

Mr P Lewis and Mr S Dean
The Planning Inspectorate
Temple Quay House
2 The Square
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Bristol
BS1 6PN

1 July 2024

Dear Mr Lewis and Mr Dean,

Further to our letter dated 25 April 2024, please find attached the Retail and Town Centres Study Update on Retail and Town Centres Study 2019 and 2020 (ECO12, EXAM4 and EXAM4A – EXAM4C)

Regarding the other evidence due at the end of June, we can confirm that the work is nearing completion but that there are some outstanding issues yet to be resolved before it is ready to be submitted for examination. Please find below an explanation on the outstanding issues in regard to each of the pieces of evidence:

[Analysis of Proposed Policies against December 2023 Written Ministerial Statement](#)

Following comments from Counsel, Officers are finalising work on the Analysis of Proposed Policies against the December 2023 Written Ministerial Statement, and this piece of work will be with you shortly.

[Habitat Regulation Assessment Report Update on Habitat Regulation Assessment \(CD6 and CD7\)](#)

The report is nearing completion. There remain outstanding issues in relation to the ability to mitigate the impacts of the Mitton allocation on the Curlew. Discussions are taking place between the councils, our consultants, and Natural England in this regard.

[Areas of Informal Recreation Allocations Update on Areas of Informal Recreation Allocations 2022 \(ALL1\)](#)

The report is near completion, however in light of the assessment, discussions are taking place with Natural England to assess whether the proposed mitigation as set out in this report and in the Mitigation Strategy (EXAM Doc ENV 4) are sufficient to mitigate the impact of development on the Malvern Hills. By reaching agreement on this with Natural England and confirming this in a Statement of Common Ground, it should be possible to minimise examination hearing time.

[Historic Environment Topic Paper Update Update 2022 \(SP24 – SP26\)](#)

The proposed sites at SWDP NEW 9 Navigation Road, Worcester; SWDP NEW 89 Madresfield Road, Malvern; SWDP NEW 14 Union Lane, Droitwich Spa; and SWDP NEW 53, Blacksmiths Lane, Lower Moor (Wychavon), are the subject of objection from Historic England. Further assessment work has been undertaken and is near completion. However, discussions are taking place with Historic England to agree an approach to ensure that satisfactory mitigation

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measures, as set out in these reports, can be implemented. Mitigation measures for SWDP 89 and 53 have already been agreed with Historic England and the councils are seeking agreement on the remaining sites.

Housing Requirements for Designated Neighbourhood Areas Update HOU6 with 2021 Census data

Having discussed this with Counsel, the councils are working to review the methodology of the neighbourhood plan requirement figures. This work will be completed by October alongside the other evidence base studies due at that time.

Economic Development Needs Assessment (EDNA)

The Economic Development Needs Assessment is near completion. The councils are seeking some clarification from the consultants to ensure that the assessment fully covers the matters you identified in your earlier correspondence.

Employment Land Monitoring (ELM)

As the Employment Land Monitoring report is so intrinsically linked to the EDNA, both pieces of evidence will be submitted together when they are both finalised.

Gypsy and Traveller Accommodation Assessment Update on the Gypsy and Traveller Accommodation Assessment 2019 (HOU3)

There has been some delay in finalising the figures for this report. These will all need to be verified on receipt of the report, and any supply issues that might arise will need to be addressed. The report is expected over the next few weeks and will be submitted once it is ready.

Transport Modelling Update

We can confirm that the transport modelling is on target for delivery at the end of August, as previously advised.

We would like to assure you that we are committed to progressing the outstanding issues as quickly as possible.

Yours sincerely



Ian Macleod

Director of Planning and Infrastructure
Wychavon and Malvern Hills Councils



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