

**Note of Kevin Poole**

At the hearing this morning, Mr Kemp indicated, after speaking to the Inspectors, that in view of my voice difficulties, it would be acceptable for me to submit a brief follow up written note for their consideration. Whilst I was able to manage a few words at the hearing, this note covers the slightly greater detail I would have gone into if my voice had allowed.

**QUESTION 72 - IS THE PROPOSED ALLOCATION OF 290.7 HECTARES (UPDATED TO 288.90 HECTARES) OF EMPLOYMENT LAND THROUGH THE PLAN JUSTIFIED AND WOULD IT BE EFFECTIVE?**

The allocation is massively skewed as between the councils by reason of the failure to address properly the geographical location of the land which is actually required.

The genesis of its problems probably lies in the unwillingness to formally “zone” a Wider Worcester Area and specifically allocate employment land to it, as all the evidence points to the fact that that is where most businesses actually want to build their factories and warehouses, right near the M5. This is acknowledged at various places in the evidence, including paragraphs 3.8, 3.9 and 4.5 of EDNA2, which talks of the need for “some of Worcester’s demand being provided in Malvern Hills” (though why the same is not also said of Wychavon is not clear). By failing to allocate a large part of the employment land close to Worcester, the councils have completely undermined the validity of the planning exercise – rather than planning for employment development where it is actually needed, they are proposing to allocate large pieces of entirely inappropriate land in far flung corners of their districts, wherever landowners have been persuaded to come forward and offer land for development.

This point is made good in EDNA2, which proposes to allocate just 13.5 hectares of employment land in the “Wider Worcester Area” of Malvern Hills district by way of re-allocation (see table A3 on page 5) and 5 hectares at the strategic Rushwick location (again, part of the WWA) and the remaining 54.79 hectares at various other locations far from Worcester. So out of the total of 73.29 hectares, almost 75% is allocated well away from the Wider Worcester Area.

In addition, the table of allocations on page 21 of EDNA2 drives the point home. It shows that on the basis of the current proposed allocations, Malvern Hills has a forecast surplus of 27½ hectares, equal to nearly 43% of the total forecast employment land demand for the district for the 20 year period of the plan. Nobody is suggesting that it has over-allocated land in the WWA, so this surplus is entirely attributable to the excessive proposed allocations elsewhere.

For these reasons, the proposed allocation is neither justified nor effective.

Kevin Poole

11 March 2025