CFS0481 and not the whole of Cales Farm (CFS0482). No evidence has been provided to demonstrate that a decentralised heat network would not be practical or financially viable.

SWDPR 56			
SWDPR 56 North East Malvern (Newland)	Sport England (Stuart Morgan) Rep ID: 205	<ul style="list-style-type: none"> • Site contains existing playing pitches including an existing cricket pitch. Policy wording and reasoned justification should ensure protection or replacement of these. • Provision of playing field in Part Biv should be in addition to protecting playing fields • Need for ball strike assessment to ensure proposed development does not unacceptably prejudice use of playing field 	Noted. No change required to meet tests of soundness, but the Inspector may wish to consider at examination a potential modification related to i. protection / replacement of existing cricket pitch, ii. Submission of a ball strike assessment, and iii. Reference to PPOSS.
	Wildlife Trust (Steven Bloomfield) Rep ID: 569	<ul style="list-style-type: none"> • Welcome Part Biv and Cii. • Appropriate GI-led approach • Policy should seek to retain and enhance existing features of high biodiversity value • Recently designated Priority Habitat S41 in NE corner of site • Concerns over anthropogenic harm to grassland 	This is something the Inspector may wish to consider at examination. Major modification proposed by Wildlife Trust. Either seek to protect designated lowland meadow S41 Priority Habitat or remove the relevant field parcel from the allocation.
	Malvern Civic Society (Stephen Goodenough) Rep ID: 593	<ul style="list-style-type: none"> • Development has been proposed for years. • Critical aspect is provision of infrastructure, employment, and safe active transport routes 	Comments noted.
	British Horse Society (Wendy Bannerman) Rep ID: 732	<ul style="list-style-type: none"> • Safe pedestrian and cycle routes should include equestrian access 	Comments noted.

<p>Bloor Homes (Nick Rawlings); Lovell Partnerships Ltd; Rep ID: 764</p>	<ul style="list-style-type: none"> • Questions deliverability of site as S.106 Agreement has not been signed and the outline application (Ref:15/01625/OUT) has not been granted planning permission 	<p>South Worcestershire Councils consider SWDPR 56 (North East Malvern) to be deliverable</p>
<p>Natural England (Hayley Fleming) Rep ID: 847</p>	<ul style="list-style-type: none"> • Any grasslands and their buffers should be protected and deleted from the allocation. • Any grasslands should retain their individual management regimes and be protected from recreational and anthropogenic pressures • Require surveys by a highly qualified and experienced ecologist at differing times of the year 	<p>This is something the Inspector may wish to consider at examination. Either seek to protect lowland grassland or remove the relevant field parcel from the allocation.</p> <p>Potential recommendation for requirement for further surveys.</p>
<p>Worcestershire Acute Hospitals NHS Trust Rep ID: 902</p>	<ul style="list-style-type: none"> • All new allocations contain specific reference to contributions to healthcare facilities. Carried forward/ existing allocations do not. 	<p>Minor mod: to say "Contributions to new or improved infrastructure in accordance with SWDPR 09. Primary and secondary health care services will be sought, in addition to the specific infrastructure items listed within this policy."</p>
<p>Beechcroft Land Ltd Rep ID: 2388</p>	<ul style="list-style-type: none"> • Further parcels of land at Newland Grange (NE of site) should be allocated for development 	<p>Support for SWDPR 56 noted. Additional land around Newland Grange was not submitted in the call for sites and therefore has not been assessed for availability, suitability and deliverability as part of the SHELAA.</p>

SWDPR 57			
<p>SWDPR 57 Land at Hanbury Rd, Droitwich Spa</p>	<p>Ainscough Strategic Land Rep ID: 1060</p> <p>Heath-Brown 81; Thomas 92; Luke 167; Martyn-Smith 174; Luca 175; Hadlington 176; Allen 182; Sport England 206; White 229; Webster 304; Mackenzie 326; Inland Waterways Association 343; Hanbury Parish Council 414; Yeates 620; Garbett 672; Canal & River Trust 674; Hadzor Hall Residents 3501; British Horse Society 753; Rowley 942; Deeley 1503; McDowell 1724; Bateman 2029; Powell 3500; Tesh 3490; Ttley 3731; Wyatt 3364; Parker 3362; Ashington 3313; Walker 2426; Sears 2718; Martin 2721; Wormald 2797; Bushfield 2828; Prudence 2834; Motteran 2837; Williams 2845; Traynor 2894; Milican 2958; Bourne 2977; Wakeman 2986; Yeates 2996;</p>	<ul style="list-style-type: none"> • Support for the allocation by some. • Others object: criticism that the site was not included at Reg 18 stage and introduced in the Reg 19 consultation. As a result the opportunity for community involvement has been limited. • The site as submitted to the SHELAA was initially ruled out. • Detrimental impact on the setting of a listed building, Hadzor Hall and surrounding Conservation Area. • Loss of agricultural land. • Deliverability of active travel connectivity to town centre questioned. Particularly if relying on the canal towpath. • Sets precedent of allowing development to the east of the M5. • Policy should have included reference to first form entry primary school as referred to in IDP and transport modelling. 	<p>The Inspector may wish to consider the issues around this site at examination.</p>

	Radford, 3015; Fishbourne 3022, 3024; Kingett 3033; Imm 3052, Tysall 3101; Morse 3224; Jenks 3228; Parker 3307.		
SWDPR 58			
SWDPR 58 Three Counties Showground	Three Counties Agricultural Society Rep ID: 741	The policy could better reflect the Society's strategy to link the showground with active travel routes and sustainable transport opportunities to help reduce vehicle movement to the site.	The SWC would welcome and support a mod to emphasise active travel options. This is something that the Inspector may wish to consider at Examination.
SWDPR 59			
SWDPR 59 Renewable Energy Allocations	Residents (Guy Inchbold) Rep ID: 282 (Elizabeth Buckmaster) Rep ID: 3042 (Steven Harries) Rep ID: 3476 (Ros Grant) Rep ID: 2855	<ul style="list-style-type: none"> • Supportive of renewable energy provision • Loss of agricultural land 	Support noted. Comments noted. 1. There is very limited brownfield land available in south Worcestershire, and particularly in areas suitable for large solar farms. 2. The site selection criteria considered whether development of the site would result in a significant loss of best or most versatile (Grade 1 or 2) agricultural land.
	Roundhill Wood Solar Farm Opposition Group (Phil Coatup) Rep ID: 292	<ul style="list-style-type: none"> • Referenced a planning appeal refusal for a solar farm due to landscape harm • Cannot predict that scheme would cease in 40 years 	Comments noted. SWDPR 59 states that landscape and visual impact assessment must be submitted with applications.

			Proposed policy says any consent would be granted for a maximum 25 years.
	Malvern Hills AONB Partnership (Paul Esrich) Rep ID: 440	<ul style="list-style-type: none"> • Site RLCE055C lies in close proximity to Malvern Hills AONB and is likely to be highly visible • No chance to assess site and effects on AONB 	RLCE055C (land at Whiting Ash Farm, Berrow) is 1 km from AONB boundary. SWDPR 59 states that landscape and visual impact assessment must be submitted with applications.
	Longdon, Queenhill, and Holdfast Parish Council Rep ID: 556	<ul style="list-style-type: none"> • RLCE012sc should have been designated red not amber on scoring. • Questions topography, grid connection, impact on AONB, Agricultural Land Classification, impact on SAM, flood risk, impact on local community 	<p>Noted.</p> <p>Possible Minor mod: to boundary of RLCE012sc (land at Queenhill) to remove area in Flood Zone 2. Other issues raised -</p> <ol style="list-style-type: none"> 1. Site appears to be predominantly SE facing. This is not a planning issue. 2. Western Power indicated that grid connection is potentially achievable. 3. Site 6.5km from AONB boundary. 4. Preference should be given to lower grade agricultural land and where possible proposal should allow for continued agricultural land use. 5. Scheduled Ancient Monument (Moat House) is 1.4km from site. Size of site was reduced to take account of Listed Buildings. Nearest Listed Building is 200m from site. Site is 530m from St Nicholas's Church.

			6. Southern boundary of site is in Flood Zone 2. Small area prone to surface water flooding through centre of site. Flood risk assessment required for all sites over 1 hectare or not in Flood Risk Zone 1
	Worcestershire Wildlife Trust (Steven Bloomfield) Rep ID: 570	<ul style="list-style-type: none"> • Support requirements of policy particularly weight to biodiversity and requirement for specific assessments for this • Recommend further weight be given to positive aspects of solar farms for ecological enhancement 	Support noted. Potential Minor mod: to SWDPR 59C and RJ to strengthen wording regarding opportunities for biodiversity net gain.
	The British Horse Society (Wendy Bannerman) Rep ID: 735	<ul style="list-style-type: none"> • Construction phases can disrupt PRoW and road networks increasing risk for equestrians and vulnerable road users 	Comments noted. Safe access can be considered and managed through planning conditions at application stage.
	Natural England (Hayley Fleming) Rep ID: 849 / 853	<ul style="list-style-type: none"> • SF06 and SF07 need further work to ensure that they are deliverable without adverse effects in birds associated with Severn Estuary Special Protection Area • Overall support for approach that governs the screening and conclusions of Appropriate Assessment for this HRA • AA needs additional explanation in support of why solar panel sites in close proximity to Functionally Linked Land would work at a plan level. 	This is something the Inspector may wish to consider at examination Minor mod: to Paragraph 9.30 to clarify that proposals on RLCE012sc and RLCE033b will not be supported if the HRA indicates an adverse impact on SPA birds.

		<ul style="list-style-type: none"> • Requesting clarification of Paragraph 9.30 to include explicit reference to functionally linked land and SPA birds 	
	<p>Landowner RCLE015 (Derek Jarman) Rep ID: 1033</p>	<ul style="list-style-type: none"> • Table 10 should be amended to include large and small scale and community PV farms on sites listed in the table. 	<p>Comments noted. As a strategic planning document, a minimum size threshold was considered necessary for inclusion as a proposed renewable or low carbon site allocation in the SWDPR. It was considered that a generating capacity of 1 megawatt or more would be appropriate. To meet the minimum generating capacity proposed solar farms would need to be a minimum 2 hectares in size.</p>
	<p>Landowner RCLE012sc (Christine Mary Daniell)</p>	<ul style="list-style-type: none"> • Support the allocation and confirms site is deliverable and available 	<p>Support noted</p>
	<p>Rural England (Peter King) Rep ID: 1274</p>	<ul style="list-style-type: none"> • Sites are agricultural land not brownfield land • Grades 3a and ideally 3b should have been ruled out • Sites within AONB would cause long-term harm • Non-cultivation of soil underneath will lower quality 	<p>Comments noted. There is very limited brownfield land available in South Worcestershire, and particularly in areas suitable for large solar farms. The site selection criteria considered whether development of the site would result in a loss of best or most versatile (Grade 1 or 2) agricultural land. No sites have been proposed in AONBS. SWDPR 27 requires all developments to deliver measurable net gains in biodiversity.</p>

			<p>Biodiversity net gain improvements can be delivered alongside solar farms to improve soil quality.</p>
	<p>Worcester County Council (Emily Barker) Rep ID: 1287 / 1323</p>	<ul style="list-style-type: none"> • Sites offer opportunity to secure BNG. • Reasoned justification could require strengthening to discuss opportunities for ecological improvement • Opportunities for Minerals Extraction should be sought where in Mineral Consultation Areas and/or are adjacent to safeguarded mineral and waste sites. 	<p>Modification not necessary to meet tests of soundness, but propose following:</p> <p>Minor mod: to Reasoned Justification to highlight that all developments should deliver biodiversity net gain in accordance with SWDPR27.</p> <p>The South Worcestershire Councils consider that there is not an obvious conflict between SWDPR 59 (Renewable & Low Carbon Energy Site Allocations) and minerals safeguarding. Solar farms would be granted consent on a temporary basis and by their very nature would not permanently sterilise mineral resources. It is understood that there are 2 proposed SWDPR solar farm allocations (land off Alcester Road, Harvington and Ryall House Farm, Ryall) are adjacent to, but not within, promoted minerals sites which can be considered at DtC discussions. Since both proposed solar farms are within Minerals Consultation Areas then the</p>

			applicant would be required to assess the potential impact on sterilising mineral resources under SWDPR 39 (Minerals and Waste Safeguarding).
	Canadian Solar and Novergy Rep ID: 1774	<ul style="list-style-type: none"> Request insertion of new paragraph at 9.8 stating applications for commercial scale projects will be permitted outside these allocations where they are in accordance with SWDPR 33 and can demonstrate that they meet the [site selection] criteria. 	Comments noted. Local planning authorities are not required to identify suitable areas for renewable or low carbon energy. SWDPR 59 relates to proposed solar farm allocations. The suitability of other stand-alone renewable and low carbon energy schemes will not necessarily be assessed against the same criteria used to identify the proposed solar farms. Therefore, the wording proposed by the respondent would not be appropriate.
SWDPR 60			
SWDPR 60 - Directions for Growth Outside the City Administrativ	Mr Stuart Morgans (Sport England) Rep ID: 207	Part B - Broomhall Add reference in part iii) that planning applications will be expected to demonstrate how the new sports facilities will be managed/operated and maintained and to demonstrate the proposed phasing of	This may be something the Inspector may like to consider at examination.

<p>e Boundary: Existing Urban Extensions to be Reallocated</p>		<p>delivery of the sports facilities and add the footnote that provision will be set in accordance with the PPOSS and BFS and calculated using Sport England’s Playing Pitch Calculator and Sports Facilities Calculator. Add footnote that existing playing fields will be protected. Part C “Temple Laugherne”.</p> <p>Add reference in part ix) that planning applications will be expected to demonstrate how the new sports facilities will be managed/operated and maintained and to demonstrate the proposed phasing of delivery of the sports facilities and add the footnote that provision will be set in accordance with the PPOSS and BFS and calculated using Sport England’s Playing Pitch Calculator and Sports Facilities Calculator.</p>	
	<p>University of Worcester Rep ID: 618</p>	<p>Policy SWDPR60 part C) should be amended to reflect the University’s ownership and recently granted planning permission, and an updated Diagram should also be included in the Policys supporting text to reflect these also. This will make the allocation sound by reflecting the true extent and nature of development that is likely to come forward at SWDPR60 part C) in line with</p>	<p>This may be something the Inspector may like to consider at examination.</p>

		<p>the University's ambitions for its ownership within the wider allocation, and in line with its recently granted planning permission there.</p> <p>With this in mind, part ii. of Part C) of SWDPR60 should be amended as follows (with the University's suggested text shown in bold): ii. Delivery of around 2,539 dwellings and around 1,540 purpose-built student homes as part of the wider housing mix. Additionally, the diagram for SWDP45/2 that shows the broad distribution of land uses and of various policy requirements for the major part of the site as referenced in part iv. of Part C) of SWDPR60 should be amended to reflect the University's entire ownership and provision of student accommodation as part of the wider allocations housing mix (and in reference to the housing mix being broadly defined within the aims of SWDPR16 as amended in line with the University's representations to that Policy).</p>	
	<p>St Modwen Properties Plc Rep ID: 1817</p>	<p>Criteria ix of Part B requires the Worcester South urban extension to include provision of a site for Travellers for up to 10 pitches within the Urban extension. As set out in our representations to draft policy SWDPR</p>	<p>The policy wording relating to traveller provision has been carried forward into the review of the South Worcestershire Development Plan because until such time as the allocated site has been fully built</p>

		<p>20, the development management process to date has confirmed there are no suitable locations for a Travellers site within Worcester South urban extension boundary and therefore financial contributions towards off-site provision have been sought. Criteria ix should be updated to reflect this.</p>	<p>out, it is necessary to have a site-specific policy against which to assess any future planning applications. To not carry forward the policy (with any necessary amendments and updates) could potentially leave a policy vacuum.</p> <p>This may be something the Inspector may like to consider at examination.</p>
	<p>Bloor Homes & Hallam Land Rep ID: 701</p>	<p>The reference to the requirement for inclusion of Traveller Sites at the two large Worcester strategic allocations from the SWDP (Worcester South SWDP45/1 and Worcester West SWDP45/2) is included in this policy to ensure that these sites continue to include provision for Travellers because there remain outstanding parcels of land with either no planning consent or only outline planning consent granted. All of the land which is shown on the SWDPs Policies Map is subject to the various permissions granted, thus there is no residual land. But in any event the financial contributions that have been secured exceed the amount required for the 10 pitches identified in Policy SWDP45/2 in any event.</p> <p>Plainly the approach in paragraph 7.10 does not reflect the circumstances that</p>	<p>The policy wording relating to traveller provision has been carried forward into the review of the South Worcestershire Development Plan because until such time as the allocated site has been fully built out, it is necessary to have a site-specific policy against which to assess any future planning applications. To not carry forward the policy (with any necessary amendments and updates) could potentially leave a policy vacuum.</p> <p>This may be something the Inspector may like to consider at examination.</p>

		<p>exist with the planning permissions at SWDP45/2. Accordingly, the reference to SWDP 45/2 should be deleted from Criterion E and paragraph 7.10 should be amended as follows: Planning permissions granted at the West of Worcester strategic allocation SWDP45/2 have each included by way of a planning obligation financial contributions towards the costs of acquiring a site and installing infrastructure to provide a new or extend an existing Traveller Site.</p>	
<p>Marches Homes Limited Rep ID: 1026</p> <p>Rooftop Housing Association Rep ID: 554, 649</p> <p>Richborough Estates Rep ID: 1001</p> <p>Wyre Piddle Ltd Rep ID: 1365</p> <p>Malvern Estates Rep ID: 1543</p> <p>Marches Homes Limited Rep ID: 1660</p> <p>Evesham Heights Limited</p>	<p>Questions the robustness of the trajectory given there are 4 policies reallocated a large number of sites which were not delivered in the previous plan. If there is a risk of similar number not being delivered in this planning period does the buffer need to be increased? We therefore consider that this policy is not effective as allocating these sites risks not delivering the required housing during the plan period.</p>	<p>According to the National Planning Policy Framework (NPPF, 2021) Paragraph 74, it is appropriate for the SWC to set out a trajectory demonstrating the expected rate of housing delivery (anticipated rate of development) for specific sites. This has been prepared with reference to available evidence on the delivery of housing on large scale strategic development sites. This evidence included several studies which have investigated delivery rates on large scale developments including developments currently in the pipeline across the country, South Worcestershire, and sites elsewhere which are comparable to varying gradations. The trajectories have also been informed by discussions</p>	

	<p>Rep ID: 1688</p> <p>Deeley Homes Rep ID: 1761, 2398</p> <p>Harris Land Management Rep ID: 1842</p> <p>Piper Homes Rep ID: 1885, 1888, 2086</p> <p>St Philips Ltd Rep ID: 1987, 2183, 2305</p> <p>Millstrand Properties Ltd Rep ID: 2158, 2333</p> <p>Hallow Stage 2 Ltd Rep ID: 3304</p> <p>Areley Kings Ltd Rep ID: 3360</p> <p>Stonebond Ltd Rep ID: 3456</p>		<p>held with respective site promoters and developers. The Inspector may wish to consider an update to the trajectory as part of the examination.</p>
	<p>Ms Jo Russell (Stoford Development Ltd) Rep ID: 1207</p>	<p>Stoford Properties support policy SWDPR 60 but propose a small number of amendments to the policy and the supporting text.</p> <p>SWDPR 11 and SWDPR 60 refer to the site as 'Worcester Six Business Park' or</p>	<p>Comments noted.</p> <p>Minor mod: for 'Worcester Six Technology Park' to be replaced with 'Worcester Six Business Park' in the policy and reasoned justification.</p>

		<p>'Worcester Six South Site' and lists it as one of a number of strategic employment sites. This reference should be used throughout the Plan and thus changes made to policy SWDPR 60.</p> <p>Requests recognition in paragraph 10.4 of the Reasoned Justification that the northern phase at Worcester Six has successfully attracted inward investment, including international investment.</p> <p>Amendments proposed to paragraph 10.5 of the Reasoned Justification to provide further context in terms of delivery, commenting on the progress of the northern phase and expanding the reference to the existing uses on site.</p> <p>Amendments proposed to paragraph 10.6 of the Reasoned Justification to clarify the intention to develop the southern phase in a similar character to that of the northern phase.</p> <p>Amendments proposed to paragraph 10.7 of the Reasoned Justification re refer to 'up to three points of access', as opposed to two as currently worded.</p> <p>Suggested change to criterion (i) within the policy to refer to the acceptable Use Classes within the site as B1, B2 and B8 in order to add more certainty. State that these Uses are consistent with the extant outline planning permission for</p>	<p>For all other comments made, these may be something the Inspector may like to consider at examination.</p>
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		the south site, and the northern phase of the Business Park.	
	Proposed minor modification		Minor mod: for SWDPR 60 to change references to 'Norton Barracks' or 'Norton Barracks Community' to ' Broomhall ' or ' Broomhall Community '.
	Proposed minor modification		Minor mod: to correct the spelling error in footnote 6 to read as follows: "The foul drainage from the development is expected to connect to the mains system and be treated at Worcester Bromwuch Bromwich Road sewage treatment works. The 2014 South Worcestershire Water Cycle Study (WCS) Addendum Report has identified that there is limited spare capacity at these works and there could be constraints in the receiving sewerage network. Developers should consider these issues early in the planning process in consultation with Severn Trent Water and have particular regard to the WCS and policies SWDPR 8 and SWDPR 35."
SWDPR 61			
SWDPR 61 - Worcester	Please refer to the separate Worcester City Allocations Table.	Please refer to the separate Worcester City Allocations Table.	Please refer to the separate Worcester City Allocations Table.

City Allocations			
SWDPR 62			
SWDPR 62 Malvern Hills Allocations	Please refer to the separate Malvern Hills Allocations Table.	Please refer to the separate Malvern Hills Allocations Table.	Please refer to the separate Malvern Hills Allocations Table.
SWDPR 63			
SWDPR 63 Wychavon Allocations	Please refer to the separate Wychavon Allocations Table.	Please refer to the separate Wychavon Allocations Table.	Please refer to the separate Wychavon Allocations Table.
SWDPR 64			
SWDPR 64 Implementation and Monitoring	Highways England (266) Mr Sean Lewis (1188)	Support the policy	Comments noted.
	Worcestershire Wildlife Trust (573) Rep ID: 573	Suggest amended wording in the glossary for Special Wildlife Sites. There is a new term for these sites Local Wildlife Sites, which should be used throughout the plan. The definition remains the same. The sites are identified by the Worcestershire Local Wildlife Sites Partnership.	Comments noted. This may be something the Inspector may like to consider at examination.
	Natural England (832) Rep ID: 832	Propose changes to the Policy relating to implementation and monitoring of Areas of Informal Recreation (AIR), the Malvern Hills SSSI Recreation Mitigation Strategy measures should be integrated into the plan	Comments noted. This may be something the Inspector may like to consider at examination.
	Worcestershire Acute Hospitals NHS Trust (904) Rep ID: 904	Propose changes to Part A, in line with proposals made to SWDPR 09, in that it only refers to parts of the NPPF and CIL	Comments noted. This may be something the Inspector may like to consider at examination.

		regulations which concern developer contributions	
	Worcestershire County Council (1295) Rep ID: 1295	As highlighted within the allocations policies, WCC requests clarification as to how strategic policy SWDPR 06: Transport (requirement M), SWDPR 09: Infrastructure, SWDPR 64: Implementation and Monitoring, and allocations policies (transport infrastructure and contribution requirements) are intended to work together. The policies appear to be inconsistent in part, whereby some requirements place S106 obligations or CIL requirements on new development proposals for cumulative infrastructure necessitated by the Plan, whereas other policy requirements appear to suggest that obligations or CIL contributions will not be required towards identified strategic infrastructure schemes if individual development proposals can demonstrate they can be accommodated within the existing available network capacity.	Comments noted. This may be something the Inspector may like to consider at examination.
Annex E			
Housing Requirement to 2041 by Designated Neighbourhood Area	Proposed minor modification		Minor mod: update status of Neighbourhood Plans where relevant with following information: For Malvern Hills: Welland NDP - consultation finished 21 August. Representation in the

			<p>process of being sent to the Inspector.</p> <p>Hallow NDP - Submitted NDP under Regulation 15, however have requested a screening opinion. Currently consulting the EA, HE and NE as to whether an EIA and/or HRA are required.</p>
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Summary of main issues for Worcestershire Parkway identified from the Regulation 19 consultation of the SWDP

Review

Topic	Respondents (All)	Main Issue	Response
Policy General	Kevin Maguire Neil Hansen Adam Stamfield Anthony Peachey Antony Mason Peter King (CPRE) Ian Butterworth James Bavin (S R Davis Architects) Maureen Williams Susan Abercrombie Paul Williamson John Yeo Richard Latham Paul Hannon Helena Bennet John and Penny Kitchener Kay Mason C J Platt Tracey France Robert Bennett Paul Ferenc	<ul style="list-style-type: none"> The policy is over prescriptive. 	The policy does contain several requirements. However, the council consider that these are necessary for a development of the size and complexity of Worcestershire Parkway.
		<ul style="list-style-type: none"> Policy needs to say 'at least' 10,000 dwellings to not restrict the rate of development. Same with employment. 	The quantum of development in the policy is caveated with the word 'approximately'. The council consider that this provides sufficient flexibility to adapt to changes in circumstances or specific build our rates.
		<ul style="list-style-type: none"> It is not credible for settlement to be 'self-sufficient' 	The policy seeks for a high level of self-sufficiency as 100% would not be realistic. The Councils are considering including a definition of 'self-sufficient' in the supporting text via a minor modification.
		<ul style="list-style-type: none"> Policy not based on realistic assessment of likely rates of delivery. 	According to the National Planning Policy Framework (NPPF, 2021) Paragraph 74, it is appropriate for the SWC to set out a trajectory demonstrating the expected rate of housing delivery (anticipated rate of development) for specific sites. This has been prepared with reference to available evidence on the delivery of housing on large scale strategic development sites.

<p>Lucinda Teague Michael Chapman Annette Crouchman Mark Williams John Driscoll Barry Collins Neil Berry Robert Adams Summix, Homes England, and Bellway Andrea Caplan (St Modwen) Terra Strategic Sean Lewis (Hallam and Spetchley) St Philips Land Andrew Morris (Joint Parish Committee) Janet Butterworth (Drakes Broughton and Wadborough with Pirton Parish Council) Jane Greenway (Norton- Juxta-Kempsey Parish Council) David Hunter-Miller (Whittington Parish Council) Ann Dobbins (Persnore Town Council)</p>	<ul style="list-style-type: none"> • Important that SWDPR 51 does not pre-empt the ongoing technical and masterplanning work for Worcestershire Parkway (WP). 	<p>The policy makes several, site specific requirements but the Council do not consider that this will impede good masterplanning.</p>
	<ul style="list-style-type: none"> • Part H of the policy proposed a spatial framework, comprehensive masterplan and design codes. ‘a comprehensive masterplan’ is unnecessary when there will be a WP Concept Plan in the SWDPR and a Spatial Framework to supplement SWDPR51. 	<p>A comprehensive masterplan is a vital part of the development of the allocation. The Councils are considering including clarification in the supporting text to show how the various levels of policy will clearly interact and support sustainable development.</p>
	<ul style="list-style-type: none"> • There appears to be multiple different layers of policy and guidance for WP. These are confusing and unnecessary and could delay planning permission. Supplementary guidance should be limited to the Supplementary Planning Document (SPD) and the design codes. 	<p>A comprehensive masterplan is a vital part of the development of the allocation. The Councils are considering including clarification in the supporting text to show how the various levels of policy will clearly interact and support sustainable development.</p>
	<ul style="list-style-type: none"> • Policy includes a single reference to Spatial Framework but doesn’t explain scope or purpose. The reasoned justification (RJ) clarifies what it is intended to be but doesn’t set out its purpose and scope. Request that paragraphs in RJ are put in policy. This would be consistent to other local plan policies for new settlements. 	<p>A comprehensive masterplan is a vital part of the development of the allocation. The Councils are considering including a clarification in the supporting text to show how the various levels of policy will clearly interact and support sustainable development.</p>
	<ul style="list-style-type: none"> • Evidence base is too detailed. 	<p>Many evidence base documents have been prepared as part of the plan making process. The Council consider that the volume and detail is proportionate and provides a robust basis for the plan.</p>
	<ul style="list-style-type: none"> • Some of the requirements in SWDPR51 are yet to be fully justified by the available evidence base, particularly transport infrastructure. 	<p>The Council consider that all policy requirements in the plan have been fully justified and that sufficient evidence on transport modelling has been undertaken for this stage of the plan making process. The results of further modelling work will be submitted to the examination.</p>

		<ul style="list-style-type: none"> • Question whether the garden community principles can be achieved. 	The Spatial Framework provides details of how the garden community principles have been used to create the overall principles of the development.
		<ul style="list-style-type: none"> • There is no justification for a new high street. 	There is currently no need for a new high street but there will be once new residents move in. The settlement will eventually be home to more than 20,000 people and they will need local access to community shops and facilities.
		<ul style="list-style-type: none"> • The development will increase noise and air pollution to an unacceptable level. 	There is no evidence to suggest that levels of air or noise pollution cannot be made acceptable.
		<ul style="list-style-type: none"> • Air pollution - How will mandatory limits for air quality set by European Directive 2008/50 be monitored and achieved? 	Details of how specific limits will be measured and monitored will be agreed at an application stage.
		<ul style="list-style-type: none"> • The development will become an extension of Worcester. 	The new settlement will be functionally and physically separate from Worcester.
		<ul style="list-style-type: none"> • Absence of consultation or consideration of the effects of this development on the properties fronting the B4084. 	The amenity of existing residence is a significant part of the SWDPR. Current concept maps are deliberately high level and do not accurately show where buildings will be precisely situated.
		<ul style="list-style-type: none"> • This Development Plan is based on out-of-date old data; most 'Local Need' requirements are based on the previous plan, issued in 2016, the targets for which were based on data emanating from information gleaned in 2014. 	National policy specifically requires that certain data sources are used and have been used, and the evidence base is considered sound in this regard.
		<ul style="list-style-type: none"> • The allocation should include Brickbarns Farm. 	Brickbarns Farm is located close to the edge of the allocation, but that area is currently proposed as greenspace.
		<ul style="list-style-type: none"> • Question the adoption of a rail-based strategy. Strategy is flawed given that Parkway is adjacent to the SRN. IDP refers to planned service upgrades. Concerned that there is no guarantee that the rail infrastructure will be upgraded. There is a risk that 	Planned service upgrades will help to make the new settlement highly sustainable. Placing growth close to the existing station and increasing demand will only make those upgrades more

		the upgrades will not be delivered, and this risk has not been assessed.	likely to come forwards. However, this is something that is out of the councils' remit.
Concept Plan	Peter King (CPRE) Land Partnerships Developments Ltd Paul Williamson Richard Latham Helena Bennet Robert Bennett Paul Ferenc Lucinda Teague Barry Collins Summix, Homes England, and Bellway Terra Strategic Sean Lewis (Hallam and Spetchley) St Philips Land	<ul style="list-style-type: none"> The concept plan has not been subject to any form of meaningful technical, viability or other analysis. The concept plan should be 'expressly downgraded' to solely be for illustrative purposes. Object to the detail of proposals put forward in concept plan– request further simplification. Plan is over prescriptive, could frustrate Development Management process and delivery of new settlement. Local centre – need to consider conflicts of it being on an arterial route. High volumes of traffic could deter residents and visitors using local centre. More protection to be afforded to dwellings on north of B4084 Policy SWDPR 51 should be amended so that there is no requirement for the masterplan to be agreed by all parties before an application is made. The policy should actively encourage planning applications to be submitted for the parts of the Worcestershire Parkway site that readily deliverable early in the plan period. 	<p>The concept plan has gone through the current round of consultation and is likely to be discussed at the examination hearings. The concept plan provides a visualisation of the policy wording.</p> <p>The concept plan provides a visualisation of the policy wording</p> <p>The Councils consider that the policy and concept plan are justified in requiring certain infrastructure and other requirements. If circumstances change in the future, then evidence to support different requirements to that in the policy may be a material consideration.</p> <p>The local centres will offer an opportunity to slow traffic down in their vicinity.</p> <p>The concept plan provides a visualisation of the policy wording</p> <p>Creating a successful and cohesive settlement on a large site with multiple landowners requires collective agreement on several issues. A masterplan is a sensible way to achieve this.</p> <p>The allocation is designed around the town-centre, so whilst efficient delivery is important it should not jeopardise the town centre which will serve to provide a sustainable settlement.</p>
Trajectory	Joel Merris (Vistry Group)	<ul style="list-style-type: none"> Recommendation to give consideration to the Planning Inspectorate's initial findings in the Tunbridge Wells Borough Local Plan (relating the 	The trajectory of development in the allocation is ambitious but has been carefully created. Multiple outlets will be selling units at the same time

<p>Nick Rawlings (Harris Lamb obo Bloor) H Wylie Castlethorpe Homes Gleeson Land Mark Marsh (Avant Homes) Lauren Draper (Savills) Sarah Milward (IM Land) Tony Harris (Harris Strategic Land) Keith Owens (Owl Partnerships) Ian Butterworth Mactaggart & Mickel Group James Chatterton (William Davis Developments) Lovell Partnerships Limited Tara Maizonnier (Beechcroft Land) Brandon Planning and Development & Caddick Residential Paul Williamson John Yeo Richard Latham Paul Hannon Helena Bennet C J Platt Tracey France</p>	<p>deliverability of the Tudeley Village new settlement). Plan needed to be modified as trajectory unrealistic.</p>	<p>across the site with the potential for many different house types and tenures to be delivered without impacting on delivery rates.</p>
	<ul style="list-style-type: none"> The housing trajectory and total quantum of development expected from Worcestershire Parkway should be revised to deliver approximately 1,850 dwellings during the plan period. 	<p>The trajectory of development in the allocation is ambitious but has been carefully created. Multiple outlets will be selling units at the same time across the site with the potential for many different house types and tenures to be delivered without impacting on delivery rates.</p>

	Paul Ferenc Lucinda Teague Michael Chapman Annette Crouchman Mark Williams John Driscoll Barry Collins Sean Lewis (Hallam and Spetchley)		
Affordable Housing	Summix, Homes England, and Bellway Andrea Caplan (St Modwen) Terra Strategic Sean Lewis (Hallam and Spetchley)	<ul style="list-style-type: none"> To promote flexibility, Green Infrastructure should state 'up to' 40% Affordable Housing subject to viability. Requirement for affordable housing should align with SWDPR18 – currently inconsistent. Question whether current wording would satisfy the tests of soundness – should align with SWDPR18. Policy needs to be more flexible in terms of Affordable Housing. Viability work still under review. Request SWDPR18 to be amended to include Strategic Site Allocations in Part G. Recommend that affordable housing target should be deleted as it is an 'unnecessary duplication' of SWDPR18 wording. SWDPR18 is sufficient – to ensure that provision of affordable housing at WP is delivered in accordance with the overall development plan requirements. 	<p>It is important that the high standards of design which the council envision for the site are delivered. The policy requires 40% Green Infrastructure but the detail of how this will be achieved across numerous landowners has yet to have been fully worked up.</p> <p>The policy refers specifically back to SWDPR 18 on affordable housing.</p> <p>Viability evidence to date has shown that 40% affordable housing on the site is possible.</p> <p>Inclusion of affordable housing requirements in the policy are justified and based on sound evidence.</p>
Housing Density	Summix, Homes England, and Bellway	<ul style="list-style-type: none"> Part Gi3 – requires overall site wide net density of 40 dwellings per hectare, with higher density in 	The NPPF requires that local authorities make best use of land. Having higher densities around

		town centre and near train station. Unclear why this target is prescribed to WP when SWDPR15 states that densities for the new settlements 'will be determined through master planning and DM process'. Density target is also unevidenced.	transport connections and town centres is entirely logical and in accordance with national policy.
Viability	Summix, Homes England, and Bellway Andrea Caplan (St Modwen) Terra Strategic Sean Lewis (Hallam and Spetchley) St Philips Land David Hunter-Miller (Whittington Parish Council)	<ul style="list-style-type: none"> Clarification sought on several statements in viability assessment. 	Since the Regulation 19 consultation a significant amount of further work on the viability assessment has been undertaken. This has included numerous meetings between the Councils and landowners. The result of this work is detailed within the IDP.
Phasing	Summix, Homes England, and Bellway Andrea Caplan (St Modwen) Terra Strategic Sean Lewis (Hallam and Spetchley)	<ul style="list-style-type: none"> Town centre first could delay the delivery. Examples around the county where delivery of town centre is reliant on sufficient population. Reference to phasing is inappropriate in a policy – should instead be addressed in a phasing masterplan at application stage. Reference to phasing does not promote the flexibility required for the WP allocation to adapt to change. 	<p>The town centre will be built out in phases alongside housing development. The uses there will also be flexible and responsive to changing needs. It is also the case that a significant amount of housing development can be brought forward in the area surrounding the town centre in the early phases of the plan. Having a town centre will provide a sustainable settlement.</p> <p>Phasing is mentioned in the policy in the sense that development should not come forward before the infrastructure needed to support it is in place. The Councils consider that this is entirely appropriate and necessary.</p>

			Further references to phases refer directly to the overall phasing of the allocation, which indicates that 5,000 dwellings will be delivered in the plan period and a further 5,000 beyond.
		<ul style="list-style-type: none"> Question requirement for two traveller sites, totalling 20 pitches to be delivered in plan period. 	The number of pitches is derived from the Gypsy and Traveller Accommodation Assessment (GTAA) evidence report and is considered sound.
Transport	<p>Laura Williams Stewart Bridge Ann Dobbins (Persnore Town Council) Charles Tucker Simon Price Adam Stamfield Antony Mason Janet Butterworth Ian Butterworth Susan Browne Victoria Evans Mary Kenchington James Fergusson Matthew Lloyd Paul Williamson Roger Morter and Janet Taylor John Yeo Richard Latham Paul Hannon John Scott Helena Bennet Pamela Hawkeswood</p>	<ul style="list-style-type: none"> The allocation will be car dependent and not rail focussed. Transport assessment is insufficient Concerned about reference to 'critical' transport infrastructure – including crossings. Could impact viability. Elements of modelling report are out of date. Concerned that current wording could be interpreted as preventing vehicular traffic from entering or leaving the site. 	<p>The allocation is being designed with accessibility at its core. A key part of this is the access to a railway station but other factors are also important, such as the location of services and high-quality walking and cycling routes.</p> <p>The policy has been developed while working closely with the Worcestershire County Highways Team. The Council consider that all policy requirements in the plan have been fully justified and that sufficient evidence on transport modelling has been undertaken for this stage of the plan making process. The results of further modelling work will be submitted to the examination.</p> <p>Active travel is a key component of the policy and ensuring that safe and convenient routes across the railway lines is integral to this.</p> <p>The most up to date transport model will become available in 2023. This will be used to test the allocations in the plan.</p> <p>The policy seeks for a high level of self-sufficiency as 100% would not be realistic. The Councils are considering including a definition of 'self-sufficient' in the supporting text via a minor modification.</p>

<p>John and Penny Kitchener Kay Mason C J Platt Tracey France Robert Bennett Paul Ferenc Lucinda Teague Michael Chapman Annette Crouchman Mark Williams John Driscoll Barry Collins Neil Berry Summix, Homes England, and Bellway Andrea Caplan (St Modwen) Terra Strategic Sean Lewis (Hallam and Spetchley) St Philips Land Andrew Morris (Joint Parish Committee) Janet Butterworth (Drakes Broughton and Wadborough with Pirton Parish Council) Jane Greenway (Norton- Juxta-Kempsey Parish Council)</p>	<ul style="list-style-type: none"> Including a list of critical transport infrastructure will result in 'unnecessary duplication' of the IDP. Preference is for list to be omitted. 	<p>The provision of adequate infrastructure to ensure the use of active travel from the very start of the development is key to a sustainable settlement in the longer term. The Councils consider that the policy is justified in requiring certain infrastructure. If circumstances change in the future then evidence to support different infrastructure to that in the policy will be a material consideration.</p>
	<ul style="list-style-type: none"> If specific transport infrastructure is listed in the policy, it should be presented after the Movement Strategy principles (items 9-11). 	<p>Comment noted. This change is not considered to be necessary to make the policy sound.</p>
	<ul style="list-style-type: none"> The structure of SWDPR G(vii) Parts 1-10 combines the requirement for an overarching approach to movement with a list of list-specific infrastructure, which makes the wording of the policy overly long and unclear. 	<p>Comment noted. This change is not considered to be necessary to make the policy sound.</p>
	<ul style="list-style-type: none"> Stoulton bypass is critical infrastructure so land in that area should come forward in an early phase in order to deliver it. 	<p>The Stoulton bypass is not considered to be critical in the first phase of development.</p>
	<ul style="list-style-type: none"> It is not clear who the Movement Strategy would be prepared by and when. 	<p>The Councils are considering including further clarification about the status and content of the Movement Strategy to the reasoned justification text.</p>
	<ul style="list-style-type: none"> Unclear how strategic policy SWDPR 06: Transport (requirement M), SWDPR 09: Infrastructure, SWDPR 64: Implementation and Monitoring, and SWDPR 51: Worcestershire Parkway (requirements G(xii) and J) are intended to work together. 	<p>The exact way in which all infrastructure will be funded, e.g. through s106, CIL etc., has not yet been decided. However, much work has taken place on the IDP and viability assessment. Ongoing work with the County Council Highways and Highways England teams will be required as part of the development of the Spatial Framework and masterplanning.</p>

<p>David Hunter-Miller (Whittington Parish Council) Ann Dobbins (Persnore Town Council)</p>	<ul style="list-style-type: none"> The policies appear to be inconsistent in part, whereby some requirements place S106 obligations or CIL requirements on new development proposals for cumulative infrastructure necessitated by the Plan, whereas other policy requirements appear to suggest that obligations or CIL contributions will not be required towards identified strategic infrastructure schemes if individual development proposals can demonstrate they can be accommodated within the existing available network capacity. 	<p>The exact way in which all infrastructure will be funded, e.g. through s106, CIL etc., has not yet been decided. Ongoing work with the County Council Highways and Highways England teams will be required as part of the development of the Spatial Framework and masterplanning.</p>
	<ul style="list-style-type: none"> Disruption to road network during construction. 	<p>Construction may cause some disruption to the road network, however, this can be managed through various means. County Highways have not raised any concerns in this regard, and the Plan is considered sound in this regard.</p>
	<ul style="list-style-type: none"> Roads cannot handle the increase in traffic. 	<p>County Highways have not raised any concerns in this regard and the Plan is considered sound in this regard. Mitigation measures will be required but the exact location and types have not yet been determined.</p>
	<ul style="list-style-type: none"> Non-car access to the Parkway is inadequate. 	<p>Parkway station is currently designed primarily to be accessed by vehicle. However, the allocation provides the opportunity to change this over time to become a destination that can be accessed by active travel and other more sustainable means.</p>
	<ul style="list-style-type: none"> Concern that there isn't a real commitment to the delivery of active travel. 	<p>The Councils are committed to active travel.</p>
	<ul style="list-style-type: none"> A new road to connect the B4084 and A44 must be built before any development takes place. 	<p>The Councils and the County Council agree that a new link road between the B4084 and the A44 will be a necessary part of the allocation. It would not be reasonable to allow no development before a</p>

			link road is complete as there is no evidence to suggest that the current network is over capacity.
		<ul style="list-style-type: none"> Impact of traffic from WP on Pershore hasn't been assessed. 	Transport assessments consider all vehicles on the network. The ongoing network modelling will include committed development and plan allocations.
Energy and Climate Resilience Ambitions	<p>Laura Williams Graeme Irwin (Environment Agency) Edward Pearce Peter King (CPRE) Janet Butterworth Ian Butterworth Allan and Janet Brown Maureen Williams Paul Williamson Paul Hannon Helena Bennet Kay Mason C J Platt Tracey France Paul Ferenc Michael Chapman Mark Williams Barry Collins Summix, Homes England, and Bellway Andrea Caplan (St Modwen) Terra Strategic</p>	<ul style="list-style-type: none"> Unclear how carbon neutrality can be achieved. 	The Council are considering adding a section in the reasoned justification to explain further.
		<ul style="list-style-type: none"> Object to provision of decentralised heat network. They are complex – significant long-term costs for residents and employers. 	The Council consider that decentralised heat networks could play a role in the allocation. The policy does not specifically require this but that it should be investigated as a possibility.
		<ul style="list-style-type: none"> Support WP being delivered as 'carbon neutral' but this concept needs to be defined in SWDPR to be clear and unambiguous. 	The Council are considering adding section in the reasoned justification to explain further.
		<ul style="list-style-type: none"> Wording in Part E and C provide an absolute requirement which 'unrealistic'. WP should aim for a high degree of self-sufficiency as a principle and should aim to maximise renewable energy generation but 100% is unrealistic. 	The Council are considering adding section in the reasoned justification to explain further.
		<ul style="list-style-type: none"> Part E as written is undeliverable and should be deleted. New text should be introduced in the vision for WP – stating that self-sufficiency should be 'maximised'. 	The Council are considering adding section in the reasoned justification to explain further.
		<ul style="list-style-type: none"> Request Part C be deleted as not justified with SWDPR evidence base, also inconsistent with requirement in SWDPR01 and SWDPR33 for 20% renewable energy generation. 	The Council are considering adding section in the reasoned justification to explain further.
		<ul style="list-style-type: none"> 'Carbon neutral' should be amended to 'Low carbon'. Flexibility should be added to requirement for local energy generation. 	The Council are considering adding section in the reasoned justification to explain further.

	Sean Lewis (Hallam and Spetchley) St Philips Land Andrew Morris (Joint Parish Committee) Janet Butterworth (Drakes Broughton and Wadborough with Pirton Parish Council) Jane Greenway (Norton-Juxta-Kempsey Parish Council)	<ul style="list-style-type: none"> As the solar farm is not required for the new settlement the land should be removed from the area to be used for the Parkway Garden Town and left to be used for agricultural purposes. 	The solar farm has the potential to offset a significant part of the energy demands of the allocation.
		<ul style="list-style-type: none"> G-Viii-3 refers to ensuring no built development within areas at a high risk of flooding as defined in the latest SFRA. This could be worded in consideration of a sequential approach to steer all built development to land at the lowest risk of flooding. 	Comment noted. The current wording is stricter than the suggested amendment and the Councils do not consider that any change is needed.
		<ul style="list-style-type: none"> Modifications to cope with flood risk are not economically viable because of the type of ground. 	No evidence has been provided to show that flood risk cannot be mitigated on this site.
Employment	Summix, Homes England, and Bellway Andrea Caplan (St Modwen) Terra Strategic Sean Lewis (Hallam and Spetchley) Andrew Morris (Joint Parish Committee) Janet Butterworth (Drakes Broughton and Wadborough with Pirton Parish Council) Jane Greenway (Norton-Juxta-Kempsey Parish Council) David Hunter-Miller (Whittington Parish Council)	<ul style="list-style-type: none"> Policy should be amended to reflect that all employment land is to be delivered adjacent to J7. Gii – say ‘at least’ 50HA. Consider reference to employment being provided being ‘as shown on the concept plan’ is overly prescriptive and restrictive and not clearly evidenced. To provide flexibility and accord with Part Gii. Express the 50ha as ‘approximately 50ha’ – this will be consistent to approach to residential dwellings. No need for further employment sites in the area No restrictions on how this employment land will be used/managed. 	<p>The Councils consider that some employment to the east of the allocation is appropriate. The figure of 50ha across the site is not a maximum figure.</p> <p>The concept plan illustrates where types of development are appropriate but there is an element of flexibility when more detailed masterplanning is carried out.</p> <p>The figure of 50ha across the site is not a maximum figure.</p> <p>Evidence reports have indicated a need for additional employment provision in the area.</p> <p>Without substantial additional evidence there is no basis to overly restrict the employment types.</p>

	Ann Dobbins (Persnore Town Council)		
Education	Andrea Caplan (St Modwen) Terra Strategic Sean Lewis (Hallam and Spetchley)	<ul style="list-style-type: none"> • Be less specific on educational requirements. • Recommend that the policy states 'educational facilities will be provided on site' rather than being specific. • Educational consultants advised that approx. 1200 homes required to sustain 2FE primary school and 1,800 required to sustain a 3FE primary school. Phase 1 residential provision is unlikely to generate sufficient level of capacity for the proposed primary school. Recommend the removal of all phasing references. • Reference to number of schools is over prescriptive – should just refer to broad delivery of education facilities as quantum to be determined at later date. 	<p>The education requirements have been developed in coordination with the County Education team and considered to be appropriate.</p> <p>The education requirements have been developed in coordination with the County Education team and considered to be appropriate.</p> <p>The education requirements have been developed in coordination with the County Education team and considered to be appropriate.</p> <p>The education requirements have been developed in coordination with the County Education team and considered to be appropriate.</p>
Green Infrastructure	Laura Williams Steven Bloomfield (Worcestershire Wildlife Trust) Antony Mason Hayley Fleming (Natural England) Peter King (CPRE) Janet Butterworth Ian Butterworth Maureen Williams Paul Williamson	<ul style="list-style-type: none"> • Loss of agricultural land. • Advise that provision of Green Infrastructure (GI) and Biodiversity Net Gain (BNG) should be treated on case by case basis. • 40% GI across whole of WP is also queried. For employment and retail, SWDPR7 says proportion of GI will be determined by site characteristics and local circumstances. 	<p>Where possible brownfield land has been allocated, however, there is not enough previously developed land to accommodate the housing needs.</p> <p>The provision of GI and BNG both work best on a landscape scale. So, it is very important that a site wide approach to these is taken.</p> <p>It is understood that not every application on the site will be able to deliver 40% GI on its own. A site-wide strategy will allow an element of offsetting of green infrastructure to other areas of the site.</p>

<p>John Yeo Richard Latham Paul Hannon Helena Bennet Kay Mason C J Platt Paul Ferenc Lucinda Teague Michael Chapman Annette Crouchman Mark Williams Barry Collins Summix, Homes England, and Bellway Andrea Caplan (St Modwen) Terra Strategic Sean Lewis (Hallam and Spetchley) Andrew Morris (Joint Parish Committee) Janet Butterworth (Drakes Broughton and Wadborough with Pirton Parish Council) Jane Greenway (Norton- Juxta-Kempsey Parish Council) David Hunter-Miller (Whittington Parish Council) Ann Dobbins (Pershore Town Council)</p>	<ul style="list-style-type: none"> Recommend stronger wording on safeguarding and management of the Site of Special Scientific Interest SSSI. 	<p>The SSSI is protected by SWDPR 51 as well as SWDPR 28 and national policy.</p>
	<ul style="list-style-type: none"> The Masterplan as currently drafted, appears to use part of the Abbey's land for green infrastructure. The land is required for the Abbey's own needs and the Masterplan should be amended accordingly. 	<p>This was a drafting error and the Concept Plan has been amended.</p>
	<ul style="list-style-type: none"> We recommend that the policy be amended to include additional commentary on the need to protect Cooksholme Meadow SSSI from the adverse impacts of development and to secure appropriate management for the site in future. 	<p>The SSSI is protected by SWDPR 51 as well as SWDPR 28 and national policy.</p>
	<ul style="list-style-type: none"> Inadequate measures proposed to protect existing wildlife. 	<p>The policy will ensure BNG enhancements as well as a significant amount of green infrastructure. The relevant surveys and mitigation will be provided as part of planning applications.</p>

Biodiversity Net Gain	Laura Williams Antony Mason Maureen Williams Paul Williamson Richard Latham Paul Hannon Helena Bennet Kay Mason	<ul style="list-style-type: none"> The development will result in a loss of biodiversity. 	The development is required to provide a 10% increase in biodiversity.
	C J Platt	<ul style="list-style-type: none"> Criterion C is inflexible as there may be circumstances across the wider site where strategies extend beyond plan period. Suggest requirement is removed as settlement delivery is beyond plan period (10,000 homes) and BNG and GI can be addressed elsewhere in plan. 	The first phase of the allocation (up to 2041) is expected to be able to deliver 40% GI and 10% increase in BNG. The second phase will also have to achieve these targets.
	Paul Ferenc Michael Chapman Annette Crouchman Mark Williams Barry Collins	<ul style="list-style-type: none"> Part G viii of policy should be deleted as will be superseded by legislative requirements in due course. 	Part G viii contains a number of requirements. None of these have been superseded by legislation at this stage. The Councils are willing to revisit this if the circumstances change and will be considered through future plan review as necessary.
	Summix, Homes England, and Bellway Terra Strategic Sean Lewis (Hallam and Spetchley)	<ul style="list-style-type: none"> Criterion GX – not necessary considering emerging legal requirement. 	This requirement has not been superseded by legislation at this stage. The Councils are willing to revisit this if the circumstances change, and will be considered through future plan review as necessary.
	Andrew Morris (Joint Parish Committee) Janet Butterworth (Drakes Broughton and Wadborough with Pirton Parish Council)	<ul style="list-style-type: none"> May be impractical in certain instances to meet above the requirements. Suggest that criterion Gx has the same level of flexibility as SWDPR07 GI policy. 	It is understood that not every application on the site will be able to deliver 40% GI on its own. A site-wide strategy will allow an element of offsetting of green infrastructure to other areas of the site.
	Jane Greenway (Norton-Juxta-Kempsey Parish Council)	<ul style="list-style-type: none"> Part Gx which requires each phase to deliver at least 10% BNG is 'unreasonable and unjustified' as it should be the development as a whole that is required to deliver 10% BNG. 	The first phase of the allocation (up to 2041) is expected to be able to delivery 40% GI and 10% increase in BNG. The second phase will also have to achieve these targets.

	David Hunter-Miller (Whittington Parish Council) Ann Dobbins (Persnore Town Council)	<ul style="list-style-type: none"> Recommend that a note be inserted in the policy stating that the policy will be superseded once Schedule 7a of Environment Act 2021 comes into force to provide clarity. 	This requirement has not been superseded by legislation at this stage. The Councils are willing to revisit this if the circumstances change or it will be considered through future plan review as necessary. The BNG requirements in the plan have been written to align with the emerging national policy.
Heritage	Charles Tucker Richard Latham Paul Ferenc Summix, Homes England, and Bellway	<ul style="list-style-type: none"> Part Gxiii is inconsistent with legislation and national policy. Policy refers to assets outside of boundary – no explanation as to why. Policy should refrain from naming assets. No requirement or reference in legislation for a ‘heritage strategy’. Reference to conservation management plan (CMP) is unclear because this document is usually to guide the management of a specific heritage asset. Heritage impact has not been adequately considered and the plans need to be reviewed to ensure an appropriate buffer area is created. While the Plan puts great emphasis on place-making in the new town communities, the impact on this historic town is ignored. 	<p>The Councils consider that the policy is in accordance with the NPPF.</p> <p>Impact on designated heritage assets outside of the site are something that will need to be taken into account as part of the proposed development.</p> <p>For site of this size and complexity and because there are a number of different landowners a number of strategies are required by this policy.</p> <p>The CMP is to help guide the management of heritage assets across the site.</p> <p>The plan has been prepared with input from Council and national heritage specialists. The level of detail that is requested will come through the preparation of the heritage strategy.</p> <p>The site is located some distance from historic towns and will not directly impact on the heritage of those towns.</p>
Spatial Framework	Summix, Homes England, and Bellway	<ul style="list-style-type: none"> Would like to see more detailed guidance on how the employment land will be delivered. 	Further guidance on how the employment land will be included is in the Spatial Strategy.

	Sean Lewis (Hallam and Spetchley)	<ul style="list-style-type: none"> The Spatial Framework hasn't been subject to community engagement so shouldn't be part of evidence base for examination. 	The Spatial Strategy will expand how the policy should be interpreted. It will be consulted upon as a Supplementary Planning Document.
Infrastructure	<p>Laura Williams Edward Pearce Anthony Peachey Antony Mason Linda Robinson Worcestershire Acute Hospitals NHS Trust Janet Butterworth Ian Butterworth Susan Browne Allan and Janet Brown Matthew Lloyd Amanda Tanfield Paul Williamson Roger Morter and Janet Taylor John Yeo Richard Latham Paul Hannon Helena Bennet Pamela Hawkeswood John and Penny Kitchener Kay Mason C J Platt Tracey France Robert Bennett Paul Ferenc</p>	<ul style="list-style-type: none"> Majority of infrastructure will be developer funded. Existing infrastructure, such as acute care, is already at capacity. Criterion Gv should seek to reduce the list of policy commitments to promote a more flexible and focused policy. Individual sport facilities do not need to be explicitly written in policy. Reference to critical transport infrastructure is not supported – as suggested these items are definitive requirements when not yet underpinned by highways modelling evidence. Reference to rail crossing being 'critical' could impact site-wide viability. Crossings also not supported by technical evidence so policy should not guess outcome of this work in Gviii. Affordable housing policy inconsistent with Policy 18 regarding the approach to flexibility. The timing and delivery of any new education facilities should align with the delivery of new 	<p>Developer funding is the way in which a large portion of infrastructure is secured. This is appropriate given that the development will require that infrastructure.</p> <p>Providers of infrastructure, such as the NHS, have been consulted as part of the plan process.</p> <p>The infrastructure requirements in that part of the policy are necessary to create a vibrant and socially sustainable development.</p> <p>The infrastructure requirements in that part of the policy are necessary to create a vibrant and socially sustainable development.</p> <p>Critical transport infrastructure has been identified as necessary to facilitate sustainable movement across the site.</p> <p>Critical transport infrastructure has been identified as necessary to facilitate sustainable movement across the site.</p> <p>Critical transport infrastructure has been identified as necessary to facilitate sustainable movement across the site.</p> <p>The policy specifically requires that 40% affordable housing is provided in accordance with SWDPR 18.</p> <p>The provision of schools will be timed to align with housing delivery in accordance with the Infrastructure Delivery Plan.</p>

<p>Lucinda Teague Michael Chapman Annette Crouchman Mark Williams John Driscoll Barry Collins Neil Berry Andrea Caplan (St Modwen) Terra Strategic Sean Lewis (Hallam and Spetchley) St Philips Land Andrew Morris (Joint Parish Committee) Janet Butterworth (Drakes Broughton and Wadborough with Pirton Parish Council) Jane Greenway (Norton-Juxta-Kempsey Parish Council) David Hunter-Miller (Whittington Parish Council) Ann Dobbins (Persore Town Council)</p>	<p>housing to ensure that school places are available as the development comes forward.</p>	
	<ul style="list-style-type: none"> Broadband requirement replicates Policy 32 so SWDPR51G (viii) Part 5 should be deleted. 	<p>The policy purposely contains references to other policies because, for a site of this scale, it is important to have a comprehensive list of requirements in one place.</p>
	<ul style="list-style-type: none"> Request for a reference in part G v2) that planning applications will be expected to demonstrate how the new sports facilities will be managed/operated and maintained and to demonstrate the proposed phasing of delivery of the sports facilities and add the footnote that provision will be set in accordance with the Playing Pitch and Outdoor Sports Strategy and Built Facility Strategy and calculated using Sport England’s Playing Pitch Calculator and Sports Facilities Calculator. 	<p>This level of detail has not been provided in the policy itself to allow for possible flexibility. The Spatial Framework would be an appropriate location for this type of request. The Inspector may like to consider this point through Examination.</p>
	<ul style="list-style-type: none"> Request for a reference to sport and recreation facilities to Part J of the policy to ensure this is part of the requirement to be provided in accordance with the IDP and a delivery strategy for the development. 	<p>Part J provides an open list of areas of infrastructure, and it is not necessary to list every area.</p>
	<ul style="list-style-type: none"> Comprehensive site-wide drainage strategy to manage all water drainage should include foul water drainage which should be agreed with Severn Trent. 	<p>Part G viii. requires a “comprehensive site-wide drainage strategy to manage all water drainage”. This covers foul water as well as surface water.</p>
	<ul style="list-style-type: none"> Request wording to seek contributions to new or improved infrastructure in accordance with SWDPR 09...primary and secondary health care services will be sought, in addition to the specific infrastructure items listed within this policy. 	<p>This is included in Part G xii.</p>
	<ul style="list-style-type: none"> Stronger protection for access and utilities to the abbey to ensure operational activities are not prejudiced. 	<p>Utilities access is covered by laws outside of planning law. So, this would not be possible to require in a plan policy.</p>

		<ul style="list-style-type: none"> • The Plan does not clarify how acute care will be improved to meet increased demand. 	The policy references the need to provide for the health needs of the new residents.
		<ul style="list-style-type: none"> • The Plan does not include ambulance nor Fire service. 	The policy makes a specific reference to the need for and emergency services department.
		<ul style="list-style-type: none"> • Infrastructure is required to be built in advance of homes being occupied but this is unlikely to happen. 	This is a long-term project that will result in a new settlement the size of Evesham. Not all infrastructure will be able to be built before homes are occupied. However, the Infrastructure Delivery Plan (IDP) demonstrates that a significant amount of the required infrastructure will be delivered early in the process.
		<ul style="list-style-type: none"> • It is likely that pressure on public spending will impact funding sources from government and council creating significant risk to the scope and schedule for the development, but no acknowledgement of these external risk factors appears in the IDP. 	The IDP is a live document and will evolve as the project moves forward. This will allow for changing financial circumstances to be considered.
		<ul style="list-style-type: none"> • The IDP contains 136 pages of consideration but not a single mention/consideration is made in relation to current residents. 	The IDP is a forward-looking document which is concerned with the delivery of infrastructure. It is based on evidence about the current state of capacity of various infrastructure types.
		<ul style="list-style-type: none"> • Specific reference is given to primary health care facilities to be delivered on site; however, reference is then made to health care contributions. 	The exact nature of what healthcare facilities will be provided for on-site and how this relates to any off-site contributions cannot be determined at this stage.
		<ul style="list-style-type: none"> • Modifications to cope with flood risk are not economically viable because of the type of ground. 	The Environment Agency and Lead Local Flood Authority have not raised any concerns in this regard.
Narrative Document	Sean Lewis (Hallam and Spetchley)	<ul style="list-style-type: none"> • Recommend moving 'public transport interchange/station' to top of the list as it is important. 	The list in question does not indicate an order of importance.

		<ul style="list-style-type: none"> • Acknowledge the desire for landscape led approach but feel that reference to landscape principles, particularly adjacent to M5 could detract from positive discussions about design principles. 	<p>A landscape led approach is important whether development is close to the M5 or not.</p>
		<ul style="list-style-type: none"> • High level of detail in this document and spatial framework – could discourage occupiers to set up in Worcestershire. 	<p>A certain level of detail is required to ensure a successful, sustainable settlement. The Councils consider there to be enough flexibility within the policy and framework.</p>

**Summary of main issues for the Malvern Hills Allocations identified from the Regulation 19
consultation of the SWDP Review**

Allocations	Settlement	Respondents (All)	Main Issue	Response
New Housing				
MHPH01/CFS0407sc Land south of Madresfield Road	Malvern	Residents (Karen Herd, Paul Herd, Cara Halling, Keith and Carol Williams, Peter Bottomley, Richard Southall, Ian Jinks, Malvern Environment Protection Group, Graham and Dinah Cramp, Alison Skipper, Anne Ridley, Alison James, Simon Egerton, Jonathon Brew, Noleen Chapman, Elizabeth Brew, Eric Gorton, A P Bramwell, Gill Murray, David Hopkinson, M Bramwell, Fran and Jeff Williams, Michael Hayes, Christine Steady, Patricia Brown, Caroline Spiers, Elaine Jones, Sally Kidd, Brian Harris, David Hopkinson, Christopher Nicholson, Hilary Heslop, Rachel Strange, Sylvia Key, Dr Graeme Crisp, Julie Richardson, Richard Spencer, Shirley Goddard, r.c34, Karen Joyce, Quintin Brewer, Jenny Killam, Janet Thwaites, Paul Strange, Jonathan Brew, Ann Harvey, Fleur Peel, DR Richards, Jennie Baker, Lucy Taylor, Gabrielle Mercer, Anne Ridley, Barbara Woods, Donna Churchfield, Hannah Tinn, Hannah Davies, Steven Wilkinson, Peter Richardson, Eric Knowles, Cora Weaver, Richard Fowler, Peter Donovan, Michael Huskinson, Halina Cartwright, John Gillham, Gillian Crisp, Penelope Bosley, Alan Threadgold, EC and J Higham, Luke Whittaker, Tracey Layland, Christine Fiddler, Alison Vincent, Paul Jones, Clive Layland, James Somerville, James Young, Jill Richards, Joan Ballinger, John Hornby Fidler, John R Bradshaw, WF Ballinger, Richard Allum, Sonia Skinner)	<ul style="list-style-type: none"> • Access • Impact of traffic/ desk-top survey • Impact on AONB • Impact of increased tourism on Malvern Hills • Surface water flooding • Impact on sewer infrastructure • Impact on heritage (including SAM) • Agricultural Land • Inadequate infrastructure • Close to 10ha threshold • Impact on ecology and trees/ No EIA • Key Views and conflict with NDP • Outside development boundary 	<p>Comments noted. The applicant has advised that access is achievable. WCC Highways have advised that vehicular access could be provided from Hall Green. WCC Highways would require visibility splays. It is considered that adequate splays would be achievable. Vehicular access could be provided from Chance Lane, at the northeast corner of the site. WCC Highways see this operating as more of a secondary access rather than a principle one. Teme Avenue is also a possible location for a vehicular site access point. Acceptable visibility splays could also be provided, subject to the removal of some hedging. As Hall Green has no existing footpaths for the proposed site to connect with, then WCC Highways recommend that a high-quality pedestrian and cycle link should be provided from Teme Avenue into the site.</p> <p>Subject to confirmation of access points, County Highways have advised that it is reasonable to assume that the capacity of the affected roads and junctions would be able to accommodate the increased flows arising from development. They have not highlighted any specific safety concerns for the Guarlford Road. Updated transport modelling is to be provided by WCC.</p> <p>The site is 2.5km away from the AONB</p> <p>There is no evidence that development of the site would adversely impact tourism.</p> <p>The site is not in Flood Zones 2 or 3. There is known surface water flooding along the northern boundary (Whiteacres Brook). Development would need to include a buffer from the northern boundary. Severn Trent have advised that surface water should be managed onsite through SuDS or to watercourses/ ponds where available.</p> <p>Severn Trent have indicated potential impact on sewerage infrastructure. Hydraulic flooding issues immediately upstream of the site and Hall Green sewerage pumping station to the east has a history of pollution issues. Severn Trent have recommended detailed hydraulic modelling.</p> <p>The Scheduled Monument and Listed Buildings (Moated Court at Sherrard's Green) are 160m from the proposed boundary of CFS407sc. Development would need to ensure that the setting and character of these heritage assets are protected.</p> <p>It is understood that the site is Grade 3 in the Agricultural Land Classification. The land is not graded as the best and most versatile.</p> <p>As the largest town in the Malvern Hills District, Malvern town has a comprehensive range of local services and employment opportunities. All infrastructure providers have been engaged with and the current capacity constraints and all known requirements associated with the proposed growth are set out in the accompanying IDP. Where</p>

				<p>necessary development will be required to contribute toward or develop new infrastructure.</p> <p>The site area provided measures 9.95ha</p> <p>The nearest registered ancient woodlands to the proposed site are Flasher's Wood (1km away) and land near South Wood (1.3km away). Ecologists comments have been sought at each stage of the consultation. All developments are expected to deliver measurable net gains in biodiversity through the restoration, recreation, and enhancement and recovery of legally protected priority species populations. Any proposal for development would need to be supported by up-to-date technical assessment of the ecological features of the site. EIA screening should be carried out at the planning application stage.</p> <p>MHPH01 is not identified as a key view in the Malvern Town Neighbourhood Plan (August 2019)</p> <p>The requirement to identify land to accommodate 14,000 additional dwellings in south Worcestershire in the plan period will require sites outside the development boundary. It should be noted MHPH01 adjoins the development boundary.</p>
		Historic England (Rosamund Worrall)	No assessment of the significance and the impact of significance on the setting of SAM (Moated Site at Sherrards Green 1016441)	Historic England consider the proposed allocation fails to demonstrate it would conserve heritage assets in a manner appropriate to their significance as required by NPPF Paragraph 189. The current allocation of a smaller cut of CFS0407 was proposed by SWC's for land south of Madresfield Road to provide 150m buffer between the proposed allocation and Scheduled Monument.
		Malvern Civic Society (Stephen Goodenough)	Question over access. Need for education and healthcare Impact on AONB.	<p>WCC Highways have advised that vehicular access could be provided from Hall Green and would require visibility splays. It is considered that adequate visibility splays could be achieved. It is noted that there are no existing footpaths along Hall Green, which is an issue in terms of encouraging prospective residents to walk. Vehicular access could be provided along Chance Lane, at the northeast corner of the south, south of Whiteacres Brook. WCC Highways would see this as operating as more of a secondary access rather than a principal one. The 60mph speed limit would require more onerous visibility splays, based on speed surveys and this would impact on the existing hedging. Teme Avenue is also a possible location for a vehicle access point. Acceptable visibility splays could be provided subject to the removal of some hedging. As Hall Green has no existing footpath for the proposed site to connect with, then WCC Highways recommend that a high-quality pedestrian and cycle link should be provided from Teme Avenue into the site.</p> <p>As the largest town in the Malvern Hills District, Malvern town has a comprehensive range of local services and employment opportunities. The South Worcestershire Councils consult County education and Herefordshire & Worcestershire CCG regarding capacity at schools and GP services. Developer contributions will be required to contribute to the funding of any services directly related to the development.</p> <p>The site is 2.5km from the AONB.</p>
		Malvern Hills Trust (Duncan Bridges)	Site lies adjacent to land under the ownership of the Malvern Hills Trust. Traffic modelling shows access crossing this land which would require an easement application. No request or application for easement has been made so	The landowner/ agent has indicated that access is achievable and that the site is deliverable. WCC Highways have indicated that alternative access is achievable.

			the site cannot be considered deliverable. Extra traffic will have an impact on Trust owned land.	
		Woodland Trust (Ben Green)	Impact on veteran trees	Development would be expected to comply with national policy regarding the protection of ancient or veteran trees and with SWDPR 08 Part B.ii.
		Madresfield Estate Trust	Landowner Supports allocation and land is available Liaising with Severn Trent Water regarding modelling and infrastructure Access is achievable and will work with SWC to develop a masterplan including landscape and access	Support and confirmation of availability and deliverability noted, as is liaison with STW and future liaison with SWC.
MHPH02/SWDPR 55/ CFS0481 Land at Cales Farm	Malvern	(Proposed to be deleted from Malvern Hills Table as duplication of SWDPR 55) Please see SWDPR 55.		
MHPH03/CFS0518 Land at 186 Madresfield Road	Malvern	Malvern Civic Society (Stephen Goodenough)	Access	This is something the Inspector may wish to consider at examination. The site is currently served by a driveway taking access from Pound Bank Road, being approximately 45m south of the roundabout junction of Madresfield Road/ Pound Bank Road. WCC Highways have advised that vehicular access is technically possible to form a new vehicular access onto Madresfield Road, although a new access would be sited relatively close to the roundabout. At this location, Madresfield Road is an adopted highway but having no footways. It has a 30mph speed limit, although this changes to the national speed limit to the east. Acceptable visibility splays can be achieved, appropriate for the speed survey results. However, it is understood that the south grass verge may be owned by a third party and forming an access may be difficult. Hence, an alternative arrangement, and probably preferable, could be to upgrade the existing access from Pound Bank Road, although a realignment to give a shorter, more direct route would be desirable. The existing access would need to be upgraded to adoptable standards, consistent with the WCC Streetscape Design Guide. Pound Bank Road is an adoptable public highway, being a single lane carriageway, except the east side, north of the existing driveway which is currently a grass verge. The road has a 30mph speed limit. Acceptable visibility splays, confirmed by speed surveys, should be achievable. However, following the Regulation 19 consultation (response from Malvern Hills Trust) it appears that the grass verge between Pound Bank Road and the preferred access road is also under the jurisdiction of the third party. The landowner/ developer should seek to confirm this and if necessary, form an agreement to ensure access is achievable.
		Malvern Hills Natural Heritage & Biodiversity Officer (Jane Sedgeley-Strachan)	Area in NW of site potentially flagged as 26% chance of Priority Habitat Lowland Meadow. Needs survey. May make it difficult to achieve BNG. Retain ponds.	The landowner should undertake an ecological survey to confirm whether there is a Priority Habitat present on the site.
		Malvern Hills Trust (Duncan Bridges)	Both access points involve crossing land under the jurisdiction of the Malvern Hills Trust. No application for easement has been received for either access point.	This is something the Inspector may wish to consider at examination. The CFS application stated that access was achievable from the adopted highway and the landowner/ developer should seek to confirm this and if necessary, apply for easements to ensure access is achievable.

<p>MHPH04/CFS0905sc Land at Guarlford Road</p>	<p>Malvern</p>	<p>Residents (Karen Herd, Cara Halling, Peter Bottomley, Pauline Walton, Professor Eric Jakeman, Robert Baker, Phillip Bellamy, Howard Ashford, Richard Southall, Ian Jinks, Malvern Environment Protection Group/ Katherine Harris, Graham Cramp, Steve Wilkinson, Linda Pritchard, Anne Ridley, Steve Davies, Alison James, Simon Egerton, Jonathan Brew, Noleen Chapman, Elizabeth Brew, Eric Gorton, AP Barnwell, Douglas Ridley, James Young, Lee Barnes, Gill Murray, M Barnwell, Fran and Jeff Williams, Michael Hayes, Patricia Brown, Caroline Spiers, Sally Kidd, Fiona Hinchcliffe, Christopher Nicholson, Hilary Heslop, Rachel Strange, Sylvia Key, Dr Graeme Crisp, Julie Richardson, Richard Spencer, Shirley Goddard, Micharl Hayes, Professor Tom Elliott, r.c34, Karen Joyce, Quintin Brewer, Jenny Killam, Janet Thwaites, Paul Strange, Ann Harvey, Robert Middleton, Fleur Peel, DR Richards, Edward Underwood-Webb, Chris Morgans, Robert Baker, Helen Nicholson, Jennie Baker, Harriert Phillips, Lucy Taylor, Anne Ridley, Barbara Woods, Malcolm Adams, Donna Churchfield, Hannah Tinn, Hannah Davies, Alison Skipper, Jill Crisp, Steven Wilkinson, Cora Weaver, Peter Richardson, Eric Knowles, Richard Fowler, Peter Donovan, Michael Huskinson, Anne Dicks, Halina Cartwright, Penelope Bosley, Alan Threadgold, Katherine Harris, AJB Lane, Peter Donovan, EC and J Higham, Luke Whittaker, Tracey Layland, John Gilham, Paul Voyner, Christine Fidler, Alison Voyner, Dr Sarah Crisp, Marc Ford, Clive Layland, James Somerville, Jill Richards, Joan Balinger, JOhn Hornby Fidler, John R Bradshaw, WF Ballinger, Rochard Allum, Stephen Matthews, Sonia Skinner)</p>	<ul style="list-style-type: none"> • Lack of consultation events • Inadequate infrastructure • Distance from shops etc will increase trips by car • Cumulative impact of traffic • Accident risk/ lack of safety on Guarlford Road • Easement for access required • Poor/unsafe access • Loss of common land • Impact on environment/ ecology • Removal of ancient hedgerow to facilitate access • Impact on Madresfield village • Proximity to sewage treatment plant • Impact on four listed buildings • Access by Listed Building (Bluebell Hall, 64 Guarlford Road) would affect its setting • Conflict with key view in Policy MV1 of the Malvern Town Neighbourhood Plan (2019) • Impact on AONB • Surface water flooding • Increase in light pollution • Impact on tourism • Close to 10ha • Outside development boundary • Loss of farmland 	<ul style="list-style-type: none"> • Consultation events were carried out with a focus on areas near the four strategic allocations. • As the largest town in the Malvern Hills District, Malvern town has a comprehensive range of local services. The South Worcestershire Councils consult County education and Herefordshire & Worcestershire CCG regarding capacity at schools and GP services. The South Worcestershire Councils also consult utility providers regarding electricity and gas networks. Developer contributions will be required to contribute to the funding of any services directly related to the development. • Policy SWDPR10 promotes accessible active transport routes within and beyond the development to reduce car dependency. Active travel should be seen as the first mode of choice where possible, followed by public transport, and then car travel. The site is close to bus stops and is around 900m from shops and bus stops at Barnards Green. • County Highways have not highlighted any particular concerns regarding road safety on Guarlford Road • County Highways indicated that vehicular access for 180 dwellings from the existing junction at Mill Lane and Guarlford Road would require access to Mill Lane to be widened which crosses land controlled by the Malvern Hills Trust. The agents have submitted an application for easement to serve the site from Mill Lane and the application is to be considered by Malvern Hills Trust. County Highways have suggested that a safer arrangement would be to take a vehicular access from some point along Mill Lane but noted that Mill Lane is a private road which is narrow and currently not suitable for any significant volumes of two way traffic flow. To serve the proposed development, a section of Mill Lane would therefore need to be widened and brought up to adoptable standards. A footway provision from the site would also need to be provided. • The agents have submitted an application for easement to serve the site from Mill Lane across Common Land and the application is to be considered by Malvern Hills Trust. • Ecologists comments have been sought at each stage of the consultation. All developments are expected to deliver measurable net gains in biodiversity through the restoration, recreation, and enhancement of priority habitats, ecological networks, and the protection and recovery of legally protected species populations. Any proposal for development will need to be supported by and up-to-date technical assessment of the ecological features of the site. EIA screening should be carried out at planning application stage. • MHPH04 includes a 100m buffer from the sewerage plant. It is understood that an odour assessment has been undertaken by the applicant. • Four Listed Buildings are adjacent to the site. The layout and design of site MHPH04 should seek to have regard to the settings of the Listed Buildings. • The site conflicts with policy MV1 (Exceptional Key Views) in the Malvern Hills Neighbourhood Plan. The site is 1km from the nearest part of the Malvern Hills AONB and there is no evidence that
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				<p>the site would adversely impact tourism/ leisure. The landowner/ agent has advised that effects to key viewpoints can be mitigated against and incorporated into the design of the development. It is also noted that views of the site from Guarlford Road will need careful consideration and screening.</p> <ul style="list-style-type: none"> • The site is not in Flood Zones 2&3. Pockets of surface water flooding exist on site. Surface water should be managed on site through SuDS or to watercourses/ ponds where available. • The site is 1km from the nearest part of the AONB and there is no evidence that development of the site would adversely impact tourism/ leisure. • The site is 9.84ha. • The requirement to identify land to accommodate approximately 14,000 dwellings in south Worcestershire in the plan period will require sites outside the development boundary. MHPH04 adjoins the development boundary. • It is understood that the site is Grade 3 in the Agricultural Land Classification. The land is not graded as the best and most versatile land.
		<p>Fisher German LLP (Stephen Holloway) on behalf of landowners of MHPH04</p>	<ul style="list-style-type: none"> • Landowner is committed to delivery of the site • Close proximity to services • 1.5km from rail station • Technical evidence has been gathered to support • Site within Flood Zone 1 • Ecology- with mitigation, the development will not result in significant negative effects on ecological features or protected species • Heritage- desk based assessment. Likely layout will result in less than substantial harm to 64 Guarlford Road and at worst a negligible impact on the remaining Listed Buildings. Will not adversely impact Conservation Area. Trial trenching resulted in no significant finds. • Landscape and Visual Assessment has found site benefits from a good level of screening from near distance views due to vegetation and existing properties. Views of new homes will be limited to those from adjacent footpaths and highways. Homes will be filtered in those views and from the Hills. • Odour assessment- GI provision and buffers will result in limited impact • Trees- mature specimens can be retained and losses mitigated • Want to include land (CFS1191) in the wider parcel 	<p>Noted that promoter has undertaken a desk-based assessment on heritage, a LVIA, and an odour assessment.</p> <p>Propose modification to include CFS1191 to enable a more comprehensive and logical development of the allocation, ensuring the creation of a coherent southern edge of the development. This is something that the Inspector may wish to consider at examination.</p>
		<p>Malvern Civic Society (Stephen Goodenough)</p>	<ul style="list-style-type: none"> • Question over access and easement from MHT 	<p>Access- MHPH04. County Highways indicated that vehicular access for 180 dwellings from the existing junction at Mill Lane and Guarlford Road would require access to Mill Lane to be widened which</p>

			<ul style="list-style-type: none"> • Impact of traffic at junction with Guarlford Lane • Proximity to sewerage works • Lack of infrastructure • Protection of key views 	<p>crosses land controlled by the Malvern Hills Trust. The agents have submitted an application for easement to serve the site form Mill Lane and the application is to be considered by Malvern Hills Trust. County Highways have suggested that a safer arrangement would be to take a vehicular access from some point along Mill Lane but noted that Mill Lane is a private road which is narrow and currently not suitable for any significant volumes of two-way traffic flow. To serve the proposed development, a section of Mill Lane would therefore need to be widened and brought up to adoptable standards. A footway provision from the site would also need to be provided.</p> <p>MHPH04 includes a 100m buffer from the sewerage works.</p> <p>As the largest town in Malvern Hills District, Malvern town has a comprehensive range of local services. The South Worcestershire Councils consult Herefordshire & Worcestershire CCG and County education regarding capacity at schools and GP services. Developer contributions will be required to contribute to the funding of any services directly related to the development.</p> <p>View from Guarlford Road- noted. The site conflicts with Policy MV1 (Exceptional Key Views) Malvern Town Neighbourhood Plan.</p> <p>Views from the Malvern Hills- the site is 1km from the nearest part of Malvern Hills AONB and there is no evidence that the- development of the site would adversely impact tourism/ leisure. The landowner/ agent has indicated that effects to key viewpoints can be mitigated against and incorporated into the design of the development.</p>
		Malvern Hills Trust (Duncan Bridges)	<ul style="list-style-type: none"> • Site lies alongside land owned by MHT • Application for easement received but no decision made • If another access is used then transport modelling will be wrong 	<p>Easement application for access to Mill Lane is pending. Alternative access understood to be potentially available</p> <p>Awaiting updated traffic modelling from WCC.</p>
MHPH05/CFS1144 Land off Mayfield Road	Malvern	Malvern Civic Trust (Stephen Goodenough)	Support for affordable housing	Support noted. No other representations received.
MHPH06/ CFS0362asc Land west of Terrills Lane	Tenbury Wells	Tesni Property	East and West parcels should be allocated for 125 dwellings	Comments on the site are noted. The sites in question have been, along with all other call for sites that were submitted during the SWCs call for sites consultation periods, subject to analysis, assessment and consultation with both internal and external consultees. The details of this assessment, along with information as to why sites have been selected for allocation can be seen in the SHELAA and on the Site Assessment Spreadsheets. Further site selection analysis has also been undertaken through the Sustainability Appraisal process. By virtue of the assessment process, the SWCs have identified a sufficient amount of sites to deliver the housing and employment requirements needed for the SWDPR plan period, including the identification of reasonable alternatives. As such, the plan is considered sound and legally compliant in this regard and it is not considered necessary to allocate any further sites.
MHPH07/ CFS0042 Hope Lane	Clifton-upon-Teme	Mrs Tamsin Almeida (Terra Strategic)	The site should be allocated for 57 (instead of 55) The site is not 'new' it follows an SWDP allocation for 30 dwellings.	The housing number is indicative and would be assessed in more detail as part of the planning application process.
		Vistry Group (424)	Due to GI requirements, the net developable area is likely	

		Richard Newman (2967) Clifton-upon-Teme Parish Council (1088) Ms Zoe Morgan (2876)	to be 50% of the site so the allocation should be 46 and not 55. 55 dwellings is too large in relation to the size of Clifton Neighbourhood plan should take precedent. Concerns of noise from sewage works. Planning permission for 50 houses was refused. Natural environments will be lost, more emphasis needed on brownfield sites. Visual impact The location is unsustainable. Other sites in the village are more suitable.	Clifton-upon Teme is a Category 1 village, the site has been assessed as part of the SHELAA and Sustainability Appraisal and is considered to be in a sustainable location. Evidence and mitigation of any issues including noise and visual impact will be required at any application stage.
MHPH08/ CFS0911sc Land south of Stourport Road	Great Witley	Great Witley and Hillhampton Parish Council	<ul style="list-style-type: none"> Allocation for 44 homes is not required. Extensive development already in the village. Limited employment opportunities for people in the village, too far from services. Increased traffic congestion Increase pollution. Enlarge carbon footprint. 	Great Witley is a Category 1 village, where new development is in accordance with the plan strategy which seeks to direct new development to the towns and most sustainable villages, such as Great Witley, which offer residents the best access to services and facilities. The new housing is required to meet the needs of the district and not solely Great Witley. The allocation proposed for the SWDPR is a smaller cut of a larger site suggested by the landowner/developer. The SWC considered that the larger site suggested would be too large as it would effectively double size of the village and would harm the heritage asset - the GII* park and garden. No objections from Worcestershire County Council regarding the local road network capacity or the principle of safe access to the site.
		Mrs CG Mann Rep: 3186	<ul style="list-style-type: none"> Loss of greenfield land Lack of infrastructure particularly health care and education. Time of year consultation took place is deceptive 	No objections from the county council regarding the school capacity. Infrastructure requirements are assessed for the amount of new development proposed, contributions towards facilities can be sought where justified.
		L Whiteman Rep ID: 3368	<ul style="list-style-type: none"> Village has had a sufficient number of homes in recent years 	Great Witley is a Category 1 village, where new development is in accordance with the plan strategy which seeks to direct new development to the towns and most sustainable villages, such as Great Witley, which offer residents the best access to services and facilities. The new housing is required to meet the needs of the district and not solely Great Witley.
		Roger Perkins Rep ID: 2467	<ul style="list-style-type: none"> Objects to allocations due to risk of urbanisation and urban sprawl in the countryside. Loss of tranquility has already been compromised due to increased in traffic. Housing is high density and uniform. Increase in light and noise pollution. Increase car usage and carbon emissions. Pressure on Infrastructure Landscape character and natural beauty will be destroyed 	Great Witley is a Category 1 village, the site has been assessed as part of the SHELAA and Sustainability Appraisal and is considered to be in a sustainable location. There will be a loss of countryside to housing, but the site is immediately adjacent to the development boundary and is therefore a logical extension to the village. It will include open space and opportunities for biodiversity net gain. There is no loss of protected green space. There are no objections from Worcestershire County Council regarding the local road network capacity or the principle of safe access to the site. Development will need to be compliant with development management policies in terms of GI, good design and density. The density will have regard to the character of the local built and natural environment.

MHPH09/ CFS0045 Glen Rise, 32 Hallow Lane	Lower Broadheath	No representations received	No issues raised	No response required
MHPH10/CFS0120 Land south of playing field	Martley	Lioncourt Homes (Sarah Blain)	Applicants have submitted a full planning application (21/0918/FUL) for 83 dwellings larger than proposed 71.	The site in question has been, along with all other call for sites that were submitted during the SWCs call for sites consultation periods, subject to analysis, assessment and consultation with both internal and external consultees. The details of this assessment, along with information as to why sites have been selected for allocation can be seen in the SHELAA and on the Site Assessment Spreadsheets. Further site selection analysis has also been undertaken through the Sustainability Appraisal process. By virtue of the assessment process, the SWCs have identified a sufficient amount of sites to deliver the housing and employment requirements needed for the SWDPR plan period, including the identification of reasonable alternatives. As such, the plan is considered sound and legally compliant in this regard and it is not considered necessary to allocate any further sites or expansion of existing sites. South Worcestershire Councils consider that a net density of 30 dph in accordance with SWDPR 15Eiii is appropriate.
		Martin O'Brian	Does not follow a team approach with strong community involvement. Site sits on lower slopes of an Iron Age Fort, a Scheduled Monument and would destroy a landscape feature in Martley NDP. Martley has a made NDP so is entitled to decide where new housing should go.	
		Martley Parish Council (Dr Stuart Cumella)	Strongly oppose allocation in Martley and fails to take into account neighbourhood development plan	
MHPH11/ CFS0336sc Lawn Farm (Phase 3), Drake Street	Welland	Little Malvern and Welland Parish Council	<ul style="list-style-type: none"> Neighbourhood plan is at an advanced stage. Process conducted a site assessment based on Locality Guidance and assessment concluded that site is not suitable. 	Comments on this site are noted, this may be something that Inspector may wish to consider at examination.
MHPH12/CFS1203 Land to north of Stocks Farm	Suckley	Residents in Suckley (Graham Carter, Carol Baron, David and Rebecca Lloyd)	<ul style="list-style-type: none"> Consider the VFRTS to be inaccurate, identifying services and facilities that aren't available in Suckley. The post office and general store are both beyond the development boundary. Footpaths to these facilities are limited so these would be reached by car. A car garage sales/repairs garage was afforded one point but there isn't one within the settlement boundary of the village. The nearest Public House is also closed. Feel Suckley should be category 2. Limited local employment. Nearest train station is Malvern. An appeal was refused on the site in 2015. Main issue considered by the Inspector was whether it was suitable having regard for the characteristics of the site, relationship to village of Suckley, spatial policies and the housing objectives of NPPF. Inspector concluded that site has very rural character. Site is outside but adjacent to AONB. 	<p>The site in question has been, along with all other call for sites that were submitted during the SWCs call for sites consultation periods, subject to analysis, assessment and consultation with both internal and external consultees. These consultees include officers from specialist disciplines including landscape, highways and the ecology team. The details of this assessment, along with information as to why sites have been selected for allocation can be seen in the SHELAA and on the Site Assessment Spreadsheets. Further site selection analysis has also been undertaken through the Sustainability Appraisal process.</p> <p>With regards to the VFRTS, all Parish Councils were consulted on the methodology of this study and were consulted on the services and facilities in their respective settlements and the SWCs were informed of any changes to these since the previous VFRTS. Bus services for settlements in south Worcestershire were analysed by Worcestershire County Council and they provided information on local bus routes and availability of transport from each location in the study. Settlements in Category 1 should have at least 4 key services and score at least 16 points in the VFRTS. In addition, they should have access to all daytime journey types. Suckley meets these requirements. It therefore, in accordance with this study, is a sustainable location for new development.</p> <p>In comparison to other category 1 villages with similar dwelling counts to Suckley (which has a Parish Dwelling Count of 267), Suckley's village uplift percentage is significantly lower. With the SWDPR proposed allocation, the village uplift percentage is 8.24%. This compares to the village uplift percentages of other category 1 settlements including 20.67% for Abberley Common (Parish Dwelling Count of 300), 53.69% for Great Witley (Parish Dwelling Count of 244) and 41.82% for Upton Snodsbury (Parish Dwelling Count of 165).</p> <p>Addressing the concern raised in terms of AONB impact, in accordance with government guidance, the AONB will be taken into consideration. This can be done in terms of design and landscape and the</p>

			<ul style="list-style-type: none"> • Landscape and design concerns • Surrounding road network constraints – narrow lanes. • Reliance on private car. • Agricultural Land Classification maps – identify land as Grade 2. • Badgers on the site. 	<p>density will be in keeping with the local area to mitigate any adverse impacts.</p> <p>SWC are aware of the appeal on the site in 2015. It must be noted that the plan making process is separate to the decision-making process in that a policy off approach is taken and therefore allocations are not tried against current or proposed SWDP policies of which previous (and current) applications are. Regarding the site (CFS1203), the issues present in the dismissed appeal are not major criterion or constraint that would prevent development from occurring. Furthermore, no consultees have presented evidence that would prevent development from occurring or that cannot be mitigated against.</p>
MHPH13/CFS1206sc Land to centre of Bayton	Bayton	No representations received.	No issues raised.	No response required.
MHPH14/CFS0511 Land South of Old Malvern Road	Powick (inc Colletts Green)	Mr Conor Flanagan Alan Williams	<ul style="list-style-type: none"> • Site CFS0514 should also have been allocated. • Low water pressure. • Flood risk. • Poor access. • Traffic congestion. • School capacity. 	Comments on the site are noted. The site in question has been, along with all other call for sites that were submitted during the SWCs call for sites consultation periods, subject to analysis, assessment and consultation with both internal and external consultees. The details of this assessment, along with information as to why sites have been selected for allocation can be seen in the SHELAA and on the Site Assessment Spreadsheets. Further site selection analysis has also been undertaken through the Sustainability Appraisal process. By virtue of the assessment process, the SWCs have identified a sufficient amount of sites to deliver the housing and employment requirements needed for the SWDPR plan period, including the identification of reasonable alternatives. As such, the plan is considered sound and legally compliant in this regard and it is not considered necessary to allocate any further sites.
MHPH15/CFS0167 Land at Milestone	Tunnell Hill (partly to meet needs of Upton-Upon-Severn)	Mr Neil Baldwin	Other potential sites in the village have been ruled out so this one should also.	Comment noted but sites have gone through a consistent selection process.
MHPH16/ CFS1139 Broomfields Farm Shop, School Plantation	Holt Heath	Mr Stephen Williams	<ul style="list-style-type: none"> • Impact on highways network • Increase in traffic and road traffic incidents. • Impact on nature. – site is surrounded by 2 sites by mature native hedgerow which supports local wildlife. Impact has not been fully investigated. <p>No public transport options from the site to Droitwich.</p>	Comments on the site are noted.
MHPH17/CFS0009 Land off A4103	Leigh Sinton	No representations received.	No issues raised.	No response required.
Housing Reallocations				
MHHA01/ SWDP 52m Former Railway Sidings, Peachfield Road	Malvern	Malvern Civic Society (Stephen Goodenough)	There have been many previous proposals for this site over the years.	All reallocations were tested at the SWDP examination and found to be sound. As part of the housing delivery monitoring process the local planning authority wrote to the landowner / agent of SWDP allocations to check that their site was still available and deliverable.
MHHA02/ SWDP 52s Victoria Road Car Park	Malvern	Resident (Mr Greg Dash)	Malvern is short of parking especially at weekends and during the tourist season.	Malvern has good parking provision with six other car parks within the town centre and many other car parks in the wider vicinity. The SWDPR seeks to balance economic, social, and environmental objectives. The SWDPR includes a range of policies that seek to ensure that development is appropriately located and designed.
		Malvern Civic Society (Stephen Goodenough)	Within the Conservation Area so needs consideration.	Any development will need to comply with S.72 Planning (Listed Buildings and Conservation Areas) Act 1990 and ensure that 'special attention shall be

			Ensure land is used to best effect.	paid to the desirability of preserving or enhancing the character or appearance of that area.' SWDPR 08 B states that development proposals will be supported where they conserve and enhance the significance of heritage assets, including their setting. This applies to designated heritage assets, i.e., listed buildings, conservation areas, scheduled monuments, registered parks and gardens and registered battlefields, as well as non-designated heritage assets.
MHHA03/ SWDP52* (19/01298/FUL) Barracks Store, Court Road	Malvern	Malvern Civic Society (Stephen Goodenough)	Site is under construction.	Noted that site is under construction and deliverable.
MHHA04/ SWDP 57/2 Land at the Haven, Oldwood Road	Tenbury Wells	No representations received.	No issues raised.	No response required.
MHHA05/ SWDP57a (18/00045/FUL) Land at Mistletoe Road	Tenbury Wells	No representations received.	No issues raised.	No response required.
MHHA06/ SWDP 57c (18/01839/OUT) Land south of the Oaklands	Tenbury Wells	No representations received.	No issues raised.	No response required.
MHHA07/ SWDP 58c (17/00372/OUT) Land off A4104, north east of Upton Marina	Upton-upon-Severn	No representations received.	No issues raised.	No response required.
MHHA08/ SWDP 59/1 Land at the Orchard	Abberley Common	No significant issues raised	No significant issues raised	No response required
MHHA09/ SWDP 59/2/r (19/00674/RM) Land west of Apostle Oak Cottage	Abberley Common	No significant issues raised	No significant issues raised	No response required
MHHA10/ SWDP 59/11 Strand Cottages, Peachley Lane	Lower Broadheath	No representations received.	No issues raised.	No response required
MHHA11/ SWDP 59* Land adjacent to Henwick Mill House, Martley Road	Lower Broadheath	Catherine O Toole obo St Philips Land Ltd (1799)	Reallocation supported.	Support noted.
MHHA12/ SWDP 60/3 Land at Wheatfield Court	Callow End	MR Malcolm Adams (2873)	Concern raised due to this site being a previously refused planning permission on this site.	Comments on the site are noted. The sites in question have been, along with all other call for sites that were submitted during the SWCs call for sites consultation periods, subject to analysis, assessment and consultation with both internal and external consultees. The details of this assessment, along with information as to why sites have been selected for allocation can be seen in the SHELAA and on the Site Assessment Spreadsheets. Further site selection analysis has also been undertaken through the Sustainability Appraisal process. By virtue of the assessment process, the SWCs have identified a sufficient amount of sites to deliver the housing and employment requirements needed for the SWDPR plan period, including the identification of reasonable alternatives. As such, the plan is considered sound and legally compliant in this regard
MHHA13/ SWDP 60/4 Land adjacent to Highbrae	Clows Top	No significant issues raised	No significant issues raised	No response required
MHHA14/ SWDP 61/* (17/01710/FUL) Land off Pearl Lane, (relates to Stourport)	Astley Cross	No significant issues raised	No significant issues raised	No response required
Mixed Use Sites				

MHMxA01/ SWDP 56 Development at northeast Malvern	Malvern	Beechcroft Land Ltd	<ul style="list-style-type: none"> Continued support for allocation of the western parcel but should include surrounding land as well. Concerns over the delivery of larger strategic sites and the need for smaller sites in the interim. 	Support for SWDPR 56 noted. Additional land around Newland Grange was not submitted in the call for sites and therefore has not been assessed for availability, suitability and deliverability as part of the SHELAA.
Other Sites				
MHOS01/ SWDP 55 Three Counties Showground	Malvern	No representations received.	No issues raised.	No response required.
New Employment				
MHPE01/ CFS0117 Park Farm, Blackmore Park Road	Malvern	Mr Peter Bottomley Mr Simon Border Mr Malcolm Downes Mr Paul Esrich Mrs Alison Skipper Janet Thwaites Duncan Bridges Stephen Goodenough Rebecca Abunassar Hayley Fleming Katharine Harris Dr Graeme Crisp Shirley Goddard Karen Joyce Mrs Janet Thwaites Barbara Woods Eric Knowles Mrs Anne Dicks Katherine Harris Mr Richard Fowler Dr Sarah Crisp	<ul style="list-style-type: none"> No proper assessment of the overall increase in traffic levels. Impact of increase in traffic. Impact on heritage assets. Cumulative impact on infrastructure. Loss of biodiversity. Impact on AONB. Impact on SSSI. Brownfield sites should be chosen first. Impact on tourism. 	<p>Comments on the site are noted. The site in question has been, along with all other call for sites that were submitted during the SWCs call for sites' consultation periods, subject to analysis, assessment and consultation with both internal and external consultees. The details of this assessment, along with information as to why sites have been selected for allocation can be seen in the SHELAA and on the Site Assessment Spreadsheets. Further site selection analysis has also been undertaken through the Sustainability Appraisal process. By virtue of the assessment process, the SWCs have identified a sufficient amount of sites to deliver the housing and employment requirements needed for the SWDPR plan period, including the identification of reasonable alternatives. As such, the plan is considered sound and legally compliant in this regard and it is not considered necessary to allocate any further sites.</p> <p>Further and more detailed evidence on issues such as traffic, heritage impact and landscape impacts will be required will be required at the application stage. This will include any mitigation measures where appropriate.</p>
MHPE02/ CFS0082sc Land off B4208 between Hill View Area and Willow End Business Park	Malvern (Hanley Swan)	Mr Malcolm Downes Mrs Alison Skipper Janet Thwaites Stephen Goodenough Katharine Harris Shirley Goddard Karen Joyce Mrs Janet Thwaites Barbara Woods Eric Knowles Mrs Anne Dicks Katherine Harris Mr Colin Robbins Mr Steven Bloomfield Rebecca Abunassar Mr Alan Garfield Mrs Patricia Garfield Ms Marion Robbins Mr R.H.M Barleet & K.V Shail Christine May David Beech Sophie Hooper Mr Tom Price Humphrey Bartleet	<ul style="list-style-type: none"> No proper assessment of the overall increase in traffic levels. Impact of increase in traffic. Impact on heritage assets. Cumulative impact on infrastructure. Loss of biodiversity. Impact on AONB. Impact on SSSI. Brownfield sites should be chosen first. Impact on tourism. 	<p>Comments on the site are noted. The site in question has been, along with all other call for sites that were submitted during the SWCs call for sites consultation periods, subject to analysis, assessment and consultation with both internal and external consultees. The details of this assessment, along with information as to why sites have been selected for allocation can be seen in the SHELAA and on the Site Assessment Spreadsheets. Further site selection analysis has also been undertaken through the Sustainability Appraisal process. By virtue of the assessment process, the SWCs have identified a sufficient amount of sites to deliver the housing and employment requirements needed for the SWDPR plan period, including the identification of reasonable alternatives. As such, the plan is considered sound and legally compliant in this regard and it is not considered necessary to allocate any further sites.</p> <p>Further and more detailed evidence on issues such as traffic, heritage impact and landscape impacts will be required will be required at the application stage. This will include any mitigation measures where appropriate.</p>
MHPE03/ CFS0084 Land off B4208 between disused railway track and Willow End Business Park	Malvern (Hanley Swan)	Mr Malcolm Downes Mrs Alison Skipper Janet Thwaites Stephen Goodenough Rebecca Abunassar Ms Maggie Williams Katharine Harris Shirley Goddard Karen Joyce Mrs Janet Thwaites	<ul style="list-style-type: none"> No proper assessment of the overall increase in traffic levels. Impact of increase in traffic. Impact on heritage assets. Cumulative impact on infrastructure. Loss of biodiversity. Impact on AONB. 	<p>Comments on the site are noted. The site in question has been, along with all other call for sites that were submitted during the SWCs call for sites consultation periods, subject to analysis, assessment and consultation with both internal and external consultees. The details of this assessment, along with information as to why sites have been selected for allocation can be seen in the SHELAA and on the Site Assessment Spreadsheets. Further site selection analysis has also been undertaken through the Sustainability Appraisal process. By virtue of the assessment process, the SWCs have identified a</p>

		Barbara Woods Mr Duncan Williams Eric Knowles Mrs Anne Dicks Katherine Harris Mr Tom Price	<ul style="list-style-type: none"> Impact on SSSI. Brownfield sites should be chosen first. Impact on tourism. 	<p>sufficient amount of sites to deliver the housing and employment requirements needed for the SWDPR plan period, including the identification of reasonable alternatives. As such, the plan is considered sound and legally compliant in this regard and it is not considered necessary to allocate any further sites.</p> <p>Further and more detailed evidence on issues such as traffic, heritage impact and landscape impacts will be required will be required at the application stage. This will include any mitigation measures where appropriate.</p>
MHPE04/ CFS1097a Land at Mayfield Road	Malvern	Dr Alison Hodge Duncan Bridges Mrs Alison Skipper Madresfield Estate Trust Mr Richard Fowler Dr Sarah Crisp Mr Kevin Poole Mr Geoff Titmuss Mr Peter Bottomley Mr Malcolm Downes Janet Thwaites Stephen Goodenough Katharine Harris Dr Graeme Crisp Shirley Goddard Karen Joyce Mrs Janet Thwaites Barbara Woods Eric Knowles Mrs Anne Dicks Katherine Harris	<ul style="list-style-type: none"> No proper assessment of the overall increase in traffic levels. Impact of increase in traffic. Impact on heritage assets. Cumulative impact on infrastructure. Loss of biodiversity. Impact on AONB. Impact on SSSI. Brownfield sites should be chosen first. Impact on tourism. 	<p>Comments on the site are noted. The site in question has been, along with all other call for sites that were submitted during the SWCs call for sites consultation periods, subject to analysis, assessment and consultation with both internal and external consultees. The details of this assessment, along with information as to why sites have been selected for allocation can be seen in the SHELAA and on the Site Assessment Spreadsheets. Further site selection analysis has also been undertaken through the Sustainability Appraisal process. By virtue of the assessment process, the SWCs have identified a sufficient amount of sites to deliver the housing and employment requirements needed for the SWDPR plan period, including the identification of reasonable alternatives. As such, the plan is considered sound and legally compliant in this regard and it is not considered necessary to allocate any further sites.</p> <p>Further and more detailed evidence on issues such as traffic, heritage impact and landscape impacts will be required will be required at the application stage. This will include any mitigation measures where appropriate.</p>
MHPE05/ CFS0141b Land Adjoining Blackmore Park	Malvern	Mr Peter Bottomley Mr Simon Border Mr Malcolm Downes Mr Paul Esrich Mrs Alison Skipper Janet Thwaites Duncan Bridges Stephen Goodenough Rebecca Abunassar Hayley Fleming Katharine Harris Dr Graeme Crisp Shirley Goddard Karen Joyce Mrs Janet Thwaites Barbara Woods Eric Knowles Mrs Anne Dicks Katherine Harris Blackmore Park Ltd Mr Ben Green Mr Richard Fowler	<ul style="list-style-type: none"> No proper assessment of the overall increase in traffic levels. Impact of increase in traffic. Impact on heritage assets. Cumulative impact on infrastructure. Loss of biodiversity. Impact on AONB. Impact on SSSI. Brownfield sites should be chosen first. Impact on tourism. 	<p>Comments on the site are noted. The site in question has been, along with all other call for sites that were submitted during the SWCs call for sites consultation periods, subject to analysis, assessment and consultation with both internal and external consultees. The details of this assessment, along with information as to why sites have been selected for allocation can be seen in the SHELAA and on the Site Assessment Spreadsheets. Further site selection analysis has also been undertaken through the Sustainability Appraisal process. By virtue of the assessment process, the SWCs have identified a sufficient amount of sites to deliver the housing and employment requirements needed for the SWDPR plan period, including the identification of reasonable alternatives. As such, the plan is considered sound and legally compliant in this regard and it is not considered necessary to allocate any further sites.</p> <p>Further and more detailed evidence on issues such as traffic, heritage impact and landscape impacts will be required will be required at the application stage. This will include any mitigation measures where appropriate.</p>
MHPE06/ CFS1019asc Land to the west of Worcester Road, Open Barn Farm	Kempsey	No significant issues raised	No significant issues raised	No response required
MHPE07/ CFS0487 Land at Bluebell Farm	Earls Croome	No significant issues raised	No significant issues raised	No response required
MHPE08/ CFS0696 Land to the north of Digaway	Ryall	Mr Tom Goodwin Mike Evans Land & Partners Ltd	Site should be replaced with an employment allocation on Land at Ryall.	Comment noted but sites have gone through a consistent selection process.
MHPE09/ CFS1212a Plot 1 Severn House, Crown East	Rushwick	No representations received.	No issues raised	No response required
MHPE10/ CFS1212b Plot 2 Severn House, Crown East	Rushwick	No representations received.	No issues raised	No response required

Employment Reallocations				
MHEA01/ SWDP 53B Malvern Technology Centre (QinetiQ)	Malvern	No representations received.	No issues raised	No response required
MHEA02/ SWDP 54 Blackmore Park	Malvern	No representations received.	No issues raised	No response required

**Summary of main issues for the Wychavon Allocations identified from the Regulation 19 consultation of the
SWDP Review**

Allocations	Settlement	Respondents (All)	Main Issue	Response
New Housing / Mixed Use				
Droitwich				
WYPHM01/ CFS0107 Hill Top Farm, Newland Lane	Droitwich Spa	No representations received.	No issues raised.	No response required.
WYPHM02/ CFS0370 Land off Tagwell Road	Droitwich Spa	Radford158; Droitwich Spa Town Council 408; Taylor Wimpey Strategic Land 940;	Access and increase of traffic to surrounding road network raises road safety and congestion concerns. No evidence that the site can mitigate against noise levels generated by proximity to M5.	Comments noted. Highway modelling has not identified an issue with road capacity or safety. Worcestershire Regulatory Services have raised no objection to the inclusion of the allocation based on noise or air pollution from the M5. Permission has recently been granted on appeal for up to 100 dwellings on the site, which is now subject to a Reserve Matters application (W/23/00247/RM).
WYPHM03/ CFS0733 Land at Mayflower Road	Droitwich Spa	Morris 248; 1411; Droitwich Spa Town Council 408;	Current open space value to the local residents. Cumulative impact of these smaller site allocations on road infrastructure, services and facilities.	Comments noted.
WYPHM04/ CFS0855a CFS0855b Land north / south of Union Lane	Droitwich Spa	Taylor Wimpey Strategic Land 940; Beechcroft Land Ltd 2339; St Philips Ltd 2183, 2305, 2184; 2185	Query deliverability and site capacity at 400 dwellings. The site is unlikely to come forward early in the plan period. The market is more likely to support lower level of development and town house rather than flats. Land contamination is a concern given former use as chemical plant. Proximity to the railway line limits potential for residential development across the whole site. Raises the issue of viability. Allocation is near or on site of a Scheduled Monument.	Comments noted. This may be something the Inspector may like to consider at examination.
WYPHM06/ CFS0969 Land at Keepers Cottage, Newland Road	Droitwich Spa	Taylor Wimpey Strategic Land 940	Unclear how access can be achieved.	The promoter of the site has secured access via the adjoining site.
WYPHM07/ SWDP48/6 Canal Basin (Netherwich)	Droitwich Spa	Taylor Wimpey Strategic Land 940	Question deliverability as the site has been reallocated twice since inclusion in the Wychavon District Local Plan in 2006. Existing business on part of site. No update to the site assessment has been undertaken. Site should be deallocated.	Comments noted. This may be something the Inspector may like to consider at examination.
Evesham				
WYPHM08/ CFS0367 Land to the west of Lingfield Road	Evesham	BFP Developments Ltd (2253) Mr Colin Merriman (3399)	Support allocation Objection due to the area already being overdeveloped	Support noted. Impact upon the surrounding area has been considered when allocating sites
WYPHM09/ CFS0308 Land at Common Road	Evesham	No representations received.	No issues raised.	No response required.
WYPHM10/ CFS1056sc Land south of Pershore Road, Hampton (Gisbourne Gardens)	Evesham	No representations received.	No issues raised.	No response required.
WYPHM11/ CFS0709 Land off Swan Lane / High Street	Evesham	No representations received.	No issues raised.	No response required.
WYPHM12/ CFS0991 Riverside Shopping Centre	Evesham	No representations received.	No issues raised.	No response required.
WYPHM13/ CFS1205sc Land at Cheltenham Road (Chemtura)	Evesham	No representations received.	No issues raised.	No response required.
Pershore				

WYPH01/ CFS0691sc Land off Wyre Road	Persnore	Mike Oakley (155); Gina Griffin (2696); Ian Daniels (3050); Terry Smith (late rep 3057) McLoughlin Planning Ltd obo Vistry Gp (2370)	Lead to coalescence of Persnore and Wyre Piddle and, in combination with development of Strategic allocation at Throckmorton, would urbanise the area from Persnore in the South West to Throckmorton in the North West. When looking North from Bredon Hill (Cotswold AONB) rather than a view of a small market town and rural villages the view will be of housing estates and industrial units spreading out into the distance. Lack of infrastructure, amenities and local employment, severe traffic congestion. There are unresolved objections and concerns raised by the Town Council, landscape officer, highways authority and regulatory services on planning application 22/01597/FUL (which covers a larger site and is for 111 homes)	Comments noted. It is acknowledged that the view northwards from Bredon Hill would be changed as a result of the allocated sites around Persnore and the larger strategic allocation at Throckmorton but new built development would be interspersed with, and existing settlements separated by, green buffers, areas of open space and undeveloped land. There are no objections from Highways to the principle of development of the allocation. The site has been assessed as part of the SHELAA and Sustainability Appraisal and is considered to be suitable for development. Comments noted regarding planning application consultee responses – these will be considered through the DM process. There are no objections from Highways to the principle of development of the allocation. The site has been assessed as part of the SHELAA and Sustainability Appraisal and is considered to be suitable for development.
WYPH02/ CFS0101 Land off Wyre Road North	Persnore	Mike Oakley (155); Gina Griffin (2696); Ian Daniels (3050); Terry Smith (late rep 3057)	Lead to coalescence of Persnore and Wyre Piddle and, in combination with development of Strategic allocation at Throckmorton, would urbanise the area from Persnore in the South West to Throckmorton in the North West. When looking North from Bredon Hill (Cotswold AONB) rather than a view of a small market town and rural villages the view will be of housing estates and industrial units spreading out into the distance. Lack of infrastructure, amenities and local employment, severe traffic congestion.	Comments noted. It is acknowledged that the view northwards from Bredon Hill would be changed as a result of the allocated sites around Persnore and the larger strategic allocation at Throckmorton but new built development would be interspersed with, and existing settlements separated by, green buffers, areas of open space and undeveloped land. There are no objections from Highways to the principle of development of the allocation. The site has been assessed as part of the SHELAA and Sustainability Appraisal and is considered to be suitable for development.
WYPH03/ CFS0807 WYPH04/CFS0808 WYPH05/ CFS0641 Land South of the Holloway	Persnore	Gina Griffin (2696); Ian Daniels (3050); Terry Smith (late rep 3057) Persnore Town Council (194) Worcs Wildlife Trust (572) Ridge LLP obo Bromford Developments Ltd (2241) McLoughlin Planning Ltd obo Vistry Gp (2372 & 2373)	Lack of infrastructure, amenities and local employment, severe traffic congestion. The 112 homes proposed in SWDPR63 rely on access onto Holloway and will impact on other nearby junctions. Worcestershire County Council has already expressed their concerns and therefore the plan is not sound in this respect. Additionally there is evidence that no consideration has been given to the cumulative impact on Persnore from multiple developments also making the plan unsound. Potential to cause similar harm to the deleted SWDP NEW 115, albeit to a lesser degree. As a result we would recommend reducing the number of dwellings allocated at this location. Strict safeguards to prevent harm to Tiddesley Wood SSSI will be required for development of any scale in this area. We recommend a reduction in the number of dwellings allocated at SWDP NEW 22, 23, 24 - Land South of the Holloway and suggest that policy wording should be added to ensure appropriate safeguards are in place to protect the nearby SSSI in line with the council's legal duties in relation to the Wildlife and Countryside Act 1981 (as amended) and national planning policy. Supportive but want to increase number of dwellings to 120	Comments noted. The statutory consultees, including highways, have not raised any concerns that cannot be overcome. Evidence and mitigation of any issues will be required at any application stage. Comments noted. The statutory consultees, including highways, have not raised any concerns that cannot be overcome. Evidence and mitigation of any issues will be required at any application stage. Comments noted. There is a gap of approx. 260m minimum between the allocation and the SSSI which could be increased if designed to include a further buffer/open space through the DM process. These sites will be developed comprehensively to include Green Infrastructure to protect and minimise any adverse impact on the Great Crested Newts and the SSSI at Tiddesley Wood. Comments noted. The number of dwellings quoted in this policy for this site is an indicative figure. Comments noted. The statutory consultees, including highways, have not raised any concerns that cannot be overcome. Evidence

			Objects on the grounds of landscape impact, impact upon protected species and habitat, drainage and unsuitable access. Promoting omission sites CFS0556a and 556b Land off Worcester Rd, Pershore.	and mitigation of any issues will be required at any application stage. Furthermore, the omission sites (CFS0556a and 556b) have been, along with all other call for sites that were submitted during the SWCs call for sites consultation periods, subject to analysis, assessment and consultation with both internal and external consultees. The details of this assessment, along with information as to why sites have been selected for allocation can be seen in the SHELAA and on the Site Assessment Spreadsheets. Further site selection analysis has also been undertaken through the Sustainability Appraisal process. By virtue of the assessment process, the SWCs have identified a sufficient amount of sites to deliver the housing and employment requirements needed for the SWDPR plan period, including the identification of reasonable alternatives. As such, the plan is considered sound and legally compliant in this regard and it is not considered necessary to allocate any further sites.
Cat 1				
WYPHM14/ CFS1228 Combination of land at rear of 34 Bretforton Road and Land at Brewers Lane	Badsey	Erik Pagano (Landform Estates)	Landowner considers the site should be allocated for more than 120 homes	The site in question has been, along with all other call for sites that were submitted during the SWCs call for sites consultation periods, subject to analysis, assessment and consultation with both internal and external consultees. The details of this assessment, along with information as to why sites have been selected for allocation can be seen in the SHELAA and on the Site Assessment Spreadsheets. Further site selection analysis has also been undertaken through the Sustainability Appraisal process. By virtue of the assessment process, the SWCs have identified a sufficient amount of sites to deliver the housing and employment requirements needed for the SWDPR plan period, including the identification of reasonable alternatives. As such, the plan is considered sound and legally compliant in this regard and it is not considered necessary to increase the housing number for this allocation.
WYPHM15/ CFS1208 Land off Kennel Lane	Broadway	National Trust	No objection in principle. Would like to see an emphasis on appropriate design and landscaping given the views of the site from higher ground in the AONB.	Comments noted.
WYPHM16/ SWDP 59/19 Land adjacent to Station Road	Broadway	Spit Fire Homes	Supports the allocation at Station Road. Revise wording of the footnote to make it clear that the re-provision of playing fields is to be at least equitable or better in quantity and quality to existing provision at the site and to facilitate the growth of the football club.	Support noted. Sport England have concerns with the wording proposed and would wish to see the footnote wording revised to ensure that this makes it clear that the re-provision of playing fields will be at least equitable or better in quantity and quality in accordance with Para 99 of the NPPF.
WYPHM17/ CFS0199 Fresh Fields, Stonebow Road	Drakes Broughton	Councillor Mark Ward	Village has had significant growth without additional infrastructure or public services. Concerned that Worcestershire Parkway is only 2.5 miles away.	The site is allocated for 25 dwellings and this is considered to be a relatively small increase in the size of the settlement, even when taking the other allocation into account.
WYPHM18/ CFS1050sc Thornleigh Farm, Stonebow Road	Drakes Broughton	Councillor Mark Ward	Village has had significant growth without additional infrastructure or public services. Concerned that Worcestershire Parkway is only 2.5miles away.	The site is allocated for 25 dwellings and this is considered to be a relatively small increase in the size of the settlement, even when taking the other allocation into account.
WYPHM19/ CFS0689 Land west of Dilmore Lane	Fernhill Heath	Terra Strategic (1142) William Davies Developments (1937)	Support the allocation however it is felt Fernhill Heath would be able to accommodate a larger housing number.	The site in question has been, along with all other call for sites that were submitted during the SWCs call for sites consultation periods, subject to analysis, assessment and consultation with both internal and external consultees. The details of this assessment, along with information as to why sites have been selected for allocation can be seen in the SHELAA and on the Site Assessment Spreadsheets. Further site selection analysis has also been undertaken through the Sustainability Appraisal process. By virtue of the assessment process, the SWCs have identified a

				sufficient amount of sites to deliver the housing and employment requirements needed for the SWDPR plan period, including the identification of reasonable alternatives. As such, the plan is considered sound and legally compliant in this regard and it is not considered necessary to increase the housing number for this allocation.
		David Roberts (2576, 2577,2578)	Loss of Agricultural Land and contravention to BMV soils protection legislation Traffic and lack of sustainable travel concerns Not compliant with the NDP	The statutory consultees, including the Highways Authority, have not raised any concerns with this site. Evidence and mitigation of any issues will be required at any application stage. The allocation is not considered to be in conflict with the NDP.
WYPHM20/ CFS0420 Land off Southall Drive	Hartlebury	Nigel Gough (1566) Sport England (208)	Site should accommodate more smaller bed homes and so the indicative figure should be raised to 70 or range of 60 to 70 to ensure the local community is aware of this. Sport England's view remains that the proposed allocation has the potential to prejudice the use of the adjoining playing field due to proximity to the adjoining cricket pitch. A risk assessment will be required with appropriate mitigation secured along the western boundary of the site. This should be suitably referenced in a footnote to the allocation.	Comments noted. The housing figure is indicative only and uses the SWC standard calculation for villages of 30dph. The DM process will determine the actual number of dwellings permissible. Comments noted. This may be something the Inspector may like to consider at examination.
WYPHM21/ CFS0371 Land off Inn Lane, Roselands	Hartlebury	Not a reg19 rep	Concern regarding inadequate access to the site.	Comments noted. This may be something the Inspector may like to consider at examination.
WYPHM22/ CFS0108 Land to the rear of Withyfields, Withybed Lane	Inkberrow	No representations received	No issues raised.	No comments required
WYPHM23/ CFS0817 Land off Withybed Lane	Inkberrow	Elan Homes (1367)	Support and confirms in full control of whole site	Support noted.
WYPHM24/ CFS0355 Land immediately adjoining southern side of Boat Lane	Offenham	Offenham Parish Council (911)	Loss of Grade 1 agricultural land and impact on food production and security. Concerns that infrastructure is at capacity. Highways modelling was conducted during pandemic so concerned it is inaccurate. Allocations are significantly more in Offenham compared to other category 1 villages. Development boundary has not been extended to cover any of the proposed sites.	Comments noted. The evidence for the South Worcestershire Councils' spatial strategy is set out in the Spatial Strategy Background paper, which was informed by extensive consultation to set the agreed spatial strategy. This is further supported by the Village Facilities and Rural Transport Study, which served to inform the settlement hierarchy. In turn the evidence for the selection of sites for allocation can be seen in the SHELAA and on the Site Assessment Spreadsheets. Further site selection analysis has also been undertaken through the Sustainability Appraisal process. The plan is therefore considered sound and legally compliant in this regard.
WYPHM25/ CFS0632 Land south of Three Cocks Lane	Offenham	Terra-Strategic	Allocation of land is supported.	Support noted.
WYPHM26 / CFS0690 Land off Laurels Road	Offenham	Terra-Strategic	Whole site at risk of surface water flooding. Inclusion of this site is questionable due to lack of evidence of its deliverability, particularly due to no clear suitable access, ecological and arboricultural constraints onsite.	Comments on the site are noted. The site in question has been, along with all other call for sites that were submitted during the SWCs call for sites consultation periods, subject to analysis, assessment and consultation with both internal and external consultees. The details of this assessment, along with information as to why sites have been selected for allocation can be seen in the SHELAA and on the Site Assessment Spreadsheets. Further site selection analysis has also been undertaken through the Sustainability Appraisal process. By virtue of the assessment process, the SWCs have identified a sufficient amount of sites to deliver the housing and employment requirements needed for the SWDPR plan period, including the identification of reasonable alternatives. As such, the plan is considered sound and legally compliant in this regard and it is not considered necessary to allocate any further sites.
WYPHM27 / SWDP59/26 Land north of Woodhall Lane	Ombersley	Ombersley Conservation Trust	The site already has planning permission so the SWDPR should allocate reasonable alternative sites in Ombersley.	Reasonable alternatives have been considered as part of the Review.

WYPHM28/ CFS0266 Land to the rear of Cutts Pool	Upton Snodsbury	Upton Snodsbury Parish Council Dr Ronald Gardner	Previous appeal for 22 dwellings dismissed Highways safety and access concerns Greenfield with high biodiversity value No clear justification for the allocation Policies Map inaccurate Unsustainable location	The statutory consultees, including the Highways Authority, have not raised any concerns with this site. Evidence and mitigation of any issues will be required at any application stage. Inaccuracies in the mapping will be reviewed.
WYPHM29/ CFS0401sc Double Gates Farm, Pershore Road	Upton Snodsbury	Upton Snodsbury Parish Council	Objection – contravention with SWDPR05 due to heritage concerns. Reasonable alternative at Former Coventry Arms Pub (CFS0541) Flooding concerns	The statutory consultees, have not raised any concerns with this site. Evidence and mitigation of any issues, including impact on heritage assets, will be required at any application stage. Reasonable alternatives have been considered as part of the Review.
WYPHM30/ CFS0486 Land at Chequers Lane	Wychbold	Environment Agency	Chequers Lane falls within Severn Middle Catchment and has a high risk of fluvial flooding. The latest SFRA modelling by JBA for the Severn Middle catchment has resulted in a reduction in the threshold from 35% to 30%.	Should make developers aware of changes but not a soundness issue.
Cat 2				
WYPH06/ CFS0484sc Land north of New Street	Bretforton	Bretforton Parish Council	No objections in principle. Pavement access to site is needed. Some concerns over the adjacent burial ground needing wider access and car parking but think a minor adjustment to DB would resolve this. Want to build a new hall and think adjacent to the site would be ideal.	Comments and support for site noted.
WYPH07/ CFS1181 Land west of Ivy Lane	Bretforton	Deeley Homes	Omission representation promoting their own site (CFS035). No other representations received.	This may be something the Inspector may like to consider at examination.
WYPH08/ CFS0380 Land north east of Main Street	Cleeve Prior	Duncan Harvey (371) Cleeve Prior Parish Council (867)	The site lies within the Conservation area and is adjacent to designated Local Green Space 3 in the NDP and would impact public views identified in the NDP	Comments noted. This may be something the Inspector may like to consider at examination.
WYPH09/ CFS0993 Site off Main Street and Mill Lane	Cleeve Prior	Duncan Harvey (371) Cleeve Prior Parish Council (867) Pete and Mandy English (3007) Elizabeth Murphy (2839) Woodland Trust (1395)	The housing number of 52 is more than 3 times the identified housing requirement Flooding, Biodiversity Highways, and Conservation concerns Not in compliance with the NDP in terms of Conservation and protecting public views. Consideration should be given to the current planning permission for 80 houses (19/00140/OUT) Indirect harm to Earls Lane Wood	Comments noted. This may be something the Inspector may like to consider at examination. It is noted that application 19/00140/OUT is pending decision.
		Messrs and Mrs Baker and Howe (1299) Ronald Solomon (2954)	Support for the allocation by landowners	Support noted
WYPH10/ CFS0568a Land at the Daves, Middle	Crothorne	Cllr Kathryn Stayn (3468)	Highway safety concerns	Comment noted, however it is considered that safety issues could be addressed at the application stage.
WYPH11/ CFS1173 Land at Middle Lane / Field Barn Lane	Crothorne	Cllr Kathryn Stayn (3468)	Highway safety concerns	Comment noted, however it is considered that safety issues could be addressed at the application stage.
WYPH12/ CFS0019 Land off Church Road	Crowle (and Crowle Green)	Councillor Mrs Margaret Rowley Nick Farress	Severn Trent should be obliged to improve the treatment of sewage before any further development is allowed on Crowle.	Severn Trent have been consulted as part of the plan preparation process and have raised no concerns about additional development in this area.
WYPH13/ CFS1124sc Land at Mill End Racing Stables	Elmley Castle	Mr Gary Hickley (1594)	Location of site inappropriate. Access to site dangerous and historic evidence of flooding. The allocation will erode the open space between Elmley Castle and Netherton and allocation should be removed.	The site in question has been, along with all other call for sites that were submitted during the SWCs call for sites consultation periods, subject to analysis, assessment and consultation with both internal and external consultees. The details of this assessment, along with information as to why sites have been selected for allocation can be seen in the SHELAA and on the Site Assessment Spreadsheets. Further site selection analysis has also been undertaken through the Sustainability Appraisal process. By

				virtue of the assessment process, the SWCs have identified a sufficient amount of sites to deliver the housing and employment requirements needed for the SWDPR plan period, including the identification of reasonable alternatives. As such, the plan is considered sound and legally compliant in this regard
WYPH14/ CFS0560 Land adjacent to Defford Motors, Upton Road	Defford	Defford and Besford Parish Council (409)	New allocation – all three allocations should have same address as adjacent and on same stretch of road. 2014 application refused due to size (63 dwellings), sustainability and impact on the environment. Concerns regarding traffic, both quantity and speed and access to remainder of the settlement as narrow junction into Crown Lane.	The statutory consultees, including the Highways Authority, have not raised any concerns with this site. Evidence and mitigation of any issues will be required at any application stage.
WYPH15/ CFS0948 Land off Main Street, Defford Motors	Defford	Defford and Besford Parish Council (409)	Reallocation – all three allocations should have same address as adjacent and on same stretch of road. 2014 application refused due to size (63 dwellings), sustainability and impact on the environment. Concerns regarding traffic, both quantity and speed and access to remainder of the settlement as narrow junction into Crown Lane.	The statutory consultees, including the Highways Authority, have not raised any concerns with this site. Evidence and mitigation of any issues will be required at any application stage.
WYPH16/ CFS0658 Land Off Upton Road	Defford	Defford and Besford Parish Council (409) Keith Smith (2424)	New allocation – all three allocations should have same address as adjacent and on same stretch of road. 2014 application refused due to size (63 dwellings), sustainability and impact on the environment. Concerns regarding traffic, both quantity and speed and access to remainder of the settlement as narrow junction into Crown Lane.	The statutory consultees, including the Highways Authority, have not raised any concerns with this site. Evidence and mitigation of any issues will be required at any application stage.
WYPH17/ CFS0866 Land adjacent to and west of Galton Arms	Himbleton	Dr E Roberts Eileen Roberts J George Andrew Knight Miss Kath Holmes Chris Jelfs Cathy Hunter Mike Gee	<ul style="list-style-type: none"> Flood risk. Poor highways access. 	The statutory consultees have not raised any concerns with this site. Evidence and mitigation of any issues will be required at any application stage.
WYPH18/ CFS0769 Blacksmiths Lane	Lower Moor	Mr Graham Langham (1592) Mrs Kim Hawtree (1609) Mr Tommy Buggins (1690) Millstrand Properties Ltd. (2337) Historic England (578)	Objection to the erosion of the countryside and impact on unsuitable roads and habitat of protected species. Risk to flooding and sewerage capacity Objection to increase in capacity from Reg 18 to Reg 19 Suggestion that CFS0299 should be allocated instead Potential issues relating to the historic environment, the Schedule Monument and its setting in particular.	The site in question has been, along with all other call for sites that were submitted during the SWCs call for sites consultation periods, subject to analysis, assessment and consultation with both internal and external consultees. The details of this assessment, along with information as to why sites have been selected for allocation can be seen in the SHELAA and on the Site Assessment Spreadsheets. Further site selection analysis has also been undertaken through the Sustainability Appraisal process. By virtue of the assessment process, the SWCs have identified a sufficient amount of sites to deliver the housing and employment requirements needed for the SWDPR plan period, including the identification of reasonable alternatives. As such, the plan is considered sound and legally compliant in this regard. This may be something the Inspector may like to consider at examination.
WDCPH19/ CFS0605 Land west of Upton Snodsbury Road	Pinvin		Adverse impact on environment and biodiversity, increased traffic, concern with travellers site as already one in village, concerns regarding children's safety crossing main road, question where the evidence is regarding move to active travel, question use of rail network due to it unreliability.	Comments noted – site is already built out.
WDCPH20/ CFS0461 Long Hyde Road	South Littleton	Christ Church (1800)	Landowner support for the allocation	Support noted
WDCPH21/ CFS0630asc Speed-the-Plough, Plough Road	Tibberton	Canal & River Trust (671)	The Single width canal bridge at Tibberton cannot be widened and suffers from a lack of forward visibility, resulting in bridge strikes and structural damage. The bridge has a weight restriction. Any new development in this area should consider traffic control measures to protect the bridge and its users. Any	Comments noted. Traffic, particularly HGVs, to and from the site is more likely to use the main roads and avoid the narrow bridge at Tibberton. This may be something the Inspector may like to consider at examination.

		<p>Carol Biggs (117), Angela Innes (172), Ross Innes (173), Christine Finley (1564), Jane Taylor (2662), Diane Nuttin (2799), Trevor & Amanda Knight (2959), Graham Lewis (3223), Patricia Lewis (3462), Wendy and Roger Scase (3477)</p>	<p>development which may result in an increase in usage of the canal towpath, either as a recreational route or as a sustainable off-road active travel route should consider whether the towpath width and surfacing is suitable to cope with the anticipated level of additional usage.</p> <p>No need for the dwellings, too many new houses already built in the village, lack of infrastructure – e.g. bus services (only 2 a day to Worcester and none to Droitwich), inadequate access to the village from Droitwich using a single track, right angled bend leading to a listed bridge, already a lot of traffic going through the village because of large housing estates built south of Droitwich with more to come, problematic access from Evelench Lane, lots of extra cars parked in close proximity to the site at school opening and closing times, village school is oversubscribed and local children already have to go elsewhere for schooling, no shop or post-office, no medical facilities and many residents use facilities in Droitwich which have to use a car to get to, is a cafeteria planned and this will add to the congestion at the junction of Evelench Lane and Plough Road, Plough Meadow is a wetland area which frequently floods and removal of the meadows would worsen the flooding particularly with climate change, inadequate sewage system in the village with back up of sewage already experienced, impact on PROWs.</p>	<p>Comments noted. The statutory consultees, including highways, have not raised any concerns that cannot be overcome. Evidence and mitigation of any issues will be required at any application stage.</p>
		<p>Wendy and Roger Scase (3477)</p>	<p>Object as site provides foraging habitat for breeding curlew. Curlews require both nesting and foraging areas. They are regularly seen and heard on this site. Object to difficulty with accessing documents for the SWDPR.</p>	<p>Comments noted. The allocation is much smaller than the Call For Sites submission (CFS0630), is immediately adjacent to existing houses and subsequently unlikely to impact on curlews. The statutory consultees, including Natural England, have not raised any concerns that cannot be overcome. Evidence and mitigation of any issues will be required at any application stage.</p>
		<p>McLoughlin Planning obo Mactaggart & Mickel Gp (1787)</p>	<p>Support allocation but advise that larger site for approx. 100 homes is available.</p>	<p>Comments noted. The site in question has been, along with all other call for sites that were submitted during the SWCs call for sites consultation periods, subject to analysis, assessment and consultation with both internal and external consultees. The details of this assessment, along with information as to why sites have been selected for allocation can be seen in the SHELAA and on the Site Assessment Spreadsheets. Further site selection analysis has also been undertaken through the Sustainability Appraisal process. By virtue of the assessment process, the SWCs have identified a sufficient amount of sites to deliver the housing and employment requirements needed for the SWDPR plan period, including the identification of reasonable alternatives. As such, the plan is considered sound and legally compliant in this regard and it is not considered necessary to increase the size of the site or the housing number for this allocation.</p>
Cat 3				
WYPH22/ CFS0584 Meadowcroft, Bishampton Road	Flyford Flavell	No representations received.	No issues raised.	No response required.
WYPH23/ CFS0028 Top Croft, Cleeve Road	North and Middle Littleton	Tosney Developments Ltd.	<p>Agent for the landowner confirming deliverability and availability. Planning permission granted 2019 for 6 affordable homes.</p> <p>No other representations received.</p>	Confirmation of availability noted.
WYPH24/ CFS0055 Land at junction of Cleeve Road and School Lane	North and Middle Littleton	No representations received.	No issues raised.	No response required.

WYPH25/ CFS0010 Springfield Nurseries, Main Street	Sedgeberrow	No representations received	No issues raised.	No comments required
Housing Reallocations				
WYHMA01/ SWDP 46/1 Garage, High Street	Pershore	No representations received	No issues raised.	No comments required
WYHMA02/ SWDP 46/4 Garage Court, Abbots Road	Pershore	No representations received	No issues raised.	No comments required
WYHMA03/ SWDP 47/1 Land to the north of Pershore	Pershore	No representations received	No issues raised.	No comments required
WYHMA04/ SWDP 48/2 Boxing Club Kidderminster Road	Droitwich		No issues raised.	No response required.
WYHMA05/ SWDP 48/3 Oakham Place	Droitwich	Droitwich Spa Civic Society 708; Morris 245;	Loss of open space for recreation/scout facility.	Comments noted.
WYHMA06/ SWDP 48/4 Acre Lane	Droitwich	Droitwich Spa Civic Society 708; Morris 245;	Loss of scout and guide facility.	Comments noted.
WYHMA07/ SWDP 48/5 Willow Court, Westwood Road	Droitwich		No issues raised.	No response required.
WYHMA08/ SWDP 50/2 (19/01410/FUL) Employment site, top of Kings Road	Evesham	No representations received.	No issues raised.	No response required.
WYHMA09/ SWDP 50/4 Land off Davies Road	Evesham	No representations received.	No issues raised.	No response required.
WYHMA10/ SWDP 50/5 (19/01541/FUL)	Evesham	No representations received.	No issues raised.	No response required.
WYHMA11/ SWDP 50/6	Evesham	No representations received.	No issues raised.	No response required.
WYHMA12/ SWDP 50/7 Land off Abbey Road	Evesham	David Ashely (2630)	Overall support for the reallocation. Archaeological findings need to be given protection	Comments noted - archaeological impacts have been considered and will be further assessed at development management stage
WYHMA13/ SWDP 59/24 Laurels Avenue	Offenham	Offenham Parish Council (911)	Loss of Grade 1 agricultural land and impact on food production and security. Concerns that infrastructure is at capacity. Highways modelling was conducted during the pandemic so concerned it is inaccurate. Allocations are significantly more in Offenham compared to other category 1 villages. Development boundary has not been extended to cover any of the proposed sites.	Comments noted. The evidence for the South Worcestershire Councils' spatial strategy is set out in the Spatial Strategy Background paper, which was informed by extensive consultation to set the agreed spatial strategy. This is further supported by the Village Facilities and Rural Transport Study, which served to inform the settlement hierarchy. In turn the evidence for the selection of sites for allocation can be seen in the SHELAA and on the Site Assessment Spreadsheets. Further site selection analysis has also been undertaken through the Sustainability Appraisal process. The plan is therefore considered sound and legally compliant in this regard.
WYHMA14/ SWDP 60/9 Station Road	Ashton under Hil	Cotswolds Conservation Board (502)	Acknowledge that there is an up to date HNS for AUH which provides clear evidence of need. Recommend that the development should be low density to reflect the pattern of existing development on the north side of The Groaten / Station Road (albeit not necessarily with such large gardens) and the edge of settlement location. Even with this lower density, priority should still be given to the provision of affordable housing.	Comments noted.
WYHMA15/ SWDP 60/15 (19/00968/FUL) Land off Roman Meadow, Pershore Road	Eckington	No representations received.	No issues raised.	No response required.
WYHMA16/ SWDP 60/20 Site adjacent Nine Acres	Overbury	No representations received.	No issues raised.	No response required.
WYHMA17/ SWDP 60/28 (20/01348/FUL) Garage site off A422 and land to the rear	Upton Snodsbury	No representations received.	No issues raised.	No response required.
New Employment				

WYPE01/ CFS0498 Former Pipes Support Site, Salwarpe Road	Droitwich	No representations received.	The site has been built out.	No response required.
WYPE02/ CFS0680 Land off Saw Mills Walk / Briar Close Business Park	Evesham	No representations received.	No issues raised.	No response required.
WYPE03/ CFS0099 Land off Evesham Road north of the Twyford roundabout	Evesham	No representations received.	No issues raised.	No response required.
WYPE04/ CFS0990sc Land between Broadway Road and the A46	Evesham	Lone Star Land Ltd (2410)	Support allocation.	Support noted.
WYPE05/ CFS0891 Land south of Vale Park	Evesham	No representations received.	No issues raised.	No response required.
WYPE06/ CFS0102 South of Keytec East Business Park	Pershore (Wyre Piddle)	Mike Oakley (155)	Is already employment land approved under 19/00382/FUL	Comments noted. Latest annual monitoring (2023) indicates site is not started but conditions have been discharged, keep allocated for now
WYPE07/ CFS0103 Keytec East Business Park	Pershore (Wyre Piddle)	Mike Oakley (155)	Is within Wyre Piddle which is only a cat 4 village and therefore unsuitable for development. Misleading as in Wyre Piddle and not in Pershore.	Comments noted. Acknowledged that site falls within Wyre Piddle parish boundary but the site is adjacent to and considered a reasonable extension of the Keytec East Business Park and once developed would be seen as such rather than in the context of Wyre Piddle village.
WYPE08/ CFS0559 Adjacent to Drakes Broughton Business Park, Worcester Road	Drakes Broughton	No representations received.	No issues raised.	No response required.
WYPE09/ CFS0061a Hartlebury Trading Estate, Crown Lane	Hartlebury	Harris Lamb obo Schroders Uk Property Fund (394)	Site should be removed from the Green Belt	Comments noted. This may be something the Inspector may like to consider at examination.
WYPE10/ CFS0061b Hartlebury Trading Estate, Crown Lane	Hartlebury	Harris Lamb obo Schroders Uk Property Fund (395)	Site should be removed from the Green Belt	Comments noted. This may be something the Inspector may like to consider at examination.
WYPE11/ CFS0061c Hartlebury Trading Estate, Crown Lane	Hartlebury	Harris Lamb obo Schroders Uk Property Fund (397)	Site should be removed from the Green Belt	Comments noted. This may be something the Inspector may like to consider at examination.
WYPE12/ CFS0061d Hartlebury Trading Estate, Crown Lane	Hartlebury	Harris Lamb obo Schroders Uk Property Fund (356)	Site should be removed from the Green Belt	Comments noted. This may be something the Inspector may like to consider at examination.
WYPE13/ CFS0925 Two Shires Park, Weston Road	Honeybourne	Mr H Wylie (809)	Believes this is an undeliverable allocation	Comments noted. This may be something the Inspector may like to consider at examination.
WYPE14/ CFS0775 Snodsbury Farmhouse, Bow Wood Lane	Upton Snodsbury	Upton Snodsbury Parish Council (745)	No objection	Support noted.
WYPE15/ CFS0400sc Eatons Farm, Church Lane	Tibberton	Richard Barrett (359); Tibberton PC (609); Cllr Margaret Rowley (970); Trevor & Amanda Knight (3036) Canal & River Trust (671)	Allocation of 9.4Ha has not been justified. Increase traffic, loss of rural view from and of Tibberton church and other listed buildings, insufficient weight to landscape value, wrong side of Pershore Lane which currently provides firm boundary for Worcester Six, leave no physical or natural boundary to prevent Worcester engulfing Tibberton. The Single width canal bridge at Tibberton cannot be widened and suffers from a lack of forward visibility, resulting in bridge strikes and structural damage. The bridge has a weight restriction. Any new development in this area should consider traffic control measures to protect the bridge and its users. Any development which may result in an increase in usage of the canal towpath, either as a recreational route or as a sustainable off-road active travel route should consider whether the towpath width and surfacing is suitable to cope with the anticipated level of additional usage.	Comments noted. The statutory consultees, including highways, have not raised any concerns that cannot be overcome. Evidence and mitigation of any issues will be required at any application stage. Comments noted. Traffic, particularly HGVs, to and from the site is more likely to use the main roads and avoid the narrow bridge at Tibberton. This may be something the Inspector may like to consider at examination.

WYEA01/ SWDP 49/3 Stonebridge Cross Business Park (Reallocation)	Hampton Lovett		No issues raised.	No response required.
WYDEAL13 (Deallocation)	Evesham	Terra Strategic (1144)	Landowner objection to the deallocation – planning permission has been granted and work is on going but not completed. The site remains available and deliverable.	Comments noted. The deallocation of this site is considered sound and legally compliant.

Summary of main issues for the Worcester City Allocations identified from the Regulation 19 consultation of the SWDP Review

Allocations	Respondents (All)	Main Issue	Response
New Housing			
WCHO01 (6 dwellings) Land at the rear (west) of Liverpool Road, Worcester	N/A - None	N/A - None	N/A - None
WCHO02 (5 dwellings) Land to the rear of 14-20 Barbourne Road, Worcester	Mrs Lorraine Gannon (Strong Era) Rep ID: 442	Support for the allocation.	Support noted.
WCHO03 (120 dwellings) Land off Oak View Way, Bromyard Road, Worcester	N/A - None	N/A - None	N/A - None
WCHO04 (39 dwellings) Checketts Lane Industrial Estate, Checketts Lane, Worcester	N/A - None	N/A - None	N/A - None
WCHO05 (60 dwellings) Shrub Hill Retail Park, Tallow Hill, Worcester (parcel west of Worcester and Birmingham Canal)	Mrs Jane Hennell (Canal and River Trust) Rep ID: 676	Any development should pay proper regard to the Worcester & Birmingham Canal and reflect the requirements of SWDPR 47.	Comments noted.
WCHO06 (16 dwellings) Land off Brickfields Road, Blackpole, Worcester	N/A - None	N/A - None	N/A - None
WCHO07 (75 dwellings) Woodside Point, Williamson Road, Worcester	N/A - None	N/A - None	N/A - None
Housing Reallocations			
WCREAL01 (40 dwellings) Ribble Close and Gas Holder Site	N/A - None	N/A - None	N/A - None

WCREAL02 (33 dwellings) Sansome Walk Swimming Pool	N/A - None	N/A - None	N/A - None
WCREAL03 (12 dwellings) Old Brewery Service Station, Barbourne Road	N/A - None	N/A - None	N/A - None
WCREAL04 (45 dwellings) Malvern Gate, Bromwich Road	N/A - None	N/A - None	N/A - None
WCREAL05 (15 dwellings) County Council Offices, Bilford Road	N/A - None	N/A - None	N/A - None
WCREAL06 (10 dwellings) Laugherne Garage, Bransford Road	N/A - None	N/A - None	N/A - None
WCREAL07 (13 dwellings) Land at Earl's Court Farm	N/A - None	N/A - None	N/A - None
WCREAL08 (30 dwellings) Land adjacent to the Masonic Hall	N/A - None	N/A - None	N/A - None
WCREAL09 (12 dwellings) Former Zig Zag site, St John's	N/A - None	N/A - None	N/A - None
WCREAL10 (10 dwellings) Royal Worcester Porcelain - Gap Site	N/A - None	N/A - None	N/A - None
WCREAL11 (16 dwellings) Land formerly associated with Tolladine Golf Course, Worcester	Mr Stephen Holloway Fisher German LLP - Former Tolladine Golf Course Rep ID: 750	Objection to the removal of the site as an allocation/reallocation.	The original part of the site (allocation SWDP 43m) has been built out under 20/00352/FUL for 16 dwellings. The newly proposed section of the site is therefore no longer required to meet the quantum of development in this location.
New Mixed-Use Allocations			
WCMU01 (495 dwellings and 3 ha employment land)	Rosamund Worrall (Historic England) Rep ID: 576	Objection to the allocation of the site on heritage/historic environment grounds.	Comments noted.

(gross)) Land at Navigation Road, Diglis			
WCMU01 Land at Navigation Road, Diglis	Mrs Jane Hennell (Canal and River Trust) Rep ID: 677	Support for the site allocation.	Support noted.
Mixed Use Reallocations			
WCMU02 (100 dwellings) Lowesmoor Wharf	Mrs Jane Hennell (Canal and River Trust) Rep ID: 678	Lowesmoor Basin is home to a working boatyard and as such may create noise and smells. Any development should take account of the activities of the boatyard when designing the layout of the site.	Comments noted.
WCMU03 Fire Station / Crowngate / Angel Place / The Butts	N/A - None	N/A - None	N/A - None
WCMU04 (50 dwellings) Trinity House/Cornmarket / Lowesmoor	N/A - None	N/A - None	N/A - None
WCMU05 Chequers Lane/Henwick Road	University of Worcester Rep ID: 619	Rep requesting the extension of the site boundary. Changes proposed to extend the site boundary and to update the information in the policy and on the Policies Map. Site to be extended from the railway line in the south to Elm Road in the north, and Hylton Road in the east and Henwick Road / Rectory Gardens / Hardwicke Close to the west.	Comments noted. This may be something for the Inspector to consider.
WCMU06 (750 dwellings) Shrub Hill Opportunity Zone	Mrs Jane Hennell (Canal and River Trust) Rep ID: 679	Any new development adjacent to the canal should comply with Policy SWDP 47 to ensure the canal is properly considered as well as general design and heritage policies as the canal	Comments noted.

		corridor should be considered as a heritage asset.	
WCMU06 Shrub Hill Opportunity Zone	Mrs Jane Hennell (Canal and River Trust) Rep ID: 680	This allocation mentions the possibility of the creation of a new canal basin. Any new basin would need the agreement of the Canal & River Trust to connect to the existing canal. The Trust would not own or manage the basin and therefore any proposed operator would need to work closely with the Trust and comply with our own procedures. The Trust at this point in time can give no assurance that a basin in this area would be acceptable and therefore whilst such a facility may be of benefit in placemaking terms it should not be a requirement as it may prove not to be deliverable.	Comments noted.
WCMU07 (120 dwellings) Blockhouse/Carden Street Opportunity Zone	Mrs Jane Hennell (Canal and River Trust) Rep ID: 679	Any new development adjacent to the canal should comply with Policy SWDP 47 to ensure the canal is properly considered as well as general design and heritage policies as the canal corridor should be considered as a heritage asset.	Comments noted.
WCMU08 Cathedral Quarter and Sidbury: Cultural Facilities	Mrs Jane Hennell (Canal and River Trust) Rep ID: 679	Any new development adjacent to the canal should comply with Policy SWDP 47 to ensure the canal is properly considered as well as general design and heritage policies as the canal corridor should be considered as a heritage asset.	Comments noted.

WCMU09 Riverside	N/A - None	N/A - None	N/A - None
WCMU10 St Clements Gate	N/A - None	N/A - None	N/A - None
New Employment			
WCEM01 Land at Blackpole Road	Ms Karin Hartley (Delta Planning) Rep ID: 1553	Requests for the site details (hectares net/gross information) and Policies Map to be updated as follows: <ul style="list-style-type: none"> • Update the site area to state 13ha and the employment land as circa 8ha (adjusted to incorporate site access). • Footnote 210 to be updated to state that circa 5ha of the wider 13ha site will be used for flood mitigation measures, green infrastructure and landscaping. • Update the Policies map to shown wider site allocation (including access off Blackpole Road). 	Comments noted. This may be something for the Inspector to consider.
WCEM02 Land at the junction of Berkeley Way and Parsonage Way	Mr Christian Evans (Worcester Civic Society) Rep ID: 11	Objection to the allocation of the site.	Comments noted.
WCEM02 Land at the junction of Berkeley Way and Parsonage Way	Michelle Alexander (Warndon Parish Council) Rep ID: 1245	Objection to the allocation of the site.	Comments noted.
Employment Reallocations			

WCEMREAL01 Worcester Woods Business Park <i>(Proposed for a new secondary school in the Reg 19 version of the plan)</i>	Geraint Jones (Savills) acting on behalf of the Spetchley Estate Rep ID: 2342	Objection to the change of the proposed development allocation to educational use from employment use.	This may be something the Inspector may like to consider at examination.
Deallocations			
WODEAL01 Land South of Leopard Hill	Bromford Developments Rep ID: 2222, 1843	Objection to the deallocation of the site.	Planning applications relating this site (this covers the remaining part of adopted site SWDP 43/1, as reallocated as part of SWDP Review site SWDP NEW 7 in the Regulation 18 consultation, prior to SWDP NEW 7 (WODEAL01) being deallocated in the Regulation 19 consultation) have been refused (20/00632/FUL, 21/00767/FUL) and application 20/00632/FUL was dismissed on appeal APP/D1835/W/21/3280719.
WODEAL02 University Park	N/A - None	N/A - None	N/A - None
WODEAL03 The Bridge Inn, Lowesmoor Terrace	N/A - None	N/A - None	N/A - None
WODEAL04 Commandery Coach Depot, Tolladine Road	N/A - None	N/A - None	N/A - None
WODEAL05 23-24 Foregate Street	N/A - None	N/A - None	N/A - None
WODEAL06 73-77 Bromwich Road	N/A - None	N/A - None	N/A - None
WODEAL07 Bridgewater House, Blackpole Road	N/A - None	N/A - None	N/A - None
WODEAL08 Chequers Lane/Henwick Road	N/A - None	N/A - None	N/A - None
Omission sites			
Land at Battenhall Farm	Mr Scott Winnard Rep ID: 712, 1421	Omission site put forward for housing.	Noted.
Land at Warndon Way (M5 Junction 6/A4440)	Mr Justin parker (Chase Commercial Ltd) Rep ID: 905	Omission site put forward for employment land.	Noted.
Other Comments			

<p>Housing Trajectory/Site Delivery</p>	<p>Millstrand Properties Ltd Rep ID: 2334</p> <p>St Philips Ltd Rep ID: 2306, 2184, 2055</p> <p>Piper Homes Rep ID: 2087</p>	<p>Questions the robustness of the trajectory given there are 4 policies reallocated a large number of sites which were not delivered in the previous plan. If there is a risk of similar number not being delivered in this planning period does the buffer need to be increased? We therefore consider that this policy is not effective as allocating these sites risks not delivering the required housing during the plan period.</p>	<p>According to the National Planning Policy Framework (NPPF, 2021) Paragraph 74, it is appropriate for the SWC to set out a trajectory demonstrating the expected rate of housing delivery (anticipated rate of development) for specific sites. This has been prepared with reference to available evidence on the delivery of housing on large scale strategic development sites. This evidence included several studies which have investigated delivery rates on large scale developments including developments currently in the pipeline across the country, South Worcestershire, and sites elsewhere which are comparable to varying gradations. The trajectories have also been informed by discussions held with respective site promoters and developers. The Inspector may wish to consider an update to the trajectory as part of the examination.</p>
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Minor Modifications

Allocations	Minor Mod	Reason
New Housing		
WCHO01 (6) Land at the rear (west) of Liverpool Road, Worcester	N/A - None	N/A - None
WCHO02 (5) Land to the rear of 14-20 Barbourne Road, Worcester	N/A - None	N/A - None
WCHO03 (120) Land off Oak View Way, Bromyard Road, Worcester	N/A - None	N/A - None
WCHO04 (39) Checketts Lane Industrial Estate, Checketts Lane, Worcester	N/A - None	N/A - None
WCHO05 (60) Shrub Hill Retail Park, Tallow Hill, Worcester (parcel west of Worcester and Birmingham Canal)	N/A - None	N/A - None
WCHO06 (16) Land off Brickfields Road, Blackpole, Worcester	N/A - None	N/A - None
WCHO07 (75) Woodside Point, Williamson Road, Worcester	N/A - None	N/A - None
Housing Reallocations		
WCREAL01 (40) Ribble Close and Gas Holder Site	N/A - None	N/A - None
WCREAL02 (33) Sansome Walk Swimming Pool	N/A - None	N/A - None
WCREAL03 (12) Old Brewery Service Station, Barbourne Road	N/A - None	N/A - None
WCREAL04 (45) Malvern Gate, Bromwich Road	N/A - None	N/A - None
WCREAL05 (15) County Council Offices, Bilford Road	N/A - None	N/A - None
WCREAL06 (10) Laugherne Garage, Bransford Road	N/A - None	N/A - None
WCREAL07 (13) Land at Earl's Court Farm	N/A - None	N/A - None
WCREAL08 (30) Land adjacent to the Masonic Hall	N/A - None	N/A - None
WCREAL09 (12) Former Zig Zag site, St John's	N/A - None	N/A - None
WCREAL10 (10) Royal Worcester Porcelain - Gap Site	N/A - None	N/A - None
WCREAL11 (16) Land formerly associated with Tolladine Golf Course, Worcester	N/A - None	N/A - None
New Mixed-Use Allocations		

WCMU01 Land at Navigation Road, Diglis	Refer to the 'main issues' table above for the relevant issues relating to the site.	Refer to the 'main issues' table above for the relevant issues relating to the site.
Mixed Use Reallocations		
WCMU02 Lowesmoor Wharf	Refer to the 'main issues' table above for the relevant issues relating to the site.	Refer to the 'main issues' table above for the relevant issues relating to the site.
WCMU03 Fire Station / Crowngate / Angel Place / The Butts	N/A - None	N/A - None
WCMU04 Trinity House/Cornmarket / Lowesmoor	N/A - None	N/A - None
WCMU05 Chequers Lane/Henwick Road	Refer to the 'main issues' table above for the relevant issues relating to the site.	Refer to the 'main issues' table above for the relevant issues relating to the site.
WCMU06 Shrub Hill Opportunity Zone	Refer to the 'main issues' table above for the relevant issues relating to the site.	Refer to the 'main issues' table above for the relevant issues relating to the site.
WCMU07 Blockhouse/Carden Street Opportunity Zone	N/A - None	N/A - None
WCMU08 Cathedral Quarter and Sidbury: Cultural Facilities	N/A - None	N/A - None
WCMU09 Riverside	N/A - None	N/A - None
WCMU10 St Clements Gate	N/A - None	N/A - None
New Employment		
WCEM01 Land at Blackpole Road	Refer to the 'main issues' table above for the relevant issues relating to the site.	Refer to the 'main issues' table above for the relevant issues relating to the site.
WCEM02 Land at the junction of Berkeley Way and Parsonage Way	N/A - None	N/A - None
Employment Reallocations		
WCEMREAL01 Worcester Woods Business Park	Refer to the 'main issues' table above for the relevant issues relating to the site.	Refer to the 'main issues' table above for the relevant issues relating to the site.
Deallocations		
WODEAL01 Land South of Leopard Hill	N/A - None	N/A - None
WODEAL02 University Park	N/A - None	N/A - None

WODEAL03 The Bridge Inn, Lowesmoor Terrace	N/A - None	N/A - None
WODEAL04 Commandery Coach Depot, Tolladine Road	N/A - None	N/A - None
WODEAL05 23-24 Foregate Street	N/A - None	N/A - None
WODEAL06 73-77 Bromwich Road	N/A - None	N/A - None
WODEAL07 Bridgewater House, Blackpole Road	N/A - None	N/A - None
WODEAL08 Chequers Lane/Henwick Road	N/A - None	N/A - None