

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

**Date: 19 March 2025**



# 1. Introduction

1.1 In accordance with the NPPF (paragraph 25)<sup>1</sup>, public bodies have a duty to cooperate on relevant strategic matters which they need to address in their plans. Furthermore, local authorities should also engage with relevant bodies, that include statutory consultees of which Historic England is one. This forms part of each local planning authority's evidence for their respective emerging Local Plans.

1.2 This Statement of Common Ground (SoCG) has been prepared to fulfil the duty to cooperate requirements in accordance with paragraph 27 of the NPPF<sup>2</sup> and the section of the Planning Practice Guidance on Maintaining Effective Cooperation.

## 2. Purpose

2.1. This Statement of Common Ground (SoCG) has been produced to support the South Worcestershire Development Plan Review (SWDPR), which has been jointly prepared by the South Worcestershire Councils (SWCs) - Malvern Hills District Council, Wychavon District Council and Worcester City Council. It sets out how the SWCs have engaged with Historic England in preparing the SWDPR, to fulfil its Duty to Cooperate requirements.

## 3. Scope

3.1. National Planning Practice Guidance (NPPG)<sup>3</sup> provides details on the broad scope of a Statement of Common Ground (SoCG), which is described below.

- the key strategic matters being addressed by the statement;
- the plan-making authorities responsible for joint working detailed in the statement, and list of any additional signatories;
- governance arrangements for the cooperation process;
- a record of where agreements have (or have not) been reached on key strategic matters, including the process for reaching agreements on these; and
- any additional strategic matters to be addressed by the statement which have not already been addressed.

---

<sup>1</sup> *Strategic policy-making authorities should collaborate to identify the relevant strategic matters which they need to address in their plans. They should also engage with their local communities and relevant bodies including Local Enterprise Partnerships, Local Nature Partnerships, the Marine Management Organisation, county councils, infrastructure providers, elected Mayors and combined authorities. (NPPF, 2023, Para 25). Under the transitional arrangements in the NPPF (December 2024) the SWDPR is being examined under the provisions of the NPPF (September 2023).*

<sup>2</sup> *'In order to demonstrate effective and on-going joint working, strategic policy making authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these. These should be produced using the approach set out in national planning guidance and be made publicly available throughout the plan-making process to provide transparency.'*

<sup>3</sup> Paragraph: 011 Reference ID: 61-011-20190315

3.2 The NPPG also recognises that the: "... level of cooperation detailed in the statement is expected to be proportionate to the matters being addressed. The statement is expected to be concise and is not intended to document every occasion that strategic policy-making authorities meet, consult with each other, or for example, contact prescribed bodies under the duty to cooperate. The statement is a means of detailing key information, providing clear signposting or links to available evidence on authorities' websites."<sup>4</sup>

## 4. Duty to Cooperate

### South Worcestershire Development Plan Review

- 4.1 The Development Plan for the SWCs currently comprises the South Worcestershire Development Plan (SWDP, adopted 2016), Local Transport Plan 4 (LTP, 2017), Minerals Local Plan (2022), Worcestershire Waste Core Strategy (2012), together with made Neighbourhood Plans. The SWDP was prepared jointly by the three SWCs working together under plan making arrangements. On completion of the SWDP Review process, the SWDP will be replaced by the South Worcestershire Development Plan Review, 2021-2041 (SWDPR).
- 4.2 The SWDPR includes strategic and detailed policies, together with site allocations for the Plan period 2021 to 2041.
- 4.3 There has been ongoing and active engagement between the SWCs and Historic England throughout the SWDPR process and Duty to Cooperate discussions have occurred at appropriate times during the SWDPR process. This commenced in 2021, following Historic England's representations to the Regulation 18 Preferred Options consultation in the autumn of 2019. Specifically, this related to meetings relating to the preparation of the Historic Environment Topic Paper, based on Historic England's representations to the Regulation 18 consultation, ahead of the SWDPR Publication consultation.
- 4.4 More recently dialogue has been ongoing concerning the response to Historic England's representations to the Regulation 19 consultation to the sites detailed below (paragraph 6.2). It is these matters that form the basis of this SoCG.
- 4.5 In addition as part of the development of the SWDPR the SWCs have consulted formally with Historic England during the following consultations:
- Traveller and Travelling Showpeople Site Allocations DPD Preferred Options - consultation concluded on 9 May 2016.
  - Traveller and Travelling Showpeople Site Allocations DPD Revised Preferred Options - consultation concluded on 18 April 2018.
  - Village Facilities and Rural Transport Proposed Methodology - consultation concluded on 2 July 2018.
  - SWDPR Call for Sites and Proposed SHELAA Methodology - consultation concluded on 2 July 2018.
  - Sustainability Appraisal Scoping Report - consultation concluded on 3 July 2018.
  - Development Boundaries Review Proposed Methodology - consultation concluded on 8 October 2018.
  - SWDPR Issues and Options - consultation concluded on 17 December 2018.
  - SWDPR Preferred Options - consultation concluded on 16 December 2019.

---

<sup>4</sup> Paragraph: 011 Reference ID: 61-011-20190315

- Renewable and Low Carbon Energy Call for Sites - consultation concluded on 3 April 2020.
- Areas of Informal Recreation Call for Sites - consultation concluded on 24 July 2020.
- SWDPR Further Regulation 18 (III) Sustainability Appraisal Consultation - consultation concluded on 19 April 2021.
- Traveller and Travelling Showpeople Site Allocations DPD Revised Preferred Options - consultation concluded on 5 July 2021.
- SWDPR Regulation 19 – consultation concluded on 23 December 2022.
- Traveller and Travelling Showpeople Site Allocations DPD Publication – consultation concluded on 13 December 2022.

## 5. Key Strategic Matters

### Strategic and Development Management Planning Policies

- 5.1 The NPPF (2023) requires that plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including historic assets. In this regard the SWDPR has carried forward and updated the strategic historic environment policy from the SWDP. SWDPR08 Historic Environment delivers the requirements set out in paragraph 196 of the NPPF.
- 5.2 In addition to the above, the NPPF provides direction at para 200-204 on how planning applications that, having implications for the historic environment and historic assets, must be assessed. The SWDPR includes a Historic Environment Management policy, SWDPR29, that seeks to achieve this and sets out more detailed parameters as to how planning applications should be considered, alongside the strategic policy SWDPR08.
- 5.3 Historic England have not raised any objection or provided any specific comments with respect to SWDPR08 and SWDPR29 at the Regulation 19 Publication consultation stage. Therefore, there is a basis of agreement between the SWCs and Historic England that the policies relating to the historic environment, as submitted, meet the requirement of the NPPF and follow Historic England's own guidance on local plan preparation, GPA1 -The Historic Environment in Local Plans (2015). The SWC background paper on the historic environment, the 'Historic Environment Topic Paper' (2022; 2024) and supporting appendices [[Historic Environment Topic Paper FINAL.pdf \(swdevelopmentplan.org\)](#)] explain further how the development of the SWDPR has considered the historic environment and how a strategic policy approach has been informed by the above in terms of policy writing and site allocation.

## 6. The Main Issues by Site Allocations

- 6.1 Any issues raised by Historic England, either via representations to the Regulation 19 Publication consultation or through Duty to Cooperate discussions prior to Submission of the SWDPR with respect to the strategic site allocations at SWDPR51 Worcestershire Parkway; SWDPR 52 Land at Throckmorton New Settlement; SWDPR 53 Rushwick and SWDPR54 Mitton will be dealt with via site specific SoCG where applicable.

## Other SWDPR Site Allocations

6.2 In representations to the Regulation 19 Publication Historic England raised issues and objection to four housing site allocations relating to the level of detail of site assessment and appraisal regarding the significance and impact of the proposed allocations on the historic environment and historic assets [[Rosamund Worrall \(Historic England\) 0576 0579 - Wychavon District Council](#)]. The sites are:

- SWDP NEW 9/WCMU01 Navigation Road, Diglis, Worcester (mixed use allocation)
- SWDP NEW 14/WYPHM04 Union Lane, Droitwich Spa (Wychavon)
- SWDP NEW 53/WYPH18 Blacksmith Lane, Lower Moor (Wychavon)
- SWDP NEW 89/MHPH01 Land south of Madresfield Road, Malvern (Malvern Hills)

6.3 In response to the representations ongoing discussions were had between SWC officers and Historic England from the autumn of 2023. Following these series of meetings, a consultant was appointed to undertake separate heritage appraisals for each of the sites. The site-specific reports (reference EXAM 18a), prepared by James Dinn Heritage, are provided here [[Heritage Appraisals \(usrfiles.com\)](#)] as an additional appendix to the Historic Environment Background Paper update submitted to the Inspectors in September 2024.

6.4 The heritage appraisals have been produced in accordance with guidance prepared by Historic England. The report aims to show how the SWCs have applied the recommended process given in *The Historic Environment and Site Allocations in Local Plans* (Historic England Advice Note 3 – HEAN3) when allocating sites for development. Three stages are set out there: evidence gathering, site selection, and site allocation policies. The requirement is for site allocations to be compliant with the National Planning Policy Framework. Allocation of the site should:

- be likely to ‘conserve heritage assets in a manner appropriate to their significance’ as required by NPPF paragraph 195
- allow, or contribute to delivery of, a ‘positive strategy for the conservation and enjoyment of the historic environment’ as required by NPPF paragraph 196
- contribute to protecting or enhancing the historic environment, thereby delivering sustainable development, in terms of the historic environment (NPPF paragraph 7)

For site selection, HEAN3 sets out five steps:

STEP 1 Identify which heritage assets are affected by the potential site allocation

STEP 2 Understand what contribution the site (in its current form) makes to the significance of the heritage asset(s)

STEP 3 Identify what impact the allocation might have on that significance

STEP 4 Consider maximising enhancements and avoiding harm

STEP 5 Determine whether the proposed site allocation is appropriate in light of the NPPF’s tests of soundness

6.5 The findings of the report for each of the sites have been considered by Historic England and relating to the site allocation at Navigation Road, Diglis in Worcester City, the site landowners the Canal & River Trust. Regarding the Blacksmith Lane, Lower Moor allocation (WYPH18), based on the findings of the site appraisal, Historic England have withdrawn its objection to

the proposed site allocation (Appendix 1: Email from Historic England to SWCs withdrawing objection 13/06/24). Historic England have also agreed to withdraw its objection to the proposed allocation at Land south of Madresfield Road, Malvern (MHPH01) based on the analysis of the site provided in the heritage site appraisal and new draft policy covering the site submitted to the Examination Inspectors as a proposed main modification and included at Appendix 2C of this document.

- 6.6 However, although the 2019 SHELAA site assessment appraisals submitted for Examination (ref. SHELAA3-83) [[017f5b\\_885065667fa8420c836d4f1181dfb7ac.pdf](#)] have helped support the evidence base for justifying the sites allocations, in relation to the other sites, Historic England's concerns remain around the impact of the proposed development on both designated and undesignated heritage assets for the remaining two sites.
- 6.7. For land at Navigation Road, Diglis Historic England's principal concerns relate to the impact on the Registered Battlefield, the 'Riverside' Conservation Area and views and vistas of Worcester's historic skyline, including the Cathedral. To this end the landowners, the Canal & River Trust have provided additional heritage character appraisal of the site prepared in July 2024 in the 'Diglis Site Allocation – Heritage Townscape and Visual Impact Review' (appended to their [Matter 12 Written Statement WS12/2](#)).
- 6.8 In terms of the Union Lane, Droitwich Spa and Madresfield Road, Malvern allocations these primarily relate to the impacts on the respective Scheduled Monument designations and there is particularly the case for potential undesignated heritage assets at Union Lane, Droitwich Spa.
- 6.9 In addition to the preparation of the new technical evidence, both parties to the SoCG consider that site specific allocation policies to include reference to an indicative concept plan and detailed development brief, can be prepared for these two sites to address the concerns of Historic England. These policies will be put forward as proposed Main Modifications to the SWDPR for consideration by the Inspectors to the current Examination hearings (Appendix 2A, 2B, 2C). One of the aims of the policies and development brief (alongside other site-specific issues) is to ensure that full consideration is given to the impact of the development on the heritage assets when submitting and determining any planning application and to consider any mitigation requirements.
- 6.10 Further work has also been undertaken by the South Worcestershire Councils on both the Union Lane site, and Navigation Road, Diglis to better understand the development capacity of each site, constraints and layout, this has informed the respective concept plans and any future preparation of a development brief and masterplanning for each site.
- 6.11 All of the work above, and the urban design analysis has been constructively discussed with Historic England and has helped demonstrate further how the consideration of the impacts on the significance of the historic environment and heritage assets has been considered with respect to these site allocations and how appropriate detailed mitigation measures will be identified and delivered through the development management process, informed by the Development Brief.

## 7. Matters of Agreement

7.1 The following matters are agreed between the SWCs (Malvern Hills District Council, Wychavon District Council and Worcester City Council) and Historic England:

- The SWCs and Historic England agree that the policies in the SWDPR specifically relating to the historic environment, i.e. SWDPR08 Historic Environment and SWDPR29 Management of the Historic Environment meet the tests, in both Parties view, of local plan making set out in the NPPF identified above.
  - Historic England have agreed to withdraw its objection to the proposed allocation at Blacksmith Lane, Lower Moor (WYPH18) based on the analysis of the site provided in the heritage site appraisal.
  - Historic England have agreed to withdraw its objection to the proposed allocation at Land south of Madresfield Road, Malvern (MHPH01) based on the analysis of the site provided in the heritage site appraisal and new draft site policy submitted to the Examination Inspectors as a proposed Main Modification (see Appendix 2C).
- **SWDP NEW 14/WYPHM04 - Union Lane, Droitwich Spa** - Further assessment of the site and understanding the constraints to the level of development have been shared between the Parties, as referred to above, and reviewed at a series of meetings towards the end of 2024. This has primarily involved site character assessment and analysis, along with early proposals on layout and scale of any future development on the site. The urban design work determined a revised site capacity figure of between 190-200 dwellings for the site, a reduction from the 400 dwellings set out in the submitted SWDPR. This revised lower figure for the site is proposed to be revised accordingly as a Main Modification. Additionally, a new site-specific policy has been prepared and is being proposed as a Main Modification to the SWDPR (Appendix 2B). Therefore, the Regulation 19 objection by Historic England is withdrawn to this allocation.
- **SWDP NEW 9/WCMU01 - Land at Navigation Road, Diglis, Worcester**
  - Historic England has no objection in principle to this proposed allocation.
  - The SWCs and Historic England have worked constructively together at a series of meetings towards the end of 2024. The meetings focussed on discussion and assessment of the site in terms of understanding site constraints, the options for mitigation, and the indicative capacity of the site. This work has primarily involved reviewing urban design and site character assessment and analysis of early proposals on layout and scale for any future development on the site, as set out in section 6 above. This work has helped inform the proposed new site-specific policy and accompanying concept plan for land at Navigation Road, Diglis, Worcester, which will be presented as a main modification as part of the SWDPR examination process. The proposed policy and concept plan is located in Appendix 2A and 3A respectively.
  - The proposed site-specific policy addresses the issues raised by Historic England and where possible and takes into account the discussions raised during the preliminary site assessment and analysis work set out in section 6 above, except for the detailed matter of views and building heights. To ensure that technical

aspects are appropriately addressed at the Development Management stage, the proposed policy is accompanied by a concept plan. Furthermore, the SWCs will prepare a comprehensive Heritage and Green Infrastructure led Development Brief prior to any formal planning applications being submitted for the redevelopment of this allocation site.

- The site assessment work and the formulation of the proposed site-specific policy and concept plan have been constructively discussed at various stages with Historic England.

## 8. Matters of Disagreement

### SWDP NEW 9/WCMU01 - Land at Navigation Road, Diglis, Worcester

8.1 Historic England maintains its previously raised concerns about the potential for development of this site to impact on views from and towards heritage assets. Historic England considers it remains unclear within the Plan process as to whether the quantum of development sought at the site would be achievable bearing in mind planning constraints for the site. Both parties are mindful that such constraints also offer potential opportunities to create a special and unique place for the town. Historic England is keen to ensure that impacts on the historic environment are sufficiently mitigated, these being: encroachment into the area of the Registered Battlefield; urban encroachment and the impact on the setting of the Riverside Conservation Area and listed buildings; impact on the historic character of the skyline of Worcester, including on views of Worcester Cathedral, particularly with reference to the most sensitive north-western part of the site. Historic England considers this would require changes to wording in Part A criterion i and Part B criterion vi. of the proposed new policy and updates to the Concept Plan.

8.2 Having regard to the Heritage Appraisal for this site ([EXAM18](#) and [EXAM 18A \(Appendix 3\)](#) of the Historic Environment Topic Paper) the SWC remain of the view that the potential impact of development on this allocation site and of the quantum suggested, is sufficiently understood for the purposes of plan making. Whilst fully acknowledging the concerns raised by Historic England, the SWCs do not consider it appropriate or necessary to specifically restrict building heights when development will be required to comply with the criterion contained within the policy and elsewhere in the SWDPR, and any development proposals will be required to safeguard key views from and towards heritage assets. Beyond the detailed assessment work already undertaken, Historic England's remaining concerns are most appropriately dealt with through revised wording to Parts A and B of the new policy (as set out in 'Diglis Worcester draft V13 for SoCG Mods of the Mods 4<sup>th</sup> draft 13.03.25' – Appendix 2A), a Development Brief to be prepared by the SWCs that promotes a Heritage and Green Infrastructure led design approach, and subsequent masterplan and Development Management stage assessment. The proposed revisions to the wording in the policy, would resolve the area of disagreement between the SWCs and Historic England.



## 9. Governance Arrangements

9.1 Governance arrangements are key to ensure that effective duty to cooperate discussions are undertaken and an appropriate SoCG prepared.

9.2 Updating of this SoCG will be linked to key milestones within the SWDPR and future Local Plan Review processes.

## 10. Conclusions

10.1 The parties are in **agreement** on the following matters:

- i) The South Worcestershire Councils (Malvern Hills District Council, Wychavon District Council and Worcester City Council) have fulfilled their Duty to Cooperate with Historic England.
- ii) **SWDP NEW 53/WYPH18 - Blacksmith Lane, Lower Moor:** As per the analysis of the site provided in the heritage site appraisal, Historic England are satisfied with the updates provided by the SWCs in relation to this site and agree to lift their objection to the site.
- iii) **SWDP NEW 89/MHPH01 - Land south of Madresfield Road, Malvern:** As per the analysis of the site provided in the heritage site appraisal and the new draft policy covering the site submitted to the Examination Inspectors as a proposed main modification and included at Appendix 2C of this document, Historic England are satisfied with the updates provided by the SWCs in relation to this site and agree to lift their objection to the site.
- iv) **SWDP NEW 9/WCMU01 - Land at Navigation Road, Diglis, Worcester:** SWCs and Historic England agree that a range of technical work that has been undertaken to ensure a clearer understanding of the constraints to developing the site in terms of impact on heritage assets including their setting, and site capacity. Appropriate detailed mitigation measures will be identified and delivered through the development management process, informed by the Development Brief. This work has helped establish the principle of the site allocation being acceptable, subject to the identification and delivery of site-specific mitigation measures to address impacts on heritage by limiting building heights and not obstructing key views. The site assessment work and the proposed site-specific policy and concept plan have been constructively discussed with Historic England who have no objection in principle to the allocation of the site in the SWDPR.
- v) **SWDP NEW 14/WYPHM04 - Land at Union Lane, Droitwich Spa:** Historic England have no objection in principle to this allocation. It is acknowledged by both Parties the proposed allocation numbers may still not be achievable based on any eventual distribution of, yet unknown archaeology with the site being constrained by nationally important archaeological remains that have a direct relationship to the adjacent Scheduled Monument.

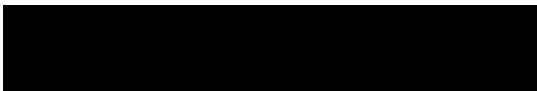
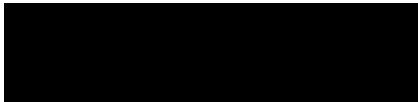
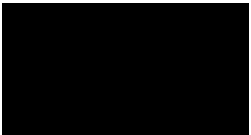
vi) The Parties will continue to work positively together and where relevant with other prescribed bodies on the delivery of the residential and mixed-use site allocations identified in this SoCG.

10.2 The parties remain in **disagreement** for the following matters:

i) **SWDP NEW 9/WCMU01 - Land at Navigation Road, Diglis, Worcester:** Historic England is supportive of the proposed allocation in principle. However, it continues to have concerns in relation to the potential impacts on views and vistas of Worcester’s historic skyline. Historic England consider that changes to Part A criterion i and Part B criterion vi. of the policy and updates to the Concept Plan are required to sufficiently address some of these issues. However, both parties would be agreeable to revisions as set out in ‘Diglis Worcester draft V13 for SoCG Mods of the Mods 4<sup>th</sup> draft 13.03.25’ (Appendix 2A). Subject to such revisions Historic England agrees with the SWCs that matters of detail could subsequently be assessed through the production of a Development Brief, and at planning application stage when further proposal specific Heritage Townscape and Visual Impact Assessment work would be undertaken.

## 11. Signatories

11.1 This SoCG has been agreed and signed by the following:

<b>South Worcestershire Councils</b>	<b>Historic England</b>
Name: Ian Macleod  Position: Director of Planning and Infrastructure, Malvern Hills District Council and Wychavon District Council  Date agreed: 19/03/2025  Signature: 	Name(s): Elizabeth Boden  Position: Historic Environment Planning Adviser, Historic England  Date agreed: 18/03/2025  Signature: 
Name: Duncan Rudge  Position: Head of Planning, Worcester City Council  Date agreed: 19/03/2025  Signature: 	

## Appendix

**Appendix 1 (Page 12):** Email from Historic England to SWCs 13/06/24 withdrawing objection to Blacksmith Lane, Lower Moor (WYPH18) and Land south of Madresfield Road, Malvern (MHPH01).

**Appendix 2A (Page 13):** Site-Specific Policy proposed as Main Modifications relating to Navigation Road, Diglis, Worcester (WCMU01) (known as 'Diglis Worcester draft V13 for SoCG Mods of the Mods 4<sup>th</sup> draft 13.03.25' in the text above).

**Appendix 2B (Page 17):** Site-Specific Policy proposed as Main Modifications relating to Union Lane, Droitwich Spa (WYPHM04).

**Appendix 2C (Page 21):** Site-Specific Policy proposed as Main Modifications relating to Madresfield Road, Malvern (MHPH01).

**Appendix 3A (Page 23):** Site Concept Plan for Navigation Road, Diglis, Worcester.

**Appendix 3B (Page 24):** Site Concept Plan for Union Lane, Droitwich Spa.

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 13 June 2024 17:26  
**To:** [REDACTED]  
**Subject:** FYI: SWDPR - DtC and SoCG with Historic England

**WARNING:** This email came from outside of the South Worcestershire councils IT network - only open links and attachments you're expecting.

Hi Andy

The only dates and times I have matching at present are 10-11am on Friday 21 June, or 3-4pm on Thursday 27 June.

Hopefully one of those will work for yourselves.

Thank you for sending through the additional heritage impact assessment work that has been undertaken in respect of the concerns we have raised during the Plan process. The additional work is welcomed.

We've had opportunity to go through the additional assessment information for the four sites we have outstanding issues on and I can advise as follows:

**General** – We hope that the project team will consider including the assessment work as part of the SWDP evidence base as a topic paper (collective). If that is the case we can advise as follows:

- **Blacksmiths Lane, Lower Moor** - The additional information addresses our concerns and we could agree that position in a SoCG;
- **Madresfield Road, Malvern** – We would be happy to discuss further to establish whether any matters arising could be addressed through additional policy wording that could potentially be addressed through a SoCG;
- **Land North of Union Lane, Droitwich Spa** – We would be happy to discuss further. It remains unclear whether the quantum of development sought by the Plan project team could be achieved on the site without a high level of harm to the significance of heritage assets taking place; and,
- **Diglis, Worcester** - We would be happy to discuss further. It remains unclear whether the quantum of development sought by the Plan project team could be achieved on the site without a high level of harm to the significance of heritage assets taking place. It would be useful to establish whether any views analysis will be undertaken as part of the Plan process.

I look forward to speaking with you and Samantha soon.

Best wishes, Ros

**\*\*Correct as of 14/03/2025 – Modifications to the Modifications TRACK  
CHANGES VERSION\*\***

**SWDPR XX – Land at Navigation Road, Diglis, Worcester**

**Site Area: 14.27ha**

**A.** Within the site area identified on the Policies Map, a sustainable, well-designed mixed-use redevelopment of land at Navigation Road, Diglis will be delivered, ~~that shall include which will feature~~ the following:

- i. Provision of ~~at least~~ around 495 dwellings, including up to 30% affordable housing in accordance with SWDPR 18 and a mix of types and sizes of market housing in accordance with SWDPR 16;
- ii. Retention of at least 3 hectares employment land (E(g), B2 and B8);
- iii. Provision of green and blue infrastructure, including site-wide landscaping and landscape buffers, play facilities<sup>1</sup> and at least 10% net gain in biodiversity;
- iv. Site layout must avoid development in areas which are subject to the highest risk of flooding;<sup>2</sup>
- v. Within the site boundary, there will be no built development in areas identified as the 'Riverside' Conservation Area or 'Areas of Regional or Local Wildlife Importance' (includes Cherry Orchard Local Nature Reserve) on the Policies Map, with these areas screened by appropriate landscape buffers;
- vi. Building heights will be limited in order to protect the 'Riverside' Conservation Area and the setting of heritage assets and to maintain views and vistas of Worcester's historic skyline including the Cathedral, and the river;
- vii. Within the site boundary, where areas overlap with Worcester's Registered Battlefield (some of which is Previously Developed Land), the setting of the Battlefield will be protected or enhanced through sensitive design and appropriate landscape buffers;
- viii. Provision of a new convenience store serving the local community. The net retail floorspace of the convenience store will be no larger than 250 sq. m net;
- ix. Provision of a new community centre;
- x. Provision of high-quality Active Travel infrastructure, which connect to the surrounding Active Travel network, public transport links and recreational areas; and

---

<sup>1</sup> LAPs (Local Area for Play), LEAPs (Local Equipped Area for Play) and NEAPs (Neighbourhood Equipped Area for Play).

<sup>2</sup> As defined in the Strategic Flood Risk Assessment and / or a site-specific Flood Risk Assessment, in accordance with SWDPR 34.

xi. Upgrades to vehicular access to the site to ensure impact on the existing road network is appropriately managed, including access to public transport routes, subject to assessment.

~~B. Proposals to develop land within the allocation will be expected to come forward in accordance with the Concept Plan (Figure XX). To support this, A comprehensive Development Brief for the site will be prepared by developers and Proposals to develop land within the allocation will be expected to come forward broadly in accordance with the Concept Plan (Figure XX). To support this, a comprehensive Heritage and Green Infrastructure led Development Brief for the site will be prepared by the South Worcestershire Councils in consultation with Worcestershire County Council, local stakeholders and Historic England. Development proposals for the site must include the following:~~

- ~~i. A comprehensive green infrastructure appraisal in accordance with SWDPR 07;~~
- ~~ii. Sustainable design and construction considerations in accordance with SWDPR 05, including renewable or low carbon energy requirements in accordance with SWDPR 33;~~
- ~~iii. A Surface Water Drainage Strategy in accordance with SWDPR 34;~~
- ~~iv. Site drainage and runoff considerations through a Water Management Statement, which has due regard to the SuDs hierarchy in accordance with SWDPR 35;~~
- ~~i.v. A comprehensive Townscape and Visual Impact Assessment including assessment of heritage, archaeology, townscape and visual impact, which accords with policies SWDPR 8 and SWDPR 29;~~
- ~~vi. A comprehensive assessment of the scale, height, massing, density and the positioning of buildings and land uses (site layout), which addresses the heritage, flood risk, landscaping and conservation matters set out in part A of this policy and, a clear explanation of how this assessment has informed the detailed proposals plan for the site, must be shown; and~~
- ~~vii. A comprehensive Travel Plan in accordance with part B of SWDPR 6.~~

~~No planning applications will be determined in advance of the preparation of the Development Brief.~~

### **Reasoned Justification**

Land at Navigation Road, Diglis is allocated as a mixed-use redevelopment site. The allocation will see development complement the existing built form of the area, which has been redeveloped into a successful residential area. The wider site context features the Diglis basin and the employment uses on Navigation Road. The redevelopment of the existing built form has consisted of predominantly flatted developments.

The site is partly operational for employment uses, indicating that the full redevelopment of the site will result in a net loss of approximately eight hectares

of employment land. Opportunities to retain existing businesses that would be compatible with any new residential development should be explored.

In order to sustain historic qualities and a sense of place, the redevelopment of the site must conserve or enhance the significance of heritage and archaeological assets. The setting of heritage assets and the impact on Worcester's historic skyline will need to be protected or enhanced by sensitive design. Accordingly, building heights will be limited and the scale, density and massing of buildings must be key site layout considerations.

In order to sustain environmental quality, the 'Riverside' Conservation Area and 'Areas of Regional or Local Wildlife Importance' (which includes Cherry Orchard Local Nature Reserve) will be protected, and no built form will be permitted in these areas within the site boundary. Redevelopment of the site must preserve or enhance the character and appearance of the Conservation Area and habitats, with appropriate landscaping and buffer zones. Worcester's Registered Battlefield overlaps with part of the southern extent of the site. Part of this area contains Previously Developed Land. The setting of the Battlefield in this area will be protected or enhanced through sensitive design and appropriate landscape buffers.

The site area is predominantly located in Flood Zone 2, with the western and southern perimeters of site partially located Flood Zone 3. Site layout must avoid development in areas which are subject to the highest risk of flooding, as defined in the Strategic Flood Risk Assessment and / or a site-specific Flood Risk Assessment, in accordance with SWDPR 34.

Provision of high-quality Active Travel infrastructure (walking and cycling networks) will provide health and wellbeing benefits with connections to nearby recreational opportunities such as the River Severn and Diglis playing fields. Design to make cycling a first choice over car use should be fully incorporated into the proposals for this site. This will also provide opportunities to expand local bicycle hire schemes (including parking bays) in the area. Further, the provision of connections to public transport links will also provide residents with opportunities to minimise use of private vehicles. Opportunities to encourage other schemes such as car sharing clubs should also be taken into account. ~~when developing the masterplan~~ Development Brief for the site.

~~It is important that the site is sensitively designed to protect and enhance its special qualities. Proposals to develop land within the allocation will be expected to come forward in accordance with the Concept Plan (Figure XX). To support this, a comprehensive Development Brief for the site will be prepared by the South Worcestershire Councils in consultation with Worcestershire County Council, local stakeholders and Historic England. To support this, A comprehensive Development Brief will need to be prepared by the developers for the allocation. The Ddevelopment Bbrief will include design principles and the phasing of new development need to in compliancy with the requirements of parts A and B of this policy, and should also include design principles and the phasing of new development. This must be prepared in collaboration and agreed~~

with the Local Planning Authority in consultation with Worcestershire County Council.

DRAFT



## SWDPR XX: Union Lane, Droitwich Spa

Site Area: 2.74ha

A. Within the area identified on the Policies Map this brownfield site is allocated for a sustainable, connected high quality designed residential allocation. The development will be required to incorporate all of the following elements:

- i. Provision of ~~approximately around~~ 200 new homes. This capacity will be reduced and the layout amended where required to protect buried archaeological remains and the significance of the Scheduled Monument. ~~, although it is acknowledged that the eventual site capacity and layout may be impacted by the extent of buried archaeological remains.~~ The development proposal should include up to 40% affordable housing, 5% self-build in accordance with Annex E and incorporating a proportion of housing suitable for the needs of older people;
- ii. Provision of Green Infrastructure and at least 10% net gain in biodiversity;
- iii. The site should be developed in accordance with the design principles set out in SWDPR 26. The development, including the public realm, should be of a high-quality design and adhere to the specific requirements for this site set out in Policy SPA11 of the Droitwich Spa Neighbourhood Plan. Any scheme should come forward in accordance with the Droitwich Town Design Guide and the Wychavon Design Code SPD;
- iv. Any development of the site should deliver enhanced active travel connectivity to the town centre and have regard to the future integration of the Netherwich Canal Basin mixed use allocation in SWDPR 63;
- v. An Archaeology and Heritage Strategy shall be prepared by the applicant which must identify how the development will conserve and enhance any heritage assets and their setting including the adjacent Scheduled Monument, and any other designated or non-designated heritage assets. The strategy should be informed by an initial desk-based archaeological assessment guiding archaeological works, to include a geophysical survey and geoarchaeological deposit model to inform design at an early stage and support decisions about the preservation *in situ* or further ground investigation as required;

- vi. **A car park, comprising 105 spaces, associated with the planned redevelopment of Droitwich Spa rail station; and**
- vii. **A ground survey investigation to establish the extent of any land contamination and an appropriate strategy setting out any necessary mitigation and remediation.**

**B. A comprehensive development brief, in accordance with the Concept Plan, will be prepared for the site by the LPA and will need to address all the following:**

- i. **A heritage, townscape and visual impact assessment that sets out how the significance of the Scheduled Monument and any other heritage assets will be conserved and enhanced, that any scheme is of an appropriate scale to the surrounding area, and wider views from and to the site are fully addressed;**
- ii. **Set out appropriate density and housing mix and provide guidance on sustainable design and construction, including renewable or low carbon energy in accordance with SWDPR 33; and**
- iii. **How the site can be connected to the town centre and surrounding area by pedestrian and cycle links.**

### **Reasoned Justification for SWDRP XX**

- 1.1 The brownfield site allocation comprises two separate sites adjacent to Union Lane covering the former Baxenden Chemicals Ltd factory. The surrounding area comprises employment and residential uses and the town centre is within a five-minute walk. The Droitwich Spa rail station is immediately adjacent, and the site sits in an elevated position alongside the railway line. The Droitwich Canal is within near proximity allowing access to the other parts of the town, Vines Park and wider countryside. Therefore, the location of this site for residential uses supports the delivery of a highly sustainable development and opportunity to regenerate the former industrial site and surrounding area.
- 1.2 Although brownfield and with a lengthy history of industrial uses and activity on the site, there is recorded [archeology](#)~~archaeology~~ along with the Scheduled Monument which covers the multi period salt production remains for which Droitwich Spa is known. Therefore, the redevelopment shall be heritage led to conserve and enhance the significance of these heritage assets and in addition to the policy requirements, further details on how this can be achieved are set out in ~~an~~the accompanying site development brief. In

addition, the site is within near proximity of the Droitwich town and canal Conservation Areas.

- 1.3 A heritage led approach will inform the design of the development, directing areas for greenspace to preserve heritage assets and guide foundation and drainage construction. Appropriate types of residential development on the site can include a mix of town houses and flatted development to a higher density given the town centre location and proximity to services [and](#), facilities. In terms of massing and storey heights the site is in an elevated position, particularly when viewed from the west and therefore consideration should be given to the maximum appropriate height of buildings so that they do not overly dominate the surrounding area. In addition, given the proximity to the railway line and noise from trains, consideration should be given to design approaches that mitigate against this, particularly along the western boundary of the site. Levels of private car parking can be at a lower rate given the proximity to rail and bus public transport options.
- 1.4 Any application must be accompanied by an Archaeology and Heritage Assessment, including a geophysical survey and archaeological deposit model informed by a core sampling programme. This will inform the requirements for further archaeological field evaluation.
- 1.5 There is wider opportunity to consider this site in the regeneration of the area as a whole and this is recognised in the Droitwich Spa Neighbourhood Plan 2024-2041, as well as the Droitwich Spa Town Centre Prospectus produced by Wychavon District Council in 2022. Therefore, any scheme on this site should consider how it can contribute to this aim and especially opportunities to link with the mix use allocation in this plan for the Netherwich Canal Basin.
- 1.6 The Concept Plan for the site provides an initial [illustrative](#) layout, connections, and supports the indicative site capacity figure. A development brief will be prepared for the site, by the Local Planning Authority, giving more detail on the matters raising from any future redevelopment. Further, any scheme must reflect the requirements in the Wychavon Design Code SPD, as well as the Droitwich Town Design Guide that accompanies the [Droitwich Town Neighbourhood Plan](#).
- 1.7 Worcestershire County Council and Network Rail are working towards a scheme for the comprehensive redevelopment of the existing railway station and enhanced capacity for buses. The existing car parking arrangements for the station are compromised by access and connectivity issues [s](#) and therefore the redevelopment of this site provides an opportunity to provide a more suitable car park with the benefit of helping to remove on-street car parking in the surrounding area. Consequently, the policy requires a maximum of 105 space car park near to the station.

- 1.8 Finally, although the former use of the site as a chemical works has not been identified in the initial site allocation assessments as an issue, a ground contamination survey and any appropriate remedial works identified as part of any future planning application should be undertaken.

DRAFT

## **SWDPR XX: Land south of Madresfield Road, Malvern**

**Site Area: 9.95ha**

- A. Land at Madresfield Road, Malvern will be developed to deliver 180 new dwellings within the Plan period.**
- B. Proposals to develop land at Madresfield Road will be expected to deliver:**
  - i. 180 new dwellings, including up to 40% affordable housing in accordance with SWDPR 18 and a mix of types and sizes of market housing in accordance with SWDPR 16;**
  - ii. 40% Green Infrastructure (excluding private gardens) in accordance with SWDPR 7;**
  - iii. A Heritage and Archaeology Strategy shall be prepared by the applicant which must identify how the development will conserve and enhance the significance of the scheduled Moated site at Sherrard's Green and any other designated or non-designated heritage assets; and**
  - iv. Incorporate an appropriate level of mitigation to limit the impact of the development, along with the retention of long-distance views to and from the Malvern Hills AONB across parts of the site in accordance with SWDPR 28.**

### **Reasoned Justification for SWDRP XX**













- 1.1 Land south of Madresfield Road lies approximately 1.5 miles east of the centre of Malvern, on the eastern fringes of the town. The site is located adjacent to the existing development boundary on the west and south and countryside on the east and north.
- 1.2 Malvern accommodates around 40% of the population in Malvern Hills District and is identified as a "Main Town" within the Plan's Settlement Hierarchy (SWDPR 3), which means that it is an appropriate location to accommodate a proportion of south Worcestershire's employment and housing growth over the Plan period. There is, however, limited land available within the town centre to accommodate Malvern's employment and housing needs through the Plan period.
- 1.3 The allocation's northern boundary is around 200m south of a group of designated heritage assets at Moat Court, Sherrard's Green. Principal among these is the scheduled Moated site (1016441, WSM06716). Associated with the moated site are two Grade II listed buildings, Moat Court (WSM34801), which lies within the moat, and a Dovecote at Moat Court

(WSM07791), which is just outside the moat. Undesignated heritage assets include the buildings of a model farm (WSM52269).

- 1.4 The moat encloses a large island (90 x 40m), although a depression across its centre shows where an earlier south arm of the moat lay. The water-filled moat is 6-10m wide and 1-2m deep. The moat is fed by a series of (unscheduled) ponds to the north, which also powered a watermill. It drains into the Whiteacres Brook to the south. Archaeological material is expected to be present both on the island and in the ditches, as well as elsewhere.
- 1.5 Without substantial and effective screening, the development on the allocation site would be clearly visible from the heritage assets, substantially altering its setting. This effect would be increased due to the slight slope on the site.
- 1.6 There is some potential for heritage interpretation on existing footpaths in the area, which pass close by the heritage assets. This could be linked to interpretation materials for local schools. Improved management of local rights of way may also be useful.
- 1.7 In design terms, it will be important to ensure that houses are designed to minimise harm. Building height is to be limited to two storeys in order to avoid overlooking as has occurred at Moat Crescent. Infrastructure such as lighting should also be carefully designed to minimise lightspill.
- 1.8 The allocation is around 10ha in gross size but there is an area along the northern boundary of the site where built development would be unsuitable, due to potential flooding. There is a clear opportunity for screening between the development and the heritage asset. This could involve strengthening the existing vegetation in this area, including management and enhancement of the hedgerows, and planting of native trees. These would be appropriate to the local landscape character. With careful design and suitable maintenance, it should be possible to enhance the setting of the heritage assets.
- 1.9 Any scheme that comes forward for the site should be designed as such to mitigate the visual impacts of any development when viewed from the Malvern Hills respecting the setting of the AONB. Advantage should be taken to incorporate long distance views towards the Malvern Hills from the site as part of any detailed layout design.

# Navigation Road Diglis Draft Concept Plan

## LEGEND

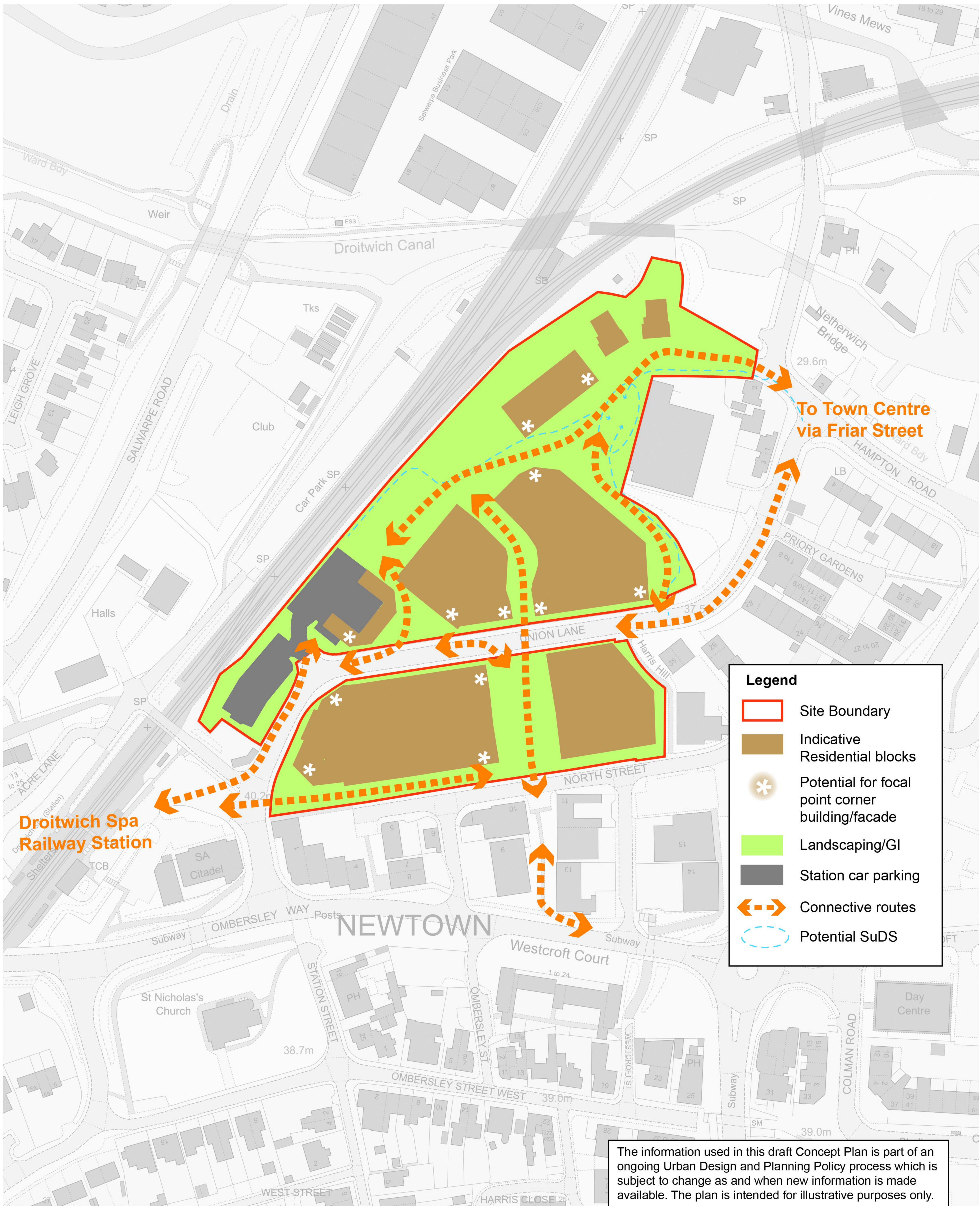
-  Site Allocation Boundary
-  Indicative Residential and/or Employment Use Blocks
-  Indicative E-Class and F2 Uses
-  High Quality Public Realm Spaces
-  Existing Trees and Vegetation
-  New Linear Park with SuDS Features
-  Integrated SuDS Features
-  Street Trees and Verges
-  Street Network
-  Grade II Listed Buildings (Diglis Island) - red dot
-  Non - Designated Heritage Assets - yellow dot
-  Existing Nature Area (retained and enhanced)



The information used in this draft Concept Plan is part of an ongoing Urban Design and Planning Policy process which is subject to changes as and when new information is made available. The plan is intended for illustrative purposes only.

Rev A - March 2025. Amendments to legend.

# Union Lane, Droitwich Draft Concept Plan



**Legend**

- Site Boundary
- Indicative Residential blocks
- \* Potential for focal point corner building/facade
- Landscaping/GI
- Station car parking
- Connective routes
- Potential SuDS

The information used in this draft Concept Plan is part of an ongoing Urban Design and Planning Policy process which is subject to change as and when new information is made available. The plan is intended for illustrative purposes only.

