

South Worcestershire Joint Core Strategy

Officers' responses to Written Submission

on the

Issues and Options Consultation

September 2008

ID No	Name	Comment	Officer Response
1	Drivas Jonas On behalf of CEMEX	<p>Sites Promoted – Pensham near Pershore.</p> <p>Stronger Communities Issue 1, support for option 3. Growth should be distributed evenly across the District.</p> <p>Issue 2, support for option 3. Issue 5, support for option 2.</p>	<p>This will be considered in the SHLAA report viewable on the SWJCS website.</p> <p>Noted This would be contrary to the Regional Spatial Strategy. Noted Noted</p>
2	Barton Wilmore (Mr Scott Delgano) on behalf of Taylor Wimpey Developments Ltd.	<p>Sites Promoted – Eastwood Rd, Malvern.</p> <p>Vision Need to be more spatial, and reflect growth agenda of South Worcestershire. Need to emphasise role of towns outside Worcester.</p> <p>Stronger Communities Emphasis should be in towns and growth in both main urban areas but also through smaller urban extension sites. Review of the Green Belt requested, support for use of greenfield sites and undertake housing market assessment.</p> <p>Better Environment for today and tomorrow. Supports issue 23 option 2. Object to introduction of local landscape designations.</p>	<p>This will be considered in the SHLAA report viewable on the website.</p> <p>The vision is an 'aim' to improve South Worcestershire by 2026. The 'growth agenda' is detailed in the objectives. Role of towns is identified in the vision but we will look to strengthen this.</p> <p>This is seen as the most sustainable approach and supports the Regional Strategy policy. Greenfield sites will be considered. Green Belt Review has been undertaken, as has a housing market assessment.</p> <p>This point was acknowledged at paragraph 7.6 of the Issues & Options paper and the situation have not changed.</p>
3	Whittington Parish Council (Mr P Roe)	<p>Stronger Communities Development east of Worcester City will not help reduce out-commuting to MUA. Dualling of Southern ring road not a sustainable option as J7 at capacity.</p> <p>Make use of urban brownfield sites first. Economic Success Shared by All. Need to maintain strategic gap between edge of Worcester City and Whittington.</p>	<p>Agreed</p> <p>Emerging evidence from the Highways Agency and highway authority does not support this view. Agree as far as practical.</p> <p>Noted.</p>
4	Harris Lamb Chartered	Sites Promoted – Land at Wychbold and south of	This will be considered in the SHLAA report

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	Surveyors (James Hollyman) on behalf of Persimmon Homes)	<p>Droitwich</p> <p>Vision. Vision correctly recognises required growth.</p> <p>Objectives. Clarify objective that suitable amount of development (dwellings) in South Worcestershire to meet identified housing need in sustainable locations - including larger villages.</p> <p>Stronger Communities Issue 1/5 - appropriate amount of development should be allocated to Category 1 villages, main towns outside Worcester City and principal urban areas. Issue 2 before greenfield land within settlements is allocated for development need to establish its requirement for open space. Issue 5 promote development in Category 1 village e.g. Wychbold. Issue 7 - need to promote more than just affordable housing in rural settlements e.g. Wychbold. Issue 7 - promote development in category 1 villages to reduce need to travel.</p> <p>Economic Success shared by all. Issue 18 - Delivering housing in the more sustainable villages will aid the rural economy - need to provide housing close to rural jobs.</p> <p>Improving Health and Wellbeing. Issue 29 - protect public open space and other important private green open space where required.</p> <p>Other Comments. Site is close to local facilities and public transport opportunities i.e. a sustainable location - Wychbold is category 1 village. RSS promotes Wychavon for significant numbers of houses in the future.</p>	<p>viewable on the website.</p> <p>Noted</p> <p>Disagree. The objective is to meet the identified housing need. It should not indicate how this could be achieved.</p> <p>Noted</p> <p>Agreed</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>This will be an important aspect in our strategy.</p> <p>Noted – RSS also aims to reduce commuting to the MUA and development at Wychbold, being close to junction 5 of the M5, is unlikely to be supportive of this.</p>
5	Hallow Parish Council (Mr	Stronger Communities	

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	P Roe)	<p>Infrastructure should be in place before development proceeds.</p> <p>Support for New Town. Economic Success shared by all Strategy should look to encourage inward investment, probably in IT. Dualling of Southern ring road required to improve access to the west of City for employment development.</p>	<p>Requirement for infrastructure reflects the position of SWJCS authorities regarding the emerging RSS.</p> <p>Noted but contrary to RSS policy.</p> <p>The emerging evidence concurs with this view.</p>
6	Trustees of J and J Byrd (Mr Geoffrey Byrd)	<p>Sites Promoted – land at Defford; Charlton and Fladbury</p> <p>Vision - Strongly Agree Objectives – Strongly Agree Stronger Communities Issue 1 - Strongly Agree to 'Use development to strengthen the roles of villages' (option 3), Strongly Disagree to other options. Issue 2 - Strongly Agree to 'Identify Land on the edge of Cat. 1 and 2 villages' (option 4), Strongly Disagree to all other options.</p>	<p>This will be considered in the SHLAA report viewable on the website.</p> <p>Noted Noted</p> <p>Noted</p> <p>Noted</p>
7	Pegasus Planning (Mr Geraint Jones) On behalf of the Spetchley Estate)	<p>Site promoted – Land south east of Worcester.</p> <p>Vision strongly supported Objectives - Supported Stronger Communities Issue 1. The settlement hierarchy is supported as a basis for the focus of development. Issue 2 - greenfield development should be in, or on the edge of the main settlements. Most growth should be directed to appropriate urban extensions. Favourite southeast edge towards junction 7 (M5) within motorway - may be beyond if more development required, but only employment uses around junction 6. Need for some development within smaller settlements eco-town not supported - will detract from services and facilities in existing settlements.</p>	<p>This will be considered in the SHLAA report viewable on the website.</p> <p>Noted Noted</p> <p>Noted</p>
7		Does not support review of the Green Belt - as most	Noted, but we need to do a review in order

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		<p>appropriate direction of growth of Worcester is to the east. Flood risk and physical constraints prevent useful growth of Worcester to north, southwest and west.</p> <p>An appropriate level of growth required in Malvern Hills and Wychavon. Does not suggest where except adjacent to M5 in south east of Worcester, contained within the motorway using existing highway infrastructure.</p> <p>Economic Development Shared by All.</p> <p>Central Technology Belt - supports growth east and south east of Worcester along M5, up to M5 and scope for strategic employment site by junction 6, Would have good motorway links. Allow some rural employment opportunities especially agricultural diversification. Some development appropriate to rural settlements required and will support existing services and facilities. Issue 8-focus development on Worcester to support sustainable transport/services.</p> <p>Other Comments.</p> <p>Client Spetchley Estate supports identification of Worcester as a major urban area.</p>	<p>to defend the Green Belt as appropriate. The SWJCS aims to avoid flood areas for development.</p> <p>Noted</p> <p>Noted</p> <p>RSS does not promote Worcester as a major urban area but as a Settlement of Significant Development</p>
8	Advantage West Midlands (Suzanne Clear)	<p>Objectives - Support Stronger Communities</p> <p>Issue 2 - urban extensions - take account of links to existing/proposed employment opportunities and services.</p> <p>Issue 6 - Balance housing growth with need to retain/provide for existing employers.</p> <p>Issue 7 - Rural economies - welcomes recognition of importance of leisure and tourism uses. Supports diversification/development of rural economies.</p> <p>Economic Success Shared by all.</p> <p>May need to consider a Regional Investment Site allocation to meet future employment need demand. Acknowledge importance of retail economy to all towns/service centres/ education/health roles.</p> <p>Tenbury Wells and Broadway likely to have strong linkages beyond Worcestershire.</p>	<p>Noted</p> <p>Agreed</p> <p>Noted</p> <p>Noted</p> <p>This will be acknowledged in the Preferred Options subject to evidence justifying such a site.</p> <p>Noted</p>
8		Low amount of office space in Worcester may affect growth	This will need to be addressed through the

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		adversely. Better Environment for today and tomorrow. Issue 27 - Promote low carbon energy in urban extensions.	Preferred Option. The SWJCS promotes low carbon energy
9	Councillor Jo Sandalls (Wychavon DC)	<p>Vision. Supports vision in theory.</p> <p>Objectives - Support Stronger Communities Development of housing should be evenly spread. Issue 4 - eco towns - can contribute in the future - needs changes to planning system. Issue 3 - we should redefine the Green Belt, but need to preserve the rural/urban corridor etc. No urban sprawls. Issue 1 settlement ranking is reasonable. Issue 9 promote range of public transport; also promote use of canals especially in Droitwich Spa. Issue 11 - development should not proceed without essential infrastructure.</p> <p>Economic Success Shared by All. Acknowledges Central Technology Belt. Issue 18.6.1-16.18.8 supported (all options). Issue 19 - retain retail provision in major towns - and structure control further out of town proposals. Safeguard rural post offices, shops, regenerate run down town centres, promote parking and pedestrianisation. Encourage tourism.</p> <p>Better Environment for today and tomorrow. Issue 26 needs to preserve character of villages and towns. Issue 27 promote eco features in new developments. Issue 24-protect/conserve/enhance rural landscapes. Issue 25-flood risk adopt stricter standards supports all measures to improve designs. Supports surface water storage and collection and collect contributions from developers. Issue 27 promote BREEAM standards. Issue 28 locate new waste treatment facilities across the country to prevent large movement of waste. Issue 29.8-29.3 promote accessible open space based on local circumstances and needs. 8.29.5 Seek contributions from developers for sport and sound transport system. Issue 30 with major expansions,</p>	<p>Noted</p> <p>Noted</p> <p>Noted</p> <p>A Green Belt Review is being carried out.</p> <p>Noted</p> <p>This is the position of the SWJCS Authorities regarding the emerging RSS.</p> <p>Noted</p> <p>Noted</p>
9		developer contributions should contribute to new hospital	

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		<p>facilities. Issue 31 - 8.31.2 seek contributions for education.</p> <p>Communities that are Safe and Feel Safe. Issue 32 - supports 9.32.2 and 9.32.3 i.e. promote design/layout to discourage crime and support existing sport and recreation.</p> <p>Other Comments. Housing figures are an overestimate. RSS should address need for local distinctiveness. Avoid creating dormitory towns.</p>	<p>Noted</p> <p>We have to provide what is allocated through the RSS. We will be seeking to remain locally distinctive, and certainly would not wish to create dormitory towns</p>
10	Robert Hitchens Ltd (Kirsty O'Nion)	<p>Site Promoted – Ronkswood Hospital, Newtown rd Worcester.</p> <p>Vision – Support</p> <p>Objectives - Supported</p> <p>Stronger Communities</p> <p>Issue 2 - Concentrate greenfield development in Worcester, then Evesham.</p> <p>Issue 4 - (option 7) Focus development east of Worcester (within M5), SE and W of the City.</p> <p>Issue 5 - Focus growth at Evesham, then other main settlements.</p> <p>Issue 6 - Employment development should be focused in Worcester, Evesham and some at Worcestershire Parkway, Norton.</p> <p>Economic Development that is shared by all. Promotes former Ronkswood Hospital site, Newtown Road for housing.</p>	<p>This will be considered in the SHLAA report viewable on the website.</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>This is an important employment site in a very sustainable location.</p>
11	Countryside Development Officer (Rebecca Pell), Worcestershire County Council	<p>Improving Health and Wellbeing.</p> <p>Issue 29 - (option 5) Seek contributions from developers to provide open space and recreation facilities.</p> <p>Other Comments. No detailed response to issues and options. Explains the role of Worcestershire County Council's Countryside Service. E.g. Provides support to communities to develop/manage their own greenspace. As well as</p>	<p>We already do this, and aim to continue.</p> <p>Noted</p>
11		managing sites for informal recreation, landscape/	

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		biodiversity. Developing a sustainable approach to open space provision - vital for significant residential development. Would seek contributions from developers.	Agreed
12	Mono Consultants Ltd (Ms C Wilson) on behalf of the Mobile Operators Assoc.	Vision - No objections to issues - options identified. Other Comments. Acknowledge that Joint Core Strategy is not applicable document for a telecommunications strategy, but that subsequent LDF documents should contain such a strategy. Refer to PPG8 and code of best practice - suggested policy for appropriate LDF document.	Noted Noted
13	Humberts (AN Champion) on behalf of Taylors of Martley.	Site promoted – Land at Laugherne Village, Martley. Stronger Communities Support for Issue 2, option 4.	This will be considered in the SHLAA report viewable on the website. Noted
14	Gloucestershire County Council (Sarah Street)	Vision - No comments to make on any part of the document at this stage.	Noted
15	Upton upon Severn Town Council (J Adams)	Stronger Communities Issue 2, option 3. Support development in the Tunnel Hill area for housing, provided necessary infrastructure is in place.	Noted
16	Humberts on behalf of Messrs C Hayes, P Jenkins & Worcestershire CC	Site Promoted – Upper Wick Lane, Rushwick Stronger Communities Support for Issue 2, options 2, 3 and 4. Support strategy to direct development to Worcester, principle towns, and higher Category villages.	This will be considered in the SHLAA report viewable on the website. Noted
18	RPS Group (Mark Sackett) on behalf of the North Tewkesbury Land Consortium.	Site Promoted – Mitton Lodge, Tewkesbury. Stronger Communities Supporting approach of dispersal and promoting specific site near Tewkesbury to meet SWRSS figures. Other Comments. Emphasis in the opportunities for cross-boundary working approach to both SWRSS, EIP and growth.	This will be considered in the SHLAA report viewable on the website. Noted We wait to see whether we have to accommodate any of the South West Regional Spatial Strategy growth. We are working with Tewkesbury BC on this matter.
19	Bell Cornwell Partnership (John Cornwall) on	Site Promoted. - Worcestershire Parkway site, Norton.	This will be considered in the SHLAA report viewable on the website.

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	behalf of the Hartwright Family	<p>Vision - Support</p> <p>Objectives - 2nd objective need to add: 'Active support will be given to proposals which provide public transport facilities at key transport nodes, including the provision of appropriate enabling development to ensure that such schemes are realised in the early years of the plan period</p> <p>Stronger Communities</p> <p>Issue 9, option 2 - strongly support.</p> <p>Issue 10, option 1/2 add to enabling development. Support issue 11, option 1.</p>	<p>Noted</p> <p>Disagree. This would be an inappropriate addition to an objective as it suggests that enabling development will be required, and this should not necessarily be the case.</p> <p>Noted</p> <p>Noted</p>
22	Tyler Parkes on behalf of Axa Reim and Stoford Development.	<p>Site Promoted – Stonebridge Cross Business Park.</p> <p>Economic Development that is shared by all.</p> <p>Identify Droitwich Spa for a significant increase in employment to reduce level of out commuting.</p> <p>Better Environment for today and tomorrow.</p> <p>Promote extension at Stonebridge Cross Business Park for the purpose of generating more employment.</p>	<p>Noted</p> <p>Noted</p> <p>Noted</p>
23	The Theatres Trust (Rose Freeman).	<p>Stronger Communities.</p> <p>Issue 7 - 4.7.4 - protect and enhance village facilities for cultural purposes/community uses (refers to PPS7) - promote performance cuts for social inclusion. Issue 11 - set out priorities for S106 agreements to address need for cultural provision.</p> <p>Economic Development that is shared by all.</p> <p>Issue 20 - option 6 - recognise wider benefits of town centres, for leisure and cultural uses, theatres, cinemas, libraries and museum. Towns should aim for balanced day and evening leisure scene.</p> <p>Issue 22 - all options apply in the appropriate location should be an overarching policy to promote and protect your existing community, cultural and leisure facilities. Also new facilities required for new development.</p> <p>Communities that are Safe and Feel Safe.</p> <p>Issue 32 option 2 - need good design in the public realm - reduces crime. Option 3 - make clear difference between public and private space through design/signage/lighting.</p>	<p>Noted</p> <p>Agreed</p> <p>Agreed</p> <p>Noted</p>
24	Atisreal (Andrew Morgan) on behalf of West Mercia	<p>Vision - Agree with vision. But should also state that development growth will only be encouraged where</p>	<p>Noted</p>

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	Constabulary).	<p>provision is made for the necessary expansion of public services and infrastructure to support it.</p> <p>Objectives - Supports objectives Include objective that contributions be made to WMC to cover cost of extra policing.</p> <p>Stronger Communities Always consult WMC in cases where major new developments are being promoted to ensure community safety is taken into account.</p> <p>Issue 3 - the Green Belt should be reviewed.</p> <p>Issue 4 and 5 issue of the eco town should be integral to SWJCS not separate.</p> <p>Issue 5 development spread over scattered villages would be most difficult to police. Issue 11 - reference to infrastructure should recognise need for emergency services as key infrastructure.</p> <p>Communities that are Safe and Feel Safe. Need to be aware of cross-border crime, particularly along motorway network. Consider impact of development on neighbouring communities e.g. Tenbury Wells/Ludlow/Craven Arms.</p> <p>Other Comments. Background to West Mercia Police as an organisation - works to a three-year strategic plan. Problem with central government funding formula.</p>	<p>The objectives are about creating a balanced and sustainable community. This will need funding and will be considered in the development of the Community Infrastructure Levy.</p> <p>West Mercia is already a consultee, and will continue to be so.</p> <p>Green Belt review is being carried out.</p> <p>Eco-Towns are a separate Government initiative.</p> <p>Noted</p> <p>Emergency services are part of the Infrastructure Providers Group and their requirements will be taken into account.</p> <p>These are very relevant cross border issues which we will be aware of in developing the Strategy</p> <p>Noted</p>
25	Malcolm Scott Consultants Ltd	Site Promoted – Blooms Garden Centre, Droitwich Rd, Worcester.	This will be considered in the SHLAA report viewable on the website.

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		<p>Stronger Communities Issue 3 - The Greenbelt. The core strategy should provide for the potential identification of new major developed sites in the Green Belt - Annexe 3 PPG2 refers). Example is to promote Blooms Garden Centre, Droitwich Road, Worcester. Economic Development that is shared by all.</p> <p>Issue 19 - option 4 (retail provision) - suggest a further option: "safeguard and promote development on specialist retail sites where this will assist in enhancing the identified important sub-regional role of Worcester as a major retail, leisure, University and tourist centre".</p>	<p>We are carrying out a Green Belt Review, but National and Regional policy does not allow for major development in the Green Belt.</p> <p>This will be taken into account in arriving at the Preferred Options.</p>
26	GVA Grimley (Matthew Fox) on behalf of the Throckmorton Consortium.	<p>Site promoted – Throckmorton Airfield.</p> <p>Stronger Communities Issue 2, option 5 and Issue 4, option 6 - strongly support.</p>	<p>This will be considered in the SHLAA report viewable on the website.</p> <p>Noted</p>
28	Vincent & Gorbling on behalf of Arndale Properties.	<p>Site Promoted – 250 Bransford Road, Worcester.</p> <p>Vision. The proposed vision lacks a clear spatial dimension. The vision needs to establish the overall spatial planning framework for the area. The majority of the vision could apply to anywhere in the county.</p> <p>Objectives - The draft objectives also lack a clear spatial dimension.</p>	<p>This will be considered in the SHLAA report viewable on the website.</p> <p>The implication of this is that the vision should be more explicit about future land uses. It is a requirement of the new planning system that Development Plan Documents should be spatial and not focused on land use. As such the proposed vision sets out what South Worcestershire will be like in 2026 and does not concern its self with directions for growth or other land use issues.</p> <p>Objectives should be expressed as clearly and briefly as possible. Adding additional explanations about how objectives will be achieved will limit the options available to achieve the objectives and will limit the flexibility in the Joint Core Strategy to adapt to changing or unforeseen circumstances.</p>

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28		<p>Stronger Communities</p> <p>Issue 1. We support the proposed settlement hierarchy. Development in all settlements other than Worcester should be guided by the need to meet local needs.</p> <p>Issue 2. Generally greenfield land within settlements should be protected. Once the capacity of Worcester as an urban area has been properly established the edge of Worcester is the next most sequentially preferable location for new residential development. We do not support an Eco-Town or any other form of new settlement. Not all under-used employment sites represent viable or realistic redevelopment opportunities for employment uses.</p> <p>Issues 3 and 4. Whether or not the Green Belt boundary should be reviewed cannot be seen in isolation, however future directions of growth are such that, in all probability, the Green Belt can be retained as at present.</p> <p>We do not believe that the councils will receive an informed response as the Issues & Options document does not provide any information on the pros and cons of each option.</p> <p>We consider that the obvious direction for future residential growth should be to the west of the city. The peripheral land in this direction is closest to the city centre and represents the most sustainable direction for future growth.</p> <p>Residential development to the South and East would clearly encourage longer distance commuting and would be further away from the city centre.</p> <p>Issue 6. The protection and provision of employment land is a key issue. The protection of unsuitable land as against its</p>	<p>Agree that this is a problem, however this is a criticism of most Core Strategies so far produced and may reflect, that people's aspirations for their community are similar throughout England, or that the ability of the planning system to affect planning outcomes is constrained by national planning policy.</p> <p>Noted.</p> <p>Noted. A Green Belt Review is being carried out.</p> <p>It is a requirement that Issues & Options consultations are front-loaded. This implies that consultations should be open and not constrained by professional or other views. Setting out planning officers or consultant's views of the pros and cons of possible options would constrain the consultation process in a way that national guidance seeks to avoid.</p> <p>Noted</p> <p>Noted</p>

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28		<p>release for housing is a key issue for this Core Strategy.</p> <p>Worcester is a net importer of employees and future growth is as much about redressing that imbalance as it is ensuring that a suitable amount of employment land is made available.</p> <p>Future employment land should be allocated principally at Worcester</p> <p>Issue 8. The key vision of the spatial strategy should be to concentrate development in accessible locations with further development within Worcester at the top of the search sequence.</p> <p>Issue 9. The key to encouraging more sustainable means of travel is to ensure sustainable patterns of development</p> <p>Meeting the Needs of all Generations</p> <p>Issue 12. We do not support the notion of identifying 'affordable housing sites' within Worcester unless the landowner is in agreement.</p> <p>Issue 13. There is no need for a specific policy, as the requirements for any particular mix would alter over time.</p> <p>Economic Development that is shared by all.</p> <p>Issue 16. There is no case for protecting employment land</p>	<p>Disagree. It is not the intention of the Joint Core Strategy to change the position of Worcester as a net importer of labour. If Worcester as the county town was not a net importer of labour this would suggest some rebalancing between Worcester and other centres of employment was required. The RSS requirement for an additional 50,000m2 of B1 offices in Worcester should increase the number of people travelling into Worcester to work.</p> <p>Noted, this is an option however it is in contradiction to point 7</p> <p>The vision for the Joint Core Strategy needs to be aspirational regarding how South Worcestershire will function in 2026.</p> <p>Agree, however the challenge is reaching agreement on what the most sustainable pattern of development is.</p> <p>Noted.</p> <p>Agree that policy should not specify particular requirements, as this could become quickly out of date. However a policy that enables the production of a Supplementary Planning Document that can be regularly reviewed and updated if necessary may be required.</p> <p>The decline of vulnerable sectors, which may</p>

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		<p>for its own sake – particularly employment land that might allegedly be suited to ‘vulnerable sectors’.</p> <p>Issue 17. There should not be a blanket protection of existing employment sites. There are key employment areas, which should be protected. Key employment areas should be identified as being of strategic significance to the local economy.</p> <p>Any site, which is proposed for ‘protection’, must be the subject of a full financial viability assessment before the site is allocated on this basis.</p>	<p>still provide a significant amount of employment, will be accelerated by any increase in employer’s fixed costs. If too much employment land is developed for higher value uses such as housing the cost of employment premises will increase, increasing employers fixed costs. Clearly a balance needs to be struck between employment and other land uses and national guidance suggests this should be on the basis of an up to date Employment Land Review. Where the outcome of such a review is not in alignment with Regional Spatial Strategy requirements it may only be a Development Plan Document that can set out, the appropriate level of, and protection of, employment land, taking into account all the available evidence.</p> <p>Noted.</p> <p>Disagree this would not be reasonable; some recently developed or redeveloped employment sites are self evidently viable for this use. If such an assessment were carried out for all sites landowners who wished to cash in on higher land values possible with alternative land uses would simply contest that the assessment was not carried out properly if it concluded that their site should be protected.</p>
30	Pegasus Planning Group on behalf of the Warndon	Sites Promoted – Land south of Warndon Wood and at Dugdale Drive	This will be considered in the SHLAA report viewable on the website.

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	Consortium	<p>Vision. We agree that sustainability should be the overarching aim of the South Worcestershire Joint Core Strategy. The proposed vision is supported particularly the emphasis given to Worcester.</p> <p>Stronger Communities It is important that the Joint Core Strategy is flexible enough to be able to respond to the eventual requirements of the Regional Spatial Strategy. The South Worcestershire Joint Core Strategy will need to provide sufficient land to accommodate in excess of 32,597 dwellings up to 2026. Issue 1. The settlement hierarchy represents a sound basis for a development strategy. Issue 2. Support option 2 but it is inevitable that a mixture of some or all of the options will be necessary to deliver a robust and sustainable approach to accommodating development. Issue 3. Greenfield sites particularly those to the east of the city should be considered first for development potential and before any recourse to the use of land in the Green Belt. Issue 4. Support options 1 and 5 and particularly that development should be focused east of the city including land between the A4440 and the M5. Objectives - The objectives are a sound basis for the policies and proposals in the Joint Core Strategy.</p> <p>Issue 6. Primarily at Worcester. Employment and housing development should be provided together to ensure that sustainable travel patterns are adopted. Land west of the M5 and east of the city is considered particularly suitable for employment uses because of the access to the road network.</p>	<p>Noted</p> <p>Noted</p> <p>Agreed.</p> <p>The RSS Preferred Option at present states 24,500 dwellings.</p> <p>Noted.</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p>
30		Issue 8. The right balance between the number of homes and jobs will contribute most to reducing the need to travel	Agreed

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		<p>by car.</p> <p>Issue 9. Multi modal interchanges will encourage more sustainable means of travel.</p> <p>Meeting the Needs of all Generations.</p> <p>Issue 12. The Local Planning Authority should set out their requirements for affordable housing based upon a robust and credible evidence base. Such policies provide certainty for developers when calculating the viability of a development.</p> <p>Better Environment for today and tomorrow.</p> <p>Issue 27. The Local Planning Authority should promote renewable energy development, which can contribute to the achievement of sustainable development.</p> <p>Issue 29. An open space audit should be used to determine what provision new developments should make to existing and new facilities.</p>	<p>Agreed</p> <p>Agreed</p> <p>This is one of our objectives</p> <p>The PPG17 Open space audits have been carried out for the three districts and will inform Core Strategy policy</p>
32	J & J Design (JR Shephard) on behalf of Hallam Land Management.	<p>Site Promoted – Swinesherd Way, Whittington.</p> <p>Vision. - Suggest inserting 'and flood risk' between 'carbon footprint' and 'as well as enhancing' in the second paragraph of the vision.</p> <p>Objectives – Support.</p> <p>Stronger Communities</p> <p>Strongly support, everyone having access to a decent affordable home and the Central Technology Belt being accessed by fast and efficient local public transport with reduced dependence on the car.</p> <p>It is essential for the Joint Core Strategy to commit unequivocally to meet the Regional Housing target as a minimum within the plan period. It is clear from other Core Strategy Public Examinations in Public that the Joint Core Strategy will be unsound unless this is the case.</p> <p>Issue 1. The proposed hierarchy reflects the reality of the spatial distribution and function of settlements with the <u>Joint Core Strategy area</u>. We strongly support option 1.</p>	<p>This will be considered in the SHLAA report viewable on the website.</p> <p>We will take this into account in refining the vision for the Preferred Options</p> <p>Noted</p> <p>Noted.</p> <p>Our baseline is the RSS Preferred Option, but we are aware that the strategy will need to be flexible to accommodate change.</p> <p>Noted</p>
32		Development in villages should be limited to that needed to meet local housing requirements, particularly needs for	

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		<p>affordable housing; and promote local regeneration or support the retention or creation of local services. The Joint Core Strategy should fully support the strategic direction towards greater concentration.</p> <p>Issue 2. Strongly support option 2. Agree with option 3, provided that the level of development to these settlements is on a smaller scale, consistent with emerging RSS Phase 2 Revision and does not undermine the fundamental strategy of concentration. Option 4 should be embraced solely to meet the objections of Draft Regional Policy CF29(c).</p> <p>Issue 3. Strongly support option 1. It is premature for the Joint Core Strategy to promote alterations to Green Belt boundaries in the absence of a clear and justifiable basis for a Green Belt revision enshrined in approved Regional Strategy.</p> <p>Issue 4. Strongly agree with Option 1, which is considered to be the most appropriate area for early sustainable urban extensions to the city of Worcester. The M5 motorway should contain easterly expansion. Strongly support option 2 as an area with capacity to accommodate a significant proportion of the needs of Worcester up to 2026 and beyond.</p> <p>Better Environment for today and tomorrow. Issue 25 disagree with option 1 and agree with options 2, 3, 5, 6, and 8.</p>	<p>Noted</p> <p>Noted, however we are undertaking a Green Belt Review to establish the way forward.</p> <p>Noted</p> <p>Noted</p>
33	Andrew Griffiths	<p>Stronger Communities All settlements in South Worcestershire should grow in proportion to their existing size to avoid upheaval to the existing residents of Worcestershire.</p>	<p>While there is need to spread development across South Worcestershire both national policy and the Regional Spatial Strategy suggest development should be located in the most sustainable locations close to existing services. This means the majority of development will have to be located within or close to the existing main urban areas.</p>
34	Brian Orme	<p>Stronger Communities Disagree that most new housing cannot be located on</p>	<p>While it might be technically possible to build</p>

ID No	Name	Comment	Officer Response
		<p>brownfield sites. Only minor incursions into greenfield sites should be allowed.</p> <p>Duelling the southern link road should be a priority over completing the North West section of a Worcester orbital route. If a North West bypass is required it should be routed north of Hallow.</p> <p>Heavy goods vehicles should be banned from the city centre river crossing.</p> <p>The junction of the A449 with the M5 is inadequate.</p> <p>Economic Development that is shared by all.</p> <p>Attracting a better range of employment should be a priority. A better mix of employment choice is badly needed.</p>	<p>very tall buildings to accommodate the growth in demand for new residential units, officers do not believe such an approach is practical and if the Regional Spatial Strategy requirements for additional homes are to be achieved this will require development of more than minor greenfield sites.</p> <p>Noted.</p> <p>Noted</p> <p>Noted</p> <p>Agree, the Preferred Options will aim to support as wide a range of employment opportunities as possible.</p>
35	Mr R C Cheater	<p>Stronger Communities</p> <p>The consequence of building more houses can only be more traffic.</p> <p>Object to the loss of green areas within cities. Green spaces provide a safety valve for people. The school closest to where I live has now lost all of its playing fields.</p> <p>Better Environment for Today and Tomorrow.</p> <p>The CO² emissions as a result of building this number of houses will contribute considerably to global warming.</p>	<p>Noted</p> <p>Noted, one of our objectives is to protect green space.</p> <p>It is true that the amount of energy required to build a home is very considerable. However homes built today are much more energy efficient than those built in the past. The Joint Core Strategy could ensure new homes are even more energy efficient and produce some of their energy needs from local renewable sources. If these options are supported the new homes may be part of the solution to global warming rather than contributing to it.</p>
35		The water supply is bound to be put under greater pressure with more houses to be supplied.	Severn Trent have not raised this issue although the Water Resource Plan for the

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		<p data-bbox="539 568 1196 624">Communities that are Safe and Feel Safe. I cannot see any direction for crime to go but upwards.</p> <p data-bbox="539 770 1245 879">Other Comments. I think the document is far too complicated. It's almost like the people 'in power' are trying to stop the public being involved.</p> <p data-bbox="539 1026 1245 1082">There are far too many people in the country. We need less people in the country not more houses.</p>	<p data-bbox="1279 169 1821 536">West Midlands does indicate that there may not be enough potable water if new infrastructure is not developed. Many of the new homes would be occupied by existing South Worcestershire residents who choose to live on their own or in smaller family units. The same level of water consumption could be spread amongst a larger number of homes. The planned new homes will also be more water efficient than existing homes and measures such as rainwater harvesting would also be incorporated in the design of development.</p> <p data-bbox="1279 600 1805 735">There is no reason why new homes or other forms of development should increase crime levels. If the design is good development should actually reduce the opportunities for criminal behaviour.</p> <p data-bbox="1279 799 1794 999">The document is lengthy but it has to cover a wide range of issues, many of which are cross cutting. It was certainly not the intention to stop the public being involved and considerable investment and consultation has been made to involve as many people as possible.</p> <p data-bbox="1279 1031 1805 1110">It is not within the scope of the South Worcestershire Joint Core Strategy to attempt to reduce the size of the population.</p>
35		We simply do not have the room to build more and more houses. It is complete madness.	The SHLAA demonstrates that there is sufficient land to meet the proposed RSS

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			housing target. However, for development to function effectively considerable investment in infrastructure is required. Whether this is madness depends on your view of the alternatives available and the likely consequences of not planning for additional homes in South Worcestershire.
36	Alan Threadgold On behalf of Qinetiq	<p>Site Promoted – Malvern Technology park</p> <p>Vision. We fully support your vision for South Worcestershire</p> <p>Stronger Communities. We recommend you give serious consideration to the potential for creating a sustainable new development at Throckmorton.</p> <p>Improved road access between Malvern and the M5 should be a priority.</p> <p>Better rail links between South Worcestershire and London</p> <p>Economic Development that is shared by all. It is important that your core strategy should align with the Central Technology Belt development plans for South Worcestershire.</p>	<p>This will be considered in the SHLAA report viewable on the website.</p> <p>Noted.</p> <p>QinetiQ have promoted this site as the possible location for an Eco-Town. The Department of Communities & Local Government will take decisions about the potential of this site.</p> <p>Agree access to Malvern is a constraint, which needs to be addressed through the preferred options.</p> <p>Agree that better heavy rail links between South Worcestershire and London would be a benefit to the area, however decisions about the future development of the Cotswolds Line are beyond the scope of the Joint Core Strategy.</p> <p>Agree. The SWJCS will only be able to address this at a strategic level.</p>
36		We would caution most strongly against constraining policy objectives, such as safeguarding employment land.	Agree that better quality facilities should be encouraged; however the ability of a

ID No	Name	Comment	Officer Response
		Quality hotel development in Malvern should be promoted	<p>strategic planning document to deliver particular developments is very limited.</p> <p>This comment is based on the perceived needs of a single if very significant employer. Basing planning policy on individual cases rather than a holistic view of needs does not often produce good planning outcomes.</p>
37	Alan Davies on behalf of South Shropshire District Council	<p>Other Comments The housing, employment and other needs of Tenbury Wells need to be considered in conjunction with the needs of Burford. Consideration of cross boarder issues may reduce the need for difficult decisions to release greenfield sites for development.</p>	Agree. We cannot plan in isolation.
38	Steven Bloomfield on behalf of the Worcestershire Wildlife Trust	<p>Vision - We would advocate the use of a slightly amended South Worcestershire Joint Core Strategy Vision.</p> <p>Better Environment for today and tomorrow. The South Worcestershire Joint Core Strategy must promote the need for a comprehensive Green Infrastructure Strategy to guide development for the area.</p> <p>Development must sit lightly within the wider environment. The South Worcestershire Joint Core Strategy must make clear the difference between open-space required for recreation, climate change adaptation and biodiversity.</p>	<p>While it would be possible to make minor changes to the proposed vision the scale of change proposed is significant and could not be made without re-consulting on the revised vision. The SWJCS process cannot be delayed further and after all there is a further opportunity to comment when the Preferred Options document is published.</p> <p>1 to 6 - Agree with the aspiration of these representations. Officers will however need to produce a Preferred Options that is both concise and enables the development of more detailed policy in subsequent Local Development Framework documents.</p>
38		The South Worcestershire Joint Core Strategy must include clear requirements for new development to deliver green	

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		<p>infrastructure in the same way, as there are requirements to deliver grey infrastructure.</p> <p>The South Worcestershire Joint Core Strategy must promote mitigation banking from multiple developments to contribute towards a more robust green network at a larger scale</p> <p>The South Worcestershire Joint Core Strategy must make clear that responding to the likely effects of Climate Change will be a key factor in determining the scope, scale, design and implementation of all new development in South Worcestershire. Opportunities for adaptation and mitigation must be taken and 'climate proofed' development must be a central tenet of all submitted applications.</p> <p>We believe that there is real merit in considering the eco-town approach. However it is absolutely vital that the location for such a settlement is allocated only after the most rigorous environmental assessment and that the design is drawn up to the highest ecological and environmental standards and respects existing environmental limits. It should not become the only flagship among otherwise less sustainable developments.</p> <p>Suggested preferred option</p> <ul style="list-style-type: none"> •To ensure that development is sustainable by the efficient design and use of land, respect for existing heritage, reduced consumption of irreplaceable natural resources and environmentally sustainable construction. •To mitigate and adapt to 'climate change', by increasing take up of sustainable renewable forms of energy, managing flood risk, promoting greater efficiency of resource use, greater levels of recycling, water harvesting, reducing waste and pollution, and enabling a countryside that has greater climate change resilience. 	<p>Agree, however decisions about development of an Eco-Town will be taken by the Department for Communities & Local Government and it seems probable that more practical development issues will be the basis of site location rather than the first principles suggested by this comment.</p> <p>Officers preparing the Preferred Option for this theme have considered this proposed wording for a preferred option. We believe the wording we have put forward will cover these issues.</p>
38		<ul style="list-style-type: none"> •To ensure that the built heritage is protected, and that new development protects and enhances existing local 	

ID No	Name	Comment	Officer Response
		<p>design characteristics, cultural and conservation importance.</p> <ul style="list-style-type: none"> •To protect the varied rural character of the settlements of South Worcestershire by ensuring that the scale and location of development is in keeping with their size, character and function. •To conserve, restore and enhance biodiversity, geodiversity, landscape character, air, soil and water quality. 	
39	Armstrong Burton Planning (Michael Robson)	<p>Sites Promoted – Various sites on the eastern side of Worcester.</p> <p>Stronger Communities</p> <p>Issue 1. The Joint Core Strategy should direct new development to Worcester as a sub-regional focus and city centre. Particularly those areas outside of the Green Belt on the edge of the city with good transport links, within close proximity to existing employment opportunities.</p> <p>Issue 2. Greenfield land on the edge of Worcester, which is outside the Green Belt, would be preferable in meeting the identified housing requirements set out in the Regional Spatial Strategy. Particularly sites located on the edge of Wychavon and adjoining the Worcester City boundary. These sites would be a more sustainable option than identifying land in smaller settlements with greater reliance on the private car. Greenfield sites can deliver affordable housing and an appropriate level of infrastructure funding to meet the needs arising from the development. A new settlement would represent a far less sustainable option when compared to existing greenfield sites on the edge of Worcester.</p> <p>Issue 3. The existing Green Belt should be maintained, there is sufficient justification for the existing Green Belt boundaries to be retained, and not altered, given the amount of alternative greenfield land available around the edge of Worcester.</p>	<p>This will be considered in the SHLAA report viewable on the website.</p> <p>Noted</p> <p>Noted</p> <p>Noted. A Green Belt Review is being carried out</p>
39		Issue 4. Housing growth should be located in areas not subject to environmental protection policies close to	Noted

ID No	Name	Comment	Officer Response
		<p>transport networks.</p> <p>Issue 5. Greenfield sites on the edge of Worcester, within the Wychavon District, would satisfy the housing growth requirements for Wychavon.</p> <p>Issue 7. Market housing should not be directed to rural villages.</p> <p>Issue 8. Promote mixed and balanced communities, and locate co-dependant land uses in proximity to one another to reduce the need to travel. Adopt reduced parking standards expressed as maxima to encourage travel by non-car modes. Larger housing sites can support appropriate public transport services as well as making infrastructure contributions, which can reduce reliance on the private car.</p> <p>Meeting the needs of all Generations.</p> <p>Issue 12. Adopt the PPS 3 thresholds for affordable housing provision</p>	<p>Noted</p> <p>Noted</p> <p>Noted</p> <p>The Joint Core Strategy cannot repeat national policy. If national policy is considered adequate no local policy is required. The South Worcestershire housing needs assessment indicates that there is a much higher need for additional affordable housing provision than would be provided by relying on the PPS 3 requirements.</p>
40	White Ladies Aston Parish Meeting (Lynn Gorman)	<p>Vision.</p> <p>The visions overall sentiments are well worth trying to achieve but transport and flooding issues are causing great concern in this area.</p> <p>There is too much emphasis on the Central Technology Belt</p> <p>We question where the sustainability and environmental appraisals are to support the vision?</p>	<p>Noted</p> <p>Noted</p> <p>The three councils have engaged Enfusion a leading environmental consultancy to carry out a sustainability appraisal that incorporates the requirements of the Strategic Environmental Appraisal regulations. Enfusion have appraised the proposed vision against objectives of sustainable development that they have</p>
40			<p>drawn up. Enfusion concluded that the vision was compatible with the achievement of</p>

ID No	Name	Comment	Officer Response
		<p>Stronger Communities</p> <p>Issue 1. In principal we approve of the settlement hierarchy, however flooding appraisals are essential and we oppose the proposed high housing figures.</p> <p>Issue 2. We are unable to support any of the options and any thought of a new settlement should not be considered until an efficient, fast and frequent integrated passenger transport system is installed.</p> <p>University of Worcester students should be included in the City's housing numbers as homes rented by students are not available to meet other housing needs.</p> <p>Issue 3. The Green Belt should be extended around Worcester to maintain the rural character of Worcestershire. Green Belt should also be introduced between Powick and Malvern Link and around Pershore, Droitwich Spa and Evesham.</p> <p>Issue 4. We disagree with all suggestions as brownfield sites should be the first focus for development. We believe that until sustainability, environmental and flooding appraisals are carried out these questions are invalid.</p> <p>Issue 5. We would suggest a natural growth as well as the above-mentioned appraisals to prevent increased traffic problems.</p>	<p>sustainable development.</p> <p>Noted</p> <p>Noted.</p> <p>Student numbers can vary and not all live in ordinary housing, although your point is noted</p> <p>Noted a review of the Green Belt is underway. However, it is unlikely that identifying Green Belt at these locations given would accord with the aim and objectives of Green Belt set out in PPG2.</p> <p>Agree - brownfield sites will be the first focus to absorb the housing requirements arising from the Regional Spatial Strategy however the basis for preparing a Joint Core Strategy is that there is not enough brownfield land to provide for the scale of new homes required and that some greenfield land will have to be identified for development. The Planning and Compulsory Purchase Act 2004 requires that public consultation be commenced when options have not been reduced by technical reports such as sustainability, environmental and flooding appraisals. These studies will be part of the evidence base.</p> <p>Noted</p>
40		Issue 6. This section presents a flawed set of issues that will encourage urban sprawl and increase traffic congestion.	Intensifying development of land currently used for employment uses may be an

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		<p>Existing employment sites should provide for the employment needs arising from the Joint Core Strategy.</p> <p>Issue 7. Development in rural communities will undoubtedly increase road use.</p> <p>Issue 8. This section cannot be considered until there is a viable transport system. However, we would wish to see existing shops, community buildings protected.</p> <p>Issue 9. We believe that the Parkway should go to Ashchurch to prevent urban sprawl at Norton and South of the City. Agree with the proposal to improve bus facilities and rail capacity.</p>	<p>additional option, however it may be that such an option is incompatible with the requirements of the Regional Spatial Strategy or would promote unsustainable patterns of development.</p> <p>It is also true that no development in rural areas will also increase road use as rural services decline as a result of lower household densities forcing rural residents to travel further to access basic services. The Joint Core Strategy will aim to strike a balance between protecting the rural environment and creating more sustainable rural communities where residents are able to choice to travel less to access every day needs.</p> <p>Viable public transport depends on the aspirations and needs of the user providing a public transport system that exceeds most South Worcestershire's resident's expectations is beyond the scope of the Joint Core Strategy. Protecting non residential land uses from development pressure for residential use will be more difficult if the Joint Core Strategy does not make adequate provision to meet expected demands for new homes.</p> <p>A parkway station at Ashchurch is meeting the needs of a community beyond South Worcestershire and without a similar facility at Norton would encourage longer car journeys through South Worcestershire.</p>
40		Issue 10. Dualling the Southern Link Road will only create bottlenecks elsewhere and both dualling this section of the	These are issues that are being investigated by the Highway Authority as part of the

ID No	Name	Comment	Officer Response
40		<p>Worcester orbital route or extending this route northwards is environmentally unsustainable and would generate more traffic.</p> <p>Meeting the Needs of all Generations. Issue 12. A variety of housing meeting different needs should be interspersed around the village and not on one site outside current village boundaries.</p> <p>Economic Development that was shared by all Issue 16. We need to retain a variety of employment. We should avoid large distribution warehouses as they employ too few people.</p> <p>Issue 17. Employment sites within a city or town should be protected. They should be upgraded and landscaped to enhance the surrounding residential areas. This would encourage very local employment and reduce the need to travel.</p> <p>Issue 19. New retail development should be located to reduce traffic flows. Retail development in Worcester City Centre should be attractive to all age groups. Surplus employment land suitable for retail uses should be redeveloped with mixed uses both traditional employment uses and retail.</p> <p>Issue 21. National multiple retailers should be discouraged from opening new branches in Market Towns.</p> <p>Issue 22. We are concerned that there is no mention of history, arts or culture. Worcestershire must provide quality and a sense of worth to compete with larger centres.</p> <p>Better Environment for today and tomorrow. Issue 25. We are concerned that seeking developer</p>	<p>evidence base for an Integrated Transport Strategy</p> <p>Agree that this is the ideal arrangement to accommodate future housing needs, however in most settlements there will not be vacant developable land spread around the settlement</p> <p>Agree.</p> <p>Agree.</p> <p>Agree.</p> <p>Noted. Shop unit size can influence the split between independent and multiple retailers. A policy discouraging multiple retailers is likely to have a negative impact on investment.</p> <p>Agree that the Issues & Options report was light on planning for cultural issues. Also agree that a quality offer is essential to attracting tourists.</p> <p>Managing flood risk is essential if sustainable</p>

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		<p>contributions towards flood protection and alleviation may allow developers to build in flood prone areas.</p> <p>Issue 27. Any buildings, processing plants, etc associated with renewable energy production should be directed to employment sites.</p> <p>Improving Health and Wellbeing. All of the issues raised in this section should be part of the infrastructure for any proposed development.</p>	<p>development is to be achieved. It is not the intention of the Joint Core Strategy to encourage developers to consider promoting development in flood plains. This option would however require developers to build sustainable drainage systems and contribute towards the costs of preventing flooding in existing urban areas.</p> <p>Noted</p> <p>Noted</p>
41	CGMS Consulting (Nathan McLoughlin) on behalf of Wyvern Homes.	<p>Site Promoted – Rose Farm, Guarlford Road, Malvern.</p> <p>Vision. Support. Need to add ref. to main urban centres, e.g., Malvern. Suggested amendments to place Major Urban Areas at the top of settlement hierarchy.</p> <p>Objectives. Greenfield ‘urban extensions’ should be providing for further growth.</p> <p>Ref. to settlement hierarchy should be included in ‘vision’/‘objectives’ sections.</p> <p>Define ‘environmentally friendly construction’ and ‘built heritage’. Make ref to RSS at end of objective 14.</p> <p>Stronger Communities Issue 1 Major Urban Areas of which there are none should be at the top of the settlement hierarchy. Identify Worcester as Settlement of Significant Development.</p>	<p>This will be considered in the SHLAA report viewable on the website.</p> <p>Noted</p> <p>This is just one option to achieve the objective.</p> <p>The revised vision does recognize the hierarchy. It would be inappropriate to include it in the Objectives</p> <p>These will be added to the glossary</p> <p>Not appropriate, as this is a Core Strategy for South Worcestershire. MUAs outside the study area.</p>

ID No	Name	Comment	Officer Response
41		<p>Clarification necessary of what constitutes category one, two or three village.</p> <p>Issue 2 - Support recognised need for greenfield development.</p> <p>Issue 3 - Support review of the Green Belt.</p> <p>Issue 4 - Object to freestanding new settlement or 'Eco-Town'.</p> <p>Issue 5 – Support option 1 growth focussed on Malvern.</p> <p>Issue 6 - Economic growth to Worcester, but also element to Malvern</p> <p>Issue 8 – Strong support for option 2, and agree with option 3</p> <p>Issue 9 – Agree with Option 1</p> <p>Issue 10 – Agree specific focus on Worcester but should not proceed without essential transport infrastructure. For South Worcestershire support option 9</p> <p>Issue 11 – Strong support for Option 2 securing essential infrastructure.</p> <p>Meeting the Needs of all Generations</p> <p>Issue 12 – Option 1 supported where all new housing is required to make a contribution towards affordable housing where the relevant thresholds are exceeded.</p> <p>Issue 13 – Agree Option 2 but disagree with option 4 as homes should not necessarily be promoted that can be extended more easily to meet changing needs, as this could compromise flexibility in the housing market.</p> <p>Issue 14 – Support option 3</p> <p>Better Environment for today and tomorrow.</p> <p>Issue 23 – Strongly agree with options 2 and 4</p> <p>Issue 24 – Option 3 is supported.</p> <p>Issue 25 – Options 3 and 7 supported</p> <p>Issue 26 – Options 1 and 3 supported.</p>	<p>Worcester will be identified as a Settlement of Significant Development in the hierarchy. This information is included in the Village Facilities and Rural Transport Survey 2008 available on the website.</p> <p>Noted</p> <p>Noted.</p> <p>Noted</p> <p>Noted</p> <p>Noted, however the same applies to Droitwich Spa and Evesham.</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Disagree. Lifetime homes are flexible.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted</p> <p>Noted</p>

ID No	Name	Comment	Officer Response
		<p>Issue 25 – Option 5 supported requiring the highest standard.</p> <p>Improving Health and Wellbeing.</p> <p>Issue 29 – Strong agreement with options 1 and 5. However, level of developer contribution should be commensurate with the level of proposed development.</p> <p>Issue 30 – Agree with option 1 but level of developer contribution should be commensurate with the level of proposed development.</p>	<p>Noted</p> <p>Supportive of national policy</p> <p>Supportive of national policy.</p>
42	RPS (Peter Roberts) On behalf of the Madresfield Estate.	<p>Site Promoted – Land at Lower Howsell Road Malvern</p> <p>Stronger Communities</p> <p>Majority of development should be directed to Worcester and principal urban areas. Limited development to Category 1, 2, 3 villages.</p> <p>Distinction should be drawn between private and public open spaces when considering sites for development. Private open spaces in sustainable locations should be prioritised for development.</p> <p>Green Belt land should only be reviewed as a last resort.</p> <p>A higher proportion of growth should be directed to the Principal Urban Areas.</p> <p>New development, where possible should be located to sites with easy access to existing services and public transport routes.</p> <p>Meeting the Needs of all Generations.</p> <p>Affordable housing should be delivered as a % of market housing developments.</p> <p>Better Environment for today and tomorrow.</p> <p>Garden land should only be developed in sustainable locations.</p> <p>Improving Health and Wellbeing.</p> <p>Issue 29, Option 4 broadly supported. But distinction should be drawn between private and public open space.</p>	<p>This will be considered in the SHLAA report viewable on the website.</p> <p>Noted</p> <p>An assessment (PMP Study) has been made of all open spaces to establish their value as it can be significant in the character of an area.</p> <p>A review of the Green Belt is being undertaken to ensure that it still meets the principles in PPG2 This is to be the way the evidence is leading.</p> <p>Agreed that this should be a JCS priority.</p> <p>Noted</p> <p>Noted</p> <p>Noted</p>
43	Pegasus Planning (AC Bateman) on behalf of	Site Promoted – Land at two shires Park, Honeybourne	This will be considered in the SHLAA report viewable on the website.

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	the Johnson brothers.	<p>Objectives - Needs of rural communities should be recognised in the objectives and that same development has to occur in rural areas to support services and jobs.</p> <p>Stronger Communities Rural settlement hierarchy should be flexible enough to meet housing needs from a suggested economic strategy of allowing rural employment sites to expand. It is important to maximise the capacity of PDL. Expanding rural employment sites would allow local rural population job opportunities and reduce the need to travel. This could support improvements in rural public transport and intro of Travel Plans.</p> <p>Economic Development that is shared by all. Greenfield land should be brought forward to allow expansion of existing rural employment sites. Existing employment sites must remain the basis for economic growth and be allowed to expand when a need has been identified. Existing rural businesses should be supported by the JCS. All employment sectors should be supported through the JCS not just those identified as 'vulnerable'. Existing employment areas should be allowed to expand without undue constraints. Landscape character should not be a barrier to this expansion.</p>	<p>Objective 8 recognises this need.</p> <p>This is just part of the evidence which Affordable housing should be delivered as a % of market housing developments will dictate locations of growth. Noted</p> <p>Noted</p> <p>Agreed, but expansion on an existing site may not be always practical.</p> <p>Agreed</p> <p>Noted All the issues have to be considered in allowing any development. Each one weighted accordingly to enable a balanced assessment to be made based on transparent and robust evidence.</p>
44	Savills on behalf of EC Drummond and sons.	<p>Site Promoted – Land at Throckmorton Airfield</p> <p>Stronger Communities Support the provision of a new settlement to deliver a substantial proportion of housing figures. Identifies Throckmorton Airfield as an appropriate. If site does not come forward as a new settlement, then land in ownership of client should be identified for mixed-use allocation.</p>	<p>This was considered in relation to Government policy on Eco Towns</p> <p>Noted. The Government's decision on Middle Quinton 'eco-town' is anticipated in October 2008. The Core Strategy will show broad locations of growth. More detail will be contained in subsequent policy documents, i.e. Site Allocations.</p>
45	RPS (Carol Muston) on behalf of Miller Strategic	<p>Site Promoted – Land at Offenham Road, Evesham.</p>	<p>This will be considered in the SHLAA report viewable on the website.</p>

ID No	Name	Comment	Officer Response
45	Homes.	<p>Vision. Unrealistic to expect development growth to “enhance” area’s natural beauty etc. Suggested rewording “ ... as well as respecting the character of the area’s landscape and maintaining its biodiversity and cultural heritage”.</p> <p>Objectives. Stronger Communities – “needs” should be replaced with “requirements”.</p> <p>Meeting the needs of all generations – too generic and not locally distinctive.</p> <p>Better Environment – bullets 3 and 5 unrealistic.</p> <p>Stronger Communities. Favouring a development strategy that focuses new growth on Worcester and Principle Urban Areas as sustainable option. The emphasis should be on Evesham as being a more sustainable location, above Droitwich Spa. The latter should have provision to meet local needs and further employment to reduce out commuting. In line with RSS, market towns should see modest growth to support hinterland. Employment growth should be focused on the most sustainable settlements. Issue 8 support a combination of options 1/2/4 Issue 9 support a combination of options 1/2/4/8 Issue 10 support options 5/9 – identifying specific transport improvements for Evesham.</p> <p>Meeting the Needs of all Generations. Sufficient affordable housing can only be delivered as a % of large-scale market housing sites – i.e. option 2. Issue 13, option 2 supported</p> <p>Economic Development that is shared by all. Issue 16, option 1 supported</p>	<p>We will take this into account in refining the vision for the Preferred options</p> <p>We consider ‘needs’ is the more appropriate to address what is necessary rather than what we may like.</p> <p>This has been drawn from the 3 Community Plans for the South Worcestershire LSP and is therefore distinctive to the study area.</p> <p>Disagree</p> <p>Noted</p> <p>Noted</p> <p>Agreed</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p>

ID No	Name	Comment	Officer Response
		<p>Issue 17 – employment sites should only be released for housing as a last resort. Issue 19, support option 2.</p> <p>Better Environment for today and tomorrow. Issue 23, support option 2. However, development proposals should look to “maintain” rather than enhance biodiversity. Issue 24-support option 1. But emphasis new development should be sensitive to the character of the countryside and local distinctiveness. Issue 25 Flooding, support option 3. JCS should be informed by SFRA in line with PPS25. Issue 26, support option 3. Issue 27, support option 5 but not necessary if repeating govt. policy. Include additional option to promote district power and decentralised energy supply systems and direct new development accordingly.</p> <p>Other Comments. Paper does not place sufficient emphasis on the importance of delivering growth and how it might be achieved. Considered that several ‘tests of soundness’ have not been met – JCS should be providing a spatial approach consistent with RSS. Evidence base is not available to review alongside Issues & Options paper.</p> <p>JCS should be flexible to accommodate a higher figure from the final RSS.</p>	<p>Agreed as a general principle. Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted.</p> <p>Noted. This should be better achieved in the preferred options. Disagree. The evidence base is emerging and advice from Government Office states that it only has to be completed by the time of submission. Considerable evidence is already on the website and this is being added to and updated. The Preferred Options will demonstrate this.</p>
46	Nathanial Lichfield and partners (Daniel Lampard) on behalf of the Kandahar Group.	<p>Site Promoted – St Andrews shopping centre car park, Droitwich Spa.</p> <p>Stronger Communities. We support the identification of Droitwich Spa, along with Evesham and Malvern as principal urban areas and town centres that offer the greatest range of services and facilities after Worcester.</p>	<p>Noted</p> <p>Noted</p>

ID No	Name	Comment	Officer Response
		<p>Economic Development that is shared by all. The Kandahar Group support the policy focus of seeking retail and leisure town centre development within existing centres including Droitwich Spa. Issue 19. Because Droitwich Spa’s retail offer does not currently meet the needs of the local community we support option 3. The Joint Core Strategy should seek to redress the imbalance between the retail offer in Droitwich and competing centres. Any further proposals for out of town centre retail development should be required to comply with the relevant (national) policy tests. Issue 20. The full range of town centre functions should be supported and promoted in all the town centres within South Worcestershire. Issue 21. To help the smaller town centres to satisfy more of the shopping needs of local resident’s larger retail units should be created to attract national multiple retailers. Retail led regeneration of town centres should be encouraged.</p>	<p>Noted</p> <p>Noted</p> <p>Agreed</p> <p>Agreed</p> <p>Noted</p>
47	Stoneleigh Planning (Alasdair Jones) on behalf of Hallam Land Management.	<p>Site Promoted – Earls Court Farm, Worcester</p> <p>Vision. Insert ‘focus for balanced development and as a’ between ‘sub-regional role as a’ and ‘thriving retail, employment’ in the third paragraph</p> <p>The vision for the future of South Worcestershire should reflect the designated role of the City of Worcester.</p> <p>Objectives. Insert ‘proposed and existing’ between ‘access to’ and ‘employment’ in the second objective.</p> <p>Stronger Communities. Paragraph 4.4 by saying that there are particular implications for Wychavon seems to pre judge directions of growth.</p>	<p>This will be considered in the SHLAA report viewable on the website.</p> <p>We will take this into account in refining the vision for the Preferred options</p> <p>Agree, and consider it does.</p> <p>Disagree as it is already implicit in the wording.</p> <p>By selectively quoting parts of this paragraph it is possible to make this assertion. However as the paragraph explains the housing</p>

ID No	Name	Comment	Officer Response
47		<p>We consider that the Joint Core Strategy should advise that it incorporates a flexible approach towards the provision of new housing and that the presently canvassed Regional Spatial Strategy figures do not represent the maximum level of growth up to 2026, particularly in and around Worcester.</p> <p>Issue 1. Worcester should be the pre-eminent focus for most development within any hierarchy of towns in South Worcestershire. Support option one known of the other options could be considered sound as they would not conform to Regional Spatial Strategy policies. The scale of development allocated to Worcester should stand head and shoulders above the other settlements and should be shown as such in the Joint Core Strategy.</p> <p>Issue 2. There is insufficient previously developed land to meet the housing and employment land needs for Worcester, as set out in the RSS Review. Support option two. The city's Green Network should continue to be safeguarded over the plan period.</p> <p>There is no case for a freestanding new settlement beyond the urban area. A new settlement is not part of the Regional Spatial Strategy, which together with the Government's Growth Point Strategy emphasise the growth, and regeneration of the region's existing urban centres. The Eco-Towns prospectus should be applied to urban extensions to Worcester.</p> <p>Issue 3. The boundaries to the Green Belt to the North of the city should be retained. Any changes to the existing Green Belt boundaries between Worcester and Droitwich to accommodate the strategic growth of Worcester would be contrary to the overall approach to Green Belts set out in the Regional Spatial Strategy.</p> <p>Issue 4. Support option 2 urban extensions to the West of</p>	<p>numbers for Wychavon are higher than for Malvern Hills and therefore the cumulative effects of Worcester's growth with the districts on housing requirements are likely to be more significant in Wychavon.</p> <p>Agree. To be given consideration.</p> <p>Agree. This is why Worcester is designated as a Sub regional focus and New Growth point.</p> <p>Agree</p> <p>Agree. The JCS aim to delivery eco-friendly development across South Worcestershire.</p> <p>Noted, but the RSS does allow for boundary changes in exceptional circumstances. We are carrying out a Green belt review before making any decisions.</p> <p>While development beyond the M5 will be</p>

ID No	Name	Comment	Officer Response
47		<p>the city. Development to the East of the M5 would be poorly related to the city because of the barrier of the M5 and would have a detrimental impact on the park and grounds of Spetchley Hall. Development close to the M5 will encourage long distance commuting.</p> <p>Issue 6. The Regional Spatial Strategy emphasises the role of Worcester as the main focus for employment growth. This should be reflected in the South Worcestershire Joint Core Strategy. Support option one as follows:</p> <ul style="list-style-type: none"> a. Principally at the City of Worcester b. Secondly at Droitwich and Malvern at levels that reflect their role as nodes along the High Technology Corridor. c. Thirdly at Evesham, Pershore, Tenbury Wells and Upton-Upon-Severn at levels to reflect local employment needs. <p>Issue 8. The potential for any increase in longer distance car commuting would be reduced by directing the strategic growth of the city to locations remote from the two M5 junctions. Reducing the rate of car commuting into Worcester would be most effectively achieved by implementing the strategy for growth in the Regional Spatial Strategy. Focusing growth on the city will increase the potential for shorter distance trips, stimulate investment in improved public transport and encourage local trips t nearby services by cycle or on foot.</p> <p>Issue 9. Support option one. Larger scale mixed use developments offer the prospect of a greater percentage of trips being internalised.</p> <p>Issue 10. Support an integrated public transport network, junction improvements to the A4440 in the short term and the dualling of this road in the medium term. The first two of these could be funded by development to the west of the city.</p> <p>Issue 11. The additional infrastructure requirements arising from new development should be planned and programmed in parallel with the growth of the city. If infrastructure is to be part funded by development it would be unreasonable to expect developers to contribute in advance of any returns as would be required if essential infrastructure is provided in advance of development. We therefore favour the phased</p>	<p>separated from the city by the M5 it is also true that development to the west of Worcester will be separated from the city centre by the River Severn.</p> <p>Agree.</p> <p>Valid points, to be considered.</p> <p>Noted</p> <p>Noted</p> <p>This is a major issue for the JCS to address. Infrastructure is essential before development commences.</p>

ID No	Name	Comment	Officer Response
47		<p>funding of infrastructure.</p> <p>Economic Development that is shared by all. Issue 17-Policy should not be to “blanket” safeguard employment sites. Some employment levels can be safeguarded within a reduced footprint; Employment level targets and measures are achievable without land use safeguarding. Notes ELA 2006 that district had a surplus of 6.25 ha of employment land. Policy E4 of Local Plan should positively encourage land use flexibility.</p> <p>Surplus Malvern Technology Centre Land can contribute to housing targets, as a mixed-use site for B1 high tech business / residential. Or all for residential use if required. (8.8ha). Site could deliver from 105-175 dwellings (part A) or 265 to 440 dwellings (A & B) Higher value residential uses may be necessary in order to enable Brownfield land to be viable for employment uses</p> <p>Other Comments Sustainability Appraisal. The Sustainability Appraisal is poorly expressed, unsound and provides misleading assessments. A meaningful Sustainability Appraisal can only take place following the identification of strategic areas of land.</p> <p>We note that the Sustainability Appraisal controversially considers that the hierarchy referred to in Option 1, as a basis for the distribution of growth, would result in a continuation of current unsustainable patterns of development.</p>	<p>Noted</p> <p>Noted</p> <p>The Core Strategy, on adoption, will supersede this policy.</p> <p>Noted</p> <p>Noted</p> <p>Disagree. While planning officers are aware of the short comings of the Sustainability Appraisal process it was felt on balance better to produce a Sustainability Appraisal report to accompany the Issues & Options Report than wait until the Preferred Options stage before publishing a Sustainability Appraisal. Sustainability Appraisal is an iterative process and if left until directions of growth have been decided can only compensate for planning rather than guide planning.</p> <p>Noted</p>

ID No	Name	Comment	Officer Response
		<p>We take issue with the Sustainability Appraisal against the background of existing and emerging Regional Spatial Strategy Policy, it cannot be appropriate to suggest that the strategic growth of Worcester is a less sustainable strategy for growth than a series of smaller urban extensions to the urban centres set out in option three. A scatter of growth across the other towns would not provide the potential for sustainable transport solutions since these usually require significant levels of growth before the thresholds of better service provision can be crossed. A more diluted spread of new housing and employment will not achieve a reduction in the carbon footprint of South Worcestershire.</p> <p>The Sustainability Appraisal appears to suggest that development to the West of the city is the least sustainable direction for growth. We take a contrary view, development to the east of the city will encourage car borne journeys to work along the M5. Development to the West of the city could be progressed in the short term based on a mix of local network junction improvements and a package of public transport measures to improve access to the city. Development to the West of the city would discourage longer distance commuting along the M5 when compared to development to the East or South of the city. The evaluation of options for directions of growth set out in the Sustainability Appraisal is unsound.</p> <p>General Comments Prioritising development on the basis of Brownfield before Greenfield will delay bringing forward deliverable strategic Greenfield housing sites in the earlier years of the strategy.</p>	<p>Noted Noted</p> <p>General Comment's response:</p> <p>Disagree. Requirements for Local Planning Authorities to demonstrate a continuous five-year supply of housing land will mean that this will not be an issue.</p>
49	Catherine Humphries on behalf of Hagley Parish Council	<p>Vision - Not able to comment on most of the proposals as they are outside the area, and consider decisions need to be made locally</p> <p>Issue 10 – option 4.10.3 Need to address problems of over capacity of traffic on the Worcester Southern Link Road</p> <p>Issue 10, option 4.10.4 Alternatively a North West bypass for Worcester may be considered</p> <p>Other Comments.</p>	<p>Noted</p> <p>Agreed</p> <p>Agreed</p>
50	Mr V Welch on behalf of the Inland Waterways	<p>Vision. Vision needs to say more on certain areas such as climate</p>	<p>We will take this into account in refining the vision for the Preferred options</p>

ID No	Name	Comment	Officer Response
50	Association.	<p>change and physical well being e.g. issues on obesity.</p> <p>Stronger Communities. Issue 2- object to mass development other than natural expansion, outside the existing built up area- Issue 3- as comment above- Issue 4-Outward expansion of Worcester is only real option. Could encourage residents who commute out for work to live nearer their jobs, thus reducing commuting.</p> <p>Issue 5- Outside their remit, but would state that do not wish to see canal / riverside development for linear housing development.- as acts against water-based visitors, and impact on income of water based businesses. Issue 6-New employment development should be in mixed-use developments, to help cut down on commuting. Issue 8. To improve accessibility, create mixed-use developments. Provide trams / trains to lure drivers from cars. Open new/ former rail stations Issue 9 Create cycleway/ footpaths – e.g. along canals, with links to wider (car free) routes. Possibly convert former rail routes to long distance paths. Issue 10 – Needs to focus more on other modes other than road transport. Can add possibilities for water freight as area well served by rivers (Severn / Avon). Need a more South. Worcestershire based focus than just looking at the Regional Transport plan. Issue 11. Need to plan the whole network first (transport?) and lay it out before development occurs- traditionally done on the continent and in some UK urban areas and works well</p> <p>Meeting the Needs of all Generations. Issue 15. Some Gypsies are water based and their needs should also be considered.</p> <p>Economic Development that is shared by all. Issue 22. Tourism industry largely ignores scope on waterways in the area- e.g. Worcester waterfront moorings unattractive- and boaters stop-over facilities don't exist, or are not free of charge, as on some canals. There is little</p>	<p>Noted. JCS is required to accommodate the growth indicated for South Worcestershire in the Regional Spatial Strategy.</p> <p>This is in the Preferred Options.</p> <p>Noted.</p> <p>Agree, but we also have to be flexible to attract businesses. Agree. To be considered in the Preferred Options.</p> <p>Agree. This is already part of the cycle strategy for Worcestershire.</p> <p>Noted</p> <p>Agree.</p> <p>Noted</p> <p>Noted. Some of this is important but not within the remit of the Joint Core Strategy to achieve.</p>

ID No	Name	Comment	Officer Response
		<p>waterside information for visitors- and needs to be in the three other main Europeans languages. - Need to survey needs and identify key sites.</p> <p>Better Environment for today and tomorrow. Issue 24; Review Conservation Areas and designate new ones.</p> <p>Issue 25- Identify flood plains and don't build on them. And create a policy to move development off existing flood plain. Work with other authorities within the catchment to ensure their development doesn't have adverse impact on South Worcestershire.</p> <p>Issue 26. Identify attractions in South Worcestershire's, and ensure development doesn't impinge- in such areas new development should be minimal- and a pastiche approach may be required.</p> <p>Issue 27- look beyond wind energy- hydropower can be provided on river Avon, Teme, Severn. Use these assets for hydro-generation bases, and also river transport to conserve energy.</p> <p>Issue 28- Can use river transport to move waste. Most of the key towns connected by canal- especially with reopening of the Droitwich Barge canal in 18 months (Droitwich, Worcester, Pershore, Upton & Evesham)</p> <p>Issue 26/22 Little consideration of the historical importance of Worcester and its built heritage- Important re tourism- Review historic buildings base- upgrade locally listed buildings, add more to local lists. Same points for Evesham & Droitwich</p> <p>Improving Health and Wellbeing. Issue 29 (As above issue 9)- link paths to canal towpaths and riverside paths to create a comprehensive network. Issue 30 development of footpath network will enable healthy open air exercise</p> <p>Communities that are Safe and Feel Safe. Issue 32. Walled off paths need to be more open and visible, therefore self-policing.</p>	<p>Conservation Appraisals are being carried out and Conservation Areas are designated under separate legislation.</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Disagree. Notice has been taken, and an historic assets characterisation study is underway.</p> <p>Noted</p> <p>Noted</p> <p>Noted</p>
51	Frank Hill on behalf of CPRE Worcestershire.	<p>Stronger Communities. Issue 1 any expansion of towns and villages should be</p>	<p>Agreed, in respect of local need but we also</p>

ID No	Name	Comment	Officer Response
51		<p>considered on an individual basis, not according to settlement hierarchy- depends on need/ benefit of new housing.</p> <p>Worcestershire does not have abundant amounts of redundant and derelict brownfield land to re-use.</p> <p>Some redevelopment of the older housing estates may yield a net gain in dwellings.</p> <p>Garden grabbing affects the character of an area adversely.</p> <p>Issue 2 4.2.1- Don't agree that land open space in towns and cities should be built on- retain for residents.</p> <p>Villages around Worcester unsuitable as growth satellites.</p> <p>Issue 2 - Eco town option- against, as the lead in time is too long (10-15 years); would require new services / facilities, rather than using existing ones; would require increased links / roads to existing towns to detriment of countryside/ agricultural land.</p> <p>Throckmorton proposal would be in addition to SWJCS Eco-Town - therefore greater adverse impact on countryside.</p> <p>Expansion of existing towns and villages is preferable to a new town</p> <p>Meeting the Needs of all Generations</p> <p>Generally need to retain bungalows to give a choice of homes to those who have physical handicaps</p> <p>Economic Development that is shared by all.</p> <p>Technology employment is a worldwide phenomenon—most likely to generate small but localised employment-employing relatively few people.</p> <p>Better Environment for today and tomorrow.</p> <p>Any development should use the minimum amount of countryside to meet local needs and national requirements. Agricultural land should be retained, -is required to provide foods and other resources.</p> <p>Issue 25. avoid development in the flood plain- this limits expansion in towns bordering flood plains especially Worcester, Evesham, Pershore and Upton, plus many smaller villages in Wychavon.</p>	<p>have greater growth to accommodate.</p> <p>Agreed</p> <p>Agreed.</p> <p>Agreed</p> <p>Noted</p> <p>Noted, however this is a separate Government initiative.</p> <p>Agreed.</p> <p>This is reflected in the Preferred Options.</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Agreed</p>

ID No	Name	Comment	Officer Response
		<p>The primarily agricultural basis of Worcestershire should be maintained and enhanced to produce sufficient food, and bio-fuels to meet energy conservation needs.</p> <p>Other Comments. Unsuitability of Worcester as a sub-regional focus- (RSS)</p> <p>10,500 houses to Worcester, with a current capacity of 3,500 is an unreasonable burden-, which gives excessive burden to MHDC and Wychavon, within the timescale given.</p> <p>No need for the Technology corridor to extend so far from main towns and roads. (WMES)</p>	<p>Noted</p> <p>This is our starting point we cannot change the regional guidance.</p> <p>We have to meet any target set out in the RSS. If local planning authorities do not, development will still happen but not planned rather by appeal. This is only a diagrammatic representation.</p>
52	J Elmer on behalf of Wyre Forest District Council.	<p>Stronger Communities. Issue 1: Generally support principle of allocating development in accordance with the settlement hierarchy.</p> <p>However, think that Hartlebury and Summerfield should not be Category 1 villages- suggest Category 2 as limited range of facilities and public transport.</p> <p>Remove Summerfield from settlement hierarchy map as it is not listed in appendix 4 Summerfield relies on services provided within Wyre Forest, e.g. health & shopping.</p> <p>Economic Development that is shared by all. Issues & Options paper does not refer to the important role of Hartlebury Trading Estate in the local economy.</p>	<p>Noted, this is the way we have progressed the Preferred Options.</p> <p>We have reviewed the categories within the Village Facilities and Rural Transport Study and concluded that this category is appropriate for Hartlebury.</p> <p>Summerfield is not in the top 3 categories.</p> <p>Noted.</p> <p>Noted</p>
53	Peter Luff MP	<p>Stronger Communities. Issue 11-infrastructure. SWJCS authorities should make no</p>	<p>Noted. We have to proceed with a plan or</p>

ID No	Name	Comment	Officer Response
53		<p>firm commitments to provide land to meet RSS review targets until Govt plans for provision of associated infrastructure are known.</p> <p>Infrastructure required not just roads/ rail etc, but hospitals, schools, energy sources, water, waste, GPs, emergency services, leisure, open space, sewers, drainage, flood defences. Likely to need a new acute hospital- health services stretched at the moment.</p> <p>Road and rail expansion to / from London / Birmingham will require significant expansion</p> <p>Issue 2 – Eco towns</p> <p>Any Eco-Town figures should be part of the RSS, not additional housing. Says that the I & O document is misleading in that it misleadingly says that an Eco Town would “meet South. Worcestershire needs”</p> <p>Throckmorton proposal appears to be larger than Pershore- impact on Pershore would be huge.</p> <p>Issue 8/9. SWJCS should not make excessive attempts to locate housing / employment land together to meet sustainability objectives (see issue 16 below)</p> <p>Issue 10. Need better co-ordination of road / rail- i.e. adequate car parks at rail stations.</p> <p>Supports new Worcestershire Parkway station at Norton. Bus interchange facilities are less significant but important.</p> <p>Meeting the needs of All Generations</p> <p>There is a shortage of affordable housing.</p> <p>Issue 15 Gypsy / Travellers.</p> <p>Need to provide for gypsies but Wychavon has already given generous provision in the past-. Inappropriate to identify significant land increase for gypsies and travellers in Wychavon- other districts, e.g. Gloucestershire/ Warwickshire must help meet needs</p> <p>Economic Development that is shared by all.</p> <p>Issue 16 on employment.</p> <p>Sceptical about how creating employment land opportunities can meet sustainable travel objectives. - People won't change their commuting habits easily</p>	<p>we may find development imposed.</p> <p>Agreed that all should be included, but our evidence will dictate what is required in different areas.</p> <p>This is an issue we are pursuing with the appropriate rail providers.</p> <p>This was correct when the I & O paper was printed as it preceded the Government's own 'Eco-Town initiative'.</p> <p>Noted- but this not a SWJCS specific proposal We must seek to meet sustainable objectives as far as possible.</p> <p>Agreed.</p> <p>Agreed with regard to Worcestershire Parkway</p> <p>Agreed.</p> <p>Noted. The emerging evidence will guide us on Gypsy's and Travellers.</p> <p>We need to secure a fast, efficient and reliable alternative.</p>

ID No	Name	Comment	Officer Response
		<p>Better Environment for today and tomorrow. Issue 25- Flood plains. There should be an absolute assumption against building on flood plains. Flood defence and prevention plans must be put in place before any commitments made. Does not support option 7.25.3-, As water run-off was significant problem in the summer floods. Option 7.25.7 may be excessive- could allow redevelopment in flood plain as long as it can reduce flood risk in the area of the development.</p> <p>Other Comments. Accepts need for more houses in the county.</p> <p>RSS projections for immigration are excessive, therefore housing figure too high for South Worcestershire.</p> <p>Need to clarify with government t if Eco Town at Long Marston or Throckmorton will count towards RSS targets or not</p>	<p>Noted</p> <p>Noted</p> <p>Noted. In principle we would not normally support development on the flood plains</p> <p>Noted. The Core Strategy has to be in general conformity with the RSS.</p> <p>Throckmorton has now been deleted. The view seems to be changing but not yet clear</p>
54	Mr Stuart Haywood on behalf of Droitwich Spa Civic Society.	<p>Vision. - Relates to Vision / Objectives- paragraph 2.6- key challenge is missing: “Maintaining and enhancing the distinctive characteristics of villages and towns within Worcestershire</p> <p>Better Environment for today and tomorrow. Should acknowledge the importance of village / town plans and their importance in the planning process in section 2.6 of document. E.G Droitwich Spa-Spa ambience should be maintained and enhanced- requires large % of open space / wooded area than non- spa towns- not just a “norm” provision as for all towns</p>	<p>Vision has been amended for consultation.</p> <p>Noted</p>
55	Frank Green on behalf of Evesham Town Council	<p>Stronger Communities. Issue 3. any intrusion into the Green Belt should be resisted.</p> <p>Issue 4. Eco Towns- concern that any new eco-town settlements in South. Worcestershire would not be</p>	<p>Noted. A Green Belt Review will be carried out.</p> <p>Noted</p>

Comment [r1]:

ID No	Name	Comment	Officer Response
		<p>sustainable. Issue 11. All infrastructures should be in place before any future development takes place. Other Comments. Eco-Towns- concern that the Eco-Town housing would not count towards RSS housing targets</p>	<p>This is an objective of the SWJCS Noted. At this stage there is still uncertainty regarding this matter.</p>
56	Mr P Esrich on behalf of the Malvern Hills AONB Partnership	<p>Vision. Issues & Options paper recognises that South Worcestershire attractive environment is one of its strengths. Stronger Communities. Issue 1: Agree the proposed settlement hierarchy & that development should be so allocated in accordance with it. However, West Malvern & Malvern wells have a character of their own- should be Category 1 villages Issue 2- Option 1 preferred. Greenfield development in AONB needs to demonstrate there is overriding need, and that cannot be sited elsewhere. Issue 5. New housing growth should not be targeted within the AONB. Issue 6. New employment development should be directed to the major settlements, with appropriate transport infrastructure. Issue 7. Development within the AONB should be small scale, & located in existing settlements. Issue 8. Any development within the AONB should be able to demonstrate that its location is suitable for the use of sustainable modes of transport. Issue 9. Improve rural bus routes for commuting & leisure</p>	<p>Noted For the purposes of the Joint Core Strategy Malvern includes Malvern Wells, Little Malvern and West Malvern. The village hierarchy methodology not based on a built settlement character, but access to facilities, services and public transport. (See Village Facilities and Rural Transport Survey on website) Agreed Agreed Agreed Agreed Agreed</p>
56			Agreed

ID No	Name	Comment	Officer Response
56		<p>Sustainable travel to schools should be encouraged. Promote walking & cycling routes Issue 11- Infrastructure-support option 2-set out priorities. Happy to discuss better use of planning obligations to manage / enhance AONB.</p>	Agreed
		<p>Meeting the needs of all generations. Issue 12. Affordable housing should generally be contained within existing settlements. Outside these, overriding needs should be demonstrated, and that environmental impacts can be dealt with.</p>	Noted
		<p>Economic Development that is shared by all. Issue 16. Supports option 3, the promotion of leisure & tourism developments for employment. Concerns over polytunnels, which should be considered in CS and subsequent LDF docs.</p>	Agreed
		<p>Issue 18.Rural economy- supports all options- new businesses should be sustainable.</p>	Noted
		<p>Issue 22 Tourism development in the AONB needs to be fairly low key/ suitable scale. Many parts of AONB at visitor capacity. - Could try and divert visitors elsewhere to less well known parts of AONB</p>	Agreed
		<p>Better Environment for today and tomorrow. Issue 24.Would like to see the Malvern Hills AONB Management Plan 2004-2009 (& revisions) recognised in Core Strategy. as a key policy focus for managing the AONB. Development outside settlements in AONB should show positive benefits to the special qualities of the AONB Although PPS7 covers AONB advice- need a specific policy within the CS to protect the AONB and set out criteria against which development proposals can be assessed.</p>	Noted. The Preferred Option can refer to and recognise the importance of the AONB designations but detailed criteria against which impact on AONB will be considered would not be relevant at the Core Strategy level.
		<p>Issue 28. Needs to be clearer where minerals issues and use of natural resources are included in the strategy.</p>	Noted
		<p>Issue 23. landscape / biodiversity linked. - Supports options 1,2 & 4.</p>	Noted Noted
<p>Issue 24. PPS& national policy needs to be translated into</p>	Agreed		

ID No	Name	Comment	Officer Response
		<p>more local policies. Option 3 important re local distinctiveness.</p> <p>Issue 26. Good design important re AONB. Additional design guidance would be useful. Need to recognise importance of view FROM as well as TO the Malvern Hills.</p> <p>Issue 27. Supports principle of renewable energy but not wind turbines in AONB. Supports energy crops such as coppicing.</p> <p>Improving Health and Wellbeing.</p> <p>Issue 29. Protect green open space but extend policy to recognise the health benefits of the open countryside. Developer contributions could be used to enhance recreation in the countryside.</p> <p>Other Comments.</p> <p>Examples of Core Strategy policies and extract of AONB Management Plan Key Strategic Objectives -see scanned in letter.</p>	<p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p>
57	Peter King	<p>Stronger Communities.</p> <p>Issue 1. Supports the settlement hierarchy. Allow all villages except category 3 to expand for housing / employment- limited to local needs. Where Category 3 villages are remote from better provided settlements, carry out local consultation to "up grade" one village to Category 1 or 2.</p> <p>Issue 2- support option 4.2.3 and large villages for development. in Malvern Hills and Wychavon.</p> <p>Issue 3. Should generally retain the Green Belt between Droitwich Spa & Worcester and in extreme North of the strategy area. Green Belt to separate Worcester & Fernhill Heath particularly important</p> <p>Green Belt could be extended in following ways:</p> <ul style="list-style-type: none"> ▪ Designate Green Belt east of M5- (motorway as boundary) ▪ Use A449 link road in Worcester as southern limit of Green Belt boundary here. ▪ Designate some Green Belt to separate Worcester and Kempsey, Worcester and Powick, Malvern and 	<p>Noted</p> <p>Noted</p> <p>Green Belt review to be carried out.</p> <p>Noted, but these are unlikely to conform to the purposes of Green Belt set out in PPG2 and is not supported by the emerging RSJ.</p>

ID No	Name	Comment	Officer Response
57		<p>Powick- not necessary to designate the whole area between these settlements.</p> <p>Issue 4. New development for Worcester should be South of Southern Link, east of Severn, or west of city.- and east of the city.</p> <p>'Eco-Town' - Support in principle. Better to expand an existing village. Should be close to a main road. Should have a railway station on a line linked to Worcester. Plan 1000-2000 houses initially – should be adequate to provide a sustainable community.</p> <p>Eco-town housing should contribute to sub-regional housing numbers, not additional.</p> <p>Issue 5- supports 4.5.3, determined at district, not sub-regional level.</p> <p>Issue 6. Location of employment development should follow housing development, to reduce travelling. Allow modest developments in Tenbury, Upton, Pershore & Evesham, and in a new settlement.</p> <p>Further commercial development at Norton not desirable, unless new settlement here.</p> <p>Issue 7 – supports modest development in category 1 villages (& perhaps category 2)</p> <p>Issue 8 – develop large villages as viable communities-retain pubs, shops, schools, community halls, churches, health facilities- demonstrate that use is required first.</p> <p>Issue 10. Southern link upgrade is most important road infrastructure project in the county. More important than northern bypass which wouldn't link easily to A44.</p> <p>Sign existing link to Leominster/ Ludlow via Holt bridge.</p> <p>Issue 9. Support park & ride in general-railways good if parking nearby. But opposes the proposed Worcestershire Parkway station-case for a railhead station should be in N of county where greater population e.g. at Bromsgrove or Droitwich Spa.</p> <p>Car free housing schemes impracticable.</p> <p>Welcome use of canals / rivers for freight, but how feasible is this?.</p> <p>Car parking charges do not generally divert people to other</p>	<p>Noted</p> <p>Noted</p> <p>Agreed.</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Agreed</p> <p>Not a strategic issue for the Joint Core Strategy.</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p>

ID No	Name	Comment	Officer Response
57		<p>modes.</p> <p>Issue 11. development should not be held up by need for infrastructure, as long as infrastructure can be provided alongside development.</p> <p>Major development should be subject to Area Action plans, adopted as SPDs- and include provision of facilities e.g. schools, health, shops, churches, community halls etc.</p> <p>Meeting the needs of All generations.</p> <p>Issue 12/13 Most developments should have a mix of tenures and sizes. Development of 3 or more houses should contribute to affordable housing.</p> <p>Limit executive homes in north- have a quota of small family homes.</p> <p>Building industry very bad at ensuring that local needs are met.</p> <p>Bungalows are required to be retained as less likely that new ones will be built</p> <p>Issue 14- An adequate stock of affordable bungalows may encourage elderly occupiers of larger houses to move.</p> <p>Doesn't understand the concept of lifetime homes.</p> <p>Issue 15-Gypsy & traveller sites should be comparatively remote from existing towns / villages but not in Green Belt. Planting should screen locations.</p> <p>Sites should be small- say 5 caravans.</p> <p>Planning consent should be based on proof that proposed occupants are Gypsies/ travellers</p> <p>Economic Development that is shared by all.</p> <p>Issue 16. Whole concept of Central Technology Belt is flawed. The RSS policy can be implemented at the key nodes without drawing the CTB on a map. Plan can focus new technology on Droitwich, Worcester & Malvern.</p> <p>Issue 17- in principle protects large employment sites- depending on need. Small Brownfield sites in residential areas may be better for housing.</p>	<p>This needs to be phased, but it must be available before the development is occupied.</p> <p>Agreed, but may be Development briefs or Masterplans in the form of SPDs</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Definition of Lifetime Homes explained in the Glossary in appendix 5 to the Issue & Options report</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Map of Central Technology Belt was taken from the RSS</p> <p>Noted</p>

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57		<p>Issue 18. Supports small-scale tourist developments. Conversions from farmland should be reversible.</p> <p>Issue 19. Retain current retail pattern. Any new settlement needs a viable retail centre.</p> <p>Need to maintain viable retail provision in larger villages.</p> <p>Substantial new housing developments also need a district centre with shops & other services-e.g. health, community centre, church.</p> <p>Issue 20- option 4 Supports need to promote space above shops for offices, houses etc.</p> <p>Issue 21-Provision of new commercial accommodation best left to the market. - E.g. Stourbridge where Crown Centre hasn't been successful.</p> <p>Issue 22.Major new tourist developments should not be centrally planned- judged on their merits.</p> <p>Issue 24. Supports these options- strategic gaps/ buffer zones should be designated as Green Belt.</p> <p>Issue 26. Supports all options. Should encourage "Areas of Distinctive Character should be encouraged as part of LDF process- would have lower standard than needed in a Conservation Area.</p> <p>Development in mature garden areas backing onto Green Belt should be prohibited.</p> <p>Issue 29- Accessible green open space should be developed at District level not sub-regional level.</p> <p>Better Environment for Today and Tomorrow Crookbarrow hill at M5 J7 is notable feature- protect from development- perhaps by designating as Green Belt.</p>	<p>Noted</p> <p>Noted</p> <p>Agreed.</p> <p>Agreed</p> <p>We will continue to promote this.</p> <p>Noted</p> <p>Noted</p> <p>Designating new areas of Green Belt would be contrary to the RSS</p> <p>Noted</p> <p>Noted</p> <p>The principle needs to be established at the strategic level to be implemented at the local level.</p>

ID No	Name	Comment	Officer Response
		<p>Issue 25. Development in flood plain should be completely prohibited. Area of meadow land around confluence of the Severn & Teme should be sacrosanct. Rainwater collection / use systems should be designed in new development- and retrofit.</p> <p>Support Issue 25.5. and 25.6</p> <p>If build in flood plains, developers should pay for all necessary flood measures. Improving Health and Wellbeing. Issue 30 & 31. Local healthcare & educational facilities should be provided in all major development. Details are better determined by the appropriate authorities, not by planning process.</p> <p>Communities that are Safe and Feel Safe. Issue 32- all options are supported. Other Comments. Support RSS with Worcester as a growth point. Improve drainage design, have non- return valves on drains</p>	<p>Agree protect from development, but would not comply with Green Belt principles.</p> <p>Noted.</p> <p>We will be seeking to encourage this.</p> <p>Noted</p> <p>Noted</p> <p>All the relevant authorities will be feeding in their requirements into the planning process. The Core Strategy and subsequent Development plan documents and Supplementary Planning Documents will seek to deliver these.</p> <p>Noted</p> <p>Noted</p> <p>This level of information would be too detailed to put in the Core Strategy.</p>
58	Barton Willmore (Joanne Russell), On behalf of Taylor Woodrow Developments Ltd	<p>Site Promoted – Land at Worcester Rd, Honeybourne.</p> <p>Vision - The vision fails to demonstrate the importance of Malvern, Evesham, Droitwich Spa and other towns.</p>	<p>This will be considered in the SHLAA report viewable on the website.</p> <p>A vision should be short, aspirational and inspiring it is not possible to mention individual settlements by name and achieve this. To do so might be interpreted as pre-judging directions of growth that should be decided through the process of preparing the Joint Core Strategy.</p> <p>If the vision just repeats the requirements set out in the Regional Spatial Strategy it will</p>
58		The vision should clearly state the quantum of housing and employment requirements placed on the area.	

ID No	Name	Comment	Officer Response
58		<p>Objectives. Objective 10 needs to be strengthened to reflect the needs and aspirations of communities outside the city of Worcester. The hierarchy of settlements should be reflected in these objectives.</p> <p>Reference should also be made within these objectives to delivering a sufficient quantity of housing.</p> <p>The objectives fail to recognise the identification of Worcester as new Growth Point for accelerated housing delivery.</p> <p>Stronger Communities. Issue 4. We suggest that a proportion of the additional dwellings allocated to Worcester but to be delivered in Malvern Hills and Wychavon districts could be accommodated through the allocation of sites within sustainable settlements located in those districts. Issue 8. Modal shift away from the car will require public transport provision, including integration between bus and rail, and provision of better opportunities to access the rail network.</p> <p>Meeting the Needs of All generations. Issue 12. Affordable housing needs can be met by</p>	<p>not be locally distinctive and would in any case delay preparation of the Joint Core Strategy until the quantum is agreed.</p> <p>If Barton Wilmore know the needs and aspirations of communities in South Worcestershire it would have been helpful to have included them in their response to the Issues & Options consultation. It is the process of preparing the Joint Core Strategy that will illicit the communities needs and aspirations.</p> <p>The Joint Core Strategy must be in conformity with national and regional planning policy which provides guidance on the number of new homes that the Joint Core Strategy should plan for. Core Strategy's that simple repeat higher level policy will not be found sound.</p> <p>Again Worcester's growth point status is a fact, the objectives need to set out how the new communities that will arise as a consequence of that fact will be more sustainable than past development not simple state the obvious.</p> <p>The Joint Core Strategy would not be in conformity with the Regional Spatial Strategy and would be found unsound at examination.</p> <p>Noted.</p> <p>While increasing the total supply of housing</p>

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		<p>increasing the supply of housing.</p> <p>Economic Development that is shared by all. Issue 27. Through the building regulations.</p>	<p>may have a marginal impact on the cost of housing it is unlikely to bring an affordable home within the reach of a significant number of households. Other planning policies will be required to meet the needs of all families</p> <p>Noted</p>
59	<p>Barton Wilmore (Joanne Russell) On behalf of Taylor Wimpey Developments</p>	<p>Site Promoted – Land at Norton Barracks</p> <p>Vision. Support the commitment to delivering sustainable communities.</p> <p>Note the Vision refers to the central role of Worcester City in the South Worcestershire Area. To continue to fulfil this role, we consider that Worcester will need to expand beyond its administrative boundaries.</p> <p>“Would like to see the Vision be more spatial and reflect the growth agenda facing South Worcestershire as a whole. The vision should clearly state the quantum of housing and employment requirements placed on the area, through the emerging RSS and the timeframe for delivery”.</p> <p>Objectives Support first objective of Core Strategy. Will help to set framework for development in the area, and will assist in meeting development requirements of RSS. Objectives should also refer to delivering a sufficient quantity of housing, taking account of need and demand, in suitable locations which offer a good level of access to jobs, key services & infrastructure. Extending the urban edge of Worcester, south of the St Peter the Great area, towards Norton Barracks would provide opportunities to integrate with existing neighbourhoods north of Broomhall Way/Crookbarrow Way, & also connect the smaller community of Norton Barracks to the city. Presently it is detached and without key linkages to Worcester. Objectives fail to recognise the identification of Worcester</p>	<p>This will be considered in the SHLAA report viewable on the website.</p> <p>Noted</p> <p>This has been accepted in The RSS and in the Issues and Options.</p> <p>Disagree. A vision is not about numbers it is about aspirations and how they can be achieved.</p> <p>Noted</p> <p>It is considered that the objectives cover these issues. However, they cannot indicate directions of growth, which will be in the Preferred Options.</p> <p>This is implicit in the Joint Core strategy. It already exists so cannot be an objective to</p>

ID No	Name	Comment	Officer Response
59		<p>as a New Growth Point for accelerated housing delivery. We consider that an appropriate new objective should be included in the JCS to reflect Worcester’s status. Consider that it may be necessary to re-evaluate local environmental designations where these might act as a barrier to bringing forward sites for housing that are in the most sustainable locations. We note that land north of the Norton Barracks is currently designated as a Strategic Gap (Policy SR10, Wychavon LP). The policy states that these strategic gaps should be reviewed as part of the Councils LDF.</p> <p>Consider that the JCS looks towards 2026 and the role and function of the strategic gap north of Norton Barracks, should be reviewed and considered against the strategic housing requirements of Worcester.</p> <p>Stronger Communities. Support hierarchy that positions Worcester as the focus for growth, & identification of PUA including Malvern, Evesham & also village category that includes Hartlebury. Suggest hierarchy listed in paragraph 4.13 of the JCS could refer to the area of “Worcester including sustainable urban extensions to the city” rather than just Worcester. Support recognition that Greenfield land will need to be identified to meet the growth requirements of the South Worcestershire area. See supporting document as to why promoting site in accordance with PPS3. Development of land at Norton Barracks would not require a review of Green Belt. Consider that our clients land interest as Norton Barracks can contribute to Worcester housing growth. We are aware that land north of Norton Barracks is currently designated as a Strategic Gap. To our knowledge, no assessment of the strategic gaps has been undertaken to suggest which may be outweighed when considering the need for the strategic growth of Worcester. We are aware that St Modwen is promoting land to the south of Broomhall Way for employment uses. Their site is</p>	<p>fulfil the vision for 2026.</p> <p>These will be reviewed as part of developing the Core strategy. However, inappropriate as an objective.</p> <p>Noted.</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Agreed</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p>

ID No	Name	Comment	Officer Response
59		<p>positively related to Norton Barracks. Together with the residential development of out clients, we consider there is real potential for a mixed-use sustainable urban extension to Worcester in this location.</p> <p>It is acknowledged that a Parkway Station at Norton and Park & Ride location at Whittington. Both of these sites are accessible to out clients land and could facilitate more sustainable modes of travel.</p> <p>It will be important to allocate a range of sites for development, including urban extensions including land at Norton Barracks. Identifying Norton Barracks as a broad location for development within the Joint Core Strategy will enable the three Councils to have a long-term view of the infrastructure required in this part of south Worcestershire. Indicating broad locations for growth can provide more certainty in the planning process, and assist in planning infrastructure.</p> <p>Meeting the Needs of All generations</p> <p>We would urge the authorities with South Worcestershire to be flexible in their JCS. Planning for the minimum housing requirement i.e. requirement, and with a rigid strategy that fails to identify the need for, and broad location of, sustainable urban extensions early within the JCS, will not provide for sufficient new housing to be in the pipeline at any one time. Affordability will not be tackled as a result. Planning to ensure a continuous supply of housing land, identifying long-term directions of growth and being clear in the JCS where development needs could be realised beyond the Core Strategy timeframe will ensure that reviews of the strategy are swift and the supply of sites does not 'dry up'. In this regard it is important to indicate a broad direction of growth through sustainable urban extensions towards Norton Barracks, giving clear direction for Worcester's expansion.</p> <p>Taylor Wimpey would encourage authorities to undertake a Housing Market Assessment as part of their LDF. Assessments should be soundly based, and result in proportions of affordable housing sought through planning</p>	<p>Noted.</p> <p>Noted</p> <p>Noted</p> <p>This has been done and can be viewed on the website.</p>

ID No	Name	Comment	Officer Response
		<p>policy, being deliverable & viable.</p> <p>Better Environment for Today and Tomorrow Express concern at Option 4, which suggests the introduction of special measures, which included local policy designations e.g. strategic gaps.</p> <p>In light of paragraph 25 of PPS7, we do not consider that there is justification to retain land north of Norton Barracks within the strategic gap, when this protective stance is clearly in conflict with the growth aspiration of Worcester and the clear directions from the emerging RSS to expand Worcester beyond its administrative boundaries.</p> <p>25.No relevant comment in terms of improving floodplain.</p> <p>26. "Important to balance environmental designations with the requirements of housing and employment growth. Taylor Wimpey will ensure that the proposed development responds to the character of the surrounding area.</p> <p>27. Comments refer to how development at Norton Barracks would contribute to renewable energy & conserve existing energy.</p>	<p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Good, this will be important in any development.</p> <p>Noted</p>
60	RPS (Vanessa Clipstone) on behalf of Mary Massingham and Eve Hudson.	<p>Sites Promoted – Land at Childswickham, Cropthorne and Wyre Piddle.</p> <p>Vision - Needs to make reference to supporting the rural economy and communities.</p> <p>Objectives - Objective 14 should also recognise development can benefit and enhance rural settlements rather than simply protect.</p> <p>Stronger Communities. As part of overall strategy some development should be focused larger sustainable rural settlements. Issue 1, option 3 positively support. Issue 2, option 6 – extend identification of land to Category 3 villages (option 4).</p>	<p>This will be considered in the SHLAA report viewable on the website.</p> <p>The vision has been revised to reflect this.</p> <p>This point is appreciated; however the objective is to retain the character of the rural communities by limited development.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p>

ID No	Name	Comment	Officer Response
		<p>Issue 5, strongly support option 4. Issue 7, strong support for option 4. Issue 11, support option 2 – setting out priorities for infrastructure provision to serve new development. Should not be seen as an opportunity to enter into ‘planning gain’ scenario.</p> <p>Meeting the Needs of All Generations Issue 12, option 2 – support; option 4 supported where there is an identified need.</p> <p>Issue 13 – need to ref. to PPS3 further clarification required.</p> <p>Economic Development that is shared by all. Issue 18 – positively worded policies should be incorporated that encourage aspects of all the options presented.</p> <p>Better Environment for today and tomorrow. Issue 25 – support for option 2 and 5.</p>	<p>Noted. Noted. Noted.</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p>
61	RPS Planning (Paul Hill) on behalf of Gleeson Strategic Land.	<p>Site Promoted – Land at Lower Howsell Road, Malvern.</p> <p>Stronger Communities. Principles underlying the development strategy assumptions, i.e. emphasis on ‘brownfield’ development and undue significance given to infrastructure issues are of concern. In balance between development potential of Malvern v Evesham/Droitwich Spa – at odds with S4 (4) advice from the County Council.</p> <p>To meet Worcester’s growth to the north west/west through delivery of NW link road and new bridge would also enable Malvern to be opened up for further development. The proposed highly dispersed settlement pattern will lead to scattered development across South Worcestershire. Alternative strategy proposed. Greenfield ‘urban extensions’ should be considered, and Malvern should not be ruled out by its historical and congested road patterns. Completing the NW ring-road/bridge would resolve this problem. Employment growth should follow suggested development</p>	<p>This will be considered in the SHLAA report viewable on the website.</p> <p>Noted.</p> <p>Noted.</p> <p>Disagree. I&O is not proposing dispersed patterns of development. SWJCS. Issues 1-5 provide a range of options, of which this just one.</p> <p>Noted.</p>
61			

ID No	Name	Comment	Officer Response
		<p>strategy. Issue 7 – option 1. Issues 8-10 Promoting development to principle urban areas would reduce the need to travel by car. Obligations cannot always deliver the necessary infrastructure.</p> <p>Meeting the Needs of All Generations Level of affordable housing can only be delivered through a % of large scale allocated developments. Likewise this is the appropriate way to provide a suitable mix of housing – Issue 13. Issue 14, option 3.</p> <p>Other Comments. Issues & Options needed to be more locally distinctive. Preferred Options needs to provide appropriate spatial vision. Specific ref. should be land to the immediate northeast of Malvern as an urban extension.</p>	<p>Noted. Noted.</p> <p>Noted.</p> <p>This is reflected in Issue 12, option 2.</p> <p>It is not appropriate for the JCS to identify specific sites, rather provide broad locations for growth. The Preferred options will build on the Vision.</p>
62	RPS Planning, (Carol Muston) On behalf of Crest Strategic Properties Ltd.	<p>Site Promoted – Church Farm Claines</p> <p>Vision. Replace “enhance” the environment with “maintain”. Suggested settlement hierarchy would lead to dispersed, unsustainable patterns of development.</p> <p>Objectives. Stronger Communities – first bullet, replace “needs” with “requirements”.</p> <p>Stronger Communities. Issue 2, options 2 and 3. Issue 3, option 2 – remove land from the Green Belt. Issue 4, option 7 – it will be necessary to make provision for housing on a number of sites around Worcester. Also JCS needs to be flexible to allow higher RSS figure. Issue 6 – it will be necessary to make some provision for employment land for Worcester outside city boundary. Accessible employment land will be required to attract inward investment. Expanding or providing new employment sites in remote rural locations would be</p>	<p>This will be considered in the SHLAA report viewable on the website.</p> <p>We will consider this, but our vision is to enhance not just maintain the status quo.</p> <p>We consider ‘needs’ is the more appropriate to address what is necessary rather than what we may like.</p> <p>The respondent has missed the point. I&O are not proposing dispersed patterns of development. SWJCS. Issues 1-5 provide a range of options, of which this just one.</p> <p>Noted. Noted. Noted.</p>

ID No	Name	Comment	Officer Response
62		<p>unsustainable. Employment sites in urban areas should be protected.</p> <p>Issue 8 – focus development at principle urban areas to reduce need for travel. Multi modal transport studies required for each urban area. New road investment should be minimized.</p> <p>Issue 9 – introduce Travel Plans for larger city employers. City centre restrictions should also be considered and congestion charging explored.</p> <p>Issue 10 – options, 2/6.</p> <p>Issue 11 – options 2.</p> <p>Meeting the Needs of All Generations</p> <p>Issue 12 – affordable housing should be delivered through large scale housing allocations.</p> <p>Issue 13, option 2 – in accordance with PPS3. Need to identify sites that can be delivered during the early part of the Plan period to meet backlog.</p> <p>Issue 14 – option 3 supported</p> <p>Economic Development that is shared by all.</p> <p>Issue 17 – regular reviews through ELR updates can provide the basis for safeguarding, upgrading, mixed-use or eventually release of sites for housing.</p> <p>Better Environment for today and tomorrow.</p> <p>Issue 23, option 2 supported</p> <p>Issue 24, option 1 supported</p> <p>Issue 25, and option 3 – SFRA required for PO.</p> <p>Issue 26, option 3. Supported</p> <p>Issue 27 – feasibility of water turbine on River Severn at Worcester. Focus development on principle urban areas to reduce travel. Locate development to allow energy needs to be provided by decentralized energy sources. Meet CFSH level 6 by 2016. No need to include Policy in JCS if implementing national policy.</p>	<p>Agreed. Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted</p> <p>This is reflected in option 2 of Issue 12.</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>This is underway but will not be completed for the Preferred Option, but will inform the Submission Document/ Noted</p> <p>Noted</p>

ID No	Name	Comment	Officer Response
		<p>Issue 29, option 1. New development should not meet shortfalls in POS, but provide sufficient for new population.</p> <p>Other Comments.</p> <p>Issues & Options fails to acknowledge the importance of delivering growth and how this will be achieved. Concerns expressed at lack of evidence base. JCS must provide spatial planning approach consistent with RSS.</p>	<p>We would hope to achieve both.</p> <p>We are developing our evidence base (see the website), and the Preferred options will deal with how growth is to be delivered.</p>
63	Cllr AME Darby	<p>Stronger Communities.</p> <p>Issue 1. Strongly object to the mechanistic and unreliable categorisation of villages in the Settlement Hierarchy. Any attempt to allocate development to villages should be much more subtle and take account of all the appropriate variables.</p> <p>Issue 2 and 4. Any consideration of a new settlement (eco-town) should only be on the basis that the additional homes would count towards South Worcestershire's housing target.</p>	<p>The Village Facilities and Rural Transport Survey has been re-visited, and it is considered to be a sound basis for defining the hierarchy.</p> <p>Agreed.</p>
65	Amanda Smith on behalf of English Heritage.	<p>Vision.</p> <p>General Comments: The Introduction, Key Challenges and Vision & Objectives should all make additional references to the historic environment. References to the historic environment are one way a Core Strategy can be made more locally distinctive.</p> <p>We strongly recommend that the historic environment is broadly defined.</p> <p>It is important that the Spatial Portrait identifies those elements of the historic environment, which contribute to the character of the Plan area.</p> <p>An additional Key Challenge at paragraph 2.6 should be 'Safeguarding and enhancing the historic assets and distinctive character of the area.' This is a major omission, which should be addressed.</p>	<p>We will take this into account in refining the vision/objectives for the Preferred options.</p> <p>Agreed. This has been taken on board.</p> <p>This is implicit in the objective without the need to re-word it.</p> <p>We will seek to improve this objective to cover this point.</p>
65		<p>We would expect any Core Strategy Vision to included reference to one of the following:</p>	<p>Built heritage is considered to be the better wording.</p>

ID No	Name	Comment	Officer Response
65		<ul style="list-style-type: none"> •Reinforcing Local Distinctiveness; •Safeguarding and enhancing historic assets; •Protecting and enhancing the environment assets of the area; or •Where change respects and builds upon the historic character of the area. <p>Objectives. There should be a specific objective for the historic environment. Add 'and buildings' after 'land' in the eleventh objective.</p> <p>Objective twelve should make specific reference to mitigate and adapt to climate change promoting the sustainable design of buildings such as via improving energy efficiency (new build and indeed existing buildings). Objective thirteen, delete 'built heritage' and replace it with 'the historic environment'.</p> <p>Stronger Communities. Issue 2, 4 & 5. Any decision about which greenfield sites should be allocated for development should be informed by robust evidence about the implications for the areas historic assets. Issue 3. Any review of the Green Belt should consider the role of the Green Belt in protecting the setting of the historic city of Worcester. As well as considering the implications for historic assets the allocation of land for employment should also support the development of balanced communities, local regeneration needs and promote sustainable transport. Issue 7. The preferred option should combine options 1 to 4 but also ensure development is tailored to the needs of individual villages. Issue 8. The preferred option should combine options 1 to 4. Issue 9. Again a combination of options is required with</p>	<p>Agreed.</p> <p>Agreed.</p> <p>Agreed.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>The historic environment is being given further consideration. We agree it was under played in the Issues and Options.</p> <p>Noted</p> <p>Noted</p> <p>Agreed</p>

ID No	Name	Comment	Officer Response
65		<p>green infrastructure planning used to encourage walking and cycling.</p> <p>Issue 10. The best use of existing infrastructure together with maximising the use of sustainable modes should be the priority rather than promoting new transport infrastructure such as bypasses.</p> <p>Economic Development that is shared by all.</p> <p>Issue18. The contribution of the historic environment to the rural economy should be included in this issue.</p> <p>Issue 19. Generally support options 4, 6, 7 and 8 and ensure the historic environment is enhanced to improve the distinctiveness of the retail experience.</p> <p>Issue 20. Combine all the options with emphasis given to options 3 and 4</p> <p>Issue 21. Support options 1, 3 & 4. A fundamental element of any preferred option must be protecting and enhancing the distinctive historic character of each of the main town centres.</p> <p>Issue 22. A combination of options 1, 4 & 5 should inform the Preferred Option with an overarching commitment to sustainable tourism which capitalises on the environmental economy of the area and surrounding districts.</p> <p>Better Environment for today and tomorrow.</p> <p>The historic environment of South Worcestershire is not explicitly addressed as a core component of this section. This is a significant omission, which must be tackled, in subsequent stages of developing the preferred option.</p> <p>Issue 24. Support option 3 and emphasis that historic assets and historic character of the landscape are fundamental to the landscape character of South Worcestershire.</p> <p>Issue 25. A combination of options is supported but any new flood protection infrastructure will need to recognise the historic environment and character of South Worcestershire.</p> <p>Issue 26. Combine the options in a preferred option that</p>	<p>Noted</p> <p>We will seek to rectify this in the Preferred Options</p> <p>This study is being progressed.</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>These were preliminary assessments, which will be re-addressed to inform the Preferred options.</p> <p>Agreed</p>

ID No	Name	Comment	Officer Response
		<p>must take account of the County wide historic landscape characterisation project to inform the policy context for the area's rural landscapes.</p> <p>Issue 27. We recommend that the preferred option takes account of the potential impact of renewable energy installations on the historic resources of South Worcestershire. A further option should consider how the Joint Core Strategy could help promote complementary improvements in the energy efficiency of the existing building stock. The preferred option should also promote the reuse of existing buildings as the most sustainable use of resources.</p> <p>Improving Health and Wellbeing.</p> <p>Issue 29. Support the combination of options 1, 3, 4 and 5 in the preferred option.</p> <p>Other Comments.</p> <p>How can option 2 of issue 2 be neutral in Sustainability Appraisal terms when options 3 and 4 are positive?</p> <p>How can option 1 of issue 26 produce a negative Sustainability Appraisal score? Adoption of this option could only improve both environmental and social sustainability.</p>	<p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Option 4 is negative, but option 3 was assessed as positive as associated development supports social objectives and provides greater potential for sustainable transport solutions.</p> <p>The view was taken that variations in local character, between and within urban and rural settlements preclude a definition of local character that would be appropriate for all development. However, while planning officers are aware of the difficulties of the Sustainability Appraisal process it was felt on balance better to produce a Sustainability Appraisal report to accompany the Issues & Options Report than wait until the Preferred Options stage before publishing a Sustainability Appraisal.</p>
66	Jennifer Simmonds on behalf of Lower	<p>Objectives.</p> <p>We acknowledge the need to constrain car travel by</p>	Noted

ID No	Name	Comment	Officer Response
66	Broadheath Parish Council.	<p>expanding the development of homes, employment and retailing in self-sustainable communities. A major missing objective is the lack of strategy or structure to drive the creation of employment</p> <p>Stronger Communities. Issue 2 & 4. Concerned about the Worcester centric approach. It is essential that the strategic open spaces between Worcester and neighbouring villages are retained. If Regional Spatial Strategy option 3 were proposed then a new town would be the best solution. Issue 7 & 8. Many in category 1 and 2 villages desire some housing, retail, leisure and employment development. Car parking provision in rural developments should be at a higher level than in urban centres. Issue 9. Concentrating developments around Worcester will result in surrounding communities becoming unsustainable and is counter to the desire to reduce the necessity to travel. Issue 10 & 11. No further expansion of Worcester City outside of the current city boundary should be entertained without securing a third river crossing. Worcester Parkway will only prove effective when the Cotswold rail route is made dual track</p> <p>Meeting the needs of all Generations. Issue 14. Housing development sites, greater than twelve homes, should incorporate play areas suitable for children. Urban designs favoured by many developers should be prohibited.</p> <p>Economic development that is shared by all. Issue 16. Pockets of employment land should be set-aside in any large or medium sized housing development for employment uses. Employment land should be located adjacent to the primary road network. Issue 19. Focus on towns but where possible allow village retail developments to at least maintain they exist offer.</p> <p>Improving Health and Wellbeing. Issue 31. Support for the High Technology Corridor will</p>	<p>Consider that the Economic Success that is Shared By All objectives adequately covers this.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted</p> <p>The aim is to create a balanced community with housing supported by employment.</p> <p>This approach is being supported in the Preferred Options.</p> <p>Noted</p>

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		require that Worcester University expand its portfolio of higher engineering subjects if high added value jobs with the technology sector are to be attracted to the southern end of the corridor.	
67	B.J. Fishwick	<p>Stronger Communities. I disagree with the assumptions that have been used to justify the need for 30,000+ additional homes in the South Worcestershire area.</p> <p>If new housing is to be sustainable it should be located in areas with existing transport infrastructure.</p>	<p>It is beyond the scope of the Joint Core Strategy to challenge the quantity of new homes required by the Regional Spatial Strategy. The key assumptions that average household size is falling and that people are living longer and choosing to remain in their family homes for longer are soundly based on Office of National Statistics evidence. The total figure is 24,500.</p> <p>Agree sustainable development requires good access to all forms of transport.</p>
68	RPS (Vanessa Clipstone) on behalf of Simms & Wood Limited)	<p>Sites Promoted – land at Wyre Piddle, Longdon Hill Nursery, Wichenford.</p> <p>Vision We generally support the proposed vision, in particular we support 'The towns and villages will have maintained their focus for local services and be valued for their diversity and richness'. However the vision should include a reference to the vision for the rural economy and the 200 plus villages, which support the rural economy.</p> <p>Objectives We generally support the objectives however objective 14 should be amended to recognise that development can significantly benefit and enhance rural communities rather than just seeking to protect such settlements from development.</p>	<p>This will be considered in the SHLAA report viewable on the website.</p> <p>We will seek to strengthen the rural aspect of the vision.</p> <p>This point is appreciated; however the objective is to retain the character of the rural communities by limited development.</p>

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68		<p>Stronger Communities. We support the text at paragraph 4.8 Issue 1. We support option 3 and consider the appropriate approach will be to strengthen the role of both the towns and villages presented in options 2 and 3.</p> <p>Issue 2. We consider that option 2 would result in development of less sustainable sites. It also implies that the growth of Worcester is pursued at the expense of other settlements. Option 3 should be extended to include category 3 villages, which are considered sustainable settlements in accordance with the settlement hierarchy. Option 5 is the least appropriate solution. We recommend that a combined option drawing upon options 2, 3 and 4 be pursued. Option 4 should be extended to include all of the identified sustainable villages, not just category 1 and 2 villages.</p> <p>Issue 5. We strongly support option 4. Issue 7. We support option 2 but this should be extended to include category 3 villages. We strongly support option 4, it is our view that enabling appropriate scale of development in villages could offer opportunities to enhance existing services and facilities. We do not consider that the Rural Regeneration Zone should be the focus of all rural development. Issue 11. We support the approach advocated in option 2</p> <p>Meeting the Needs of All Generations Issue 12. We support options 2 and 4.</p> <p>Issue 13. No policy is required in the Joint Core Strategy the requirements set out in PPS3 can be relied on to ensure an adequate range of market homes is provided.</p> <p>Economic Development that is shared by all. Issue 17. We do not support the catch all approach in option 1. The issue is whether the existing employment sites are suitable to meet further employment demand or if other employment sites should be promoted to meet future</p>	<p>Noted. Noted.</p> <p>Noted.</p> <p>Noted. Noted.</p> <p>Noted.</p> <p>Noted</p> <p>Noted. The JCS cannot simply repeat National or Strategic planning policy</p> <p>Noted</p>

ID No	Name	Comment	Officer Response
		<p>demands. We consider option 3 would be useful for assessing whether individual employment sites are suitable for redevelopment.</p> <p>Issue 18. We strongly support the overall approach; positively worded policies should be incorporated which encourage economic development in line with appropriate and viable criteria. We question the use of policies in the Rural Regeneration Zone that favour development.</p> <p>Better Environment for today or tomorrow.</p> <p>Issue 25. It would be unrealistic to prohibit all redevelopment of sites within flood zones.</p>	<p>Noted</p> <p>Agree, however it is realistic for South Worcestershire to develop policies that prevent any development or redevelopment of at risk uses (e.g. housing) in the 1 in 100 year flood plain.</p>
69	RPS (David Crofts) on behalf of Consolidated Rank Properties)	<p>Site promoted – Land at Cales Farm, Malvern</p> <p>Vision.</p> <p>Introduction: The Joint Core Strategy should not give the impression (paragraph 2.1) that the six main towns are of equal importance. Malvern is much more significant than Upton-Upon-Severn and Tenbury Wells.</p> <p>Support the vision; particularly welcome the emphasis on economic development and the reference to the Central Technology Belt is particularly important.</p> <p>Stronger Communities.</p> <p>The Joint Core Strategy is premature, as the eventual outcome of the Regional Spatial Strategy revision could have considerable implications for what kind of Core Strategy is appropriate for South Worcestershire.</p> <p>Issue 1. Support option 2, the next settlements down in the proposed hierarchy should be the focus for any development not allocated to Worcester. Option 3 is inappropriate because of the wide range in the size of settlements referred to.</p>	<p>This will be considered in the SHLAA report viewable on the website.</p> <p>Noted. We will make this clearer in the Preferred Options.</p> <p>Noted</p> <p>Government Office for the West Midlands have advised that the SWJCS process should not be put on hold whilst the RSS is being reviewed, rather the SWJCS needs to be flexible enough to deal with higher growth scenarios.</p> <p>Noted.</p>
69			

ID No	Name	Comment	Officer Response
69		<p>Issue 2. None of the options as they stand are appropriate. Option 3 is the least worst option but it could be made more appropriate by the deletion of Pershore, Tenbury Wells and Upton-Upon-Severn from the list of settlements. Option 2 is undesirable as it implies the growth of Worcester at the expense of other towns. Option 4 is undesirable as it would encourage a more dispersed form of development. Option 5 should be the option of last resort, any such new settlement is likely to lead to greater car use.</p> <p>Issue 3. Support option 1, there should be sufficient strategic choice for distribution of development without the need for a review of the Green Belt.</p> <p>Issue 4. Support options 3 and 6.</p> <p>Issue 5. Support option 1.</p> <p>Issue 6. Support option 5.</p> <p>Issue 8. People cannot be compelled to live close to their work; but what the planning system can do is bring about a distribution of development which enables people to live close to their work if they wish, this means, concentrated development. Option 1 is the most appropriate of the options put forward.</p> <p>Meeting the Needs of All Generations</p> <p>Issue 12. Option 2 is the most appropriate and option 5 is the least appropriate and effective.</p> <p>Issue 13 The range of market houses provided should be left to developers and the market to decide within the context of PPS 3 requirements. With respect to affordable housing it is our experience that the Local Planning Authority will determine the mix of house types.</p> <p>Economic Development that is shared by all.</p> <p>Issue 16. The most effective option would be option 1.</p> <p>Issue 17. Generally speaking, we consider that existing employment areas should be protected. Many existing firms could not afford to buy or rent new premises if they were forced to relocate.</p> <p>Issue 18. We consider that a strict criterion-based approach</p>	<p>Noted</p> <p>Noted, but we are carrying out a review of the Green Belt.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>This is the approach which is supportive of</p>

ID No	Name	Comment	Officer Response
		<p>should be adopted towards development in rural areas, leaving allocations to the larger settlements only.</p> <p>Issue 19. Option 2 is the most appropriate.</p> <p>Issue 20. The most appropriate option would be a combination of all the options.</p> <p>Better Environment for today and tomorrow.</p> <p>Issue 25. Option 1 is the least appropriate; Local Planning Authorities should await any revisions to PPS 25 resulting the most recent flood events.</p> <p>Other Comments.</p> <p>Sustainability Appraisal. RPS is concerned about the use of a Sustainability Appraisal at such an early stage as it will lead respondents and the method used is crude and simplistic.</p> <p>How can options 2 and 3 of Issue 1 have the same Sustainability Appraisal rating?</p> <p>The Sustainability Appraisal scores of issue 19 are most unhelpful.</p>	<p>the emerging evidence.</p> <p>Noted</p> <p>Noted</p> <p>Noted. We will be taking into account the latest Government Guidance.</p> <p>While planning officers are aware of the issues of the Sustainability Appraisal process it was felt on balance better to produce a Sustainability Appraisal report to accompany the Issues & Options Report than wait until the Preferred Options stage before publishing a Sustainability Appraisal. Sustainability Appraisal is an iterative process and if left until directions of growth have been decided can only compensate for planning rather than guide planning.</p>
70	Name is unreadable.	<p>Stronger Communities.</p> <p>I don't know why more house have to be built?</p>	<p>The requirements for additional homes in South Worcestershire arise from Office for National Statistics projections for household formation between 2001 and 2026. People are choosing to live in smaller household groups, a trend over many decades in England, and the rise in the number of elderly people means that the existing housing stock is not being recycled as fast as in the past.</p>
70		<p>Where are the people coming from?</p>	<p>People who already live in South Worcestershire and their descendents will</p>

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			occupy the majority of the new homes.
71	Boyer Planning (David Lander) on behalf of Miller Strategic Land.	<p>Sites Promoted – Land at Middle and Upper Battenhall Farms</p> <p>Vision. The vision pays insufficient regard to the fundamental role of Worcester to accommodate strategic housing development, ‘an expanding centre of population’ should be inserted in the third paragraph between ‘role as’ and ‘a thriving retail’.</p> <p>Objectives - Generally support but: The first bullet-point should be re-worded by inserting ‘as a minimum’ between ‘meet’ and ‘the housing’. This change would reflect the government expectation that housing requirements will be minima. The second bullet-point should be re-worded by inserting ‘and making optimum use of existing infrastructure provision.’ At the end.</p> <p>Stronger Communities. Issue 1. We support the identification of a settlement hierarchy. Issue 2. Support options 1 & 2 make maximum use of suitable greenfield land within and immediately adjacent to the city’s existing urban area. We see no justification for a freestanding settlement. Issue 4. We wish to emphasise that the initial focus should be on maximising the use of available opportunities within the city boundary because these areas have the highest levels of existing facilities and infrastructure. Sites within the city served mainly by existing infrastructure can make an important contribution in the early part of the plan period.</p>	<p>This will be considered in the SHLAA report viewable on the website.</p> <p>The reference in the third paragraph to ‘Worcester fulfilling its sub-regional role’ seems to adequately cover the role of Worcester without being overly prescriptive. A spatial vision should not be prejudicing decisions about how that vision can best be achieved.</p> <p>Disagree. This clearly states that it will meet the RSS, which will give the definitive allocation, not the minimum to be provided.</p> <p>Disagree. Our aim will be to ensure the provision of new infrastructure as the existing in many instances is already in need of replacement or upgrading.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p>
71		Issue 11. We do not accept the premise in the heading to issue 11, namely that provision is required in advance of	Noted.

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		<p>development. Different types of infrastructure will be required at various stages in the life of a development. Plainly therefore option 1 is not an appropriate way to proceed, we broadly there support option 2.</p> <p>Meeting the needs of all Generations Issue 12. Larger scale residential schemes clearly provide the greatest scope to deliver affordable housing.</p> <p>Economic Development that is shared by all. Issue 17. A detailed employment land review will provide the analysis required to demonstrate which existing employment areas need no longer be protected.</p> <p>Better Environment for today and tomorrow. Issue 23. Biodiversity should be enhanced by means of carefully linked planting in the form of trees, hedgerows and water areas, taking care to ensure that these conform with landscape character guidance. Issue 24. The aim should be to reinforce the character of the landscape both within and outside the city, ensuring that green links and green spaces are designed and maintained to provide that defined character. Issue 29. The local landscape character and diversity of green links and green spaces should be clearly defined and opportunities made to secure or enhance them in conjunction with new developments. Green links can be reinforced by convenient cycle and pedestrian links.</p>	<p>Noted</p> <p>Agreed. See evidence base on the website</p> <p>Noted</p> <p>We will be seeking to do this</p> <p>Agreed</p>
72	Jenny Crawford on behalf of Crowle Parish Council.	<p>Stronger Communities. With the collapsing housing market is the number of houses indicated actually needed?</p>	<p>The projected housing need is based on long term trends such as falls in the average household size and an aging population. These trends have not been affected over time by comparatively short-term changes in housing markets that reflect the ups and downs of the wider economy.</p>
72		<p>Why is Crowle a Category 2 village and Tibberton a Category 3. Crowle has no general store, the primary</p>	<p>Settlements in category 1 have at least four Key Services and score at least 16 points in</p>

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		school is full and public transport provision is minimal.	<p>the Village Facilities Survey. In addition they have “medium/high” levels of public transport including access to all of the daytime bus service types identified in the Rural Transport Survey.</p> <p>Settlements in category 2 have at least two Key Services including a shop and have access to a “medium/high” range of bus services i.e. at least daily services for employment and shopping purposes.</p> <ul style="list-style-type: none"> For further detailed results and analysis please consult the Village Facilities and Rural Transport Study 2008
73	Harris Lamb (Simon Hawley) on behalf of Crest Nicholson.	<p>Sites Promoted – Land at Badsey and Brewers Lane near Evesham.</p> <p>Stronger Communities. The Joint Core Strategy should ensure that an appropriate level of development is allocated to the more sustainable rural settlements to help maintain and enhance their sustainability.</p> <p>Issue 2. The Category 1 villages should be the focus for growth outside of Worcester and the principal urban areas.</p> <p>Issue 7. fails to address how the residential development needs of rural communities can be met.</p> <p>Issue 8. In order to reduce the need to travel in rural areas, residential development should be allocated to category one villages.</p> <p>Meeting the needs of All Generations. Issue 13. The building industry should determine the mix of housing types provided. This level of detailed policy is too prescriptive to include in the Joint Core Strategy.</p> <p>Economic Development that is shared by all. Issue 18. Delivering housing in the more sustainable villages will aid the rural economy.</p>	<p>This will be considered in the SHLAA report viewable on the website.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted</p> <p>Noted.</p>
74	Lovejoy (Mark Rose) on behalf of William Davis Ltd and JS Bloor)	<p>Site Promoted – Land at Copcut Lane, Droitwich Spa.</p> <p>Stronger Communities.</p>	This will be considered in the SHLAA report viewable on the website.

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74		<p>Issue 1. The proposed hierarchy is supported as a sound basis for the implementation of a sustainable development strategy. It is critical that the roles of Worcester, and the principal urban areas, including Droitwich Spa, are acknowledged in the Joint Core Strategy and that future strategic growth is focussed on these locations. Villages are inherently less sustainable locations for development than the principal urban areas. A dispersal of development across all the settlements listed would mean that cumulatively a significant amount of the overall development required in the area would be directed away from the most sustainable locations.</p> <p>Issue 2. The recognition that development on greenfield sites is required is welcomed to deliver the scale of development required in the plan period it is entirely appropriate that a variety of suitable and sustainable development sites come forward concurrently. It is not considered that a self-standing new settlement is an attractive form of development given the potential for sustainable urban extensions.</p> <p>Issue 3. There is a need to review the extent of the Green Belt in South Worcestershire however areas previously designated as Areas of Development Restraint should be considered for development before sites currently within the Green Belt.</p> <p>Issue 5. Droitwich Spa should be the primary focus for growth within Wychavon District. It has a strategic role as a population, employment and service centre, is a key node in the Central Technology Belt, and has access to the M5 and rail links to Birmingham.</p> <p>Issue 6. Future employment development should be closely associated with, and accessible to the new residential development areas.</p> <p>Issue 7. No need for a local policy Regional Spatial Strategy policy RR1 is sufficient.</p> <p>Issues 8 & 9. To reduce the need to travel development should be directed to the principal urban areas and provided in strategic mixed-use urban extensions.</p>	<p>Agreed.</p> <p>Noted.</p> <p>We have undertaken a preliminary review.</p> <p>Noted.</p> <p>Agreed.</p> <p>Disagree. The local distinctiveness of our rural areas cannot be fully justified through a Regional policy.</p> <p>Noted.</p>

ID No	Name	Comment	Officer Response
		<p>Issue 11. Strategic scale urban extensions to the principal urban areas offer the greatest opportunity to maximise the provision of the infrastructure required to support the sustainable growth of the area. The policy should establish a framework that sets out the roles and responsibilities of the, local authorities, the infrastructure providers and developers, in terms of identifying the, infrastructure requirements, facilitating their provision and making the required funding available.</p> <p>Meeting the Needs of All Generations Issues 12 & 13. Housing will be more affordable if policy facilitates the delivery of residential development expeditiously and strategic scale urban extensions offer the greatest opportunity for delivering affordable housing.</p>	<p>This will be the role of the Preferred Options.</p> <p>Noted</p>
75	Pegasus Planning (David Onions) on behalf of Bellway Homes south Midlands.	<p>Site Promoted – Land to the south of Pershore Road, Hampton, Evesham.</p> <p>Stronger Communities. There ought to be some recognition of the strategic function of the larger settlements within South Worcestershire. The Joint Core Strategy should promote development in locations, which will not give rise to commuting to and from the Major Urban Areas. Ensuring that communities provide an appropriate mix of employment and housing opportunities is a fundamental objective of building stronger communities.</p> <p>The Joint Core Strategy should make provision for in excess of 32,597 dwellings.</p>	<p>This will be considered in the SHLAA report viewable on the website.</p> <p>This will be recognised in the Preferred Options. Noted.</p> <p>Agreed.</p> <p>The number of dwellings that the Joint Core Strategy should make provision for will be established by the Regional Spatial Strategy. If the Joint Core Strategy tries to make provision for a different number of dwellings it is likely to be found “unsound”.</p>
75		<p>Issue 1. The proposed settlement hierarchy provides a good basis for a development strategy. The Preferred Option should seek to ensure there is no increase in commuting to</p>	<p>Noted.</p>

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75		<p>and from the Major Urban Areas. Evesham and Malvern would appear to have some advantages over Droitwich Spa.</p> <p>Issue 2. Land on the edge of the major settlements will provide a sustainable location to focus new development supporting local facilities and building on existing infrastructure. As options development of greenfield land within settlements or a new settlement are not considered appropriate.</p> <p>Issue 3. Any review of the extent of the Green Belt must be predicated on the basis that it could provide for the most sustainable option for development.</p> <p>Issue 5. Option 1 is considered the most appropriate strategy. Evesham also has advantages over other locations such as Droitwich Spa in that it is located sufficiently far away from the Major Urban Areas to discourage commuting.</p> <p>Issue 8. To reduce car use residential development needs to be located where it has good access to public transport, employment and other services. This suggests development should take place where it relates well to existing settlements.</p> <p>Issue 9. Building upon existing settlements particularly where those settlements are located beyond the commuting belt of the Major urban Areas is likely to provide opportunities to access a wider range of facilities by public transport.</p> <p>Issue 11. Development opportunities, which build upon the existing infrastructure of a settlement, will be a more sustainable option than relying on new infrastructure being provided from scratch.</p> <p>Meeting the Needs of All Generations</p> <p>Issue 12. Affordable housing policies should be based on a clear understanding of local needs and should be considered on a site-by-site basis. Making unduly burdensome affordable housing requirements will only compound housing need problems.</p>	<p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Housing market and housing needs assessments have been prepared to inform the Joint Core Strategy. If the Joint Core Strategy is to be a spatial planning document it must seek to address the needs</p>

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		<p>Issue 14. Lifetime Homes mean the under-occupation of the existing housing stock will result. This may not be the most effective and sustainable option.</p> <p>Better Environment for Today and Tomorrow Issue 24. The Joint Core Strategy should not introduce local landscape designations. However the best landscapes within South Worcestershire should be preserved and have a greater standing than other landscape areas. There does not seem to be justification for the protection of the character of open countryside immediately around urban areas through use of such tools as landscape buffers/strategic gaps. It is possible to integrate development within existing landscapes without causing any harm.</p> <p>Issue 25. A site-by-site approach that considers flood mitigation measures and features that minimise flooding would provide a more flexible and realistic approach.</p>	<p>identified even if this imposes burdensome requirements on developers and landowners.</p> <p>The decision to move out of a family home will only be marginally effected by whether it is built to Lifetime Homes standards. The point of Lifetime Homes is that they can adapt to the changing needs of the resident. Under occupation is an established trend in England's homes and is in no small part the justification for the need for so many additional dwellings in South Worcestershire.</p> <p>Noted. We are doing more work with the County Council in respect of the landscape.</p> <p>This is an important topic. Our aim is to avoid flood risk areas, but mitigation to minimise flooding will be covered in principle.</p>
76	Richard Waterman on behalf of QinetiC.	<p>Sites Promoted – Land at Malvern Technology park and Unidentified land east of Worcester.</p> <p>Stronger Communities. Issue 1. Strongly agree that the LDF should direct new development to Worcester. It is located within the Central Technology Belt and can properly be regarded as a sustainable location. Housing growth should be directed to areas outside of the Green Belt on the edge of the city with good transport links and within close proximity to existing employment opportunities.</p>	<p>This will be considered in the SHLAA report viewable on the website.</p> <p>Noted.</p>
76			

ID No	Name	Comment	Officer Response
76		<p>Issue 2. It is essential that sufficient land is made available within or near Worcester to meet the housing needs of South Worcestershire. These allocations should recognise the Worcester does not have a legacy of old, redundant previously developed sites. We are aware of sustainable greenfield land adjoining Worcester and on the edge of Wychavon, which are available, suitable and achievable. The development of these sites would be a more sustainable option than identifying land in smaller settlements with greater reliance on the private car. Development of larger greenfield sites also provides the opportunity to deliver affordable housing and an appropriate level of infrastructure.</p> <p>The provision of a new settlement would be an approach not supported by any policy and would represent a far less sustainable option when compared to taking full advantage of existing greenfield sites on the edge of Worcester.</p> <p>Issue 3. The existing Green Belt should be maintained there is sufficient justification for the existing Green Belt boundaries given the amount of alternative greenfield land available around the edge of Worcester.</p> <p>Issue 4. Support option 1 areas to the east of Worcester. Land to the east of the city is not subject to environmental or infrastructure constraints and has good access to the local transport network.</p> <p>Issue 5. Wychavon's housing needs would best be met by allocating sites within Wychavon but adjacent to the Worcester City Boundary.</p> <p>Issue 7. Market housing should not be directed to rural villages as this is the least sustainable option.</p> <p>Issue 8. Locating co-dependent land uses in proximity to one another is the most appropriate means of encouraging travel by means other than the car. Parking standards expressed as maxima can also reduce car dependency. Larger housing sites also generate sufficient investment in infrastructure to support public transport and other non-car modes.</p>	<p>Noted.</p> <p>Noted.</p> <p>A Green Belt review is being carried out to establish whether it still meets the principles laid down in PPG2.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p>

ID No	Name	Comment	Officer Response
		<p>Meeting the Needs of all Generations Issue 12. PPS 3 requirements should be adopted (no need for a local policy). Issue 13. LDF requirements should reflect an up to date housing needs assessment.</p> <p>Issue 14. The needs of elderly and single people should be recognised in policy, e.g. by promoting the development of special care facilities.</p> <p>Economic Success that is shared by all. Issue 17-Policy should not be to “blanket” safeguard employment sites. Some employment levels can be safeguarded within a reduced footprint; Employment level targets and measures are achievable without land use safeguarding. Notes ELA 2006 that district had a surplus of 6.25 ha of employment land. Policy E4 of Local Plan should positively encourage land use flexibility. Surplus Malvern Technology Centre Land can contribute to housing targets, as a mixed-use site for B1 high tech business / residential. Or all for residential use if required. (8.8ha). Site could deliver from 105-175 dwellings (part A) or 265 to 440 dwellings (A & B) Higher value residential uses may be necessary in order to enable Brownfield land to be viable for employment uses.</p> <p>Communities that are Safe and feel safe. Issue 32. By adopting national planning guidance for the design of new developments.</p> <p>Other Comments. RSS housing targets may be considered too low and more housing land might need to be found</p>	<p>PPS3 encourages the setting of local standards to meet local need. Agreed.</p> <p>Noted.</p> <p>Noted</p> <p>Noted</p> <p>The Core Strategy will supersede this policy on adoption. Noted</p> <p>Noted</p> <p>Noted</p> <p>The plan has to be flexible enough to deal with this scenario.</p>
78	Highways Agency (Colin Mercer).	<p>Vision We agree that ensuring adequate infrastructure is one of the key challenges facing the area and support the</p>	Noted

ID No	Name	Comment	Officer Response
78		<p>emphasis that is being placed on transport infrastructure. We agree with the proposed vision and objectives for South Worcestershire. We also agree with the transport objectives that are set out in Section 4.</p> <p>Given the transportation issues in South Worcestershire we consider that the delivery of the vision would be helped through the creation of a transport related theme and set of objectives.</p> <p>Stronger Communities. Issue 1. We are pleased that the settlement hierarchy is based on evidence relating to public transport provision. We consider improving levels of public transport provision in all settlements is essential to delivering sustainable growth. Any growth in category 2 and 3 villages must be accompanied by a comprehensive package of public transport improvements. The feasibility of providing and sustaining these improvements needs investigation before consideration of allocations of sites in these settlements. Issues 2, 3, 4 & 5 M5 Junction 6 will reach capacity by 2012 without any additional development.</p> <p>M5 Junction 7 will have significant queues on the A44 and B4084 by 2014. An assessment incorporating the traffic levels that are likely to be generated by the levels of housing growth proposed conclude that this junction would be very close to capacity by 2026. M5 Junction 5 will be likely to reach capacity by around 2020 without any additional development. Around Evesham the A46 is currently above capacity and current levels of congestion are expected to worsen without any additional development.</p>	<p>Noted</p> <p>The Joint Core Strategy must be a spatial plan. A requirement of this sort of plan is that it deals with public service objectives in a holistic way and not in isolated themes such as housing, employment and transport. Therefore if the Joint Core Strategy treats transport as a single theme it will be more likely to be found unsound at examination.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Evidence from the Highway Authority would suggest that it already is..</p> <p>Noted.</p> <p>Noted</p> <p>Noted</p>

ID No	Name	Comment	Officer Response
78		<p>We would support the allocation of sites that are located so as to reduce the need to travel through providing key linkages with existing and proposed employment sites and services, and high quality public transport for longer journeys.</p> <p>We would support mixed-use development, which is well linked to services in the city and town centres by high quality public transport.</p> <p>Mitigation measures to junctions 5, 6 and 7 of the M5 will be necessary. However these should only cater for traffic of a strategic nature, not local traffic that is created as a result of new development.</p> <p>We would not support the allocation of sites located in close proximity to the strategic road network. This will include sites to the east of the city boundary, including land to the east of the M5, sites to the north of the city and sites to the south east of the city boundary.</p> <p>When considering site allocations in Evesham and Droitwich Spa the impact on the A46 and junction 5 of the M5 should be considered.</p> <p>Development allocations within the smaller towns of the Joint Core Strategy area should be accompanied by measures, which seek to rectify current deficiencies in public transport provision.</p> <p>The allocation of housing development within the villages should depend on the level of public transport provision and the range of other services within the settlement.</p> <p>Issue 6.</p> <p>We support the principal that employment opportunities should be close to where people live.</p> <p>We would support a pattern of employment growth that provided land at Worcester in close proximity to public transport provision and well linked to existing and proposed housing.</p> <p>We would support employment growth of an appropriate scale located within the six other main towns on sites that are well linked to existing and proposed housing</p>	<p>Noted</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p>

ID No	Name	Comment	Officer Response
		<p>development and public transport. Employment proposals within the villages should be of an appropriate scale to provide opportunities for residents and the surrounding rural community but should not result in commuting.</p> <p>We would not support development that would impact on the Strategic Road Network.</p> <p>We would also support new employment development, which promotes the use of rail or water for the movement of freight.</p> <p>Issue 8. The preferred option should include a mix of the four options. All new developments should be required to produce and implement a travel plan.</p> <p>Issue 9. Support a mix of all the options and a mechanism and programme for securing these improvements should be established at an early stage. Travel Plans should be used to promote walking and cycling. We support the aim of securing improvements to rail provision and the Joint Core Strategy should take account of the likelihood of such improvements being secured.</p> <p>Issue 10. Although all new development should be located to reduce the need to travel improvements to the strategic and local road networks will be necessary to accommodate the growth levels set out in the Regional Spatial Strategy. A timetable for securing the options set out needs to be clearly defined.</p> <p>Issue 11. Infrastructure will need to be provided on a phased basis alongside development. However due to the complex issues and funding streams involved we suggest that a detailed programme for the implementation of essential infrastructure is drawn up alongside the allocation of sites. The source of funding to deliver infrastructure needs to be resolved at an early stage.</p>	<p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p>
79	Environment Agency (J Burnett)	<p>Vision. It would be prudent to mention Sustainable management of water in the proposed vision. Insert 'water environment'</p>	<p>We will take this into account in refining the vision for the Preferred Options</p>

ID No	Name	Comment	Officer Response
79		<p>between 'landscape, its' and 'biodiversity' in the second paragraph.</p> <p>Objectives. The objectives are appropriate but several of the issues soil, water quality/resources has not been properly addressed elsewhere within the document. We recommend removing 'quality' at the end of the last Better Environment objective. This change is necessary to ensure issues of quantity as well as quality are considered. The following issues have not been considered properly at the issues and options stage;</p> <ul style="list-style-type: none"> • Water Resources. • Water Quality. • Climate Change. • Contaminated Land. • Infrastructure. <p>Stronger Communities. Issue 2. Development should be steered to areas with a 'low probability' of flooding. Issues 4, 5 & 6. We would recommend that a policy option is put forward to bring forward sites at lowest flood risk first (informed by the Strategic Flood Risk Assessment) where infrastructure provision is available or could be provided. Therefore the criteria for identifying land for development would be, low flood risk, fresh water and sewer availability and capacity, as well as contaminated land. Issue 11. Support option 1 together with a policy for the phasing of sites linked to infrastructure upgrades.</p> <p>Better Environment for today and tomorrow. Issue 23. Support options 2 and 4. Issue 25. Support options 3 to 8 providing there is a reduction including betterment in the wider surface water regime and or surface water infrastructure. We would expect developer's contributions for flood defences and sustainable drainage systems to be covered by a separate Supplementary Planning Document.</p>	<p>Noted. We hope this has been rectified in the Preferred Options document.</p> <p>We have the ability to improve quality but isn't the quantity beyond the ability of the Core strategy. The Joint Preferred Options document has picked up some of these issues, but they do not affect the objectives directly.</p> <p>Agreed.</p> <p>Agreed. We still have to carry out a Strategic Flood Risk assessment.</p> <p>Noted.</p> <p>Noted. Noted.</p>

ID No	Name	Comment	Officer Response
		<p>Paragraphs of waffle about PPS 25 and whether or not we have used the same terms.</p> <p>Issue 27. Suggest that water efficiency is also considered as part of issue 27. Support options 3, 5 and 6 but also expect targets for water efficiency. All development should be required to achieve water efficiency levels linked to the Code for Sustainable Homes and all new developments of over 20 homes should contribute to retrofitting water efficiency measures to existing homes.</p>	<p>If the Environment Agency are not clear about whether or not PPS 25 is sufficient to guide development decisions with regard to flooding issues and do not explain clearly what policy a Local Development Document could contain that goes beyond the requirements of PPS 25, neither the Environment Agency or the South Worcestershire Local Authorities will achieve their objectives with regard to flood management.</p> <p>Noted</p>
80	Pegasus Planning (Miss Katherine Meider) on behalf of Mr I Tahmas.	<p>Site Promoted – Land at Heron Lodge Worcester.</p> <p>Vision. We agree that sustainability should be the overarching aim of the South Worcestershire Joint Core Strategy.</p> <p>The proposed vision is supported particularly the emphasis given to Worcester. It is important that the Joint Core Strategy is flexible enough to be able to respond to the eventual requirements of the Regional Spatial Strategy.</p> <p>The South Worcestershire Joint Core Strategy will need to provide sufficient land to accommodate in excess of 32,597 dwellings up to 2026.</p> <p>Objectives The objectives are a sound basis for the policies and proposals in the Joint Core Strategy.</p> <p>Stronger Communities.</p>	<p>This will be considered in the SHLAA report viewable on the website.</p> <p>Noted</p> <p>Noted</p> <p>Agreed.</p> <p>The number of dwellings that the Joint Core Strategy should make provision for will be established by the Regional Spatial Strategy. If the Joint Core Strategy tries to make provision for a different number of dwellings it will be likely to be found unsound.</p> <p>Noted</p>
80		<p>Issue 1. The settlement hierarchy represents a sound basis for a development strategy.</p> <p>Issue 2. Support option 2 but it is inevitable that a mixture</p>	<p>Noted</p> <p>Noted</p>

ID No	Name	Comment	Officer Response
		<p>of some or all of the options will be necessary to deliver a robust and sustainable approach to accommodating development.</p> <p>Issue 4. Opportunities within Worcester city boundary for housing development should be maximised.</p> <p>Issue 8. A mixture of locating development in accessible locations and where it relates well to existing services together with ensure new development contributes to improved travel choices.</p> <p>Issue 9. Development in and around Worcester offers the best opportunities to encourage more sustainable travel.</p> <p>Meeting the Needs of All generations</p> <p>Issue 12. The Local Planning Authority should set out their requirements for affordable housing based upon a robust and credible evidence base. Such policies provide certainty for developers when calculating the viability of a development.</p> <p>Better Environment for today and tomorrow.</p> <p>Issue 27. The Local Planning Authority should promote renewable energy development, which can contribute to the achievement of sustainable development.</p> <p>Issue 29. An open space audit should be used to determine what provision new developments should make to existing and new facilities.</p>	<p>Agreed, but they are limited without affecting the value of the green network.</p> <p>Agreed.</p> <p>Noted.</p> <p>Agreed. Evidence on the SWJCS website.</p> <p>Agreed</p> <p>An Open Space audit has been carried out for the three districts. These can be viewed on the website</p>
81	Heaton Planning Ltd (Spencer Warren)	<p>Site Promoted – Land at Cleeve Prior.</p> <p>Stronger Communities.</p> <p>Issue 2-support option 4.</p> <p>Issue 5-support option 3.</p>	<p>This will be considered in the SHLAA report viewable on the website.</p> <p>Noted.</p> <p>Noted.</p>
82	Butler Sherborn (Richard Greasby) on behalf of the Jones Family.	<p>Site Promoted – Land at Wood Farm, Hanley Road, Malvern.</p>	<p>This will be considered in the SHLAA report viewable on the website.</p>
83	D.R. Briggs	<p>Stronger Communities.</p> <p>To ensure residents have access to open countryside as much housing as possible should be in smaller</p>	<p>Noted, but not necessarily the most sustainable option.</p>

ID No	Name	Comment	Officer Response
		<p>developments rather than in expanding larger towns. I think that as much new housing as possible should be in a new town.</p>	<p>Noted, but contrary to Regional Policy.</p>
84	Andrew Guy	<p>Stronger Communities. Maximum use of existing buildings (e.g. upper floors of shops) within Worcester should be made before greenfield sites are realised for residential development.</p> <p>Worcestershire's housing needs should be accommodated by an urban renaissance of Worcester and in areas to the west of the River Severn so that housing development does not facilitate or encourage long distance commuting.</p> <p>New employment provision should be made after more analysis of the commuting habits of Worcestershire residents and located to reduce commuting distances.</p> <p>The completion of the North West link fro Claines to Hallow should be a priority over dualling the Southern Link Road</p> <p>Meeting the needs of all Generations To deliberately set out to create affordable housing is to attempt to manipulate a housing market that has invariably proved to be self-adjusting.</p>	<p>The number of new homes that the Joint Core Strategy must plan for if it is to be in compliance with the Regional Spatial Strategy (a key test of soundness that must be passed if it is to get through Examination in Public) can not be accommodated on brownfield sites. The strategy for meeting the Regional Spatial Strategy objectives set out in the Joint Core Strategy must be credible, realistic and deliverable. Worcester has had policies to encourage the full use of upper floors of retail premises for some time but a public authority cannot dictate how every private property owner should use their premises.</p> <p>Noted. We agree it must be sustainable.</p> <p>Noted</p> <p>The evidence does not back this view. Indeed to build the NW link road would encourage long distance commuting.</p> <p>Free markets often produce negative externalities, which result in those able to take part in the market passing on some of their costs to others who may or may not be excluded from participation in the market.</p>
84			

ID No	Name	Comment	Officer Response
84		<p>Who is to say who qualifies for affordable housing?</p> <p>Economic Development that is shared by all. Issue 19, option 4: More sustainable to use empty premises above shops for affordable housing than build on Greenfield sites.</p> <p>Other Comments. Respondent has submitted a copy of his letter to the West Midlands Regional Assembly- dated 22/2/2007 regarding the WMRSS revision, and wishes these to be included as his comments on the SWJCS consultation. -</p> <p>-Queries whether the WMRA as an unelected body can impose planning policy on elected members of L.A's.</p> <p>-RSS- No tangible issues to comment on.</p> <p>-RSS consultation questions are biased.</p> <p>-No evidence in public domain supporting proposition that MUA's cannot accommodate their own growth.</p> <p>-RSS contradictory in seeking to stem out-migration from MUA's whilst justifying Greenfield development in shires based on migration.</p> <p>-The growth rates for housing under RSS options 1,2,3 are way above historical trends- suggests migration will accelerate under RSS in contradiction of urban & rural</p>	<p>The housing market in England has never met the housing needs of all the nations residents. If it is accepted that without society civilisation is not possible and that government is an essential institution in maintaining society then it is perfectly logical and sensible for government to plan to meet the needs that the market does not or cannot satisfy. Local Councils have well-established processes for allocating scarce resources including affordable housing to those in most need.</p> <p>We will be seeking to continue to promote utilising living above the shop</p> <p>They have been taken into account where appropriate.</p> <p>This is not for the Joint Core Strategy to question.</p> <p>Noted</p> <p>Not an issue for the Core Strategy</p> <p>Not an issue for the Joint Core Strategy</p> <p>Noted</p>

ID No	Name	Comment	Officer Response
		<p>renaissance policies. -Need to test current RSS assumptions about capacity of Worcester & Redditch</p> <p>-Presents alternative options based on very lower capacity of Redditch & Worcester, which would increase requirements for Wychavon & Malvern Hills. (See scanned letter)</p>	<p>These have been assessed. In Worcester's case we believe they are correct.</p> <p>Noted</p>
85	Paul Hill, RPS Planning (Paul Hill) on behalf of Barratt Homes West Midlands Division.	<p>Site Promoted – Malvern Town Football Club Ground. Vision. RPS disagrees with the vision. The vision should recognise that the provision of all forms of housing is required not just affordable housing. Delete decent and affordable from the first line of the second paragraph and change homes to housing.</p> <p>Stronger Communities. The South Worcestershire Joint Core Strategy places undue reliance on brownfield land, paragraph 4.2.</p> <p>Issue 1. The acknowledgement of Malvern as a principal location where strategic development should be directed is entirely appropriate. The preferred option should be supported by separate infrastructure/accessibility study for each of the South Worcestershire towns.</p>	<p>This will be considered in the SHLAA report viewable on the website. The inclusion of the words decent and affordable in the vision reflects the objectives of the three Councils Sustainable Communities Strategies it does not prescribe how decent and affordable homes for everyone can be provided. RPS's response appears to be based on a developers' view of what affordable homes are, and how affordable rented accommodation has traditionally been provided.</p> <p>National planning policy guidance and targets emphasise the re-use of Previously Developed Land before the release of greenfield sites. In the light of these requirements it would be easy to criticise the Joint Core Strategy for not saying more about directing development to brownfield sites.</p> <p>This is the approach suggested in the Preferred options</p>
85		The proposed settlement hierarchy is wholly inappropriate. What is being proposed is a commitment to a highly dispersed settlement hierarchy.	The settlement hierarchy does not propose any commitment to any particular pattern of future development. This issue is seeking

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85		<p>Issue 2 support options 2 and 3 however Upton should not be a focus for development because of the flooding constraints. Category 1 villages, infill, conversion and exception development only. Category 2 & 3 villages conversion and exception development only.</p> <p>Issue 6 Generally employment growth should be provided in balance with new housing. Expanding or developing employment in remote locations would not contribute to a sustainable pattern of development.</p> <p>Issue 7. Only promote development in villages to meet affordable housing needs.</p> <p>Issues 8, 9 & 10. The most appropriate way of reducing the need to travel is by promoting development at the principal urban areas, which have access to a range of services and public transport.</p> <p>Issue 11. Development is the most effective and often the only way of ensuring the delivery of related infrastructure.</p> <p>Meeting the Needs of All Generations</p> <p>Issue 12. By focusing strategic housing growth to large development sites will ensure that an increased supply of affordable housing is achieved throughout South Worcestershire.</p> <p>Issue 13. All residential development should be required to provide a range of housing which takes into account the character of the local area and the housing market needs report.</p> <p>Issue 14. Special needs housing should be located in locations that provide very local access to services and public transport.</p> <p>Economic Development that is shared by all.</p> <p>Issue 16. Promote and protect specific types of employment.</p>	<p>views about which settlements should be grouped in which level of a settlement hierarchy.</p> <p>Noted</p> <p>Agreed.</p> <p>This is an approach considered in the Preferred Options. This is the approach being suggested in the Preferred Options.</p> <p>Noted</p> <p>Noted</p> <p>Agreed</p> <p>This will be an important aspect to be taken into account in considering locations.</p> <p>Noted</p>

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		<p>Issue 17. To deliver the objectives of the Central Technology Belt, The Rural Regeneration Zone and the wider objective of ensuring future prosperity existing employment sites must be protected and provision made for new high quality employment sites.</p> <p>Better Environment for today and tomorrow. Issue 25. Given the importance of flooding in the area it is essential that development is not directed to any sites within the flood plain. For this reason housing growth should not be directed to Upton-Upon-Severn. Issue 27. The most important influence on the consumption and conservation of energy is the overall spatial pattern of development over the next 20 years. It is therefore essential that the Joint Core Strategy seeks to centralise development in the areas principal urban settlements.</p> <p>Other Comments. In the opining of RPS, the approach taken to the issues and options consultation needs to be more bespoke to the needs of South Worcestershire and result in an overall development strategy which delivers what is most appropriate for the area. The preferred option should specifically allow for the relocation of Malvern Town Football Club and the redevelopment of the site for residential purposes.</p> <p>Should the proposed settlement hierarchy and resultant development strategy proceed as indicated, it will result in a dispersed and far less sustainable approach to future development.</p>	<p>Agreed</p> <p>Noted</p> <p>Noted</p> <p>Agreed, however by the time the Joint Core Strategy is in conformity with national and regional planning policy and expressed in broad spatial terms it will be the same as every other Core Strategy so far produced. This is not a general comment it is highly specific and land-use focused. The Joint Core Strategy must be a spatial planning document and it would be inappropriate for it to refer to specific sites.</p> <p>The Issues & Options Report does not contain a development strategy. The future development strategy for South Worcestershire will be determined through the preparation process of the Joint Core Strategy.</p>
86	Bell Cornwell Partnership (John Cornwall) on behalf of Sir Bert	<p>Site Promoted – Land at Hindlip north of Worcester.</p> <p>Vision - Supported.</p>	<p>This will be considered in the SHLAA report viewable on the website.</p> <p>Noted</p>

ID No	Name	Comment	Officer Response
86	millichip sports Ltd.	<p>Objectives - Broadly support. Under Stronger Communities/Meeting the Needs and Improving Health emphasise the need for and role of recreation and sport facilities to meet the vision.</p> <p>Stronger Communities. Proposed hierarchy is supported. Issue 2, options 1&2 supported. Support removal of land from the Green Belt to the north of the City. Issue 5, option 3 supported. Employment principally at Worcester with distribution to support new housing development. Issue 7, option 2 supported. Issue 8, all options not mutually exclusive but emphasise importance of option 1. Issue 9, all options generally supportive, question viability of option 4/5. Issue 10, options 1 + 2 fully supported. Issue 11, option 1 + 2 strongly supported.</p> <p>Meeting the Needs of All Generations Issue 12, option 1 supported Issue 13, option 2-supported Issue 14, option 1 – concern expressed as just another ‘add on’ contribution. Option 2 + 3 strongly supported. Option 4 + 5 supported.</p> <p>Economic Development Success that is shared by all. Issue 16, support option 1 + 3, latter should make specific reference to sports-related development. Issue 17, Option 3 supported with caveat that details of the policies will be important. The criteria for proving viability must be reasonable. Issue 18, support for all options. Issue 19, option 8 supported. Issue 20, all options supported. Suggest option 3 make specific ref. to recreation, sports-related activities. Issue 21, all options supported. Issue 22 should also include ref. to recreation and sport. Option 2 should reflect this.</p> <p>Better Environment for today and tomorrow. Issue 24, option 2 supported. However, no support for</p>	<p>Noted</p> <p>Noted. Green Belt review will be undertaken.</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted.</p>

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		<p>additional layers of designation. Issue 25, option 4, 5, 6, 7 supported. Option 8 broadly supported. No support for option 1. Issue 26 – all 3 options supported. Issue 27 – all 6 options are supported. Issue 28 – support option 3.</p> <p>Improving Health and Wellbeing. Issue 29 generally support all 5 options. Issue 30, options 1 + 2 both necessary. Issue 31, support option 1.</p> <p>Communities that are Safe and Feel Safe. Issue 32, support for all three options.</p>	<p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p>
87	Worcestershire County Council	<p>Vision Suggested change to vision: Amend 1st sentence of 2nd paragraph to read" Development growth where....has access by the widest feasible choice of sustainable modes of transport to decent homes.... In addition education should also be mentioned</p> <p>I & O paper weak on the historic environment.</p> <p>Needs to address accessibility and demand management re transportation.</p> <p>All references to public transport should be changed to passenger transport.</p> <p>Transportation section suggests amendments to the vision: "Development Growth where everyone has access by widest feasible choice of sustainable modes of transport to decent homes, jobs, and health and community facilities"...Also suggests education should be mentioned.</p> <p>Consider using the phrase 'competitively priced' rather than 'affordable' in the initial policy statements (Vision and objectives) as a policy to hang demand management on. - Reference to Eddington report.</p>	<p>We will take this into account in refining the vision for the Preferred Options</p> <p>Agree. The Preferred Options will seek to address this.</p> <p>Noted</p> <p>We will take this into account in refining the vision for the Preferred Options</p> <p>We will take this into account in refining the vision for the Preferred Options</p> <p>Noted</p>

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87		<p>Para 3.2 A Better environment, key challenge © should be added within the brackets for this theme.</p> <p>Key challenge (d) should be added under Stronger Communities and Economic Success themes.</p> <p>Vision requires:</p> <ul style="list-style-type: none"> -a greater "sustainable development" emphasis- particularly. Re biodiversity impacts and opportunities. -Greater appreciation of existing biodiversity and conservation/ enhancement -consideration of climate change resilience -balance central tech belt with sustainable rural economy -opening line is overly negative- needs rewording; -Makes suggested rewording of the whole Vision statement (see scanned report) <p>Objectives <i>Stronger Communities</i> 2nd bullet point- amend wording: ' To locate development in order to reduce its carbon footprint, where convenient, affordable and financially sustainable access to..."and are available by walking, cycling and passenger transport thus reducing..."</p> <p>3rd bullet point- add "and sustainable" after '. Affordable, safe.' travel choices.</p> <ul style="list-style-type: none"> •New bullet To locate development in order to reduce carbon footprint <p><i>Economic Success that is shared by all:</i> Additional bullet: To ensure that the Central technology belt is truly accessible by public transport as well as the private car, supporting the maximising of employment opportunities for Worcestershire residents.</p> <p>Amend 3rd bullet point: "...Sub Regional role of Worcester as a sustainable and major retail, leisure, university and tourist centre, building</p>	<p>Noted</p> <p>We will take these into account in refining the vision for the Preferred Options</p> <p>Not necessary to mention one particular initiative in a general objective- does not add to the objective.</p> <p>Agreed.</p> <p>Bullet point 2 adequately covers this.</p> <p>This applies to all areas not just the Central Technology Belt. It is felt that the other objectives adequately address this issue.</p> <p>It is not considered that this addition is necessary as sustainability is central.</p>

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87		<p>on the success of the Sustainable Towns Project. Last bullet, add "and villages" after "towns".</p> <p><i>A Better environment for Today and Tomorrow</i> 1st bullet-amend." Is sustainable by the efficient use of scarce land and transport resources,"</p> <p>Large amount of additional wording/ inserts suggested by county ecologist – see scanned report)</p> <p><i>Improving Health and Well-being:</i> 1st bullet- amend "To improve the physical and mental health of SW residents by improving sustainable access to green spaces, providing opportunities and encouraging participation in physical and social activities, and through improved access to health care provision and a wide range of fresh food"</p> <p><i>Communities that are safe and feel safe</i> 1st bullet, amend " ..Well-designed places, spaces, buildings and transport services and infrastructure.</p> <p>Preliminary paragraphs: County ecologists suggest the issue of potential farming renaissance, and recognition of good stewardship of the land should receive it's own separate section point. 4.1- Climate change not just desirable- it's about survival.</p> <p>4.10- could add discussion for potentially ecologically robust green networks and the benefits they will bring.</p> <p>Stronger Communities. Issue 1 Settlement hierarchy- Gives background to the accessibility of schools in each settlement category. Table</p>	<p>Not convinced this applies to the villages</p> <p>It is questionable whether these resources are scarce. Furthermore, objective needs to apply to all resources, not just transport resources- and the term transport resources is unclear- could mean roads, buses, cycle lanes- these aren't natural resources in themselves, even if they deplete them. Noted</p> <p>Laudable, but perhaps too detailed re fresh food</p> <p>This is covered by the term "development". We will take this into account in refining the vision for the Preferred Options</p> <p>We have sought to raise the significance of farming in the rural economy. Noted</p> <p>Green Networks are central to development in the Preferred Options. Useful information to be considered.</p> <p>SWJCS would be relying on the County Council as Highway Authority to provide/oversees this evidence.</p>

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87		<p>of existing capacity of schools appended.</p> <p>Transport section- agrees with settlement hierarchy but only if provided with significantly improved transport and infrastructure services, in particular. Walk, cycle and passenger transport. Then for Worcester, lists what these requirements are, including focusing on people rather than vehicles. For Evesham, Malvern, Droitwich Spa, Pershore, Tenbury Wells and Upton.- agree as long as investment in transport infrastructure and passenger transport.</p> <p>Re cat 1 & 2 villages- agree if appropriate links to higher tier settlements improved.</p> <p>Query Category of Eckington (Cat 1?). Queries why Norton is not included- not a village but could be considered as an area for growth.</p> <p>Option 1 would be PPS9 compliant with additions- see scanned report.</p> <p>Issue 2. Education section: In terms of new settlement 10,000 dwellings most appropriate size to support schooling.</p> <p>Transport section: sites for additional housing must be accessible by all modes. Use accessibility planning to identify which are/ can be the most sustainable re walk, cycle, and passenger transport. Use Continuous(weighted) measures of accessibility.</p>	<p>Noted</p> <p>Settlements in category 1 have at least four Key Services and score at least 16 points in the Village Facilities Survey. In addition they have "medium/high" levels of public transport including access to all of the daytime bus service types identified in the Rural Transport Survey.</p> <p>Norton has been classified as a lower category village which has a good level of public transport provision but low service/ facilities provision. However, there is a case to acknowledge it's close proximity to services in Worcester.</p> <p>Noted</p> <p>Noted</p> <p>Should not be such an issue if truly inclusive communities are developed.</p>

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87		<p>Option 1 not supported- using Greenfield land within the built up area is unlikely to meet demand and could harm the health of residents.</p> <p>Need a combination of land on edge of Worcester and other towns and the creation of new communities.</p> <p>Ecologist- suggested new option, to be PPS9 compliant- a combination approach is required- within/ on edge of new existing large settlements and mainly cat 1 villages, plus a new truly sustainable eco-settlement, - whilst considering constraints / opportunities of existing built/ cultural and natural heritage..</p> <p>And a new Eco settlement has potential to be PPS9 compliant, if maximises use of existing infrastructure, whilst minimising impact on biodiversity.-All other options are potentially likely to not conform to PPS9 (see scanned report for details)</p> <p>Issue 3. Transport section- Green Belt should be reviewed, but take account of accessibility issues.</p> <p>Ecologist suggests a new option- says a Green Belt review is essential- i.e. from ecological viewpoint may be preferable to build on the Green Belt and protect other areas.</p> <p>Issue 4 –Transport section- cater for Worcester growth by directing growth to the most sustainable locations in terms of transport. The Integrated Transport Strategy for Worcester should be a core element.</p> <p>Ecologist- potentially non- PPS9 compliant-depends on site-specific data- prelim biodiversity & landscape character analysis done by WCC Environmental policy team is available on request.</p> <p>Issue 5-.Transport section. -by directing growth to the most sustainable locations incl. in terms of transport. The Integrated Transport Strategy for Worcester should be a core element.</p> <p>Ecologist-Prefers option 3. (Housing in Cat 3 settlements should be permitted only to meet local needs) Option 5 inappropriate, unless to facilitate appropriate and</p>	<p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>We have undertaken a preliminary Green Belt Review.</p> <p>Noted</p> <p>Agreed, this will be a core element of the Preferred Options.</p> <p>Noted</p> <p>Agreed, this will be a core element of the Preferred Options.</p> <p>Noted</p>

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87		<p>proportionate development within the RRZ..</p> <p>Issue 6- re new employment growth .The Integrated Transport Strategy for Worcester if implemented will provide the infrastructure & services that will deliver accessibility to key employment sites in & around Worcester.- so Worcester can take a high proportion of employment dev. Also improved links to market towns will allow these to accommodate additional employment. Employment sites adjacent to the motorway will increase commuting.</p> <p>Don't locate high quality CTB developments in areas where skills not available- i.e. match housing type to employment type.</p> <p>Ecologist- cannot comment on specific identified options until an adequate analysis and SA (including biodiversity impact) has been undertaken and alternatives considered. The current SA grades are unhelpful.</p> <p>Issue 7-Development needs of rural communities- by directing growth to the most sustainable locations. in terms of transport. Need sustainable access to Worcester & the market towns.</p> <p>By providing small "interchange hubs" on the passenger transport network- inter urban bus/ rail services and fed by appropriate rural modes- Community Transport, Demand responsive transport, shared taxi, taxi bus, local bus, cycle, walk, car. Option 4 dependent on close matching of local skills and employment development type.</p> <p>Issue 7. School roles falling in rural areas. Even some small development may not save an unsustainable school.</p> <p>Ecologist- new option- needs combination of options 1 & 2 with elements of 4.</p> <p>Issue 8- reduction in use of car. Need an accessible reliable, convenient and value for money alternative to the car. Requires investment in rapid transit systems along major routes into / out of Worcester/ and major towns. May need to introduce demand management to Worcester and 2nd & 3rd tier towns. Enforce passenger transport improvements on new development.</p> <p>Ecologist: Options 1,2,3,4 – should aspire to achieve them</p>	<p>Agreed, and this approach is included in the Preferred Options</p> <p>The Joint Core Strategy aims to to achieve this.</p> <p>Noted, but only a very early attempt to just give an indication of sustainability issues.</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>This is part of the integrated transport strategy. Enforcement may not be necessary if the alternative is sufficiently attractive.</p> <p>Noted.</p>

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87		<p>all.</p> <p>Issue 9; Greater emphasis required on sustainable modes of transport. Refers to response to issue 8 above. Once sustainable means of travel are provided, the key must be to provide the information to allow people to use them. Network needs to include walking & cycling routes- connecting residential areas with key services, and segregated from mainstream traffic.</p> <p>Ecologist-should aspire to achieve all the options. New infrastructure should not be imposed on the landscape; it should be integrated with the landscape.</p> <p>Issue 10. Strategy will need a clear recognition of the need for significant transport infrastructure, and passenger transport services, throughout the Appendix 4 settlement hierarchy. In particular Worcester will require an integrated rapid transit network for bus & rail.</p> <p>Transport section response.</p> <p>Need to direct investment first at sustainable means of transport modes, infrastructure & services- so that there is a viable alternative to the car in place at an early stage. Provides suggested text for Para 4.31 – “A Worcester Integrated Transport Strategy is being developed to set out the transportation infrastructure requirements to accommodate the growth of Worcester City and surrounding area. The Strategy aims to combine the following transport network for Worcester:-</p> <ul style="list-style-type: none"> •Increased road capacity specifically river crossings (options include dualling of the Worcester Southern Link Road, completion of the North West By pass linking the A4440 at Grove Farm to A449 at Claines; a new city centre bridge. •A high quality passenger transport network with at least 6 Park & Ride sites linked by Bus rapid transit routes serving major employment, health, education and retail sites. •A Parkway station at Norton improving access to rail services to London, Birmingham, Bristol, Cheltenham, Oxford and Cardiff. Improvements to the local rail network to improve frequencies and access. 	<p>Noted</p> <p>Agreed.</p> <p>Agreed</p> <p>Noted. The integrated transport strategy is incorporated into the Preferred Options.</p> <p>Noted, but the latest evidence suggest that the North west Link Road is not required.</p> <p>This is in the strategy.</p> <p>The Joint Core Strategy supports this, but information from the rail authorities is not positive.</p> <p>Noted.</p>

Comment [r2]: Can we say at this stage that this is in the strategy- as we are answering I & O questions. Do we say that this could be incorporated as a preferred option?

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87		<p>•City Centre demand management aimed at reducing the attractiveness of travelling by car through the city centre e.g. parking controls, restrictions on direct through routes, priority for non-private car traffic.</p> <p>•A comprehensive network of direct, continuous and pleasant walking and cycling routes connecting residential areas with key services and segregated from mainstream traffic</p> <p>A significant level of investment in transport infrastructure has been identified as necessary prior to development and a major scheme bid is being developed. However, a major scheme bid must achieve Regional Priority status, before being considered by the Government's Department for Transport for funding.</p> <p>Need to review Worcester specific options in the light of the above.</p> <p>Concern that reviewing motorway capacity encourages longer car journeys.</p> <p>Ecologist- prefers options 1 & 2, with reservations, and option 6, but subject to EclA mitigation, compensation, and enhancement. Option 4 is not a sustainable option.</p> <p>Issue 11. Use planning obligations- funding to secure extra school places- or negotiate for land for schools (10ha High schools; 2ha primary/first schools).</p> <p>Transportation section-By having a clear integrated transport strategy in place, and associated infrastructure & services. Set out the level of contribution required from developers to ensure developments will be sustainable.</p> <p>Development can only proceed if developer provides a robust Travel Plan-, which needs to be legally binding and enforceable.</p> <p>Infrastructure must be in place at time of completion.</p> <p>Ecologist: - Option 1 add" or guaranteed" at the end.</p> <p>Option 2- agrees as written.</p> <p>Meeting the Needs of all Generations.</p> <p>Issue 12- Affordable & special housing needs.</p> <p>Options 1 or 2 – agree- Affordable housing should be</p>	<p>An aim of the Joint Core Strategy. This is what we are aiming for.</p> <p>Noted.</p> <p>Agreed. This has been done.</p> <p>Noted.</p> <p>Noted.</p> <p>This is what we will be seeking to do for the Submission document. It is difficult to get costings from the infrastructure providers.</p> <p>Noted, and the Joint Core Strategy aims to deliver on this. We are seeking this.</p> <p>Noted.</p> <p>Noted</p> <p>Noted</p>

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87		<p>incorporated into larger development sites and provide a social mix.</p> <p>Issue 13- Range of suitable housing- Agree with option 1- needs to be linked to local development needs.</p> <p>Issue 14-housing quality, flexibility- Agree Option 3- highest accessibility to health care, appropriate social activities & fresh food for homes for the elderly.</p> <p>Ecologist- all options appropriate. Add all new homes should be fully sustainable- forward thinking approach to design, landscape, habitat creation should be designed in at outset.</p> <p>Issue 15- Gypsy & Traveller accommodation- sites need to be close to local facilities.</p> <p>Economic Development that is shared by all.</p> <p>Issue 16. -Transport section- concern that ELR study has identified that the North Western Link Road is required.</p> <p>Ecologist- all options have their merits. Capitalise on links between tourism/ recreation/ hospitality sectors. I.e. well reared produce/ good food/ better environment/ strengthen rural identity/ culture/landscape/ biodiversity/ heritage/eco-tourism. Local sourcing of foodstuffs beneficial against disbenefits of importing food.</p> <p>Issue 17- Before employment sites are re-used for other purposes, developer must prove no longer viable as an employment site.</p> <p>Issue 18. Ecologist- all options viable adds another one-recognising robust, sustainable agriculture and local food production is a key to a holistic sustainable approach. - Agriculture requires greater consideration throughout the SWJCS. Option 6, add "sustainable" before "environmental technologies"</p> <p>Issue 19- retail provision-Option 5 supported</p> <p>Ecologist- option 4 and 6 agreed</p>	<p>Noted</p> <p>Noted</p> <p>Agreed</p> <p>Noted, but we will also be assessing the transport evidence.</p> <p>Noted</p> <p>Agreed</p> <p>Noted</p> <p>Noted</p>

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87		<p>Issue 20-For Worcester & the market towns need to focus on people rather than vehicles to enhance the quality of the environment. - Promote city/ town centres to people in conjunction with sustainable transport & services. Include demand management measures to include:</p>	Noted
		<ul style="list-style-type: none"> •Restructuring of central area parking- Move long stay to edge of centre & Park & Ride and interchange hubs. •Promote high-turn-over, short stay parking •Parking control zones (if needed) •Provide passenger transport/cycle/walk priority access into/across city & towns. •Provide a good mix (of land uses?) 	Noted
		<p>Issue 21 Transport section – see responses to Section 1 & 20.</p>	Noted
		<p>Improve public spaces- reduce severance effect of heavy traffic by greater use of shared road space- priority (in order)-pedestrians, cyclists and public transport.</p>	Noted
		<p>Issue 22- Transport section- Support Option 6 Ensure tourist/ leisure attraction are linked to main town / city centres by attractive/ direct pedestrian routes.</p>	Agreed
		<p>Ecologist- supports option 1 & 5. Option 4- multiple smaller tourism opportunities may be preferable.</p>	Noted
		<p>Better Environment for today and tomorrow. Issue 23- Preferred options will need to address PPS 9 on biodiversity and geodiversity beyond designated sites. Option 4 – developers need to provide biodiversity gain.</p>	Noted. But this was not meant to be draft wording for the Preferred Option report, just background on the Issues and Options.
<p>Ecologist- New Option suggested -development should adhere to PPS9, and associated circular and good practice guidance. - But to be compliant needs routine input of ecological expertise into the planning process- unlikely therefore to be achieved.</p>	Noted		
<p>Options 1,2 & 4 are PPS9 compliant. Suggested rewording of last sentence of 7.5...to include enhancement of habitats</p>	Noted		

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87		<p>where appropriate (see scanned report)</p> <p>Archaeology-Need a study on the full range of historic assets. (See under other issues, below)</p> <p>Issue 24 should also refer to the role of the historic landscape in shaping today's landscape. - E.g. buried archaeological remains. Need to consider the condition of the landscape as well as visual impact analysis. Protect all statutory areas and those of local importance/ local distinctiveness.</p> <p>Suggest a new draft option 4 "Safeguard the rural landscape character and local distinctiveness of South Worcestershire, monitoring and where appropriate enhancing its condition, paying particular attention to the most significant and sensitive components that define its character." Reasons are:</p> <ul style="list-style-type: none"> •Option 1 is against Govt guidance, European landscape Convention, Structure plan, RSS- Need to care for the whole landscape- not just AONB's •Option 2- shouldn't just focus on urban fringe areas. •Option 3 – best of the options given, but may imply fossilising existing landscape instead of accommodating some change in the most appropriate/ least damaging way, safeguarding the essential landscape characteristics. <p>Para 7.6 New wording is suggested to clarify the second part of this paragraph (see scanned report)</p> <p>Issue 25-Flooding-Options 2,3,4 & 5 easily accommodated. Ensure developments provide adequate drainage, that they upgrade existing facilities downstream.</p> <p>Ecologist- all options appropriate—additional options:</p> <ul style="list-style-type: none"> -Opportunities should be taken to use all available land in floodplain for flood mitigation- consider CPO powers for this -Development designed for the purpose of flood mitigation should be permitted -Change of land use where facilitates flood mitigation should be permitted. <p>Issue 26 -should also refer to historic character of a locality.</p> <p>The focus of the issue could be clearer- Prefers option</p>	<p>This is being undertaken.</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p>

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87		<p>4(other), "Prepare design guidance for new development based on landscape character assessment of the built environment, including its open spaces, and ensure that all new development is informed both by such guidance and also by visual impact analysis".</p> <p>The other options are also in some way acceptable:</p> <p>Option 1- useful that it considers the landscape character of urban as well as rural areas.</p> <p>Option 2, should be considered as part of option 1.</p> <p>Option3, as above, fine if a range of options, rather than 1 can be considered. And difficult to determine, e.g. how will "important views" be defined? Could say "Ensure new development conforms with the conclusions of visual impact assessment"</p> <p>Surely options 1,2 & 3 are already enforced through planning.</p> <p>Transport section- support Option 7- i.e. in some other way- i.e. ensure development is designed & located to reduce the need to travel by car-opportunities to walk, cycle, use public transport.</p> <p>Ensure all new development uses local and recycled materials- but will there be sufficient to meet demand. -If greater use of quarries required, this will impact on Green Belt / local communities.</p> <p>Issue 27 Needs more emphasis on climate change.</p> <p>Insufficient attention given to issues of water infrastructure & water quality.</p> <p>Welcome promotion of renewable energy but preferred option should make this subservient to energy conservation. And note under option 6 that PPS22 does not regard energy from waste as a renewable source.</p> <p>Preferred option should also consider sustainable construction standards. Refers to County papers on planning for water, renewable Energy and Climate change due early 2008.</p> <p>Ecologist- additional option- water saving and harvesting perhaps.</p> <p>Issue 28- waste management facilities—locate where transport links to the site are most suitable. Only one site in</p>	<p></p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Preferred Options will reflect this.</p> <p>Noted</p> <p>Noted</p> <p>Noted</p>

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87		<p>an area could increase mileage.</p> <p>Improving Health and Wellbeing. Issue 29- green open space network-could refer to Access to land Chapter of the Worcestershire Countryside Access & Recreation Study.</p> <p>-Ask for contributions from development- caution- if we expect too much planning gain, sites will need to be bigger- financial contributions for existing facilities may be more appropriate in some cases.</p> <p>Issue 29- historic features can add to the interpretation value of green open spaces. Ecologist Option 1 add, "which maintain functional ecological connectivity with strategic wider countryside ecological networks. Option 2 not preferred. Option 3 preferred. Option 4 possibly too rigid. Issue 30- Ensure good accessibility to healthcare facilities- and include them in larger sites.</p> <p>Ecologist- would benefit from consideration of outdoor on mental / physical well being. Issue 31. Need to take account of other less formal educational opportunities- e.g. archaeology courses.</p> <p>Transport section. Ensure majority of residents have safe & direct pedestrian routes (less than 1 mile) to primary school.</p> <p>Good walking, cycling, public transport access (max 60 mins journey) to secondary schools & further education facilities. Improved passenger transport to Worcester University.</p> <p>Ecologist-learning through re-connection with indigenous culture / heritage, including biodiversity/ countryside/rural.</p> <p>Communities that are Safe and Feel Safe. Ecologist- Need to be proactive urban and rural landscaping design, as well as access to open space/nature and social/</p>	<p>Noted</p> <p>Noted. The important issue is that developers no what will be required of them before purchasing the land</p> <p>Agreed</p> <p>The Joint Core SDstrategy aims to achieve this.</p> <p>Agreed</p> <p>Noted Agreed, but not an issue for the Core Strategy.</p> <p>This may be achievable in large new urban extensions, but not so easy within existing housing areas.</p> <p>Agree</p> <p>Noted</p> <p>Agree</p>

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87		<p>cultural inclusion.</p> <p>Other Comments. Evidence: Historic environment assessments of potential growth areas should be undertaken prior to decisions on development. Sustainability appraisal outcomes questioned particularly in relation to absence of biodiversity and geodiversity data.</p> <p>Evidence; Need to acknowledge that the Environmental constraints study was commissioned in relation to the New Growth points study. -Criticises the study as emphasising wet habitats over dry habitats.</p> <p>Transport section- caution re asking for too much planning gain from developers- need to get the best realistic package from them.</p> <p>Education: Rule of thumb 100 new dwellings generate 2.9 children per year group based on 2001 census data. Debateable if this will be still valid over the 20year period. Generally school rolls have been generally in decline- county population projections are for continued decline despite overall pop increase. Could impact on areas not experiencing housing increase. And place pressure on existing places in areas where housing increases. But need to consider in relation to each site housing mix.</p> <p>They provide details of projected school aged children over the 20-year period for each of the 3 RSS option-housing targets. (See scanned document). For Option 2 South Worcestershire as a whole shows a -4.3% decrease in 5-9 year olds and a -13.6% decrease in 10-14 year olds for the dwelling increase of 24,500 dwellings.</p> <p>Education contributions are collected through S.106 agreements. If there are insufficient school places financial contributions are requested (for 5-100 dwellings) based on the 2.9/100 dwelling ratio.</p>	<p>Noted. Further work is being carried out.</p> <p>Noted. This is ongoing work, which will help develop the policies.</p> <p>Noted.</p> <p>The important issue will be that developers are aware of what is required from them at the time of land acquisition.</p> <p>Noted</p> <p>The County Council's Children's directorate are fully engaged and will be providing and updating the evidence as required.</p> <p>Noted.</p> <p>Noted</p>

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87		<p>For larger sites, the County Council, with the District Council may negotiate for land for a new school.</p> <p>If a larger development is broken down into smaller phases, with different developers this may make it difficult to agree appropriate contributions.</p> <p>It is preferable to identify & allocate a school site at an early stage if required, to avoid negotiations with developers over release of expensive potential housing land.</p> <p>Re new settlement-Optimum size for primary school in an urban area, or large settlement is 2 form entry- 60 pupils a year. Thus a new settlement of 5,000 houses would require 2 new primary schools- and so on, pro rata.</p> <p>The larger the new settlement the more likely it could support a new middle or secondary school, reducing travelling distances- therefore more sustainable settlement would be nearer 10,000 than 5,000 dwellings.</p> <p>Table provided summarising current school organisation in South Worcestershire. May require area reviews within the SWJCS plan period.</p> <p>Population forecasts (county) predict fall in 15-19 year olds over SWJCS plan period- will depress demand for post 16 education. But if education post 18 becomes compulsory (Queen's Speech, 2007) may increase.</p> <p>School rolls are falling in rural areas. If pressure for schools to close because of this, need to be aware of potential housing growth in villages at an early stage. In general, some development would be welcome in villages with a school.</p> <p>Appendix provided which summarises current school provision for each settlement- Notes that this provision cannot be guaranteed over the plan period.</p> <p>Lists which villages, by category (1,2, 3) are within 2 miles of primary schools/ 3 miles of secondary schools, see scanned report)</p>	<p>Noted</p> <p>Noted</p> <p>Agreed.</p> <p>Noted</p> <p>Noted. At present the evidence points to urban extensions rather than a new settlement.</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p>

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		<p>Sustainability Appraisal Comments from the ecology section: Summary: Sustainable development will not be achievable in the absence of adequate baseline biodiversity and geodiversity data analysis along with full consideration of biodiversity and geodiversity.</p> <p>Suggests wider biodiversity, outside designated sites does not appear to have been adequately taken into account in the Scoping Report, the Green Infrastructure study (draft), the outline Environmental Constraints Study, the development of Issues and Options paper or the SA analysis.</p> <p>Section 2 of Issues & Option paper Comments from the ecology section: Section 2 describes and considers the importance of the rural character and heritage reasonably well, as are Landscape character, environment & landscape. But consideration of the importance of the areas biodiversity (wildlife, habitats, etc and geological diversity is not adequate. Reference is made to PPS9, to which the SWJCS will need to be compliant.</p> <p>Para 2.4 Setting the scene. Good – need to add discussion / description of the biological and geological heritage of the area.</p> <p>Para 2.6. Place economic prosperity as a lower 'challenge'.</p>	<p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p>
88	West Midlands Regional Assembly (David Thew)	<p>Vision. Vision & objectives generally align with RSS Revision It would have been useful to see if any other vision statements had been considered to provide a choice</p> <p>Para 1 of vision could be strengthened to refer to the need to focus development into a named network of market towns especially to create a network of rural service centres. Para 2 could be strengthened to refer to dual need</p>	<p>Noted</p> <p>To do so at Issues & Options stage would have pre-empted growth options locations. We will take this into account in refining the vision for the Preferred Options but our feeling is that this would increase commuting and not make South Worcestershire sustainable which is our primary objective</p>
88			

ID No	Name	Comment	Officer Response
88		<p>to diversify the rural economy and improve skills base across sub-region.. Also refer to need to make prudent use of natural resources, including sustainable management of waste. Also reference to a more robust description of the role & growth aspirations of Worcester & need to build the functional transport links to the MUA to support urban renaissance in the region.</p> <p>Objectives Spatial objectives are too inspirational- need to be able to be monitored.</p> <p>Objective 2 re reduction of carbon footprint – refers to RSS Policy RR4 and UR4</p> <p>Stronger Communities. Due to timing of RSS Preferred Option, some of Stronger Communities options do not conform. RSS Option 2 figures now apply. –see pares 3.60-3.65 gives sub-regional context.- & refer to RSS policies CF2 & CF3</p> <p>Issue 1-Option 1-3 generally in conformity with RSS phase 2 Preferred Option. (RSS P.O-Re suitability of villages for growth- Para 6.21 (RSS P.O) allows some flexibility re small scale housing in smaller rural villages-These may not be in the 3 categories described. If Option 3 pursued, refer to RR1-RR4 of RSS but these policies may change under RSS phase 3 revision Issue 2: Option 1 would be against part E of emerging RSS Policy SR2: Option 5- Creation of free-standing eco-town does not accord with existing or phase 2 RSS policy, although RSS may require minor review to identify preferred location of eco-towns-(Ref DCLG Eco –town prospectus). Any housing provided through eco-town would be in addition to RSS figures.</p> <p>Issue 3 No support for options 4 & 5, which suggest that the green belt could be extended.</p>	<p>We believe they can be, and the criteria for doing so will begin to be developed through the Preferred Options document.</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Difficult to be in conformity with constantly changing higher tier plan. SWJCS option for a free standing settlement was produced ahead of the Government's Eco-Town proposals and was considered to go towards meeting the RSS targets.</p> <p>Noted</p>

ID No	Name	Comment	Officer Response
88		Issue 4 Option 3- focussing development n of Worcester in green belt would need to be in context of Objective d) of RSS P.O.	Noted
		Option 6-Option 5- Creation of free-standing eco-town does not accord with existing or phase 2 RSS policy, although RSS may require minor review to identify preferred location of eco-towns-(Ref DCLG Eco –town prospectus). Any housing provided through eco-town would be in addition to RSS figures	
		Issue 5: category 3 villages for balance of growth not in accord with CF2C- priority to those villages with range of services- mainly Cat 1 (& possibly cat 2)	Noted
		Option 5 – Directing growth to RRZ not accord with emerging RSS policy CF2	Noted
		Issue 6: Option 4 & 6 would not conform to emerging RSS policy PA6(1) as fail to provide a portfolio of employment land.- and would not be inline with Sub regional implications of RSS Preferred Option re Worcestershire.- see Para 3.65	Noted
		Issue 7: Option 1 would not accord with RSS policy CF2C, which doesn't restrict housing development to just affordable.	Noted
		Option 4 not in line with CF2C or Para 6.21	Noted
		Comments of Rural Policy Lead	
		Need to identify inter-relationship between urban & rural areas in an appropriate settlement hierarchy Need to diversify and modernise the rural economy within the RRZ	Noted
		Meeting the needs of All generations	
Issue 12. All options generally in line with CF7 of RSS- but need to address need for affordable housing targets (social rent & intermediate); - Need to address approach to delivering affordable housing- e.g. LA's need to set out basis for S106 negotiations.	Agreed Noted		
Issue 13. Options 1, 2 & 4 in line with CF8 of RSS-	Noted		
Option 3 (allow building industry to decide housing mix) would not be in conformity	Noted Noted		

ID No	Name	Comment	Officer Response
88		Issue 14. Options 2 & 3 in line with part B of CF8, regarding housing needs of the elderly, but fails to address needs of other groups-e.g. students- important in Worcester context.	Noted
		Both Issues 13 & 14 "fail to reflect any spatial dimension... such as providing for higher value housing in some settlements e.g. Worcester to retain those with well paid jobs in the community"	Noted
		Issue 15 Options 1 & 2 inline with RSS policy CF9- but option 2 is only one tool- not a stand alone policy on it's own	Noted
		Additional point: SWJCS should consider managing the housing supply in accordance with emerging RSS policy CF10	Noted
		Economic Success that is shared by all. SWJCS should be mindful that employment land to be provided is also suitable for some sui generic uses such as waste management as well as B1 (except town centre offices), B2 & B8.	Noted
		Issue 17 Options 1 & 2 do not accord with emerging RSS policy PA6B which requires demonstration that land makes an important contribution to the portfolio before protection from competing uses.	Noted
		Option 3 may provide evidence towards PA6B, but not conform with PA6B.	Noted
		Issue 17 Option 7. RRZ policies must comply with RR2- this may be subject to revision in Phase 3 of RSS revision	Noted
		Issue 19, Option 3 would be contrary to emerging policy PA11, which see Worcester as preferred location for major retail dev.	Noted
		Option 5- would need to align with emerging policy PA6B- and also take account of PA11, PA12A, PA12B and PA13 retail provision.	Noted
Option 6 may not accord with emerging policy PA13- depends on interpretation of "strictly".	Noted		

ID No	Name	Comment	Officer Response
88		<p>Issue 20 –should have regard to emerging RSS Policies PA10, 11,12A, 12B and 13A Issue 21 Option 5- Increase in town centre parking unlikely to be in conformity with emerging policy T7.</p> <p>Better Environment for today and tomorrow. Issue 23 Option 3 would not be in conformity with RSS policies QE1 iii) & iv) and QE7i). However RSS QE policies may be subject to change in RSS phase 3 revisions</p> <p>Issue 24 Options 1 & 2 contrary to RSS QE6 & 7</p> <p>Issue 25 Option 7 May not accord with existing RSS stance on Development & Flood risk- sequential approach (PPS25) may allow for some development in flood plain.</p> <p>Issue 27, option 6 and none of options in Issue 28 can be addressed in SWJCS- i.e. Worcestershire County council responsibility to allocate.</p> <p>And RSS doesn't encourage production of energy from waste.</p> <p>Communities that are Safe and Feel Safe. No potential issues of conformity.</p> <p>Other Comments. NB: These representations are informal views as part of the front-loading of the development plan process- - gives advice on whether certain options if pursued would likely to conform to RSS. Conformity has been undertaken against RSS Preferred option 2 of Phase 2 partial revision, and those in existing RSS not under revision. Comments of Rural Policy Lead: Section 2 of the I & O paper adequately summarises the issue covering the need to manage the scale/nature of development in villages &</p>	<p>Noted</p> <p>Noted. This will need to be assessed when we reach Submission stage, and the RSS progressed hopefully to adoption.</p> <p>Noted as above.</p> <p>Noted as above.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted</p> <p>Noted</p> <p>Noted</p>

ID No	Name	Comment	Officer Response
		<p>hamlets to deliver sustainable development- whilst protecting open countryside, natural resources, assets such as river corridors/ flood risk areas/green belt, important landscapes (e.g. AONB's), sensitive habitats and biodiversity.</p> <p>Lists the RSS policies that should be addressed by RSS- These are: RR2, RR3, RR4, PA14, PA15. (See scanned document).</p>	Noted
89	RPS Planning on behalf of Persimmon Homes South Midlands Ltd.	<p>Site Promoted – Land at Yew Tree Hill, Droitwich Spa.</p> <p>Vision Disagree. Should recognise that the provision of all forms of housing is required and not just affordable. Stronger Communities. Issue 1 - Disagrees with settlement hierarchy, feels it is unsustainable. Issue 2 - SWJCS rely too heavily on brownfield sites.</p> <p>- Retention of Green Belt should remain to existing boundaries.</p> <p>Issue 5 - Promotes SE Droitwich, in particular Yew Tree Hill, for delivering housing. Issue 6 - Employment strategy should provide opportunity for local businesses, in ward investment and follow proposed development. Issue 7 - Only promote dev in villages to meet affordable housing needs Issue 8,9 & 10 - SWJCS must promote dev strategy, which reduces need to travel by car. Issue 11 - Obligations not always best solution, physical development most effective way to deliver infrastructure</p>	<p>This will be considered in the SHLAA report viewable on the website.</p> <p>Disagree. This is not a reference to social housing but to all housing, which should be affordable to those who need to purchase. Disagree.</p> <p>We wish to see development take place on brownfield land before Greenfield wherever practical. However, overall the Preferred Options will give broad locations for significant Greenfield development. Noted, but we have carried out a Green Belt Review to check this out.</p> <p>Noted, this is considered in the Preferred Options Agreed, we wish to encourage the growth of local businesses and the Preferred Options will seek to do this.</p> <p>Noted</p> <p>Agreed, and this will be a central objective of the Preferred Options.</p>

ID No	Name	Comment	Officer Response
		<p>projects.</p> <p>Meeting the Needs of All Generations Issue 12 - None of the options recognise the need to locate housing growth to larger dev sites at sustainable locations, which will ensure affordable housing. Issue 13 - All developments to provide a mix of housing sizes and types to take into account character of area.</p> <p>Issue 14 - Only locate specialist homes for the elderly in locations accessible to facilities and public transport.</p> <p>Economic Success that is shared by all. Issue 17 - Important employment sites should be protected.</p> <p>Better Environment for today and tomorrow. Issue 24 Protect only statutorily protected landscapes. A review and need for Special Landscape Area, especially in Droitwich, needs to be undertaken. Issue 25 - Allow development in areas subject to surface water run off flooding, as long as mitigation in place. - Development should not be directed to functional flood plains. Issue 27 - Centralised approach should be adopted to future development</p> <p>Other Comments. See Droitwich as a logical urban extension and Yew Tree Hill as broad area for future growth.</p>	<p>Noted.</p> <p>This would be an in built principle. This Issue is about how much should be provided in any given development. Agreed</p> <p>Noted</p> <p>Agreed</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p>
90	Mr B.G Newland	<p>Other Comments. Parish Councils suggests a limited number of housing – between 40-50 new homes between 2008-2026, including affordable housing.</p>	<p>Noted</p>
91	North Tewkesbury Land Consortium. (RPS Group – Paul Hill)	<p>Site Promoted – Land to the north of Tewkesbury. Vision.</p>	<p>This will be considered in the SHLAA report available on the website.</p>

ID No	Name	Comment	Officer Response
91		<p>Disagree. Vision is inward looking and fails to make a connected role, function and physical relationship to settlements in adjoining Districts.</p> <p>Objectives Strongly disagrees – specifically on stronger communities- fails to acknowledge a need for some of Tewkesbury's development requirements to be met in South Worcestershire.</p> <p>Stronger Communities. Issue 1 - Disagrees with settlement hierarchy, feels it is unsustainable, not recognising need to reduce travel and climate change and will result in dispersed approach. - Settlement hierarchy is a piecemeal approach to development strategy. - Presents an analysis of settlement hierarchy that implies the total number of housing may exceed the total amount of required housing numbers..General windfall dev should be allowed in Cat.1 villages, Exception sites and residential conversions allowed in Cat 2 & 3 villages, although no residential conversions in the open countryside. - Tewkesbury should be recognised in the development strategy</p> <p>- Sees the hierarchy of settlements as a rolling forward process of the existing MDC local plan and not having regard to emerging RSS. Issue 2 - Concentrate strategic growth in areas of Evesham, Malvern, Droitwich Spa, Pershore and Tenbury Wells, rather than dispersed approach. - SWJCS should recognise development, social and economic relates to needs of Villages in S. Worcs. - Issue 5 - Promotes Tewkesbury as a principle urban area, in particular land at Mitton, for delivering housing.</p> <p>Issue 6 - Employment strategy should provide opportunity for local businesses, in ward investment and follow proposed development, which is sustainable.</p>	<p>Noted. The Vision will be refised in the Preferred Options</p> <p>This is not a requirement of the West Midlands RSS or that for the South West.</p> <p>Noted. It has been reviewed and the evidence suggests it is sound.</p> <p>Noted – See above.</p> <p>Noted</p> <p>The South West Regional Spatial Strategy Panel Report does not set out a need for cross boundary development. Disagree.</p> <p>The Preferred Options already does this.</p> <p>The Preferred Options already does this.</p> <p>Cross boundary development is not required at this stage.</p> <p>The Preferred Options does this.</p>

ID No	Name	Comment	Officer Response
91		<p>- Mixed use developments should be considered Issue 7 - Only promote dev in villages to meet affordable housing needs Issue 8,9 & 10 - SWJCS must promote dev strategy which reduces need to travel by car. Issue 11 - Obligations not always best solution, physical development most effective way to deliver infrastructure projects</p> <p>- Meeting the Needs of All generations</p> <p>- Issue 12 - None of the options recognise the need to locate housing growth to larger dev sites at sustainable locations, which will ensure affordable housing.</p> <p>- The dispersed housing approach is not the solution for addressing affordable housing. Issue 13- All developments to provide a mix of housing sizes and types to take into account character of area. - SWJCS needs to make sure strategic development requirements are delivered through allocating land on large housing sites. Issue 14 - Only locate specialist homes for the elderly in locations accessible to facilities and public transport.</p> <p>Economic Success that is shared by all. Issue 16 - Promote and protect specific types of employment</p> <p>Issue 17 - Important employment sites to the area should be protected.</p> <p>- QinetiQ site at Malvern should be retained for future employment.</p> <p>Better Environment for today and tomorrow. Issue 25 - Allow development in areas subject to surface water run off flooding, as long as mitigation in place.</p>	<p>It will be.. Noted</p> <p>The Preferred Options aims to do this. Noted</p> <p>Disagree. This Issue is about how much should be provided in any given development. Noted</p> <p>Noted</p> <p>Agreed</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p>

ID No	Name	Comment	Officer Response
		<p>- Dev should not be directed to functional flood plains.</p> <p>Issue 27 - Centralised approach should be adapted to future development</p> <p>- Development should be focused near public transport and energy to be drawn from decentralised energy supply systems.</p> <p>Other Comments. Important to identify Tewkesbury as a economic and social focus for villages in SWJCS as SW RSS consider it as possible principle settlement for future growth.</p> <p>The periphery of Tewkesbury should be given cross boundary growth options.</p>	<p>Agreed</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Cross boundary issues are being taken into account as appropriate. The South West Regional Spatial Strategy Panel Report does not recommend any need for development in South Worcestershire.</p>
92	Kensington and Edinburgh (RPS – Philip Rawle)	<p>Site Promoted – Land to the south west of Tenbury Wells.</p> <p>Vision - Disagree. Vision is inward looking and fails to make a connected role, function and physical relationship to settlements in adjoining Districts.</p> <p>Objectives - Disagrees – specifically on economic success shared by all- should go a step further to promoting development growth in South Worcestershire.</p> <p>Stronger Communities. Issue 1 - Disagrees with settlement hierarchy, feels it is unsustainable, not recognising need to reduce travel and climate change and will result in dispersed approach.</p> <p>- Settlement hierarchy is a piecemeal approach to development strategy.</p> <p>- Presents an analysis of settlement hierarchy that implies the total number of housing may exceed the total amount of required housing numbers...General windfall dev should be allowed in Cat.1 villages, Exception sites and residential</p>	<p>This will be considered in the SHLAA report viewable on the website. We will take this into account in refining the vision for the Preferred Options</p> <p>Disagree.</p> <p>Noted. The proposed hierarchy has been reviewed and the evidence suggests that it is sound. Noted – See previous comment.</p> <p>Noted</p>
92			

ID No	Name	Comment	Officer Response
92		<p>conversions allowed in Cat 2 & 3 villages, although no residential conversions in the open countryside. - Sees the hierarchy of settlements as a rolling forward process of the existing MDC local plan and not having regard to emerging RSS. Issue 2 - Concentrate strategic growth in areas of Evesham, Malvern, Droitwich Spa, Pershore and Tenbury Wells, rather than dispersed approach.</p> <p>Issue 5 - Distribute growth amongst Droitwich, Evesham, Malvern, Pershore and Tenbury Wells. - SWJCS should look at broad areas for development on the southern side of Tenbury Wells.</p> <p>Issue 6 - Employment growth should principally be at Worcester and remainder in Droitwich, Evesham, Malvern, Pershore Tenbury Wells, and Upton opportunity for local businesses, in ward investment and follow proposed development, which is sustainable. - Mixed use developments should be considered</p> <p>Issue 7 - Only promote development in villages to meet affordable housing needs Issue 8,9 & 10 - SWJCS must promote development strategy which reduces need to travel by car. Issue 11 - In some other way - Obligations not always best solution, physical development most effective way to deliver infrastructure projects Meeting the Needs of All generations. Issue 12 - None of the options recognise the need to locate housing growth to larger development sites at sustainable locations, which will ensure affordable housing.</p> <p>- The dispersed housing approach is not the solution for addressing affordable housing.</p> <p>Issue 13- All developments to provide a mix of housing sizes and types to take into account character of area. - SWJCS needs to make sure strategic development requirements are delivered through allocating land on large housing sites.</p>	<p>Disagree</p> <p>The Preferred Options does this.</p> <p>The Preferred Options does this.</p> <p>The Preferred Options considers this.</p> <p>The Preferred Options does this.</p> <p>Agreed Noted</p> <p>The Preferred Options aims to do this.</p> <p>Noted</p> <p>Disagree</p> <p>Noted</p> <p>Agreed Noted</p>

ID No	Name	Comment	Officer Response
		<p>Issue 14- Only locate specialist homes for the elderly in locations accessible to facilities and public transport.</p> <p>Economic Success that is shared by all. Issue 16 - Promote and protect specific types of employment</p> <p>Issue 17 - In some other way- in relation to issue 16 and 17- specific employment sites that are important to the economy should be protected. - Qinetiq at Malvern should be protected for future employment</p> <p>Better Environment for today and tomorrow Issue 25 - Allow development in areas subject to surface water run off flooding, as long as mitigation in place. - Dev should not be directed to functional flood plains.</p> <p>Issue 27 - Centralised approach should be adapted to future development</p> <p>- Development should be focused near public transport and energy to be drawn from decentralised energy supply systems.</p> <p>Other Comments. Concern that the SWJCS is just adjusting previous strategies, which cannot deliver growth sustainably. Land at Oldwood Road, Tenbury Wells should be identified for development growth. This was considered in the SHLAA report viewable on the website.</p>	<p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Agreed</p> <p>Noted</p> <p>Noted</p> <p>Noted.</p> <p>This is too detailed for a Core Strategy.</p>
93	Boyer Planning Ltd (Owen Jones) on behalf of JS Bloor Ltd.	<p>Site Promoted – Land at Olbury Road, Worcester.</p> <p>Vision - Suggests alternative vision to the final sentence of the final paragraph ‘Worcester will continue to be the focus for housing development reflecting its strategic status and pre-eminent role within the sub region’.</p> <p>Objectives – Agree with public transport and highway network objective.</p>	<p>This will be considered in the SHLAA report viewable on the website. We will take this into account in refining the vision for the Preferred Options</p> <p>Noted.</p>

ID No	Name	Comment	Officer Response
93		<p>Meeting the needs of all generations should be amended to include 'this objective should be achieved in the context of RSS 11'.</p> <p>Stronger Communities. Issue 1 - Support.</p> <p>Issue 2 - the settlement hierarchy should guide location of new development and Worcester should be the focus for new development - option 2 is rightly based upon identifying areas in the edge of Worcester. - Inappropriate to distribute housing to land on edge of other settlements. - Concept of a new settlement is not a realistic option Issue 3:- no Green Belt to the west of Worcester and therefore preferable to future development. - No exceptional circumstances that would warrant an alteration to the Green Belt. Issue 4- Support Option 2 - focus development to the west of Worcester. - Raise concerns about the suitability of breaching M5 boundary to the east & does not support allowing development to the north, within the greenbelt. - Rejects a new settlement</p> <p>Issue 6 - Support Option 1 – principally at Worcester with remainder at Droitwich, Evesham and Malvern. Issue 8- Development should be situated in close proximity to employment, community facilities etc, with public transport linkages to urban areas and key destinations. Issue 10 - Development and transportation strategy to the west of Worcester would be the most suitable option. Agree with White Young Green report on benefits to North West Link Road to provide necessary improvement to local transport network. Issue 11 - Infrastructure should be provided in conjunction with new development</p> <p>Meeting the Needs of All generations</p>	<p>Disagree, all the objectives need to be achieved in the context of RSS</p> <p>Noted</p> <p>Agree</p> <p>Agree</p> <p>Noted, but in some cases this will be the most sustainable option. Noted, but it had to be considered. Noted.</p> <p>Noted</p> <p>Emerging evidence does support this view.</p> <p>Noted. The Preferred Options is unlikely to promote this given the evidence.</p> <p>Noted</p> <p>The Preferred Options aims to do this.</p> <p>Noted. The emerging evidence does not support the North West by-pass.</p> <p>Agreed. The Joint Core Strategy aims to achieve this.</p>

ID No	Name	Comment	Officer Response
		<p>Issue 12 - The SWJCS needs to ensure adequate number of housing that is flexible and responsive to ensure delivery.</p> <p>Other Comments. Support urban extension to Worcester on the western side.</p>	<p>Agreed</p> <p>Noted</p>
94	Sharba Homes CSJ Brooke Smith	<p>Site Promoted – Land at Honeybourne</p> <p>Stronger Communities. Issue 1 - Support the settlement hierarchy, although the evidence base needs to be progressed Issue 2 - Evidence base for allocation of land in category 1&2 as having sustainability constraints needs to be clarified. Issue 5 - identification of large towns and cat 1&2 villages have a positive/unknown sustainability score – this is inconsistent with Issue 2. SHLAA document should be available on the website. Issue 7 - Supports identifying needs of housing and employment for rural communities. Needs to be new approach to meeting housing employment needs to reduce the level of migration and offer a spatial approach. The Village Facilities and Rural Transport Survey should be available to view.</p> <p>Meeting the Needs of All Generations Issue 12 - generally acceptable although category 1 villages excluded as being an option. A variety of approaches needed to facilitate affordable housing i.e. exception sites, shared ownership schemes and part affordable housing - this should be based on parish surveys. Evidence should be gathered for the range and type of housing required. Redevelop existing sites should be considered. Issues 14 - need to maximise development opportunities in towns and villages</p> <p>Economic Success that is shared by all. Issue 17 - require developers to demonstrate that continued employment use is not viable before letting sites</p>	<p>This will be considered in the SHLAA report viewable on the website.</p> <p>Noted. This has been re-visited</p> <p>Noted</p> <p>Noted (CHECK)</p> <p>Agree Agree. The Preferred Options aims to achieve this.</p> <p>Agree</p> <p>Noted</p> <p>This has been done through the Housing needs assessment. See the evidence on the website.</p> <p>Noted</p> <p>Agreed</p>

ID No	Name	Comment	Officer Response
		<p>go for other use is the most flexible approach. Issue 18 - promote employment and housing in towns and cat 1 is effective way to strengthen rural economy.</p> <p>Issue 22 - new tourism and leisure developments and expansion of developments should be allowed where sufficient infrastructure</p> <p>Better Environment for today and tomorrow. Issue 25 - development should be directed away from areas of flood risk.</p> <p>Issue 27 - The settlement hierarchy should be considered in terms of energy conservation. Issue 29 - Private green space is not defined in the core strategy paper.</p> <p>Needs to refer to annexe b of PPS3 for definition of private Open Space.</p> <p>The scope of the 'Green Infrastructure Study' needs to be set out in greater detail and is not illustrated in glossary.</p> <p>Improving Health and Wellbeing. Issue 31 - SWJCS should maximise dev potential of existing school sites to achieve local housing and educational needs.</p> <p>Other Comments. SWJCS have not made it clear how the current consultation relates to other DPDs and whether the site allocations will be prepared at district level.</p> <p>Poor links with evidence base in the Core Strategy – documents need to be made available and also need to be more substantial.</p>	<p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Agreed</p> <p>Noted</p> <p>Noted</p> <p>Noted. The Green Infrastructure Study will be published prior to the Preferred Options consultation and “refreshed” prior to the publication of the submission document.</p> <p>Noted</p> <p>The Issues and options consultation did not relate to any other DPDs. It is likely that the Site Allocations DPD will be prepared at the South Worcestershire level. The evidence base is being expanded and is available on the website.</p>
95	Mr L Bishop on behalf of Warndon Parish Council	<p>Stronger Communities. These vital to the growth of Worcester: Issue 10: Option 3 and 4 supported, to dual southern link</p>	<p>Agree Evidence emerging from the transport</p>

ID No	Name	Comment	Officer Response
		<p>and build the NW bypass.</p> <p>Issue 11: Infrastructure: Need to improve education and health care facilities. Priority must be full range of adequate transport, social and recreational facilities for housing supply, in advance of development.</p> <p>Issue 12: Provision of affordable housing supported</p> <p>Other Comments.</p> <p>-Re water supply- no specific mention- perhaps a study of other schemes in the country may be advisable</p> <p>- Re- funding- there is no mention of how the strategies will be funded. apart from some from developers. Will Govt make funding available, and when? Are the three Authorities to fund the balance out of their resources?</p> <p>-Land ownership- doubtful that landowners will volunteer to sell their land, so will compulsory purchase be the final answer?</p>	<p>studies supports the dualling of the Southern Link Road, but not building the Northern relief road.</p> <p>Agreed. This is an objective of the Preferred Options.</p> <p>Noted</p> <p>Noted</p> <p>It will be a combination of Government Grants, and the Community Infrastructure Levy for which the details are still being worked out. The Districts themselves have very limited resources.</p> <p>Evidence (SHLAA) suggests this is not the case. Compulsory purchase is an option should land not be forthcoming.</p>
96	William Tooby on behalf of Bransford Webbs Plant Company.	<p>Vision.</p> <p>Vision misses the fundamental challenge of climate change.</p> <p>To achieve a 60% reduction by 2050 (Govt climate change bill) will require a 40% reduction by 2026. The vision / objectives does not reflect the lifestyle changes that will be required to achieve this reduction. —The statement of “continued economic growth throughout the region” is unlikely and undesirable if our priority is to save planet Earth.</p> <p>Better Environment for today and for tomorrow.</p> <p>Acknowledge importance of nature/ countryside, and reconnect with it</p> <p>Other Comments.</p> <p>Key issues re climate change:</p> <p>-developing the local economy, particularly food production</p>	<p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p>

ID No	Name	Comment	Officer Response
		& manufacturing. Stern Report on climate change-average emissions per head must fall from 7 to 2-3 tonnes of CO2 per year by 2050. Core strategy must foresee the growing public support for changing lifestyles to support climate change requirements	Noted Noted
97	G.L Hearn (Catherine Parker) on behalf of Tesco Stores Ltd.	<p>Stronger Communities. Support expansion of Worcester beyond admin boundaries Support Issue 10 – 4.10.4 Support Issue 8 – 4.8.2 Support Issue 4 – 4.4.2 & 4.4.6 Support Issue 2 – 4.2.3</p> <p>Meeting the Needs of All Generations Affordable housing requirements should be backed up by evidence and development constraints. Viability issues should also be noted in assessing affordable housing on a site-by-site basis.</p> <p>Economic success that is shared by all. Support Issue 19 – (6.19.5)</p> <p>Convenience stores should be planned as part of new developments.</p> <p>Support supermarkets to anchor district and local centres as well as additional expansion of existing district / local centres serving large residential areas.</p> <p>Other Comments. Questions role of WMRA as a non-elected body Issues raised regarding whether the Assembly should be agreeing the number of houses SW needs</p>	<p>This is required. Noted Noted Noted Noted.</p> <p>Noted. The Southern Housing Market Assessment has provided evidence in regard to Affordable Housing. This is available on the website.</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>These are not issues that the core strategy can address.</p>
98	David Pollit	<p>Other Comments. Questions role of WMRA as a non-elected body Issues raised regarding whether the Assembly should be</p>	<p>These are not issues that the Joint Core Strategy is permitted to address.</p>

ID No	Name	Comment	Officer Response
		agreeing the number of houses SW needs	
99	'Disappointed of Droitwich' (anon)	<p>Meeting the needs of All Generations Supports full range of homes</p> <p>Support affordable homes for first time buyers Better Environment for today and tomorrow. Briefly discusses themes linked to Issue 25. "No flood plain building"</p> <p>Other Comments. Queries consultation process, numbers of returned questionnaires compared with population, also questions whether all age groups (esp. young) have been adequately consulted.</p>	<p>Noted</p> <p>Noted</p> <p>Noted</p> <p>We feel we have had a reasonable response from most age groups. However, we will be seeking to improve this at the next stage.</p>
100	Acolus Rural provision services (Ted Rodgers) on behalf of DEFRA Estates Division.	<p>Site Promoted – Land west of Throckmorton Airfield.</p> <p>Vision - "We... have no comments to make at this time"</p> <p>Other Comments. Acorus have asked to be consulted at an early stage if an eco-town is being considered.</p>	<p>This will be considered in the SHLAA report viewable on the website.</p> <p>Noted</p> <p>Noted. Not a Preferred Option.</p>
101	GVA Grimley (Colin Bell) on behalf of Evesham Estates	<p>Site Promoted – Evesham Estates (Phase 3)</p> <p>Vision - Further emphasis on accommodating additional growth, particular in economic (employment development) terms.</p> <p>Stronger Communities. Issue 1 – Support options 1 and 2. Agree development should be based around a settlement hierarchy (Para 4.13). Issue 2 – Support a mixture of options 2 and 3. Land on the edge of Worcester and land on the edge of the South Worcestershire towns.</p> <p>Issue 3 – Where possible Green Belt land should be maintained & must be able to demonstrate growth cannot be accommodated elsewhere. Suggests a relative merits</p>	<p>This will be considered in the SHLAA report viewable on the website.</p> <p>Disagree. Our purpose is only to accommodate necessary growth.</p> <p>This has been applied in the Preferred Options</p> <p>Noted</p> <p>We have carried out a Green Belt Review, and looked at possible development sites in relation to it.</p>

ID No	Name	Comment	Officer Response
		<p>assessment to determine most appropriate locations for alterations.</p> <p>Issue 5 – Supports option 1. Raises issues of dormitory / commuter towns with special emphasis on Droitwich.</p> <p>Issue 6 – Agrees with option 1. Grimley states that communities that are less reliant on Worcester and the conurbation, economic development must be set as the priority.</p> <p>Issue 8 – strategically minimise the need for residents to travel (particular by car). Locally development patterns should make best use of existing public transport infrastructure. Support option 4.</p> <p>Issue 9 – Support option 1</p> <p>Economic Success that is shared by all. Address all options in issue 16</p>	<p>Agree</p> <p>Noted</p> <p>Agree. This is what we have tried to pursue through the Preferred Options.</p> <p>Noted</p> <p>Noted</p>
102	David Woodward	<p>Other Comments. Support the provision of elderly care accommodation in rural communities.</p>	<p>Noted</p>
103	Mr John Plumridge, Shrawley Parish Council	<p>Stronger Communities. Point 5 – “This document suggests a significant inward migration without identifying the major need for infrastructure”. River crossings being the highlighted concern.</p> <p>Point 7 – many village communities can accommodate a limited supply of new housing (local and migratory need). This loosely ties with issue 5 option 3. (...a balanced distribution in category 1 and 2 villages).</p> <p>Economic Success that is shared by all. Point 6 – discusses the viability of the rural economy being of considerable concern.</p>	<p>Point 5 – Issue 10 (4.10) looks at transport infrastructure priorities (E.g. river crossings) and Issue 11 asks how do we ensure the provision of infrastructure in advance of development.</p> <p>Noted</p> <p>Noted. This will be reviewed in arriving at the Preferred Options</p>

ID No	Name	Comment	Officer Response
		<p>The letter questions MHDC current policies in the “Rural Enterprise Zone” (RRZ) being “severely restricted”. This supports Issues 7 (options 2 and 3) and 18 option 7 – establish more flexible policies in RRZ</p> <p>Better Environment for today and tomorrow. Point 3 – links to issues 25 (flooding) and 27 (renewable energy sources). Issue 25 – partially supports option 7, however goes further by saying... curtail development on existing & potential flood plains. Issue 27 – the letter highlights... “the need for contingent action to mitigate the anticipated effects climate control”.</p> <p>Other Comments. The letter is predominantly a response to the WMRA's RSS and is “seriously concerned” with how the RSS figures have been derived. However the letter does discuss the provision of housing and associated infrastructure and small-scale employment from a rural perspective. Questions use of the phrase “affordable housing” being widely used without any apparent accepted definition.</p>	<p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>SWJCS Issues and Options document defines Affordable Housing as housing subsidised in some way for people unable to rent or buy on the open housing market. The definition includes key worker housing and shared ownership homes.</p>
104	Mr L East on behalf of Naunton Beauchamp Parish Council and Kineton and Dormston; Flyford Flavell; Grafton Flyford and North Piddle; Upton Snodsbury.	<p>Stronger Communities. No mention to specific issues or options however the letter does discuss the following points: Congested Roads</p> <p>“Upgrading road infrastructure if further houses are to built in the rural areas east of Worcester” (possibly agreeing with 4.10.1). The letter further discusses the need to provide facilities such as leisure centres and shops and employment. And queries the emergency services capabilities in servicing the proposed development.</p> <p>Economic Success that is shared by all. “...requirements for incremental jobs and infrastructure associated with the (increasing) people”</p>	<p>The Joint Core Strategy aims to address this by seeking to encourage people to use public transport.</p> <p>Noted, and the issues raised have been addressed in the Preferred options.</p> <p>Noted.</p>

ID No	Name	Comment	Officer Response
		<p>Better Environment for today and tomorrow. Letter identifies Grafton Church located in Grafton Wood being the only UK location of the rare Hairstreak butterfly. "Area north of the church has been identified as a Stone Age SSSI... anything but the most careful & sensitive development would result in the desecration of a beautiful and important heritage."</p> <p>Letter discusses that even if funds were available, schools, hospitals and employment could not be constructed in time to service the growth in population. Meaning further commuting/congestion. The letter explains this proposed development is contrary to national and international commitments to reduce carbon emissions.</p> <p>Other Comments. The letter is predominantly a response to the WMRA's RSS and feels it is "unacceptable not to have and see a proper justification for housing growth... backed up by data and evidence. However the letter does discuss the provision of housing and associated infrastructure and small-scale employment from a rural perspective.</p>	<p>Worcestershire Wildlife Trust (WWT) confirm the rarity of the butterfly as well as the Grafton church location however, the WWT state that the Hairstreak Butterfly is not confined to this one location and can be found along the South East and South West coasts of England. The WWT identify the destruction of hedgerows being the main threat to the species.</p> <p>These concerns are noted, and we will seeking infrastructure requirements to be in place for development.</p> <p>Noted</p>
105	D Withey	<p>Other Comments. Should be addressing the problems of soaring world population, rather than planning for further development.</p> <p>"What is proposed amounts to officially organised vandalism, and the continued desecration of countryside".</p> <p>". No intention completing such a questionnaire, which in effect would amount to condoning the insanity of such a scheme"?</p>	<p>This is beyond the scope of the Joint Core Strategy</p> <p>Noted</p> <p>Noted</p>
106	Caroline Williams on behalf of Worcester Community Housing	<p>Vision. Agree with 2.1. 3.1 objectives appropriate</p>	<p>Noted</p>

ID No	Name	Comment	Officer Response
		Issue 32 – Strongly agree with 9.32.2 and agree with 9.32.3	
107	RC Bowley	<p>Vision. Whilst the current strategy is looking ahead to 2026 any actions taken now must incorporate some thought to 2050 where recent forecasts tremendous growth in UK population</p> <p>Stronger Communities. Most important aspect relating to any new/further development is communications primarily road and/or rail</p> <p>Issue 4 – support 4.4.6 Issue 5 – disagrees with 4.5.4 small villages can only take a limited amount of infilling before character of village is changed.</p> <p>Some support for Issue 10 – 4.10.5 (in some other way) “roads can be readily built on the outskirts of existing conurbations, Worcester and six SW towns” this statement also suggests some support for Issue 5 4.5.2.</p> <p>Economic Success that is shared by all. “2nd most important consideration is employment” Long term prospects appear to be high tech employment. Again similar to stronger communities the letter suggests support for Issue 6 - 4.6.2.</p>	<p>The plan period is to 2026 but the Joint Core Strategy will need to be revised as time moves on.</p> <p>Agreed. This is why an integrated transport strategy will be central in our Preferred Options. Noted We will need to assess the character before pursuing any development to ensure that the character of our villages is retained.</p> <p>Noted.</p> <p>Noted Noted</p>
108	Mrs Grove	<p>Vision. Whilst the current strategy is looking ahead to 2026 any actions taken now must incorporate some thought to 2050 where recent forecasts tremendous growth in UK population</p> <p>Stronger Communities. Most important aspect relating to any new/further development is communications primarily road and/or rail</p> <p>Issue 4 – support 4.4.6</p> <p>Issue 5 – disagrees with 4.5.4 small villages can only take a limited amount of infilling before character of village is changed.</p>	<p>We will limit ourselves to 2026, but the preferred options will have an eye on the period beyond.</p> <p>Agreed which is why an integrated transport strategy will be central in the Preferred Options. Noted</p> <p>We will need to assess the character before pursuing any development to ensure that the character of our villages is retained.</p>

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		<p>Some support for Issue 10 – 4.10.5 (in some other way) “roads can be readily built on the outskirts of existing conurbations, Worcester and six South Worcestershire towns” this statement also suggests some support for Issue 5 4.5.2.</p> <p>Economic Success that is shared by all. “2nd most important consideration is employment”</p> <p>Long term prospects appear to be high tech employment. Again similar to stronger communities the letter suggests support for Issue 6 - 4.6.2.</p>	<p>Noted.</p> <p>Noted</p> <p>Noted</p>
109	Harriet Baldwin, Parliamentary Candidate for West Worcestershire.	<p>Stronger Communities. Issue 7 – some support for 4.7.1 affordable housing needs in villages Issue 9 – supports 4.9.6 (rail) Issue 10 – strong support for 4.10.3 Support for additional crossing over the River Severn (4.10.5). in addition to this old railway lines serving western parts of rural Worcestershire e.g. Malvern to Tewkesbury should be re-opened</p> <p>Other Comments. Directly involve parish and town councils directly in consultation process. Ask all parish and town councils for their housing needs... this would make the process (consultation) more acceptable to the communities.</p> <p>Questions WMRA/RSS population estimates. Suggests the use of longer-term average historic periods to project forward the population growth.</p> <p>Supports MHD allocated growth up till 2026, however strongly objects to Worcester city’s allocation being built within MHD at a loss of “...135 hectares of green field land”</p>	<p>Noted</p> <p>Noted Noted Emerging evidence does not support a northern bridge. There is no support from the Department of Transport (Rail) for this project.</p> <p>There is on-going consultation with Parish and Town Councils</p> <p>We have to be guided by the RSS.</p> <p>Noted, but it has been accepted that the Worcester growth cannot all be contained within the City boundary</p>
110	Pegasus Planning Group (Chris May) on behalf of Barratt Homes)	<p>Site Promoted – Land off Swinesherd Way.</p> <p>Vision - Supports paragraph 1.2 (role of Worcester City) &</p>	<p>This will be considered in the SHLAA report viewable on the website.</p> <p>Noted</p>

ID No	Name	Comment	Officer Response
110		<p>3.3 Vision is supported esp. emphasis on Worcester city as a sub regional focus. Objectives – Generally agree with paragraph 3.4</p> <p>Suggests acknowledging Worcester City as a major employment, retail leisure, university and tourist centre.</p> <p>Calculations (see letter) suggest the need for 32,597 dwellings up to 2026 in South Worcestershire and as such the JCS needs to plan for and be flexible enough to accommodate this level of requirement.</p> <p>Stronger Communities. Issue 1 – Support hierarchy esp. focusing growth to Worcester</p> <p>Issue 2 – Support 4.2.2 Issue 3 – Discussed but option not evident. Issue 4 – support 4.4.1 & 4.4.5 as the most sustainable options. Issue 8 – the letter does not fall in to a particular category however Pegasus does point out commuting can be elevated through appropriately balancing employment and housing development. Issue 9 – some support for 4.9.1 & 4.9.2 “encourage household to adopt sustainable travel patterns. E.g. the development of multi-modal interchange site (inc. park & ride) is encouraged.</p> <p>Meeting the Needs of All generations. Issue 12 – Little reference to specific options however does iterate that Lap’s should set out their requirements for</p>	<p>Noted</p> <p>We believe this acknowledged in chapter 2, within the vision and elsewhere. However, it will also be prominent in the Preferred Options</p> <p>We have used the Option 2 figures in the Regional Spatial strategy Preferred Option. However, we have ensured that our Preferred Options are flexible enough to be able to accommodate more although it will be at a cost to our environment.</p> <p>Noted, this is included in the Preferred options.</p> <p>Noted Noted Noted</p> <p>Noted</p> <p>Noted. The Preferred Options will be supportive of this approach.</p> <p>The Joint Core Strategy deals with the strategic implications. Detail will follow in</p>

ID No	Name	Comment	Officer Response
		<p>affordable housing within the SWJCS.</p> <p>Improving Health and Wellbeing. Issue 29 - Little reference to specific options however does iterate sufficient provision of formal and informal spaces. New development should provide contributions towards a quantitative and/or qualitative improvement of existing facilities.</p>	<p>other Development plan Documents or Supplementary Planning Documents.</p> <p>Noted</p>
111	Jeffrey West on behalf of the Cotswold Conservation Board	<p>Better Environment for today and tomorrow. "...The Board strongly urges the Councils (SWJCS) to include a specific policy within the CS to deal with the Cotswold AONB" the letter further states "The board would... be opposed to a policy which attempts to treat all landscapes within... the same policy if that in any way dilutes the principles which should apply to the ANOB."</p>	Noted
113	Foxley Tagg Planning Ltd (Sally Tagg) on behalf of Redrow Homes Midlands Ltd.	<p>Sites Promoted – Sites in Wychbold.</p> <p>Stronger Communities. Issue 1 - SETTLEMENT HIERARCHY Does not consider that the settlement hierarchy is a sound basis for development. Scrutiny of the scoring system used is required.</p> <p>Respondent discusses flaws in the scoring and makes the case that the hierarchy does not accord with the emerging RSS Policies: CF2, PA11, T1 or T2. These policies all seek to achieve sustainable development, hence need to adhere to. (please see scanned image for full individual policy reasoning).</p> <p>Problems (number 1) •should reflect distance that exists between villages and key centres, in particular Worcester. "This is something which the transport survey takes no account of at present."</p> <p>Changes (number 1) •in order to account for the impact distance has on public transport viability and commuting distances, it is essential</p>	<p>This will be considered in the SHLAA report viewable on the website.</p> <p>The Village Facilities have been re-visited, and we consider it is a sound basis for establishing the hierarchy.</p> <p>We disagree with this view.</p> <p>To be sound our Core Strategy has to be generally in conformity with the Regional Spatial Strategy policies.</p> <p>Noted</p> <p>Noted</p>

ID No	Name	Comment	Officer Response
113		<p>to recalculate the hierarchy. Suggests a ranking that reflects which village are closest to the major towns and city</p> <p>Problems (number 2)</p> <ul style="list-style-type: none"> •results are not properly used to inform the village hierarchy. Discusses hierarchy is based on “quantitative data produced in facilities survey, which the more qualitative ranking produced in the transport survey cannot be easily be combined with.” •Assertion evident by the fact that of the 26 villages the Transport survey identified as the most accessible by public transport, only 5 of these locations are designated category 1. •Foxely Tagg state “it is clear JCS takes little account of the transport viability of villages. The hierarchy does not meet requirements of policies T1 and T2.” 	<p>Disagree. Nine journey types e.g. journeys to employment and shopping facilities, were defined for each settlement. These were scored according to the tupe of journey they could access. It is this alone that makes the rural transport survey quantitative rather than qualitative.</p> <p>The results of both the village Facilities Survey and the Rural Public Transport Survey enable the various settlements surveyed to be set within a sustainability hierarchy. Category 1 settlements by definition require at least four Key Services and score at least 16 points in the Village Facilities Survey. In addition they have “medium/high” levels of public transport including access to all of the daytime bus services types identified in the Rural Transport Survey. It is this combination of two surveys that denotes the more sustainable settlement in this case category one settlements.</p> <p>To be sound the Joint Core Strategy has to be generally in conformity with the Regional Spatial Strategy policies. At the heart of Policy T1 is the necessity to improve accessibility and mobility, whilst avoiding past trends of increased car traffic and longer journeys. Policy T2 discusses the need to reduce travel and suggests that high density development should be encouraged in locations well served by public transport. The categorisation of South Worcestershire’s</p>

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113		<p>Changes (number 2) •Transport Survey must be awarded a quantitative score</p> <p>VILLAGE FACILITY STUDY The following changes need to be made otherwise “the JCS will have been made using flawed data”. (contrary to PPS12 - planning decisions to be based on a robust evidence base)</p> <p>Problems (number 1) •Study does not take account of “Small to medium sized enterprises. •No account taken for self employed as an employment source •Access to employment opportunities is something that should be re-assessed, to take account of wider spectrum of opportunities to inform village hierarchy.</p>	<p>settlements addresses both policies as it looks to score settlements based on their existing facilities and their existing access to rural transport. More specifically the rural transport provision element of the study identifies 8 key journeys and scores the settlement’s ability to access urban areas and local facilities. A hierarchy is then constructed using these combined scores to determine the relative sustainability of a settlement.</p> <p>Transport survey results are already considered to be quantitative.</p> <p>The data is sourced from local councillors and parish clerks and where data was provided an on-site survey was carried out. Further to this an annual update is being carried out throughout the Joint Core Strategy production period to ensure the data is as up to date as possible. It is on this basis that we disagree with the representor’s view and that the Village and Rural Transport Study is in line with PPS12 where planning decisions should be based on a robust evidence base.</p> <p>Disagree</p> <p>The study identified self employed firms that have a significant workforce. Access to local employment and existing employment provision will be re-assessed on an annual basis. The Rural Transport Study does take account of the wider employment opportunities by scoring settlements that can access employment as stated in the journey types and service specifications.</p>

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113		<p>Changes (number 1) •Recommended that public houses are designated a key service... "these facilities provide a forum for regular social interaction".</p> <p>Problems (number 2) •Mobile shop should be deleted. "Rise of internet shopping means that every village has access to a mobile shop"</p> <p>Changes (number 2) •Pubs that serve food should score in the restaurant/café section.</p> <p>CONCLUSIONS Undertaking proposed changes would ensure that Issue 1 could be satisfactory resolved. Issue 2 – The SA score attributed to option 4 should be altered to reflect the fact that this growth strategy disperses and dilutes the negative effects of development. (increase from a negative to a positive). Issue 3 – Agree that greenbelt around Worcester and Droitwich be reviewed. Issue 4 - option 3 makes no reference to profound implications of the ongoing RSS review. This SA must reflect the emerging RRS policy implications, which acknowledge that if land were designated as greenbelt it would not necessarily be contrary to sustainable principle to develop it. ("It cannot be considered unsustainable to develop greenbelt land until all the salient, site specific issues, have been considered.") Issue 5 – Option 3 "...is the most suitable growth strategy</p>	<p>Disagree. While public houses do provide a meeting point for the local community a village/parish hall is considered the main focal point and provides more services for the community.</p> <p>Disagree. A mobile shop is a local facility that provides a service to the local community service beyond that of an internet shop. Currently internet usage is not universal and those that have access may not necessarily use the internet for online shopping. The point is noted that will need to be reviewed in the near future as internet access becomes more universal.</p> <p>Agree. Pubs which have a clear restaurant or café facility do score an additional point.</p> <p>Noted, but the Sustainability Appraisal work is on-going to inform policy making.</p> <p>Noted. This study is being progressed.</p> <p>Agreed, and we have taken this approach with the Preferred options.</p> <p>Noted</p>

ID No	Name	Comment	Officer Response
		to pursue". Issue 6 – Droitwich should receive a substantial employment allocation in the Core Strategy	Noted
115	Christopher Harvey on behalf of the Chamber of Commerce.	<p>Vision - Supported Stronger Communities. Any increase in the number. of homes should be matched investment in social and economic infrastructure coupled with a realistic balance of employment and economic development. Support settlement hierarchy There needs to be an investment in infrastructure e.g. dualling the Worcester southern link and building a northern relief road.</p> <p>Supports rail interchange at Norton also to be used as a park and ride. Ensure another river crossing over the Severn Possible construction of a new motorway junction (Junction 7A)</p> <p>Dual Evesham and Oxford rail line Encourage train operates to invest in rolling stock</p> <p>Some support for a new eco-development (town) in the Norton area Supports affordable housing in rural where there is a need</p> <p>Increase affordable housing provision in urban areas</p> <p>Discuss potential of multi use facilities in villages e.g. combining a pub and a post office. More peripatetic services by doctors, dentists and others should be pursued. This reduces overall travelling and carbon emissions.</p>	<p>Noted</p> <p>Agreed, the Preferred Option seeks to achieve this.</p> <p>Noted Evidence emerging from the transport studies supports the dualling of the Southern Link Road, but not building the Northern relief road.</p> <p>Noted, but likely to be long term.</p> <p>Noted This is unlikely to get Highway Agency support.</p> <p>Agreed. This is being progressed. Noted.</p> <p>Noted Agreed, this will be incorporated into the Preferred Option.</p> <p>We will be seeking to maximise affordable housing provision. Agree.</p> <p>Agree</p>
115		In early 2008, the chamber plans to bring together businesses and others in a logistics forum to consider issues related to goods transport by business.	The previous consultation event with the Chamber was very useful.

ID No	Name	Comment	Officer Response
		<p>Improve buses “image problem” Provide subsidies for key bus services</p> <p>Economic Success that is shared by all. Agrees that current designated employment sites should be protected</p> <p>Better Environment for today and tomorrow. There is a need to protect more than just the statutorily protected AONB but that other areas around our urban centres will also need protection. There is a definite need to re-assess the risks of flooding and other climate impacts Strongly agrees with the option of encouraging all new developments to include the capture, storage and re-use of water. Ensure drains, ditches and watercourses are maintained and kept free flowing to help reduce flash flooding. Cranfield university research has highlighted the impacts of rising temp in SW. this will increase the fire risk esp. in rural and natural environments. Users should be made aware of the issues and their responsibility. Supports SW commitment in taking positive action to reduce carbon emissions Encourage renewable energy in new developments Use of waste incinerators using most up to date technology Support the notion that small businesses should be allowed access to refuse collection. This would significantly increase the amount private waste that is recycled.</p>	<p>Agree Noted, but not within our remit.</p> <p>Noted</p> <p>Agree</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p>
116	David Lock Associates (Nicholas Freer) on behalf of Gallagher Estates.	<p>Vision. Vision could go further in setting out spatial elements. Propose the following addition to the vision: “New strategic mixed use communities adjacent to Worcester will embrace and contribute to the dynamism of the City, and deliver an extension in the social, green and physical infrastructure of the town. Such communities will establish the highest positive image for the future of the City and ensure more people will live closer to the</p>	<p>We will take this into consideration in assessing a revised vision in the Preferred Options Document.</p>
116			

ID No	Name	Comment	Officer Response
116		<p>employment growth within the City. Such development will complement the revitalisation of the waterfront area of the City. Major new investment in public transport infrastructure will be secured through a regional park and ride site at Norton. The role of the City of Worcester in the region will grow”.</p> <p>Objectives – Objective in relation to the rural character of settlements needs to be more sharply focused. Sub-point should state that there is an insufficient supply of previously developed land and therefore Greenfield land should be released.</p> <p>Stronger Communities. Issue 1 – Sequential approach should be adopted when allocating development in accordance with settlement hierarchy. Strongly disagree with Sustainability Appraisal...contradictory to development strategy in rest of Issues and Options paper.</p> <p>Issue 2 – Strongly disagree with Sustainability Appraisal...option 2 offers by far the most sustainable option in comparison to those that propose greater dispersal. A new settlement should be resisted where there are sustainable options on the edge of Worcester. Issue 3 – No need to review the Green Belt boundary around Worcester.</p> <p>Issue 4 – Strongly support growth to the east of Worcester, also to the south but priority must be given to development of land to the east of the City. Such a direction of growth offers the opportunity too much enhance the investment in public transport and expand the green infrastructure network.</p> <p>Issue 6 – Employment opportunities located at Worcestershire Parkway would be consistent with principles of sustainable development and with Central Technology</p>	<p>To do this would be prejudicial to the development of the Preferred Options.</p> <p>Your comment is noted. The sustainability Appraisal is a running commentary on the policies as they develop. There is no development strategy in the Issues and options.</p> <p>Noted</p> <p>The Green Belt will be challenged so in order to defend it or identify areas which may be released a review is necessary.</p> <p>Evidence is emerging that the Worcestershire Parkway proposal is unlikely to be implemented until towards the latter end of the Plan period. Therefore, utilising as an employment location at this time would not be sustainable. However, there is long term potential.</p> <p>Noted</p>

ID No	Name	Comment	Officer Response
		<p>Belt aspirations. The Sustainability Appraisal identifies the positive value of an employment location adjacent to the Worcester Parkway station.</p> <p>Issue 8 – Agree with all the options. Core Strategy should commit to the principle of ‘strategic scale developments’...development of at least 4000 dwellings or above allows for the potential for a substantially wider range of facilities and services as well as employment.</p> <p>Issue 9 – The critical and fundamental option is the pursuit of public transport improvements. We support the development of a high quality public transport network in South Worcestershire. A direction of growth to the southeast of the City will contribute to the delivery of the public transport network and specifically the ‘Project Express’.</p> <p>Issue 10 – Worcester should prioritise ‘Project Express’ which is consistent with the emerging transport policies of the RSS which also identifies Worcester Parkway as a Strategic Park and Ride site</p>	<p>The Joint Core Strategy fully support public transport improvements.</p> <p>The implementation of a Parkway proposal is unlikely until the latter end of the plan period, therefore we have to manage transport proposals in the interim without it.</p>
117	James Glynn on behalf of Severn Trent Water.	<p>Vision - “..At this time I have no specific comments or observations to make regarding the detail of the issues and options”.</p>	Noted
118	Government Office for the West Midlands (Mike Price)	<p>Vision - Rural regeneration is an important element of the RSS which needs to be included as part of the ‘spatial portrait’.</p> <p>Scope to further develop local distinctiveness within the vision.</p> <p>Stronger Communities. Certain ‘topics’, for example, the development of Worcester, the potential for development in the green belt and the development of other towns should be considered for their spatial implications rather than on an individual, ‘old style’ local plan basis.</p> <p>Economic Success that is shared by all. Example of an option, which relates to national policy – Issue 19, Option 6 relates to policy on out-of-town retailing,</p>	<p>We will seek to include both these elements in the Preferred Options.</p> <p>We agree, and we have sought to do that in the Preferred Option.</p> <p>Noted. The Joint Core Strategy cannot simply repeat national and strategic planning</p>

ID No	Name	Comment	Officer Response
		<p>which is already covered by PPS6.</p> <p>Better Environment for today and tomorrow. It is good to see that waste is being addressed in a positive manner.</p> <p>Improving Health and Wellbeing. The Issues & Options document does not reflect the needs of children, young people or families as such. The references to (educational) achievement set out in Issue 31 are complacent. No mention of the importance of schools, children services, youth facilities being at the heart communities...and how these services can be key to cohesion and improved access to services.</p> <p>Other Comments. Appreciate evidence base is still being developed, but by time of submission, evidence should be available in relation to other towns and rural areas not just Worcester.</p>	<p>policy.</p> <p>Noted</p> <p>Noted. It is recognised that this was a deficiency, which we will seek to rectify in the Preferred Options.</p> <p>Agreed</p>
119	Richard Chapman on behalf of Malvern town Council.	<p>Improving Health and Wellbeing. Issue 29 Town Council in need of land for allotments, burials and recreation.</p> <p>Demand will grow in years up to 2026</p>	<p>Noted</p> <p>Noted</p>