

PART 2 - SCHEDULE OF SIGNIFICANT CHANGES

	SWDP 1 – Development Strategy and Settlement Hierarchy	
	See revised SWDP policy on Category 1, 2 and 3 villages	No significant changes to policy SWDP 1 other than to the settlement hierarchy – refer to policies SWDP 23, 24 and 25.

SWDP 2- EMPLOYMENT, HOUSING AND RETAIL SUPPLY

	SWDP 2	
	TABLE 1	
SOC001	<p>Delete 2nd paragraph and replace with the following:</p> <p><i>The latest Department for Communities and Local Government projections (2008) show an increase of 21,600 households in South Worcestershire between 2008 and 2030. The Worcestershire Strategic Housing Market Assessment (SHMA) 2012 provides robust, proportionate evidence to 2030 in the form of scenarios of housing growth, informed by these national projections and by evidence on jobs growth. The South Worcestershire Councils' locally derived housing provision policy for about 23,200 dwellings for 2006-2030 reflects the overall scale of housing growth associated with SHMA Sensitivity Scenario 2 (23,157 dwellings) aiming to improve the alignment of housing, jobs, and the labour force. The scale of growth of the Plan's sub areas is moderated by the need to respect key environmental assets, notably the Malvern Hills AONB and to absorb displaced housing requirement within the plan area, so that the plan is positively prepared. Housing Background Paper 2012 sets out the detailed justification of the planned scale and distribution of housing development.</i></p> <p>In conjunction with the consultation on the amended housing provision figures in SWDP 2, for the avoidance of doubt.</p>	<p>To ensure the SWDP is in accordance with national policy (National Planning Policy Framework / NPPF / Framework) (paragraphs 158 and 159, and paragraph 14 [<i>the Plan should meet objectively assessed needs ...</i>]) it should be amended.</p> <p>The purpose of Table 1 is not to lay out all the evidence but to highlight critical issues identified from the extensive evidence base available, relating for example to demographic change, including households, and to housing. It is these issues that the Plan needs to address. There needs to be consistency between the key issues in Table 1 and the response to those issues in Policy SWDP 2, informed by the evidence.</p> <p>Table 1 should make clear that the issues of the growth of households and the need for housing has been informed by the latest available technical evidence and the evidence SWDP relies on to respond to those issues. In particular, it should signal the relationship between national</p>

	SWDP 2	<p>projections, the latest Strategic Market Assessment 2012 (SHMA), the choice of SHMA scenario on which to base the plan, and moderating factors that influenced the Plan's sub-areas' housing provision policy.</p> <p>Housing figures should be referred to in Table 1, as well as households, and they need to relate to the plan period 2006 - 2030 to enable easy comparison with the policy and so improve comprehension.</p> <p>Table 1 should signal the evidence that sets out the detailed justification of the scale and distribution of that growth by referring to SWDP Housing Background Paper 2012. That Paper has been informed by the Demographics Background Paper and its addendum, which includes the latest ONS 2010-based population projections.</p> <p>This amendment is made in conjunction with the amended housing provision figures in SWDP 2, for the avoidance of doubt.</p>
SOC002	<p>Insert the following into Table 1 - Population and housing issues, after the third paragraph:</p> <p><i>The Strategic Housing Market Assessment 2012 highlights the demand for smaller properties as the result of this growth in single person households, needing houses as well as flats in response to aspirations for space and the options available through a house. Additional larger family dwelling stock will also be needed due to the predicted increase in older family households.</i></p> <p>in conjunction with the consultation on the amended housing provision figures in SWDP 2, amended policy SWDP 30 and the new policy on the needs of older people, for the avoidance of doubt.</p> <p>See also changes to SWDP 30 and the new policy responding to the housing needs of older</p>	<p>To be in accordance with NPPF (paragraph 154) (policies to provide a clear indication of how a decision maker should react to a development proposal) and to provide adequate justification, the SWDP should be amended.</p> <p>The plan needs to be clear about the implications of demographic and household changes, and the increase in housing and the policy responses to those issues. Table 1 should provide further clarification about household needs for different sizes of dwellings. The sources of information for</p>

	SWDP 2	
	people.	<p>this comes from:</p> <ul style="list-style-type: none"> a) The Housing Background Paper 2012 – this provides the up-to-date analysis of the implications of the latest demographic evidence, such as household size. b) Strategic Housing Market Assessment (SHMA) 2012 <ul style="list-style-type: none"> i. SHMA paragraph 6.9 refers to the national trend of falling average household size. SHMA highlights recent trends e.g. paragraph 4.37 regarding the relatively large proportion of smaller properties developed in Worcester over recent years within the city centre market, the majority of which will be occupied by smaller households ii. Figure 6.27: Projected Changing profile of Households by Type (2006-2030) – for Sensitivity Scenario 2 (summarised in SHMA Figure 6.29) indicates there are an additional 54,100 single person and couple households to 2030. In Worcester these are largely younger households, but in Malvern Hills and Wychavon these are largely older person households iii. SHMA paragraph 6.113 concludes that the substantial projected growth in one-person households overall suggests a sustained demand for smaller properties. However, this will not solely be reflected in aspirations

	SWDP 2	
		<p>for flatted properties. A notable proportion of current housing stock is occupied by single person households who aspire to have additional space and the other options available to them through ownership of a house. SHMA paragraph 6.113 also concludes that due to the predicted increase in older family households, a sustained demand for larger family stock and new supply of this type and size of housing will be required over the plan period to accommodate demand and household aspirations.</p> <p>iv. SHMA paragraph 2.21 considers the implications of key national housing policy and benefit changes e.g. rising pressure of demand for low-priced, smaller properties. SHMA figure 7.4 provides evidence on estimated size of affordable housing for 2011-2016. This shows there is a predominant requirement for smaller 1- and 2-bedroom dwellings. There is also, to a lesser extent, a continued requirement to deliver medium and larger family-size dwellings consisting of 3 and 4+ bedrooms.</p> <p>It is erroneous to conclude / infer that the projected growth in households will be accommodated only in new housing provision made through this plan, or that new housing will only be occupied by new households. Some existing households will move into and occupy</p>

	SWDP 2	
		<p>new housing. This releases housing. As a result, part of the growth in households can be met by the existing dwelling stock.</p> <p>It is erroneous to conclude that, because 70% of the increase in households will be single person households, over 70% of the new housing will therefore be smaller dwellings (e.g. 1- and 2-bed dwellings). The mix of housing to be provided also needs to take into account the mix of housing stock available and evidence of need in the local area.</p> <p>Informed by evidence, Policy SWDP 30 on housing mix should allow for flexibility towards changing households and the range of new housing.</p> <p>This amendment is made in conjunction with the amended housing provision figures in SWDP 2, amended policy SWDP 30 and the new policy towards the needs of older people, for the avoidance of doubt.</p>
SOC003	<p>Delete 4th paragraph and replace with the following:</p> <p><i>The estimated need for affordable housing in the plan period is at least 8,350 dwellings. By creating the right conditions to create jobs and deliver the plan's economic strategy, the plan can create the conditions to reduce the need for further affordable housing, including fostering household confidence to move to market housing, thereby releasing affordable housing for re-lets.</i></p> <p><i>The uplift in land values from development is the key opportunity in this plan period for seeking to meet the unmet need for affordable housing. The scale of housing provision between 2006 and 2030 could deliver at least 5,500 affordable dwellings, taking overall viability into account. This is a realistic target to include in the plan.</i></p>	<p>To ensure the SWDP is the most appropriate strategy, provides adequate justification, and is in accordance with the NPPF (paragraph 47), it should be amended.</p> <p>Changes should be made to Table 1 as a consequence of amendments proposed to Policy SWDP 2 regarding affordable housing.</p> <p>See below for comments relating to total provision, market housing and affordable housing details under policy SWDP 2 – (the policy should</p>

	SWDP 2	
	<p><i>The amount of additional affordable housing will rise as RSLs deliver at 100% affordable housing by building more 'affordable rent' housing without grant funding, and from a range of new Government schemes and affordable housing programmes. Significant additional affordable housing will also occur within the existing dwelling stock including: a forecast of 570 dwellings in Worcester through change of tenure from market housing ownership to private sector rent that is affordable; plus mortgage rescue and RSLs purchasing properties. Delivery through 'rural exception' sites; Neighbourhood Plans and Community Right to Build; and from financial contributions from small sites will provide further affordable housing that is additional to the overall housing provision policy.</i></p> <p>See responses relating to the balance between affordable housing and market housing provision under SWDP 2</p>	<p>state the overall target for affordable housing provision, to be consistent with the Framework and to provide sufficient guidance for decision makers).</p> <p>It should be noted that the Framework uses a range of terms in relation to affordable housing</p> <p>Paragraph 173 - To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should...</p> <p>Paragraph 47 refers to 'objectively assessed needs for market and affordable housing', and it requires that:</p> <ul style="list-style-type: none"> a) The plan needs to illustrate the overall expected rate of housing delivery for market and affordable housing combined, through a housing trajectory for the plan period. b) The plan must also set out a housing implementation strategy for the <u>full range</u> of housing describing how the plan will maintain delivery of a five-year supply of housing land to meet the housing target. <p><i>See amendments to policy SWDP 2 relating to the balance between affordable housing and market housing provision</i></p>
	HOUSING PROVISION & PLAN PERIOD	
SOC004	<p>Insert new policy clause for review and monitoring of plan as follows:</p> <p><i>The South Worcestershire Development Plan will be reviewed by 2019</i></p> <p>Amend paragraph 1.2, bullet point 2 – state that the plan period for the Development Strategy</p>	<p>To ensure the SWDP is the most appropriate strategy and provides adequate justification it should be amended.</p>

	SWDP 2	
	<p>is 1 April 2006 to 31 March 2030. See changes relating to Policy SWDP 2, which make clear that the housing provision relates to 2006 to 2030.</p>	<p>The plan should clearly specify the plan period, and Policy SWDP 2 should make clear to what time period the housing provision relates (01/04/2006 - 31/03/2030).</p> <p>Framework paragraph 47 states that Local Planning Authorities should “<i>ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period</i>”.</p> <p>Framework paragraph 157, bullet point 2 – states that Local Plans “<i>should be drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer term requirements, and be kept up to date</i>”.</p> <p>The plan should therefore include Policy for provision for housing for the entire plan period.</p> <p>A Plan period of 2006 - 2030 enables the plan to have a 15-year time horizon from the likely adoption date (end 2013). This is consistent with Framework paragraph 157 and should not be changed.</p>
SOC005	<p>Insert new policy clause for review and monitoring of plan as follows: <i>The South Worcestershire Development Plan will be reviewed by 2019</i></p>	<p>To ensure the SWDP is the most appropriate strategy and is effective it should be amended.</p> <p>There is a need for policy to state that there will be a review of the plan 5 years after it is adopted. In addition, the Councils will be working towards the</p>

	SWDP 2
	<p>comprehensive delivery of the policies and proposals of the SWDP and have no reason to believe that they will not be implemented in full. However, it is accepted that there could be circumstances where development fails to come forward for a number of reasons, some of which will be beyond their control. Where the Councils are able to use their influence and power to enable the delivery of the SWDP, they will do so. The Plan has an in-built mechanism to monitor performance through an Annual Monitoring Report. The Annual Monitoring Report will monitor policy delivery. Generally, the outcome of the monitoring process will inform any decision on whether or not the Plan should be reviewed.</p> <p>A Housing Implementation Strategy sets out the proposed approach to managing the delivery of housing (both affordable and market) in order to meet the requirement for South Worcestershire set out in the SWDP (this is discussed further in the Housing Background Paper). Based on policies relating to housing supply within the SWDP, the key components of a Housing Implementation Strategy are: -</p> <ul style="list-style-type: none"> • Scenario and contingency planning (to identify different delivery options in the event that actual housing delivery does not occur at the rate expected) • A risk assessment to identify obstacles and constraints to housing delivery (and development of management strategies to

	SWDP 2
	<p>address any risks)</p> <ul style="list-style-type: none"> • The approach to engaging with house-builders and other key stakeholders (ensure that housing delivery objectives are widely understood and accepted, including positive engagement through pre-application discussions) • The approach to regular monitoring and review of actual housing delivery performance against the housing trajectory • An indication of the circumstances in which specific management actions may be introduced should monitoring and review indicate that there are issues <p>At this stage, two potential areas of risk (and the contingency measures to deal with them in the event that they materialise) are identified:</p> <p>a) If monitoring demonstrates that planned growth and regeneration is not being delivered, there is sufficient flexibility in the plan (opportunity exists to bring development forward from the latter phase), as well as a degree of flexibility in Policy SWDP 2 (the target is not expressed as a ceiling). The proposed new policy on making effective and sustainable use of land includes density targets but the policy criteria mean that these are not unduly restrictive so quality development can be delivered</p> <p>b) Additional growth pressures - the Councils have sought to take a realistic view of</p>

	SWDP 2	
		<p>economic growth and the demand for labour, which would need to be housed to the end of the plan period. Current strategic forecasts about economic growth are not as strong as those prevalent during the preparation of the Regional Strategy (i.e. before the current recession). Again, the opportunity to bring forward development from the latter phase together with a small increase in commuting from surrounding areas might address that situation. However, if monitoring provides evidence on strong, sustained demand, then the Councils' commitment to early review will be the appropriate mechanism to consider reasonable alternatives.</p>
	Table 2 PROVISION	
SOC006	<p>Delete Table 2</p> <p>Amend Title of Policy SWDP 2 to "Employment, Housing and Retail Provision Requirement and Delivery"</p> <p>Delete the first and second paragraph of policy SWDP 2</p> <p>Insert the following at the start of SWDP 2</p> <p><i>The Local Planning Authorities in South Worcestershire will plan, monitor and manage the delivery of the provision of housing, employment land and retail floorspace between 2006 and 2030 in accordance with Table 4 and the site allocations set out in Policies SWDP 6 to SWDP 25, consistent with the Infrastructure Phasing Plan in [new] Policy SWDP [New x]. This will help to maintain the 5-year supply of housing land and employment land, and ensure that priority locations for regeneration are developed earlier on in the life of the Plan.</i></p> <p><i>Development proposals not in accordance with the Infrastructure Phasing Plan will be resisted unless the applicant demonstrates that the infrastructure necessary to support</i></p>	<p>To be in accordance with NPPF and to ensure the SWDP is positively prepared, it should be amended.</p> <p>Changes to SWDP are necessary to clarify policy about the provision requirement for housing, development in the plan period, as follows.</p> <ol style="list-style-type: none"> 1. Elevate the locally derived overall scale of housing provision for the plan period for South Worcestershire to Policy status in order to: <ol style="list-style-type: none"> a) give sufficient certainty about POLICY towards the scale of provision to be made; and b) be consistent with the Framework paragraph 47 (for market and affordable

	SWDP 2										
	<p><i>the development has substantial, current commitment by the agencies responsible for delivering that infrastructure.</i></p> <p><i>Housing provision will be made for about 23,200 dwellings (net) during the plan period, comprising the Sub-Area Totals which are separate and non-transferable, and the related market housing and affordable housing provision as set out in Table A2</i></p> <p>Table A2 Total & Sub-Area Housing Provision (2006 - 2030)</p> <table border="0"> <tr> <td>Wider Worcester Area (WWA)</td> <td style="text-align: right;">9,400</td> </tr> <tr> <td>Malvern Hills (excluding WWA)</td> <td style="text-align: right;">4,900</td> </tr> <tr> <td>Wychavon (excluding WWA)</td> <td style="text-align: right;">8,900</td> </tr> <tr> <td>TOTAL</td> <td style="text-align: right;">23,200</td> </tr> </table> <p><i>Worcester urban extensions are part of the Wider Worcester Area, to be delivered on land abutting the administrative boundary of Worcester City and not elsewhere within Malvern Hills or Wychavon.</i></p> <p>Insert additional written justification:</p> <p><i>The plan has been positively prepared. Joint working and co-operation has addressed 'larger than local' cross-boundary issues relating to housing. This enables the unmet housing requirement of Malvern Hills to 2030 to be met within this plan area by redirecting displaced housing requirement from the Malvern Hills area to the Wider Worcester Area and Wychavon.</i></p> <p><i>At 4,900 dwellings, the policy provision for Malvern Hills (outside the Wider Worcester Area) is below the housing level based simply on the latest national household projection level of 7,300 plus a 3% allowance for vacancies for this sub-area.</i></p> <p><i>Redirection of approximately 2,600 of the Malvern Hills housing requirement has been necessary because of limited opportunities for urban growth in Malvern Hills District. This is due to constraints on the development of Greater Malvern and in Malvern Vale resulting from their proximity to the Malvern Hills AONB, and the need to protect the AONB from adverse environmental impacts of extensive, concentrated urban</i></p>	Wider Worcester Area (WWA)	9,400	Malvern Hills (excluding WWA)	4,900	Wychavon (excluding WWA)	8,900	TOTAL	23,200		<p><i>housing, illustrate the expected rate of housing delivery through a housing trajectory for the plan period and set out a housing implementation strategy for the full range of housing describing how they will maintain delivery of a five-year supply of housing land to meet their housing target)</i></p> <ol style="list-style-type: none"> 2. Express the housing provision as a target, not as a 'ceiling' or a 'floor' figure, and 'rounded' - to avoid spurious accuracy, be sufficiently flexible and give sufficient certainty (the justification of the figures is set out in this Schedule and the Housing Background paper) 3. Using the phrase '<i>about 23,200</i>' provides sufficient flexibility to adapt to rapid change, in line with Framework paragraph 14. To use the phrase '<i>as a minimum</i>' is superfluous. 4. To give sufficient certainty for development management decision making, for communities, investors and developers, identify the housing provision sub totals for <ul style="list-style-type: none"> • The Wider Worcester Area - to provide for the growth of Worcester including growth immediately outside the Worcester City administrative boundary, towards which urban extensions adjoining Worcester City will be needed • Malvern Hills (excluding the Wider Worcester Area)
Wider Worcester Area (WWA)	9,400										
Malvern Hills (excluding WWA)	4,900										
Wychavon (excluding WWA)	8,900										
TOTAL	23,200										

	SWDP 2	
	<p><i>development nearby. Joint plan-making provides the opportunity to damp down the historic trend of large-scale net in-migration into the Malvern Hills area by making alternative provision at sustainable locations elsewhere in the SWDP plan area which can accommodate the displaced requirement.</i></p> <p><i>The plan addresses the consequences of accommodating the displaced Malvern requirement, in particular:</i></p> <ul style="list-style-type: none"> <i>• it acknowledges the need for transport infrastructure and services to enable the labour supply to access employment in Malvern Hills,</i> <i>• a meaningful proportion of the affordable housing in the Worcester South and West Urban Extensions will meet affordable housing need from Malvern Hills District</i> <i>• The need to coordinate services provided by the County and District Councils and other providers to support communities in the Wider Worcester Area.</i> 	<ul style="list-style-type: none"> • Wychavon (excluding the Wider Worcester Area) <p>5. Identify a separate housing provision sub-total for the administrative area of Worcester City Council (as part of the Wider Worcester Area total) – to give sufficient clarity for the Worcester City Local Planning Authority. The Wider Worcester Area provision extends beyond the City boundary in order to accommodate the growth of Worcester (including part of the displaced requirement from Malvern Hills). Urban extension allocations outside the City boundary will contribute towards the Wider Worcester Area subtotal, but not the Worcester City provision subtotal.</p> <p>6. Demonstrate that the plan has been positively prepared through the housing provision area subtotals.</p> <p><u>Cross-boundary issues: Unmet requirements from within the plan area</u></p> <p>Joint working and co-operation has addressed 'larger than local' cross-boundary issues relating to housing. This enables the unmet housing need of Malvern Hills (about 2,600 dwellings) to be met by redirecting displaced housing requirement from the Malvern Hills area to the Wider Worcester Area and Wychavon. The unmet requirement is therefore accommodated within the rest of the plan area during the plan period, thereby meeting</p>

	SWDP 2	
		<p>the test of soundness in Framework paragraph 182. The principal reasons for this planned intervention are:</p> <p>a) The limited opportunities for urban growth in Malvern Hills District – in particular, constraints on the development of Malvern Town and in Malvern Vale due to their proximity to the Malvern Hills AONB, and the need to protect the AONB from adverse environmental impacts of extensive, concentrated urban development nearby; and</p> <p>b) the opportunity to damp down the historic trend of large-scale net in-migration into the Malvern Hills area by making alternative provision at other sustainable locations in the SWDP plan area which accommodates the displaced requirement.</p>
	UNMET NEEDS ADJOINING AREAS / OTHER AREAS	
SOC007	<p>Insert additional written justification:</p> <p><i>From objective assessment of development requirements the South Worcestershire councils conclude that the plan meets an appropriate level of unmet housing requirement to 2030 arising from areas outside South Worcestershire which it is reasonable to accommodate within this plan area. South Worcestershire will continue to provide housing to accommodate substantial in-migration, but at levels more consistent with sustainable development, an economic prosperity-led plan, and taking account of the West Midlands Urban Renaissance strategy.</i></p> <p><i>The councils in South Worcestershire diligently undertook joint working through evidence gathering and during plan preparation to identify requirements. They co-operated with adjoining authorities and with other authorities, such as councils in the West Midlands, to consider strategic priorities for the delivery of homes, including</i></p>	<p>To ensure that the SWDP demonstrates that it has been positively prepared, it should be amended.</p> <p>Amendment to the reasoned justification is needed to make clear whether there is unmet housing or other requirements from outside the plan area which it is reasonable to address in the plan area, the evidence for this, and how the plan has addressed the identified unmet requirement.</p> <p>The SWDP Housing Background Paper 2012 sets out the objective assessment of housing development requirements. It concludes that at</p>

	SWDP 2
	<p><i>cross-boundary housing requirements. SHMA 2012 involved joint working within Worcestershire to prepare evidence on housing need. The evidence base sets out the assessment, and the joint working and activities demonstrating effective cooperation consistent with the Duty to Co-operate.</i></p> <p>Consequential changes related to the changes to housing provision and for certainty regarding Duty to Co-operate</p> <p>Action</p> <p>Continue Duty to Co-operate activities through the remaining plan preparation stage to submission, aiming to develop Memorandum of Understanding with relevant bodies, to add to the evidence base by the time of submission.</p> <p>Informed by the latest progress on plans in other authorities, the SWDP Sustainability Appraisal needs to test the option of taking a significantly higher level of unmet need from the West Midlands Metropolitan Area being met in South Worcestershire to 2030 and compare this to the alternative option of greenfield urban extension of the West Midlands Metropolitan Area.</p> <p>This assessment needs to be available in time to inform preparation of and decisions on the Publication plan</p> <p>this time there is no compelling evidence of unmet housing requirements to 2030 from adjoining authorities or other areas which it would be reasonable to accommodate within South Worcestershire, above that catered for by the revised scale of provision (23,200 dwellings). The Background Paper demonstrates how the councils in South Worcestershire:</p> <ul style="list-style-type: none"> • diligently undertook joint working through evidence gathering and during plan preparation, to identify requirements • Co-operated and collaborated with adjoining authorities and other authorities in the West Midlands and North Gloucestershire to consider strategic priorities for the delivery of homes, including cross-boundary housing requirements (from where historically out-migration has flowed into South Worcestershire). • were consistent with the Duty to Co-operate, and with Framework paragraphs 17, 156, 178 179. <p>Long term trends of population flows (migration) are one indicator of the pressure to meet 'need'. The 'positively prepared' test of soundness (Framework paragraph 182) refers to 'unmet requirement' from neighbouring authorities. However, the largest net population and hence household flows into South Worcestershire come from the West Midlands Metropolitan Area (450 people per year). This is about half of the overall</p>

	SWDP 2
	<p>historic trend of net in-migration of 816 people per year (2005 - 2010) into this plan area. Of this, 228 per year came from Birmingham (<i>2012 SWDP Demographic Background Paper p15-16</i>). This is a fairly well-established pattern, a 'ripple-effect' of people moving out of urban areas in favour of more rural areas nearby, and then those areas in turn experiencing a smaller net out-migration to other rural areas further away from the urban areas.</p> <p>Based on SHMA Sensitivity Scenario 2, the proposed revised housing provision of about 23,200 dwellings accommodates substantial net in-migration into South Worcestershire (equivalent to about 12,500 dwellings). This is over half of the total planned provision and more than that related to 'natural change' in the plan area. The latter is about 10,750 dwellings (<i>see SHMA 2012 Fig 6.4 'natural change' scenario household growth projection; plus 3% vacancies</i>).</p> <p>1) <u>West Midland Metropolitan area</u></p> <p>Birmingham City Council and the West Midlands Planning and Transportation Committee (for the four Black Country LPAs, Birmingham, Solihull and Coventry) made representations, seeking to increase the total SWDP housing provision (as well as reduce employment land provision). Neither respondent stated there was 'unmet need' as the result of their relevant emerging plans' housing provision policies, nor that the consequences of their own plans necessitated</p>

	SWDP 2
	<p>specific provision being made in South Worcestershire.</p> <p>Birmingham City Council asserted that the SWDP's 'under-provision' may put increased pressure for Birmingham to provide for additional new housing, beyond the city's capacity for sustainable development on predominantly brownfield sites.</p> <p>Other respondents assert that there is the potential for unmet housing requirements from the West Midlands, including 30,000 from Birmingham, and South Worcestershire should meet this in part.</p> <p>Redirecting displaced requirements to South Worcestershire effectively leapfrogs the West Midlands Green Belt and the districts in North Worcestershire, thus pushing growth into areas further away from the regional focus for employment and the concentration of business in the Metropolitan Area.</p> <p>A significant proportion of those displaced households would continue to need access to jobs in the West Midlands metropolitan area. This can be expected to generate significant movement, as longer distance commuting to work, contrary to Framework paragraph 34 (<i>"developments that generate significant movement are located where the need to travel will be minimised"</i>)</p> <p>Since 2004 the West Midlands Urban Renaissance Strategy has looked to develop</p>

	SWDP 2
	<p>urban areas in such a way that they can increasingly meet their own economic and social needs, in order to counter the unsustainable movement of people and jobs. This includes the need to direct development to those parts of the West Midlands needing housing. Successful implementation of that strategy would reduce the risk of unmet need and lower the pressure for out-migration by enabling more households to be housed within the conurbation. Quality development and affordable housing within the conurbation would thus help to retain population. Birmingham, Coventry and Solihull's plans are still in preparation and could make higher provision for housing, as suggested by the WMRSS Panel Report (the Black Country authorities' Joint Core Strategy has been adopted).</p> <p>To date it appears unreasonable for South Worcestershire to accommodate further unmet requirement above the substantial in-migration and household levels already catered for by the amended SWDP. The relevant evidence available has not yet demonstrated that:</p> <ul style="list-style-type: none"> a) new greenfield urban extensions in the West Midlands metropolitan area cannot be delivered in the long term, which would reduce the need to redirect un-met demand to other areas; or b) Redirecting displaced housing requirement from their areas to South Worcestershire is more sustainable than directing that displaced

	SWDP 2
	<p>requirement to urban extensions within the West Midlands metropolitan area (where access to major urban public transport systems can support short distance commuting) and / or other adjoining areas.</p> <p>Under the Duty to Co-operate, the South Worcestershire Councils discussed with the West Midlands Metropolitan Authorities / Birmingham City Council their concerns about the Preferred Options. The increase in housing provision under amended Policy SWDP 2 is proposed to improve the alignment between jobs, housing and the labour force, providing a positive response to the respondents' concerns. The Housing Background Paper 2012 demonstrates that the SWDP as amended makes adequate provision to accommodate substantial in-migration and household levels, thereby catering for reasonable unmet requirement from the West Midlands. Further provision is unnecessary.</p> <p>LPAs in South Worcestershire will continue to:</p> <ul style="list-style-type: none"> a) have the opportunity under Duty to Co-operate to assess emerging plans and evidence that becomes available from the West Midland Metropolitan Area authorities; and b) assess whether the evidence is robust and proportionate and whether it demonstrates that the West Midland Metropolitan Area can make adequate provision e.g. through sustainable urban extensions using Garden

	SWDP 2
	<p>City principles and major urban public transport systems, or have unmet demand met in other adjoining areas such as North Worcestershire.</p> <p><u>2) North Gloucestershire</u></p> <p>Tewkesbury Borough Council supports the SWDP approach and agrees that at this time “land at Mitton” is not required to meet the development needs of the South Worcestershire area. The three North Gloucestershire Councils did not request that North Gloucestershire’s needs be met in South Worcestershire, nor did they provide evidence of unmet housing need in their area. Current evidence indicates that there are options available to accommodate the needs of the Cheltenham, Gloucester and Tewkesbury Joint Core Strategy within that plan area. There is therefore no forecast unmet requirements at Tewkesbury that needs to be met within the SWDP plan area.</p> <p><u>3) Other adjoining areas</u></p> <p>No representations were received from Stratford upon Avon District Council, Shropshire Council, Warwickshire, or Cotswold District Council. No evidence of unmet need has been provided.</p> <p><u>4) Rest of Worcestershire</u></p> <p>No representations were received from Wyre Forest, Redditch or Bromsgrove LPAs about the overall provision for housing or employment, nor did they provide evidence of any unmet</p>

	SWDP 2																					
		requirements within their areas that need to be met in South Worcestershire.																				
	HOUSING NEED - SPECIFIED HOUSING PROVISION – FOR MARKET HOUSING AND AFFORDABLE HOUSING																					
SOC008	<p>Insert the following as Table A2:</p> <p>Provision 2006 to 2030</p> <p>Market Housing:</p> <table> <tr> <td>Wider Worcester Area (WWA)</td> <td>6,880</td> </tr> <tr> <td>Malvern Hills (excluding WWA)</td> <td>3,660</td> </tr> <tr> <td>Wychavon (excluding WWA)</td> <td>7,170</td> </tr> </table> <p>South Worcestershire</p> <table> <tr> <td>Total</td> <td>17,700</td> </tr> <tr> <td><i>Of which Worcester City</i></td> <td><i>4,550</i></td> </tr> </table> <p>Affordable Housing*</p> <table> <tr> <td>Wider Worcester Area (WWA)</td> <td>2,520</td> </tr> <tr> <td>Malvern Hills (excluding WWA)</td> <td>1,240</td> </tr> <tr> <td>Wychavon (excluding WWA)</td> <td>1,730</td> </tr> </table> <p>South Worcestershire</p> <table> <tr> <td>Total</td> <td>5,500</td> </tr> <tr> <td><i>Of which Worcester City</i></td> <td><i>950</i></td> </tr> </table> <p>Notes:</p> <p>*The affordable housing provision is a target</p> <p>Figures may not sum due to rounding</p> <p>Written Justification</p> <p>Insert the following in written justification:</p>	Wider Worcester Area (WWA)	6,880	Malvern Hills (excluding WWA)	3,660	Wychavon (excluding WWA)	7,170	Total	17,700	<i>Of which Worcester City</i>	<i>4,550</i>	Wider Worcester Area (WWA)	2,520	Malvern Hills (excluding WWA)	1,240	Wychavon (excluding WWA)	1,730	Total	5,500	<i>Of which Worcester City</i>	<i>950</i>	<p>To ensure the SWDP has adequate justification, is in accordance with the NPPF (paragraph 47) and gives sufficient certainty, it should be amended.</p> <p>Policy SWDP 2 should be amended to identify housing provision subtotals for market housing and affordable housing, based on objectively assessed needs.</p> <p>The proposed amendment to Policy SWDP 2 has been informed by the evidence base. This enables the Councils to ensure that the Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in the Framework. The Housing Background Paper 2012 sets out the audit trail explaining how the amended Policy SWDP 2 housing provision of 23,200, and its market housing and affordable housing elements, together with planned supply, has been justified. This analysis provides evidence demonstrating the consistency of the policy provision of about 23,200 dwellings with the plan's objective to maximise the opportunities to deliver affordable housing. Further total housing provision above this level is not needed to meet this objective.</p> <p>The Councils considered carefully the available</p>
Wider Worcester Area (WWA)	6,880																					
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	SWDP 2
	<p><i>Evidence in the Housing Background Paper indicates that the estimated total need for affordable housing in the plan period is at least 8,350 dwellings.</i></p> <p><i>This takes into account:</i></p> <ul style="list-style-type: none"> • <i>1,082 completions to 2011</i> • <i>total commitments for 329 as at April 2011</i> • <i>a further 3,785 affordable dwellings to meet the current backlog of need and net newly arising need 2011 - 2016, plus</i> • <i>additional net newly arising need for 2016 - 2030 of the order of at least 3155 dwellings.</i> <p><i>The Background Paper provides an objective assessment of the sources of supply. It indicates that if affordable housing delivery relied only on the uplift of development land value then total potential supply of additional affordable housing in the plan period would amount to about 5500 affordable dwellings. This assessment is based on:</i></p> <ul style="list-style-type: none"> • <i>1082 completions 2006 - 2011 plus total commitments for 329 as at April 2011</i> • <i>the potential to deliver up to approximately 4,090 affordable dwellings from future housing supply from which affordable housing can be sought.</i> <p><i>This takes into account:</i></p> <ul style="list-style-type: none"> • <i>the residue of overall housing provision not committed as at April 2011 (approximately 13,440 dwellings including delivery on sites allocated in this plan, but excluding empty homes brought back into use and housing release as household moves to extra-care housing with high-care packages)</i> • <i>Policy SWDP 31's sliding scale of affordable housing to be sought from sites permitted for C3 dwellings</i> • <i>a further reduction of 5% made for forecasting purposes only to discount lower delivery rates prior to plan adoption and to allow for circumstances where there may no local need, consistent with the criteria for Policy SWDP 31, or there are viability issues</i> <p><i>Use Class C2 housing (residential care homes, plus the high end care of extra care</i></p> <p>evidence when preparing the Preferred Options document, including the assessment of available RSS evidence. However, more up-to-date evidence is available, which now needs to inform plan preparation. This includes the Strategic Housing Market Assessment 2012. The SHMA identifies the scale of backlog to be met in South Worcestershire plus forecast of new need arising. It also assesses the scale of relets and resales likely to be forthcoming to meet this need.</p> <p>SHMA paragraph 7.6 “analysis in section 7 presents an assessment of the levels of affordable housing required to address future needs, in reality a proportion of these needs could be met through alternative approaches depending on the availability of public funding. This is an issue touched upon within this section and considered in Section 8”.</p> <p>The plan needs to be consistent when referring to affordable housing. At present, if s106 legal agreements are used to deliver affordable housing then this is by negotiation – which means they cannot be ‘required’ but can be ‘sought’, and is therefore a target.</p> <p>In 2011 the Government consulted on changing regulations to allow affordable housing to be delivered through CIL. The results, and the Government’s response to that consultation, are awaited. If included within CIL arrangements, the tariff would be a requirement, in accordance with the Charging Schedule, and therefore non-</p>

	SWDP 2
	<p><i>housing) and 'sui generis' non-self-contained student accommodation are not subject to Policy SWDP 31, and so will not contribute to the supply of affordable dwellings</i></p> <p><i>The uplift in land values achieved through Use Class C3 market housing provision is a key opportunity in this plan period to seek to meet much of the residue of the unmet affordable housing need, but viability constrains the ability of development to meet all of that need, as indicated in the Affordable Housing Economic Viability Study.</i></p> <p><i>The target of 5,500 affordable dwellings is a minimum. The target is about 2,840 below the total level of potential need, but it is a realistic target for delivering affordable housing via the uplift in development value.</i></p> <p><i>It is expected to be added to through</i></p> <p><i>a) changes in tenure within the existing stock, or from sources external to South Worcestershire, which will not need additional dwellings built, including:</i></p> <ul style="list-style-type: none"> <i>• change in stock in Worcester from market housing to private sector rent that is affordable</i> <i>• RSLs purchasing 'existing satisfactory properties' and acquiring properties via Mortgage Rescue</i> <p><i>b) affordable housing is expected to be delivered through means that are allowed for by policy but not yet fully quantified, so not counted towards the policy housing provision total at this time (i.e. they would be in addition to the 23,300), from:</i></p> <ul style="list-style-type: none"> <i>• rural exceptions</i> <i>• Neighbourhood Plans and Community Right to Build, and</i> <i>• Delivery of affordable housing from financial contributions from small sites (less than 5 dwellings);</i> <p><i>c) Other 100% affordable schemes. If built, these would raise the total supply of affordable housing counted towards SWDP2. The products listed below are new and lack of national or local evidence about actual delivery precludes identifying a specific allowance in Table 4 provision at this time:</i></p> <ul style="list-style-type: none"> <i>• RSLs building more 'affordable rent' housing without grant funding, by raising money on the financial market and funded by the affordable rents</i> <p>negotiable. If the regulations are amended the South Worcestershire Councils would be able to choose whether or not to use CIL receipts for affordable housing purposes.</p> <p>The estimated need for affordable housing in the plan period is at least 8,350 dwellings.</p> <p>This takes account of:</p> <ul style="list-style-type: none"> • 1,082 completions to 2011 • Total commitments of 329 as at April 2011 (SHMA Fig. 7.3 Step 3.3 - Committed supply of new affordable housing (based on 329 social and affordable rent dwellings per year for 5 years)). • a further 3,785 affordable dwellings to meet the current backlog of need and net need arising 2011 - 2016, (SHMA Fig 7.3 last row in Step 4), plus • Additional net need arising for 2016 - 2030 of the order of at least 3155 dwellings (analysis in the Housing Background Paper based on the difference in South Worcestershire between long-term forecast annual new need arising [1473] and relets / resales [1248 including 3% uplift from the increased supply by 2030] gives a net annual affordable housing need to be met of 225 per year. When multiplied by 14 years [2016 – 2030] this gives a total of 3155). <p>The Housing Background Paper provides an objective assessment of the sources of supply. If affordable housing delivery relied only on the</p>

	SWDP 2
	<ul style="list-style-type: none"> • <i>Local Authority New Build</i> • <i>100% grant funding / affordable housing delivered through a range of mechanisms - currently e.g. the Affordable Homes Programme (replacing the National Affordable Housing Programme), Kickstart (HomeBuy Direct and NAHP)</i> <p><i>As a result, the market housing provision total and subtotals in Policy SWDP 2 are calculated by subtracting only the potential for delivering 5,500 affordable dwellings through development value uplift from the 23,200 total, without further deduction for 100% affordable housing schemes. Monitoring will indicate whether the higher levels of affordable housing are delivered. The Plan Review is the appropriate mechanism to consider whether to Amend the housing provision totals and / or the subtotals for market housing and / or affordable housing in the light of evidence about 100% affordable housing schemes delivery.</i></p> <p>(See response to Preferred Options Table 1 regarding affordable housing)</p> <p>See recommended increase in provision total to about 23,200 for the plan period 2006 – 2030, amendments to SWDP 2 Housing Provision Policy (Table A1, A2 and Table 4 Housing supply)</p> <p>See responses to SWDP 31 on affordable housing</p> <p>uplift from development value, then the total potential supply of affordable housing would currently amount to about 5,500 from:</p> <ul style="list-style-type: none"> • 1,082 completions to 2011 • 329 dwellings commitments at 2011, and • The potential delivery of up to 4,090 affordable dwellings from the approximate 13,400 residue of housing provision from which affordable housing can be sought. <p>The potential to deliver about 4,090 affordable dwellings through housing development permitted during 2011 - 2030 includes delivery of sites allocated in this plan This potential is a realistic forecast, based on:</p> <ul style="list-style-type: none"> • the residue of overall housing provision not committed as at April 2011 (approximately 13,800 dwellings excluding empty homes brought back into use and housing release as household moves to extra care housing with high-care packages) • taking into account amended Policy SWDP 31's sliding scale of affordable housing to be sought from sites permitted for C3 dwellings. That policy is based on the robust, credible evidence in the Affordable Housing Economic Viability Study 2008 • A further reduction of 5% for forecasting purposes only, to discount lower delivery rates prior to plan adoption and to allow for circumstances where there may be no local

	SWDP 2
	<p>need, consistent with the criteria for Policy SWDP 31, or there are viability issues (although the sliding scale is set at a level where overall development remains viable)</p> <p>Robust implementation of Policy SWDP 31 will be essential in meeting the Plan's objective of maximising the opportunity to deliver affordable housing. This will include measures to deliver sustainable development consistent with policies in the plan.</p> <p>The target provision of 5,500 units of affordable housing is about 2,850 below the total level of potential affordable housing need. However, as the total planned supply exceeds the housing provision total by 290 dwellings, a further 90 affordable dwellings could be achieved, thus reducing the gap to 2,760.</p> <p>C2 housing (residential care homes, the high end care of extra-care housing) and non-self-contained student accommodation are not subject to Policy SWDP 31 and so will not contribute to the supply of affordable dwellings.</p> <p>However, further additional affordable housing can be delivered through other means.</p> <p>a) Part of the 2,760 residual gap is expected to be met from recently permitted development that is subject to completion of Section 106 agreements in Wychavon. This is likely to be about 500 affordable dwellings- these were not included in the commitment of 329 affordable housing units listed above (although they are counted in the</p>

	SWDP 2
	<p>overall dwellings count)</p> <p>b) part of the remaining gap of 2,260 dwellings can be met from changes in tenure within the existing stock, or from sources external to South Worcestershire, and so won't add to total provision in the plan area, including:</p> <ul style="list-style-type: none"> • The change in stock of housing for private sector rent that is affordable in Worcester (i.e. market housing ownership changing tenure to private rent) is expected to continue to increase at a rate of a net 30 per year. Applying this for the period 2011 - 2030 adds a further 570 to the stock of affordable housing, reducing the gap to 2,190 • RSLs purchasing 'existing satisfactory properties' and acquiring properties under the Mortgage Rescue scheme • affordable housing permitted in areas immediately adjoining the plan area that have been agreed as available for meeting need in South Worcestershire <p>c) Of the remainder, further affordable dwellings are expected as rural exceptions, and from affordable housing delivered through Neighbourhood Plans and Community Right to Build, and delivery of affordable housing from financial contributions from small sites (less than 5 dwellings). These will occur either as 'exceptions' to the main policy guiding development, e.g. in the</p>

	SWDP 2
	<p>countryside, or will be the subject of neighbourhood policies and mechanisms outside the remit of this Plan. Therefore, these are extra to the 23,200 housing provision total (consistent with Framework paragraph 47, 2nd and 3rd bullet points regarding supply assessment).</p> <p>d) The remaining gap will reduce as:</p> <ul style="list-style-type: none"> • RSLs are expected to build more 'affordable rent' housing without grant funding, by raising money on the financial market and funded by the affordable rents. • Local Authority New Build, if taken up by the Councils • 100% grant funding / affordable housing delivered through a range of mechanisms - currently e.g. the Affordable Homes Programme (replacing the National Affordable Housing Programme), Kickstart (HomeBuy Direct and NAHP) <p>These would be 100% affordable schemes. If built, these would increase the total supply of affordable housing counted for SWDP 2 purposes.</p> <p><u>Future Action</u></p> <p>Robust and transparent assessment of SWDP 2 will be undertaken in light of policy SWDP 31 and worked up alongside CIL to incentivise new development to occur. Decisions on the CIL Charging Schedule rates have yet to be taken and will need to be informed by the scale of affordable housing need and the potential to deliver through</p>

	SWDP 2	
		e.g. s106 agreements. Government decision is awaited on whether future regulations on CIL will encompass affordable housing.
	LOCALLY DERIVED HOUSING PROVISION TARGETS	
SOC009	<p>Delete paragraph 2.2 from 4th sentence ('The Decentralisation and Localism Bill...') to the end of paragraph 2.2 and paragraph 2.3 and replace with the following:</p> <p><i>The Government's proposed changes to the planning system provided the opportunity for the three Councils to re-examine closely the latest available, reliable, local evidence base and used this evidence to establish their own local development provision requirements for employment, housing and other land uses through the plan-making process.</i></p> <p><i>Updated evidence includes the Worcestershire Strategic Housing Market Assessment 2012 and the South Worcestershire Development Plan Demographic Background Paper February 2012. The SHMA is evidence, not policy, but it is the starting point for determining the level of housing provision 2006 - 2030 for SWDP. A wide range of other evidence has also been considered.</i></p> <p>REJECTED ALTERNATIVES</p> <p><i>At a completion rate of 1225 to 1275 dwellings per year, the scale of housing provision for South Worcestershire set out in the published draft West Midlands Regional Spatial Strategy – Phase 2 or the Panel Report would equate to about 29,400 to 30,600 over the plan period 2006 to 2030. This is about 300 per year above the Sensitivity Scenario 2 rate and up to 250 per year above the scale equivalent to the 2008 household projections.</i></p> <p><i>The Housing Background Paper demonstrates that it is not necessary to build dwellings at this higher rate in order to be consistent with an economic prosperity led planning strategy or to deliver sufficient affordable housing consistent with the Plan objective to maximise opportunities to deliver affordable housing</i></p> <p><i>The rate of growth in WMRSS Phase 2 is excessive in the light of the analysis of improving the alignment of population and households, housing, jobs, labour force,</i></p>	<p>For the SWDP to be the most appropriate strategy, to be in accordance with NPPF and to provide adequate justification it needs to be amended.</p> <p>Previous guidance in PPS3 (paragraphs 32 to 35), which the Preferred Options Plan had had regard to, has now been wholly superseded by NPPF, particularly:</p> <p>a) NPPF paragraph 44, which states that LPAs should 'use their evidence base (<i>our emphasis</i>) to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework'; and</p> <p>b) NPPF paragraphs 158 -159 regarding the use of a 'proportionate 'evidence base to ensure that the 'Local Plan is based on adequate, up-to-date and relevant evidence (<i>our emphasis</i>) about the economic, social and environmental characteristics and prospects of the area.'</p> <p>The Preferred Options plan had been informed by the Focused Sub-Regional Review of the RSS Evidence Base - Background Paper 1 Demographics & Housing Need / Demand (Sept.</p>

	SWDP 2	
	<p><i>and taking into account the need to protect key environmental assets. This issue involves cross-boundary issues and the Duty to Co-operate</i></p>	<p>2010). This considered estimates from the perspective of RSS evidence base at the time. That evidence document was one part of the evidence base that informed the Preferred Options housing provision numbers. However, in considering housing and other requirements for local plan-making, account needs to be taken of more detailed and up-to-date sub-regional and local information, not least given the passage of time since RSS evidence underpinning housing provision targets was produced.</p> <p>Vital new evidence has emerged since the SWDP Preferred Options were published. The most up-to-date evidence is now the Worcestershire Strategic Housing Market Assessment Jan2012. This is more up-to-date than the evidence used to justify the emerging WMRSS Revision Phase 2. SHMA is evidence, not policy. SHMA is therefore the starting point for determining the level of housing provision 2006 - 2030 for SWDP. Other evidence must also be considered.</p> <p>In addition, since July 2011 Worcestershire County Council has produced the South Worcestershire Development Plan Demographic Background Paper (February 2012), which updates information previously published in the Worcestershire Demographic Report 2004 - 2009 (and the earlier Worcestershire Demographic Report 2011 with South Worcestershire Appendix). It analyses the 2008 CLG household</p>

	SWDP 2	
		<p>projects and incorporates analysis of the 5 main SHMA Scenarios. The addendum to the 2012 Background paper includes analysis of the ONS 2010-based population projections.</p> <p>CLG intend publishing 2010-based household projections but has not yet indicated when they will be published.</p> <p>Information has been available across a range of evidence and governance documents</p>
SOC010	<p>Amend Figure 2 to state that:</p> <p><i>A full audit trail listing the evidence used and explaining how evidence , including the sustainability appraisal and consideration of representations, has informed the development of the plan is set out in a series of background papers</i></p> <p>Amend reasoned justification to INSERT the following new paragraph at the end of the Paragraph 4.16:</p> <p><i>The Worcestershire Strategic Housing Market Assessment 2012 is the latest assessment of the full housing needs of the plan area. The South Worcestershire Councils worked with neighbouring authorities because the housing market areas cross administrative boundaries. The 2012 SHMA developed scenarios identifying the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which meet household and population projections, taking account of migration and demographic change.</i></p> <p><i>The SHMA evidence, which used the latest available national household (2008) and population projections, informed the Councils' development of policy on housing provision. It enables the Councils to meet the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in the National Planning Policy Framework. The national projections and SHMA are evidence not policy. Other material considerations are taken into account, including the natural and historic environment such as the Malvern Hills Area of Outstanding Natural Beauty, and the viability of delivering affordable</i></p>	<p>To ensure the SWDP provides adequate justification and is in accordance with NPPF, it needs to be amended.</p> <p>In response to representations about the need for an audit trail clearly showing how the housing provision policy has been derived from the evidence available, the Councils have produced the Housing Background Paper.</p> <p>Although preparation of the Preferred Options plan was informed by a range of demographic and housing evidence, including the 2007 Strategic Housing Market Assessment, new evidence became available after the Preferred Options were published.</p> <p>To be consistent with the Framework paragraph 159, the local planning authorities need to have a gained a clear understanding of housing needs in their area. Therefore the plan needs make clear that it has been informed by the latest Strategic Housing Market Assessment (2012), and states:</p> <ul style="list-style-type: none"> • what the Worcestershire Strategic Housing

	SWDP 2	
	<p><i>housing and infrastructure.</i></p> <p>The use of SHMA 2012 and other matters to determine policy underpins recommended changes to Policy</p>	<p>Market Assessment 2012 is</p> <ul style="list-style-type: none"> • how it provides the latest assessment of full housing needs. • that the Councils worked with neighbouring authorities and why • the 2012 SHMA developed scenarios • it uses latest national projections • SHMA is evidence, not policy • other material considerations are taken into account. <p>The plan needs to be consistent with the Framework paragraph 17, core principle 3 - i.e. every effort needs to have been made objectively to identify and then meet the housing needs of the plan area.</p> <p>It also needs to be consistent with Framework paragraph 47- the Councils need to use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in the Framework.</p>
	SWDP 2 and alignment with an economic prosperity-led planning strategy	
SOC011	<p>Change to written justification</p> <p>Insert following paragraph immediately before the heading 'Delivering Development' and Paragraph 4.17:</p> <p><i>4.17 The Worcestershire Strategic Housing Market Assessment 2012 provides robust, credible evidence to 2030 in the form of scenarios of housing growth, informed by these national projections and by evidence on jobs growth. The South Worcestershire</i></p>	<p>To ensure the SWDP provides adequate justification and is in accordance with NPPF, it needs to be amended.</p> <p>The Councils carefully considered the available evidence when preparing the Preferred Options document. However, evidence submitted with</p>

	SWDP 2	
	<p><i>Councils' locally-derived housing provision policy of about 23,200 dwellings for 2006 - 2030 reflects the overall scale of housing growth associated with SHMA Sensitivity Scenario 2 (23,157 dwellings) and improves the alignment of housing, jobs, and the labour force. The scale of growth of the Plan's sub-areas is moderated by the need to respect key environmental assets, notably the Malvern Hills AONB and to absorb displaced requirement within the plan area, so that the plan is positively prepared. The Housing Background Paper 2012 sets out the detailed justification of the planned scale and distribution of housing development.</i></p> <p>Replace the first sentence of Paragraph 4.17 of the Preferred Options with the following: <i>The main focus of this Development Plan is to provide development which supports the area's economic prosperity. The key mechanisms to achieve this are to make provision for</i></p> <ul style="list-style-type: none"> • <i>the right amount and type of land for employment uses in locations where business will thrive and be more resilient to the twin challenges of global competition and moving towards a low carbon economy</i> • <i>sufficient housing that enables more of the labour force to be housed locally and provides the right mix to meet a wide range of housing needs</i> • <i>retail development that is more resilient to changing retail behaviour and challenges to the High Street and which supports town centre uses and the vitality and viability of town centres in South Worcestershire</i> • <i>infrastructure that supports communities housing the labour force and supports the movement of labour, goods and materials, with alignment of the phasing of development and supporting infrastructure, including facilities to support training and skills</i> 	<p>some representations raised queries about the relationship between the Preferred Options scale of housing provision, the scale of job growth, the ability to house the labour force and the impact on the economy (measured by GVA). A range of higher housing provisions were suggested by respondents, asserting that unless the level of housing provision is raised significantly, then jobs would be lost or economic growth would require significant levels of labour to be drawn from surrounding areas, increasing in-commuting. It was also suggested that this is likely to put pressure on lower-skilled residents seeking accommodation in South Worcestershire as demand outstrips supply. Alternatively, other respondents concluded that high levels of housing growth are undeliverable and not the best way to achieve a robust balance between the plan's various objectives.</p> <p>It was important to address these concerns by assessing the alignment of the plan's policies with the intention of being an economic prosperity-led planning strategy.</p> <p>The Housing Background Paper provides this assessment and demonstrates how the alignment between housing and the economy can be improved, consistent with the SWDP being an economic prosperity-led planning strategy. It sets out the justification for the response – to increase housing provision in the plan period to about 23,200. In particular, the scale of growth has been</p>

	SWDP 2
	<p>informed by Sensitivity Scenario 2 from the 2012 Strategic Housing Market Assessment, which is a variant of SHMA 2012 Core Scenario 4 that aligns employment forecasts with the projected labour force within each authority, based on the demographic trend-based Core Scenario 3. This alignment process keeps a number of key assumptions constant, including Economic Activity Rates.</p> <p>The alternative SHMA scenarios that most closely align to an economic prosperity-led plan are Core Scenario 4 and Sensitivity Scenario 2.</p> <ul style="list-style-type: none"> • <u>Core Scenario 4</u> SHMA paragraphs 6.85 and 6.86 conclude that for the majority of Worcestershire authorities, the projections under Core Scenario 4 show a significantly greater level of population growth. This is largely driven by the assumption that each authority needs to accommodate further in-migration of working-age people to service both new jobs and / or existing jobs as the population ages and retires. In reality it is likely that the existing labour force will expand its capacity naturally through higher levels of economic activity of those in the upper age bands of the active workforce. This reflects plans to raise pensionable ages and a sustained pressure on many people to continue to supplement potential pensions with income from employment. • <u>Sensitivity Scenario 2</u> modifies the economic

	SWDP 2	
		<p>activity rates of this particular age cohort (with incremental increases in economic activity rates in the age groups 50 - 64 and 65+). Paragraph 6.87 concludes that these assumptions serve to expand the latent capacity of the existing labour force rather than require the same levels of in-migration of working age people to match job forecasts. This is considered to represent more accurately the way in which the labour force will change in the future.</p> <p>As the result of the councils' consideration of these matters, the councils concluded that the Plan should take into account the latest housing scenarios from SHMA 2012. Whilst the positive implications of Scenario 4 would move South Worcestershire towards a position of stabilising the labour force over the plan period, it would have significant consequences due to the impact of the scale of development and the demand on resources, particularly for infrastructure.</p> <p>The councils' decision to rely on the above evidence and to use Sensitivity Scenario 2 to underpin policy on the scale of housing provision is justified. It is reasonable to anticipate a rise in economic activity rates in older age groups. The availability of a labour force is a national long-term issue due to the ageing population. All planning authorities face the long-term trend of an ageing population, which has potential implications for the local labour supply, particularly those areas</p>

	SWDP 2	
		<p>experiencing natural decrease. The impact of raising the pension age and the consequent need for many to work longer is already the subject of a national policy on pensions.</p> <p>The Plan, as proposed to be amended by this Schedule of Changes, will set out the economic vision and economic strategy that positively and proactively encourages sustainable economic growth, in order to be consistent with Framework paragraph 21. Evidence in the Housing Background Paper and the Economic Prosperity Background Paper demonstrates how the alignment between housing and the economy can be improved, consistent with the SWDP being an economic prosperity-led planning strategy. The economic strategy for South Worcestershire is to be found at SOC017 in this schedule.</p> <p>The Plan does not have a specific target for the net increase in jobs. Instead the Plan focuses on creating the right conditions for creating jobs. SWDP objectives include development that focuses on improving the area's economic prosperity, delivering new jobs, retaining key employers and maximising high value employment opportunities through providing the right employment sites. The economy can prosper and businesses can be competitive through investment and improved productivity, not necessarily through creating many more jobs.</p>
	HOUSING SUPPLY	
SOC012	Change Table 4 in Policy SWDP 2 as follows:	To ensure the SWDP strategy is the most

SWDP 2		
<p>HOUSING SUPPLY 2006 to 2030</p> <p>Wider Worcester Area (WWA)</p> <p>1,770 Completions¹</p> <p>1,193 Dwellings under construction and outstanding commitments at the latest monitoring date²</p> <p>150 Long term empty homes brought back into use</p> <p>100 Housing released by households moving into the highest level of extra care housing (which is effectively C2)</p> <p>994 Windfall Allowance³</p> <p>1,395 Urban Capacity Allocations⁴</p> <p>3,925 Urban Extension⁵</p> <hr/> <p>9,527 Subtotal</p> <p>Malvern Hills (excluding WWA)</p> <p>1,097 Completions¹</p> <p>782 Dwellings under construction and outstanding commitments at the latest monitoring date²</p> <p>150 Long term empty homes brought back into use</p> <p>200 Housing released by households moving into the highest level of extra care housing (which is effectively C2)</p> <p>760 Windfall Allowance³</p> <p>481 Urban Capacity Allocations</p> <p>700 Urban Extensions</p> <p>597 Village Allocations⁶</p> <p>70 Tenbury Wells Allocations</p> <p>43 Upton-upon-Severn Allocations</p> <hr/> <p>4,880 Subtotal</p> <p>Wychavon (excluding WWA)</p>		<p>appropriate, and that the plan is adequately effective and justified, it needs to be amended.</p> <p>As well as policy towards housing provision, the plan also needs to set out policy towards the elements of housing supply which are the means by which housing provision is met.</p> <p>For clarity, certainty and to be consistent with national policy, the components of supply should be clearly identified in policy SWDP 2 based on proportionate (i.e. adequate, up-to-date, relevant) evidence to accord with NPPF paragraph 158.</p> <p>The Housing Background Paper provides detail about the changes to supply components drawn from a range of information, updated in the light of Councils' consideration of representations and amended allocations, informed by:</p> <ul style="list-style-type: none"> • Housing Land monitoring provides up-to-date evidence regarding completions, under construction and commitments • The Strategic Housing Land Availability Assessment provides evidence on available and developable sites <p>The publication of the National Planning Policy Framework provides the opportunity to reconsider the range of supply elements that the Councils can include in policy. These should now include:</p> <ol style="list-style-type: none"> 1. completions from 1 April 2006 2. dwellings under construction at the latest monitoring date and outstanding commitments at the latest monitoring date (with a discount of

SWDP 2		
1,090	Completions ¹	4% for non-delivery) 3. long-term empty homes brought back into use 4. small windfalls in the first 10 years (from 2015/16 to avoid double count with completions of committed windfall sites) 5. small windfalls after the first 10 years 6. Housing released by households moving into higher levels of extra-care housing supported by care packages (which is effectively C2 accommodation) providing specialised housing for those with support or care needs 7. Site allocations Where monitoring identifies under-supply compared to the monitored housing trajectory, supply can be brought forward through permitting allocations or via windfalls. The Councils will monitor delivery of the supply components for housing, employment land and retail floorspace through the Annual Monitoring Report, which is the appropriate vehicle to inform whether policy delivery is on course or whether the plan needs to be reviewed. The Policy needs to be informed and accompanied by a housing trajectory for the plan period, for market and affordable housing, illustrating the expected rate of delivery. The plan needs to set out a housing implementation strategy for the full range of housing describing how the Councils will maintain delivery of a five-year supply of housing land to meet the housing
2,777	Dwellings under construction and outstanding commitments at the latest monitoring date ^{2,7}	
250	Long term empty homes brought back into use	
200	Housing released by households moving into the highest level of extra care housing (which is effectively C2)	
1,114	Windfall Allowance ³	
793	Urban Capacity Site allocations ⁸	
1,400	Urban Extension Site allocations	
1,457	Village Site allocations ⁶	
9,081	Subtotal	
	South Worcestershire	
23,488	Total Supply	
	Changes to Written Justification	
	Replace paragraph 4.18 (2 nd and 3 rd sentences) as follows: <i>Additional work on urban capacity for the city, including the allowance for small windfalls has demonstrated that the number of dwellings that can be accommodated within the city boundary can be increased to about 5,370 homes, plus the allowance for about 150 empty homes brought back into use and about 100 dwellings released as households move into extra care homes with higher care packages. This has consequently significantly reduced the scale of the Wider Worcester Area's residential development to be met from urban extensions to 3,925 in order to address the revised requirement for 9,400 dwellings from 2006 - 2030.</i>	
	Insert additional reasoned justification after paragraph 4.18 and before paragraph 4.19 <i>As well as dwellings completed since 1 April 2006, those dwellings under construction or with planning permission but not yet started (discounted by 4%) are part of the</i>	

	SWDP 2
	<p><i>supply counted towards the housing provision. In addition, new homes will be achieved by:</i></p> <ol style="list-style-type: none"> <i>1) the development of allocation sites identified within the South Worcestershire Development Plan;</i> <i>2) the development of small windfall sites and the change of use of buildings where land and premises are shown to be surplus to the requirements of other land uses;</i> <i>3) the provision of new homes through conversions;</i> <p><i>Housing supply is also added to by</i></p> <ol style="list-style-type: none"> <i>1) bringing long term empty homes back into use</i> <i>2) the release of housing achieved through delivery of extra care housing that involves a significant level of care through a care package</i> <p><i>Affordable housing delivered through Neighbourhood Plans and Community Right to Build, and from financial contributions from small sites are sources of un-quantified supply which are additional to the supply identified in Table 4.</i></p> <p><i>Over time other sites may be identified in later Strategic Housing Land Availability Assessments. Development of these sites would add to housing supply. However, at this time they are unknown and so are not included in the supply set out in Table 3.</i></p> <p>target. This:</p> <ul style="list-style-type: none"> • should draw on evidence of the supply of deliverable and developable sites • can include allowance for windfall sites in the 5-year supply where supported by compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. <p>Unlike Planning Policy Statement PPS3, the NPPF does not preclude counting windfalls in the first 10 years if there are no 'exceptional' circumstances, provided there is compelling evidence of previous windfall delivery (consistent with the 5-year supply calculations).</p> <p>The Framework encourages bringing empty homes back into use (paragraph 51). The Housing Background Paper details the evidence underpinning a realistic assessment of the potential to bring long term empty homes back into use.</p> <p>The Framework requires the plan to address the full range of housing needs including those of older people and their needs ranging from accessible, adaptable general needs housing for those looking to downsize from family housing and the full range of retirement and specialised housing for those with support or care needs. Information is available from the Worcestershire Extra Care Homes Strategy, and is considered in the analysis in the Housing Background Paper 2012.</p>

	SWDP 2	
SOC013	<p>Amend footnotes to SWDP 2 as follows:</p> <ol style="list-style-type: none"> 1. Total number / amount of homes (net) / employment space completed for the period 1 April 2006 - 31 March 2011 2. Total number / amount of homes / employment space with planning permission. A discount of 4% for planning permissions not being implemented has been applied to all outstanding commitments (including dwellings under construction). 3. Windfall is unallocated housing development. An allowance for small windfall completions is included from 2015, to avoid double counting with the completion of small windfall commitments existing at 2011. The annual windfall rates allowances for 2015 - 2025 and for 2025 - 2030 are: Worcester 75 and 50; Malvern Hills 57 and 38; Wychavon 86 and 60. 4. These allocations are all within the Worcester City administrative area and are set out in the Site Allocations - Urban Areas chapter plus the allocation at Worcester Technology Park. 5. These allocations are beyond the Worcester City administrative area. The Urban Extensions are set out in the Site Allocations in the Worcester chapter. 6. Village allocations are set out in the Site Allocations - Rural Areas chapter. 7. In order to meet the 5-year housing land supply, Wychavon District Council has granted planning permission for three major housing proposals that are departures from the adopted Wychavon District Local Plan. These housing schemes are Crookbarrow Rd, Norton (74) Offenham Rd, Evesham (508) Allesborough Hill, Pershore (45) 	<p>To ensure that the SWDP is adequately justified, it needs to be amended</p> <p>The footnotes to SWDP 2 need updating and correcting in the light of proposed changes to SWDP 2 Table 4, and evidence set out in the Housing Background Paper 2012.</p>
	5-YEAR HOUSING LAND SUPPLY	
SOC014	<p>Insert the following in SWDP 2:</p> <p><i>The availability of housing land will be kept under review, maintaining a continuous supply of suitable sites to deliver the overall housing target. New housing sites identified in the plan will be released for development consistent with Table 4 having regard to:</i></p> <ul style="list-style-type: none"> • <i>The need to maintain a 5 year supply of housing land;</i> • <i>Policy XX on the effective and sustainable use of land</i> • <i>The contribution that will be made towards improved infrastructure provision,</i> 	<p>To ensure the SWDP is consistent with the NPPF, it needs to be amended.</p> <p>Amendments to the SWDP are necessary to update the policy and reasoned justification regarding the maintenance of a 5-year housing land supply.</p> <p>NPPF paragraph 47 requires Councils to have a 5% buffer moved forward from later in the plan</p>

	SWDP 2
	<p style="text-align: center;"><i>including affordable housing.</i></p> <p>Insert the following written justification: <i>The Housing Implementation Strategy for the full range of housing objectives comprises: Stronger Community Objectives 1, 2, and 3; and policies: SWDP 2 (housing provision and supply), SWDP 6 - 13; SWDP 17 - 21; and: SWDP 23 - 25 (site allocations), SWDP 30 (housing mix), SWDP 31 (affordable housing), SWDP 32 (rural exceptions), SWDP 34 (replacement dwellings), SWDP 36 (rural worker dwellings); SWDP 41 (residential moorings); plus: SWDP 33 (Gypsy and traveller accommodation).</i></p> <p><i>5-year housing land supply calculations will be produced annually for the following areas</i></p> <ul style="list-style-type: none"> • <i>Wider Worcester Area (WWA)</i> • <i>Malvern Hills (excluding WWA)</i> • <i>Wychavon (excluding WWA)</i> • <i>Worcester City</i> <p><i>Separate and non-transferable housing provision means that any identified shortfall against the 5 year housing land supply in one sub-area will not be met elsewhere in the plan area.</i></p> <p><i>At April 2011 there was.... [an updated statement about the 5 year supply positions will be</i></p> <p>period (unless there is evidence of persistent under-delivery when the buffer would have to be 20%).</p> <p>The Housing Background Paper demonstrates that there hasn't been persistent under delivery when housing completions are considered over a reasonable timeframe, and therefore the 5% buffer is used. The 5% is drawn forward from the end of the plan period; it is not additional to the proposed amended housing provision total of 23,200.</p> <p>In line with NPPF paragraph 48, the proposed amendments to SWDP make an allowance for windfall sites in the five-year supply as there is compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply.</p> <p>1) The plan (and the related evidence base) needs to state that:</p> <ul style="list-style-type: none"> i) There is currently a 5-year housing land supply for the plan area and for the specified sub-areas. The Councils should identify (and update annually) a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land; to be consistent with Framework paragraph 47 (2nd bullet point)

	SWDP 2	
	<p>inserted in the Plan when the 2012 monitoring information has been finalised, to inform the preparation of the pre-Submission plan</p> <p>TO FOLLOW</p> <p>Guidance set out in the National Planning Policy Framework emphasises how important it is for the South Worcestershire Local Planning Authorities to demonstrate a five year supply of deliverable sites. This demonstration is vital if policies for the supply of housing are to be considered up to date when applying the presumption in favour of sustainable development for development management purposes.</p> <p>Insert Annex illustrating the housing trajectories</p>	<p>and to provide sufficient certainty regarding housing delivery</p> <p>2) The plan will need to include a base-point housing trajectory for market and affordable housing in the plan, to demonstrate and monitor delivery against, and maintenance of the 5 year housing supply, to be consistent with Framework paragraph 47, bullet point 4 and to provide clarity. The trajectory will illustrate the expected rate of housing delivery for the plan period.</p> <p>The plan should set out a housing implementation strategy for the full range of housing objectives. This will be expressed through the Stronger Community Objectives and relevant policies: In accordance with Framework paragraph 47, the housing implementation strategy must describe how the Councils will maintain delivery of a five-year supply of housing land to meet their housing target(s), e.g. ensure that the plan</p> <p>i) Confirms that separate 5-year supply calculations will be produced annually for each sub area, and for Worcester City – for clarity and certainty.</p> <p>The Housing Background Paper 2012 will set out (in an annex) the 5-year supply analyses for the 3 sub areas and for Worcester City, informed by the 2012 monitoring, to be finalised to inform the preparation of the Pre-Submission Plan.</p> <p>The Framework does not require the Plan to</p>

	SWDP 2							
		<p>identify an additional 20% housing land supply. Framework paragraph 47 relates to the 5-year supply regarding an “additional buffer of 5% (moved forward from later in the plan period)”.</p> <p>ii) identify the material considerations to be taken into account i.e.</p> <ul style="list-style-type: none"> • Maintaining a 5-year supply in each sub-area • Priority for reuse and development of brownfield land – towards meeting a brownfield target • The contribution towards infrastructure and affordable housing 						
	BRINGING BACK EMPTY HOMES INTO USE / BETTER USE OF DWELLING STOCK							
SOC015	<p>Change SWDP 2 to include allowance for long-term empty homes to be brought back into use by 2030, as follows:</p> <table data-bbox="248 900 651 1027"> <tr> <td>Worcester</td> <td>150</td> </tr> <tr> <td>Malvern Hills</td> <td>150</td> </tr> <tr> <td>Wychavon</td> <td>250</td> </tr> </table> <p>Insert the following written justification</p> <p><i>The Framework makes clear that local planning authorities should identify and bring back into residential use empty housing and buildings in line with local housing and empty homes strategies. A realistic allowance for bringing long term empty homes in the sub areas has been included in Policy SWDP 2 as part of the supply to meet the provision requirement.</i></p>	Worcester	150	Malvern Hills	150	Wychavon	250	<p>To ensure the SWDP provides adequate justification and to be consistent with NPPF (paragraph 51), it should be amended.</p> <p>The plan should take into account the opportunities to bring long-term empty homes back into use. This means that they become available to meet part of the need for housing which would otherwise have had to be met by new build or conversion.</p> <p>Assessment of housing supply to meet the provision requirement should take account of empty homes. The South Worcestershire authorities are identifying and bringing back into residential use empty housing and buildings in line with the Worcestershire Housing Strategy and the Worcester Empty Homes Strategy (2005 - 2008)</p>
Worcester	150							
Malvern Hills	150							
Wychavon	250							

	SWDP 2
	<p>objective: To reduce the number of long term empty homes and increase the housing supply in Worcester by bringing them back into use.</p> <p>As of 1 April 2004 there were a total of 1170 empty properties in Worcester, 2.86% of the 40,921 properties in the City. Of this total 346 were identified as long-term empty properties</p> <p>The English Housing Stock Condition Survey 2010 identifies that the number of empty homes in the plan area was:</p> <p style="padding-left: 40px;">Worcester 1216 Wychavon 1392 Malvern 1176</p> <p>Evidence about Worcester indicates that about two-thirds of empty homes are empty for only a short time (less than 6 months); e.g. when houses are sold, renovated / repaired, or new tenants found. This is part of the normal 'churn' in the housing market, as houses are bought and sold, or relet. These dwellings were not at risk of being lost to supply and cannot be counted again as a net addition to supply when reoccupied.</p> <p>Of those empty for more than 6 months, about a third are subject to litigation which makes them unavailable for local authority purposes. Another third are taking more than 6 months to renovate but will eventually come back into the housing supply without intervention.</p> <p>That leaves only a third that would otherwise remain empty, become derelict with time and</p>

	SWDP 2							
		eventually be lost to supply. It is these dwellings that need intervention in order to be brought back into use in the housing supply.						
	WINDFALLS							
SOC016	<p>Amend SWDP 2, Table 4 supply to include the following allowance for small windfalls:</p> <table> <tr> <td>Worcester</td> <td>994 dwellings</td> </tr> <tr> <td>Malvern Hills</td> <td>760 dwellings</td> </tr> <tr> <td>Wychavon</td> <td>1,114 dwellings</td> </tr> </table> <p>Amend footnote 3 to update the reference to windfalls Insert additional written justification regarding the sources of supply See also responses regarding the 5-year housing land supply</p>	Worcester	994 dwellings	Malvern Hills	760 dwellings	Wychavon	1,114 dwellings	<p>To ensure the SWDP is the most appropriate strategy and provides adequate justification, it should be amended.</p> <p>The Plan should be amended to take into account small windfalls from 2011 (not just those after the first 10 years).</p> <p>When the Preferred Options were published, PPS3 precluded taking windfalls into account in the first 10 years of the plan period. The Preferred Options only included a small allowance for windfalls after the first 10 years, as allowed by PPS3.</p> <p>Since publication of the Preferred Options, the Government has published the National Planning Policy Framework, which replaces the previous guidance in PPS3 Housing. The Framework does not preclude including an allowance for windfalls in the first 10 years.</p> <p>Therefore the Councils have assessed the potential for small windfall development (sites of 9 dwellings or fewer and not on residential gardens), and identified the following component of supply to be set out in the housing supply policy:</p> <p>TOTAL - 2,868 Worcester (994) based on:</p> <ul style="list-style-type: none"> • 75 per year in 2015 - 2025
Worcester	994 dwellings							
Malvern Hills	760 dwellings							
Wychavon	1,114 dwellings							

	SWDP 2	
		<ul style="list-style-type: none"> • 50 per year in 2025 - 2030 • With discount of 6 dwellings to avoid double count of site allocation for 6 dwellings <p>Malvern Hills (760) based on:</p> <ul style="list-style-type: none"> • 57 per year in 2015 - 2025 • 38 per year in 2025 - 2030 • no discount for allocations as the above Malvern rates are only for sites of 4 or less dwellings <p>Wychavon (1114) based on:</p> <ul style="list-style-type: none"> • 86 per year in 2015 - 2025 • 60 per year in 2025 - 2030 • With discount of 46 dwellings to avoid double count of site allocations in site size category of 5 - 9 dwellings. <p>The allowance is consistent with Framework paragraph 48. The framework makes clear that local planning authorities may make an allowance for windfall sites in the five-year supply. National policy no longer prevents windfalls being taken into account.</p> <p>The total potential supply from small windfalls (not on residential gardens) forecast for 2015 to 2030 is 2,868, and the Councils consider this is realistic. This equates to 12% of the total plan period provision and 20% of the non-committed provision as at April 2011. It allows a meaningful degree of flexibility for sites to come forward within the</p>

	SWDP 2	
		<p>overall potential supply without undermining the strategic thrust of the plan.</p> <p>The plan provides a reasonable and realistic balance between the greater certainty of site allocations and the flexibility of windfall allowance.</p> <p>The Housing Background Paper sets out the compelling evidence that small windfall sites have consistently become available in the local area and will continue to provide a reliable source of supply. The analysis has had regard to historic windfall delivery rates. After 10 years, the likely delivery rate is reduced by a third to reflect the general current constraints of development boundaries and the take up of existing brownfield sites. The scale identified avoids double counting by excluding small site allocations.</p> <p>The windfall allowance does not include large windfalls that are identified in the Strategic Housing Market Assessment, so is realistic in that it avoids double counting.</p>
	Employment allocations - figures	
SOC017	<p>Written justification:</p> <p>Insert the following as a new section in the plan, after the Plan's overall Vision, before the Objectives:</p> <p><i>The economic role is one of the Plan's three roles to achieve sustainable development, the other two being social and environmental. Through its economic role the plan contributes to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure.</i></p>	<p>To ensure the SWDP is in accordance with NPPF, it needs to be amended.</p> <p>The plan needs to set out the economic vision and economic strategy, which positively and proactively encourages sustainable economic growth, in order to be consistent with Framework paragraph 21.</p> <p>Whilst the Vision in the Preferred Options document expresses some of the elements of the</p>

	SWDP 2	
	<p><i>The Economic Vision and Economic Strategy for South Worcestershire are at the core of this economic prosperity led planning strategy. They elaborate on and develop the Plan's overall vision for South Worcestershire, and expand the strategic focus which directs the Plan's policies and proposals.</i></p> <p>A Vision for Economic Prosperity in South Worcestershire.</p> <p><i>The economic vision for South Worcestershire is an excellent place to do business, with a substantial low-carbon economy that has diversified so that the overall prosperity of the area can withstand any down-turns in individual sectors. The South Worcestershire economy is one that is growing in output (increased GVA) and becoming more productive (GVA per head); there is sustained jobs growth, inward investment and indigenous investment; and infrastructure improvements particularly improving access for business are being delivered. Growth has been enhanced by the retention of younger residents, particularly University of Worcester graduates and youngsters who would previously have had difficulty in finding job opportunities. There are more high value jobs in the area, leading to reduced out commuting. Cultural and environmental assets have been enhanced increasing the attractiveness of the area to visitors, residents and businesses.</i></p> <p>The Economic Strategy for South Worcestershire is :</p> <ul style="list-style-type: none"> • <i>to create the conditions for sustained economic and jobs growth;</i> • <i>to ensure South Worcestershire is open for business and able to match the requirements of potential inward investors</i> • <i>to ensure a flexible approach is maintained to all opportunities that deliver economic benefits with a target of return to GVA levels that existed before the down turn in 2008.</i> <p><i>This will be achieved through:</i></p> <ul style="list-style-type: none"> • <i>Reduced reliance on the public sector and increase output and employment in the private sector, and particularly higher value and skilled occupations</i> • <i>Growing and adding value to existing South Worcestershire businesses including agricultural and horticultural businesses</i> • <i>Securing and growing high technology sectors which already have a presence in</i> 	<p>economic vision, a more comprehensive economic vision and economic strategy need to be set out in the plan, for the avoidance of doubt and to complement the overall Vision for South Worcestershire.</p> <p>The Economic Vision and Economic Strategy reflect the urgency for Councils through the plan to proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs, in line with Framework Core principles (paragraph 17).</p> <p>Developed in conjunction with the Council's Planning, Economic Development and Business and Economic Regeneration teams, the Economic Vision and Economic Strategy draw out key strands already included within the Preferred Options plan and express them clearly.</p> <p>Evidence in the Housing Background Paper and the Economic Prosperity Background Paper demonstrates how the alignment between housing and the economy can be improved. The Economic Prosperity Background Paper provides the audit trail setting out how the plan translates the economic vision and economic strategy into amended SWDP policies and proposals, consistent with an economic prosperity led planning strategy. It demonstrates how the plan is doing everything it can to support sustainable economic growth in South Worcestershire.</p>

	SWDP 2							
	<p><i>South Worcestershire</i></p> <ul style="list-style-type: none"> • <i>Providing the right land and premises in the right location and at the right time to help businesses start, grow and flourish</i> • <i>An established and sustained low carbon economy</i> • <i>Providing and maintaining an adequate supply of new homes that support economic growth</i> • <i>Maintaining a competitive level of infrastructure throughout South Worcestershire – particularly excellent access including electronic access</i> • <i>Sustained and regenerated South Worcestershire’s city and town centres as priority areas for regeneration</i> • <i>Supporting flourishing rural economies , with strong land-based sectors and diversification into higher added values activity, enhanced by greater broadband connectivity</i> • <i>Retaining retail spending in South Worcestershire and increasing leisure and tourism related spending / income</i> • <i>Ensuring local residents are able to take up increased job opportunities in higher skilled and higher value occupations.</i> 							
SOC018	<p>Insert the following into SWDP 2:</p> <p><i>Employment land provision will be made for about 280ha during the plan period, comprising the Sub-area Totals in Table A1 which are separate and non-transferable.</i></p> <p>Table A1 2006 to 2030 EMPLOYMENT PROVISION –SOUTH WORCESTERSHIRE AND SUB-AREAS</p> <p>Delete the column entry for employment land in Table 4 and insert the following:</p> <table border="0" style="width: 100%;"> <thead> <tr> <th style="text-align: left;">TABLE 4</th> <th style="text-align: right;">hectares</th> </tr> </thead> <tbody> <tr> <td>Wider Worcester Area (WWA)</td> <td style="text-align: right;">120</td> </tr> <tr> <td>Malvern Hills (excluding WWA)</td> <td style="text-align: right;">40</td> </tr> </tbody> </table>	TABLE 4	hectares	Wider Worcester Area (WWA)	120	Malvern Hills (excluding WWA)	40	<p>To ensure the SWDP is sufficiently justified and is the most appropriate strategy in the circumstances, it needs to be amended,</p> <p>Table 2, which contained the employment provision totals in the Preferred Options, is to be deleted. Instead, the locally derived overall scale of employment provision for the plan period for South Worcestershire and sub-areas (plus Worcester City) is elevated to Policy status in order to:</p> <p>a) give sufficient certainty through the policy towards the scale of provision to be made; and</p>
TABLE 4	hectares							
Wider Worcester Area (WWA)	120							
Malvern Hills (excluding WWA)	40							

SWDP 2		
Wychavon (excluding WWA)	120	<p>b) be consistent with the Framework (paragraph 154) whereby policy must provide a clear indication of how a decision-maker should react to a development proposal</p> <p>The Preferred Options plan referred to a five-year rolling supply of employment land. The purpose of this is to ensure that sufficient land is made available during the plan period. There is nothing in the policy or the SWDP as proposed to be amended that would prevent additional appropriate and sustainable proposals from being granted permission even if the original target figure for employment land had been met earlier than anticipated. Policy SWDP 2 as amended provides an employment land provision target. The target is not intended to be an absolute figure under those circumstances. Providing a supportive, flexible and responsive policy framework for future allocations allows for land to come forward as and when it is required.</p> <p>The scale of employment land provision enables the plan to improve choice and provide essential flexibility, ready to respond to improved economic circumstances.</p> <p>The Economic Prosperity Background Paper makes clear the evidence on which the employment land provision is based. The evidence indicates that employment land provision for the plan period should be in the range of about 220 – 290ha. The amended policy identifies employment land provision towards the upper end</p>
South Worcestershire TOTAL	280	
<i>Of which Worcester City</i>	<i>80</i>	

	SWDP 2
	<p>of this range in order to be ready for improvement in the economy, to support the plan's economic vision and strategy, and to be consistent with the Framework paragraph 17 (core principle) for the plan to proactively drive and support sustainable economic development. The Plan is making every effort to identify objectively and then meet the business needs of an area, and respond positively to wider opportunities for growth, taking account of the business needs of the area. The Plan correctly places significant weight on the need to support economic growth.</p> <p>The scale of provision in amended Policy SWDP 2 is also consistent with Framework paragraph 28 – this includes:</p> <ul style="list-style-type: none"> • Planning policies should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development; and • Promote a strong rural economy, so the local and neighbourhood plans support the sustainable growth and expansion of all types of business and enterprise in rural areas, both through conversion of existing buildings and well-designed new buildings. <p>Amendments to Policy SWDP 2 are proposed, to clarify that the concept and policy status of the 'Wider Worcester Area' and related development also applies to the employment provision and supply i.e.:</p> <p>To give sufficient certainty for development</p>

	SWDP 2	
		<p>management decision-making, for communities, investors and developers, identify the employment provision subtotals for:</p> <ul style="list-style-type: none"> • The Wider Worcester Area - to provide for the growth of Worcester including growth immediately outside the Worcester City administrative boundary, towards which urban extensions adjoining Worcester City will be needed • Malvern Hills (excluding the Wider Worcester Area) • Wychavon (excluding the Wider Worcester Area) <p>A statement about the scale of provision in each sub area is needed in the plan to provide clear guidance for each planning authority. For the avoidance of doubt the amended policy makes clear that the sub-area provision requirements are separate and non-transferable. A shortfall in one sub-area cannot be made good in another sub-area.</p> <p>The amendment to policy proposed above includes identifying specific employment land provision for Worcester City as well as for the Wider Worcester Area.</p> <p>The scale of employment provision between the sub-areas is commensurate with the settlement hierarchy policy and takes account of labour supply.</p>
SOC019	SUPPLY COMPONENTS	To ensure the SWDP is sufficiently justified

SWDP 2		
Wider Worcester Area		
Completions ¹	9.0	
Commitments ²	31.4	
Urban Capacity Allocations ⁴	41.0	
Urban Extensions ⁵	41.0	
SUPPLY Subtotal	122.4	
Malvern Hills (excluding WWA)		
Completions ¹	10.84	
Commitments ²	10.76	
Urban Capacity Allocations	9.00	
Urban Extensions	10.00	
Village Allocations ⁶	0	
Tenbury Wells Allocations	0	
Upton-upon-Severn Allocations	0	
SUPPLY Subtotal	40.6	
Wychavon (excluding WWA)		
Completions ¹	32.38	
Commitments ^{2, 7}	61.08	
Urban Capacity Allocations	0	
Urban Extensions	34.45	
Village Allocations ⁶	0	
Major Rural Employment Allocations	10.00	
SUPPLY Subtotal	137.91	
South Worcestershire TOTAL SUPPLY	300.91	
		<p>and is the most appropriate strategy in the circumstances, it needs to be amended,</p> <p>Informed by the representations on the plan, and consistent with the Framework paragraph 17 Core principle to “proactively drive and support sustainable economic development”. As well as stating employment land provision, Policy SWDP 2 is also amended to identify the amended supply as the result of proposed amendments to site allocations. These will add further employment sites within the plan area. However, this has not increased the total provision because monitoring of the potential supply led to corrections, including the use of the net employment land total at the Worcester Technology Park. As a result the scale of supply in Policy SWDP 2 is reduced to 301ha, even with additional sites being proposed.</p> <p>As amended the SWDP employment allocations are considered to be sufficiently robust and deliverable enough to fulfil the requirements of the strategy.</p> <p>The supply to be counted towards achieving the employment provision sub-area totals needs to be made clear.</p> <p>Several of the identified allocations lie immediately outside the Worcester city boundary, within the neighbouring authorities. The urban extensions including the Worcester Technology Park (SWDP8/5) lie immediately outside the city boundary. However, it is accepted by all three authorities engaged in producing the SWDP that</p>

	SWDP 2	
	<p>Written justification</p> <p>Insert the following:</p> <p><i>The scale of provision policy SWDP 2 is consistent with the Framework principles and policy towards sustainable development including the need for the plan to drive and support sustainable economic development. The provision requirements are targets to enable the Councils to take a positive approach to sustainable new development. The scale of provision enables the plan to improve choice and provide essential flexibility, ready to respond to improved economic circumstances. It allows an appropriate level of flexibility, consistent with the planning strategy being economic prosperity-led in order to create the right conditions to create jobs.</i></p> <p>See also responses to SWDP 2 - Housing provision and supply, regarding the policy change to improve alignment between housing and employment, and proposed changes to the policy footnotes</p>	<p>the urban extensions identified under SWDP 8 will serve the employment needs of Worcester, thereby supporting the growth of South Worcestershire. This represents a pragmatic and sustainable solution to the need to ensure that local residents are provided with sufficient employment opportunities while at the same time protecting the historic character and amenity of the city itself.</p> <p>See also proposed amendments to SWDP 2 - Housing provision and supply, regarding the policy change to improve alignment between housing and employment, and proposed changes to the policy footnote.</p>
	Retail provision and allocation - figures	
SOC020	<p>Insert the following into Policy SWDP2:</p> <p><i>Retail provision will be made for about 50,000 square metres (net floorspace) during the plan period comprising the Area Subtotals, which are separate and non-transferable as set out in Table A4</i></p> <p>Table A4 2006 to 2030 retail provision Square metres Wider Worcester Area (WWA)# 30,000 . Malvern Hills (excluding WWA) 7,500 Wychavon (excluding WWA) 12,500 South Worcestershire TOTAL# 50,000 # of which- Worcester City 28,000</p> <p>Amend footnote 5 to Table 4 to indicate that retail floorspace provision within the</p>	<p>To ensure that the SWDP is sufficiently effective and flexible and to be consistent with NPPF, it needs to be amended.</p> <p>The amendment to the Plan identifies the retail floorspace provision as a target in Policy SWDP 2 for South Worcestershire and for the sub-areas, for the avoidance of doubt and to clarify the scale of provision for monitoring purposes. This is a broad indication of the level of growth, justified by the available evidence.</p> <p>The SWDP plans positively for future retail activity but is also realistic. Evidence in the update report is relatively cautious in its approach to issues around capacity and associated expenditure in recognition of the turbulent economic conditions.</p>

	SWDP 2	
	<p>Neighbourhood Centre under policy SWDP8/1 is additional to the supply identified in Table 4, and is subject to detailed master planning</p> <p>Amend Reasoned justification</p> <p>Add the following:</p> <p><i>Identification of the components of retail floorspace set out in Table 4 for Worcester and the main centres of Malvern Hills and Wychavon indicate the main planned sources of retail floorspace supply.</i></p> <p><i>Current retail evidence does not indicate there is a need to expand the city and town centres listed in SWDP Policies. Given emerging changes in shopping activity and format, and the need to promote competitive town centres, the broad floorspace provision target together with policy SWDP 28 could enable the Councils to consider a suitably designed, located and sustainable retail scheme that takes supply above Table 4, that is located to benefit the vitality and viability of the established City and town centres and that complies with all other relevant SWDP policies and respects the character and size of the centres to which they relate.</i></p>	<p>Notwithstanding current turbulent economic conditions, the policy provides for growth in the long term and is in accordance with the requirements of NPPF paragraph 23, where the onus is on local authorities to promote policies that encourage vitality and viability.</p> <p>It would be inappropriate to make allowances at this stage for additional capacity based on speculation. The new policy proposed for a commitment to review of the SWDP by 2019 builds in a mechanism providing the opportunity for revising policy. Should monitoring show that the market has improved significantly and more quickly than anticipated, an early review of the SWDP could then look again at how demands for additional capacity could be met.</p> <p>No change is made to the food and non-food supply policy components as set out in the Preferred Options.</p> <p>The 2010 Retail Update Report found that the floorspace requirements for convenience shopping in South Worcestershire are marginally increased and oversupply marginally reduced, but the changes are small and do not require a different policy response. There is no new evidence available to justify an uplift in the policy provision. There is no need to increase the supply of retail floorspace identified in the policy further or to make additional site allocations.</p> <p>The Update Report goes on to suggest that there is unlikely to be significant demand for additional</p>

	SWDP 2
	<p>retail floorspace in Worcester / South Worcestershire, although any emergent demand is likely to occur in the city rather than elsewhere in the plan area. It states that there is a need to identify a large and flexible site to meet future retail demand.</p> <p>It is possible that the demand for retail floorspace in particular will reflect the demands of the market, especially given emerging changes in shopping activity and format (e.g. internet shopping).</p> <p>To that end, it is agreed that the Update Report does suggest that retail floorspace limits should not be seen as an upper level cut-off, “... <i>provided the development is suitably located to benefit the vitality and viability of the city centre</i>”. This will help to encourage a more flexible and market-responsive approach to the delivery of retail floorspace; any such development will be subject to the other policies of the SWDP and the NPPF and will need to reflect the size and character of the town centre in which it exists. This reconsideration does not, however, extend to housing or employment floorspace, which are not referred to in the Retail Report and which are subject to different criteria and demands in the SWDP.</p> <p>For clarity, and in order to develop a sustainable urban extension at Broomhall Community, the plan needs to be clear about the retail floorspace to be located at the Neighbourhood centre at the Worcester South Urban Extension allocation (see</p>

	SWDP 2	
		amendment to policy SWDP8/1 – indicating a scale of allocation).

SWDP 3 - SUSTAINABLE DEVELOPMENT

	SWDP 3	
SOC021	<p>Delete SWDP 3</p> <p>It is recommended that a new Overarching Sustainable Development Principles Policy (SWDP 1) replaces the previous SWDP 3 Sustainable Development Policy.</p> <p>The proposed new Overarching Sustainable Development Principles Policy would reflect the NPPF by reflecting the three roles that the planning system is expected to perform - economic, social and environmental.</p> <p>The proposed new Overarching Sustainable Development Principles Policy would also reflect the presumption in favour of sustainable development, as outlined in the NPPF, by seeking to secure development that improves economic, social and environmental conditions in South Worcestershire.</p>	<p>To ensure the SWDP is in accordance with NPPF, it needs to be amended.</p> <p>The National Planning Policy Framework (NPPF) states that the purpose of the planning system is to contribute to the achievement of sustainable development. It also states that there are three dimensions to sustainable development – economic, social and environmental. NPPF states that these roles should not be undertaken in isolation because they are mutually dependent.</p> <p>At the heart of the NPPF is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking.</p> <p>See Appendix B for proposed wording of new policy</p>

SWDP 4 - MOVING AROUND SOUTH WORCESTERSHIRE

	SWDP 4 - MOVING AROUND SOUTH WORCESTERSHIRE	
SOC022	<p>Add a paragraph to SWDP 4 protecting land for rail infrastructure enhancements and show these on the policies map.</p>	<p>To ensure that the SWDP demonstrates that it has been positively prepared, it needs to be amended.</p> <p>Paragraph 41 of the National Planning Policy</p>

SWDP 4 - MOVING AROUND SOUTH WORCESTERSHIRE		
		Framework allows / requires plans to protect routes that could provide sustainable transport infrastructure improvements
SOC023	Parking standards must be planning policy - they cannot be left to a Supplementary Planning Document. Parking standards need to be set out in an appendix to the plan and these standards should be the subject of public consultation.	To ensure that the SWDP demonstrates that it has been positively prepared, it needs to be amended. Parking standards must be planning policy - they cannot be left to a Supplementary Planning Document. Parking standards need to be set out in an appendix to the plan and these standards should be the subject of public consultation.
SOC024	Amend paragraph 4.58 to read: <i>Parking standards within new development should comply with the requirements outlined in appendix XX, make the most efficient use of the site's developable land and support the development Travel Plan, associated mode share forecasts, measures to encourage maximum use of sustainable modes of transport and proposed transport network mitigation measures</i>	To ensure that the SWDP demonstrates that it has been positively prepared, it needs to be amended. Parking standards must be planning policy - they cannot be left to a Supplementary Planning Document. Parking standards need to be set out in an appendix to the plan and these standards should be the subject of public consultation.
SOC025	Include the site of Worcestershire Parkway as a site allocation on the SWDP Policies Map.	To ensure that the SWDP demonstrates that it has been positively prepared, it needs to be amended. Paragraph 41 of the National Planning Policy Framework allows / requires plans to protect routes that could provide sustainable transport infrastructure improvements.

SWDP 6 - WORCESTER ALLOCATIONS

SWDP 6 – WORCESTER ALLOCATIONS		
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	SWDP 6 – WORCESTER ALLOCATIONS	
	Cedar Avenue Depot SWDP6/4	
SOC026	<p>Delete SWDP6/4 Cedar Avenue Depot – 45 Dwellings</p> <p>Insert in SWDP 6 - Worcester City Allocations (B. Mixed Uses, Table 7 Sites for mixed use development):</p> <p style="padding-left: 40px;">Cedar Avenue Depot / Blackpole Road: 115 dwellings 1.2ha employment land</p> <p>Amend Proposals Map to show site boundary for mixed use development.</p>	<p>To ensure SWDP is positively prepared and effective it needs to be amended.</p> <p>Development of this site for housing is necessary to ensure that the amended housing provision requirement for Worcester City is met.</p> <p>This site of 3.2ha adjoins the Preferred Options allocation for housing at Cedar Avenue and has been put forward as available for development as a single larger site totalling 4.31ha including the Preferred Options allocation. It has been suggested that there should be retail / retail and housing on the site. However, retail development in this location on existing employment land would not accord with SWDP 28 and the principle of new out-of-centre retailing at this site is not acceptable. The Employment Land Review (2011) recommends that the whole site should be retained for current employment use. However by bringing the two sites forward as a mixed use development for employment and housing, employment use is retained and an increased number of dwellings can be provided in order to meet the housing requirement of SWDP 2 as referred to above. This allocation will also be in line with the new SWDP policy on Making the Most Effective and Sustainable Use of Land. Furthermore, the retention of some employment land is in accordance with SWDP 27. The SWDP (as proposed for amendment) makes sufficient employment land provision.</p>

	SWDP 6 – WORCESTER ALLOCATIONS	
		The design and layout of the employment and residential uses would need to be determined through detailed design work, as will the potential for the retention of existing buildings, in accordance with amended Policy SWDP 26.
	SWDP 6 – Worcester - Dudley Close	
SOC027	<p>SWDP 6 Worcester City Allocations (A. Housing Table 6 Sites for Housing).</p> <p>Add site - Land at Dudley Close - 8 Dwellings</p> <p>Amend Proposals Map to include new site.</p>	<p>To ensure the SWDP is effective, it needs to be amended</p> <p>Development of this site for housing is necessary to ensure that the amended housing provision requirement for Worcester City is met.</p> <p>Evidence has been received from a Registered Social Landlord at the Preferred Options stage that identifies this site of 0.13ha as suitable and available for the development for 100% affordable housing (8 dwellings). It has been considered as part of the Strategic Housing Land Availability process.</p> <p>The housing provided will make a valuable contribution to the affordable housing requirements of Worcester City. The redevelopment of the brownfield site will provide an opportunity to improve the area with the site currently comprising a number of lock-up garages, which the respondent describes as being of low quality, underused and an area prone to anti-social behaviour.</p> <p>The proposed access will be off Dudley Close, which itself is accessed from Oldbury Road. The pedestrian link between Dudley Close and Drakes</p>

	SWDP 6 – WORCESTER ALLOCATIONS	
		Avenue will be retained in order to promote sustainable modes of transport. The allocation of this site will be in accordance with SWDP 2 in relation to meeting Worcester's housing requirements and the new SWDP policy regarding Making the Most Effective and Sustainable Use of Land.
	Moor Street Clinic SWDP6/8	
SOC028	Delete allocation from the SWDP. Amend Proposals Map to remove site	To ensure the SWDP is effective, it needs to be amended. There is no evidence that this site will be developable within the Plan period; the allocation must be removed from the Plan.
	Post Office Sorting Office SWDP6/9	
SOC029	Delete allocation from the SWDP Amend Proposals Map to remove site	To ensure the SWDP is effective, it needs to be amended. There is no evidence that this site will be developable within the Plan Period; the allocation must be removed from the Plan.
	New site – Land North of Warndon Woods	
SOC030	Insert the following into Policy SWDP 6 Employment (Table 8 Sites for Employment) <i>Land to the north of Warndon Woods, 18.46ha (gross) / 5ha (net) B1 use to be phased for development after 2019.</i> Amend Proposals Map to include new employment site and show revised Significant Gap designation. Insert additional reasoned justification following Paragraph 5.14: <ul style="list-style-type: none"> <i>The Significant Gap Policy designation to the east of the City, west of the motorway,</i> 	To ensure that the SWDP demonstrates that it has been positively prepared, it needs to be amended. Representations to Policy SWDP 6 have identified an omission in terms of employment land provision to the east of the City but to the west of the M5. Having carefully considered the representations there appears to be some merit in allocating this

	SWDP 6 – WORCESTER ALLOCATIONS	
	<p><i>will be retained except where new urban capacity site allocations within the Worcester City administrative boundary are proposed.</i></p> <ul style="list-style-type: none"> • <i>Housing development will not be permitted given the proximity of the land to the M5.</i> • <i>Undeveloped land in the Gap west of the A4440 should not be developed, to continue to provide a buffer, protecting the character of existing development at Warndon.</i> • <i>Some of the land east of the A4440 can be considered for employment development, complementing the proposed Worcester Technology Park development to the east of the M5, but development will be required to respect existing constraints such as the Conservation Area, listed buildings, the Local Nature Reserve at Warndon Woods and take into account on-site factors such as the easement related to the overhead electricity pylons and the landform. Up to 5ha net of high quality B1 employment development will be permitted, which is appropriate to the surroundings.</i> 	<p>area as employment land. However, there are a number of constraints both on and adjoining the site that will need to be addressed. This land is also designated as a Significant Gap. Taking all these issues into consideration it is recommended that the net developable area will be no greater than 5ha.</p> <p>Development for employment is consistent with the SWDP being an economic prosperity led planning strategy. It accords with the proposed economic vision and economic strategy proposed to be included in the SWDP.</p> <p>The development of this site for employment uses will complement the development of the Worcester Technology Park to the east of the motorway. Therefore, it will be phased for development post-2019 to ensure that the Technology Park is developed first.</p> <p>In view of these issues and for the avoidance of doubt this policy will include strict criteria to which the development of the site must conform:</p> <ul style="list-style-type: none"> • The Significant Gap policy will be retained as it continues to serve a useful purpose, separating the urbanised area of the City, particularly housing, from the motorway and protecting a number of landscape and natural and built heritage assets. The scale, design and layout of development in this area must have regard to the retained designation of the Significant Gap in which it will be located. Up to 5ha net of

	SWDP 6 – WORCESTER ALLOCATIONS	
		<p>high quality B1 employment development will be permitted, which is appropriate to the surroundings. On balance, high quality development in this location for the uses proposed would not adversely impact on the strategic function of the Significant Gap to such an extent that it would undermine that strategic function by causing unacceptable loss of openness</p> <ul style="list-style-type: none"> • Undeveloped land in the Significant Gap west of the A4440 should not be developed. This will continue to provide a buffer, protecting the character of the existing development at Warndon • The release of this land will be phased for development post-2019 in order to ensure that the employment allocation east of the M5 reaches a reasonable stage of development first. This site should not be considered as an alternative to the employment sites east of the M5 but should complement the proposed Worcester Technology Park • Housing will not be permitted as a suitable use given the proximity of the land to the M5 • Development will need to respect existing constraints such as the Conservation Area, listed buildings, the Local Nature Reserve at Warndon Woods and the landform. It must also take into account

	SWDP 6 – WORCESTER ALLOCATIONS	
		the easement related to the overhead electricity pylons.
	New Site – Land South of Warndon Woods	
SOC031	<p>Insert the following into Policy SWDP 6 - Employment (Table 8 Sites for Employment)</p> <p><i>Land to the south of Warndon Woods, 6.98ha (gross) / 5ha (net) B1 use to be phased for development after 2019</i></p> <p>Amend Proposals Map to include new site for employment use and show revised Significant Gap designation.</p> <p>Insert additional reasoned justification following paragraph 5.14:</p> <ul style="list-style-type: none"> <i>The Significant Gap Policy designation to the east of the City, west of the motorway, will be retained except where new urban capacity site allocations within the Worcester City administrative boundary are proposed.</i> <i>Housing development will not be permitted given the proximity of the land to the M5.</i> <i>Undeveloped land in the Gap west of the A4440 should not be developed, to continue to provide a buffer, protecting the character of existing development at Warndon.</i> <i>Some of the land east of the A4440 can be considered for employment development, complementing the proposed Worcester Technology Park development to the east of the M5, but development will be required to respect existing constraints such as the Conservation Area, Listed Buildings, Local Nature Reserve at Warndon Woods and take into account on-site constraints such as the easement related to the overhead electricity pylons and the landform. Up to 5ha net of high quality B1 employment development will be permitted which is appropriate to the surroundings.</i> 	<p>To ensure that the SWDP demonstrates that it has been positively prepared, it needs to be amended.</p> <p>Representations to Policy SWDP 6 have identified an omission in terms of employment land provision to the east of the City but to the west of the M5.</p> <p>Having carefully considered the representations, there appears to be some merit in allocating this area as employment land. However, there are a number of constraints both on site and on land adjoining the site that will need to be addressed. This land is also designated as Significant Gap. Taking all these issues into consideration it is recommended that the net developable area will be no greater than 5ha.</p> <p>Development for employment is consistent with the SWDP being an economic prosperity-led planning strategy. It accords with the proposed economic vision and economic strategy proposed to be included in the SWDP.</p> <p>The development of this site for employment uses will complement the development of the Worcester Technology Park to the east of the motorway. Therefore, it will be phased for development post-2019 to ensure that the Technology Park is developed first.</p>

	SWDP 6 – WORCESTER ALLOCATIONS	
		<p>In view of these issues and for the avoidance of doubt this policy will include strict criteria to which the development of the site must conform:</p> <ul style="list-style-type: none"> • The Significant Gap policy will be retained as it continues to serve a useful purpose, separating the urbanised area of the City, particularly housing, from the motorway and protecting a number of landscape, and natural and built heritage assets. The scale, design and layout of development in this area must have regard to the retained designation of the Significant Gap in which it will be located. Up to 5ha net of high quality B1 employment development will be permitted which is appropriate to the surroundings. On balance, high quality development in this location for the uses proposed would not adversely impact on the strategic function of the Significant Gap to such an extent that it would undermine that strategic function by causing unacceptable loss of openness • Undeveloped land in the Significant Gap west of the A4440 should not be developed. This will continue to provide a buffer, protecting the character of the existing development at Warndon • The release of this land will be phased for development post 2019 in order to ensure that the employment allocation east of the M5 reaches a reasonable stage of

	SWDP 6 – WORCESTER ALLOCATIONS	
		<p>development first. This site should not be considered as an alternative to the employment sites east of the M5 but should complement the proposed Worcester Technology Park</p> <ul style="list-style-type: none"> • Housing will not be permitted as a suitable use given the proximity of the land to the M5 • Development will need to respect existing constraints such as the Conservation Area, listed buildings, the Local Nature Reserve at Warndon Woods, the landform, and take into account the easement related to the overhead electricity pylons.
	SWDP 6 – New site - Worcester Old Brewery Service Station	
SOC032	<p>SWDP 6 Worcester City Allocations (A. Housing Table 6 Sites for Housing)</p> <p>Add site - Land at Old Brewery Service Station, Barbourne Road – 6 Dwellings</p> <p>Amend Proposals Map to include new site.</p>	<p>To ensure the SWDP is positively prepared and effective it needs to be amended.</p> <p>Development of this site for housing is necessary to ensure that the amended housing provision requirement for Worcester City is met.</p> <p>There is an opportunity to make better use of the vacant brownfield site by renewing the allocation on this frontage site. The Old Brewery Service Station site (0.15ha) was allocated for residential development in the City of Worcester Local Plan 1996-2011 and reallocated for housing development in the adopted Balanced Housing Markets DPD 2007. The site was the subject of an appeal decision in 2009 to grant outline planning</p>

	SWDP 6 – WORCESTER ALLOCATIONS	
		<p>permission for a convenience store with 12 residential flats above. That permission lapsed in February 2012 and has not been renewed. The DPD allocation for the site was not carried forward into the SWDP because it was assumed that the appeal scheme would be built out. However, in the absence of the (now lapsed) appeal scheme going ahead it is proposed that the former local plan allocation for affordable residential development should be re-instated in the SWDP.</p> <p>The allocation of this site is required to contribute to the required affordable housing provision in accordance with SWDP 2. It is also in line with the new SWDP policy regarding Making the Most Effective and Sustainable use of land.</p>
	Old Northwick Farm SWDP6/6	
SOC033	<p>Amend Proposals Map to show extension to boundary of allocation SWDP6/6 to include this site (subject to findings of the SFRA).</p> <p>Include footnote to policy SWDP6/6 to make the provision for 40 dwellings subject to the findings of the Strategic Flood Risk Assessment.</p>	<p>To ensure the SWDP is positively prepared and effective it needs to be amended.</p> <p>Development of this site for housing is necessary to ensure that the amended housing provision requirement for Worcester City is met.</p> <p>Evidence has been provided from the Strategic Housing Land Availability Assessment (SHLAA) process which supports the allocation of this site as an extension to the north part of the Preferred Options housing site at Old Northwick Farm (SWDP6/6). This extension comprises 0.75ha of land adjoining Northwick Road, Worcester situated within Wychavon District. This site has been assessed for constraints as part of the SHLAA process and now benefits from a SHLAA</p>

	SWDP 6 – WORCESTER ALLOCATIONS	
		Panel view that there are no major constraints to site development. However this site is currently being assessed as part of the SFRA update together with SWDP6/6 and any allocation is subject to the findings of this assessment. There is no proposed increase to the 40 dwellings currently allocated in site SWDP6/6 as the extension to the site will effectively compensate for the loss of developable area associated with flood risk in the southern part of site SWDP6/6. Historic assets (fishponds) between the main area of SWDP6/6 and the extension to the north suggest that the access to the site extension will be direct from Northwick Road.
	SWDP 6 – New allocation - Nunnery Way / Worcester Football Club	
SOC034	<p>SWDP 6: Worcester City Allocations (D. Other Uses Table 9 Sites for other development)</p> <p>Insert allocation for a replacement stadium for Worcester Football Club on land at Nunnery Way including appropriate enabling development (no housing will be permitted).</p> <p>Insert reasoned justification following paragraph 5.14:</p> <ol style="list-style-type: none"> 1. <i>Clarify for the avoidance of doubt the types of enabling development that will be acceptable.</i> 2. <i>Ensure the maintenance of the site as Significant Gap and Green Network in the event that the football club proposal does not proceed.</i> <p>Amend Proposals Map to include new site and revised Significant Gap designation</p>	<p>To ensure that the SWDP demonstrates that it has been positively prepared, it needs to be amended.</p> <p>Although the adopted Local Plan allocates land at Nunnery Way for a new football stadium for Worcester City Football Club and planning permission has been granted for residential development on the site of the current stadium, in line with a local plan allocation, the Preferred Options document made no provision for a relocation site for the Football Club. It is accepted that a site for a football stadium should be included in the SWDP to enable the Worcester City Football Club to maintain its presence in the City. It is recommended that the land at Nunnery Way should be reallocated and it is accepted that</p>

	SWDP 6 – WORCESTER ALLOCATIONS	
		<p>some form of enabling development will be required to support the development but the written justification will make clear that housing is not acceptable in this area as the site (8.27ha) is adjacent to the M5 Motorway.</p> <p>This site is designated as significant gap. In the event of the Football Stadium not being developed, this land would remain Significant Gap and Green Network.</p> <p>The local planning authority has accepted the principle of development for a replacement stadium on the site allocated in the Local Plan. The planning application for the development, reference P08Q0652, was considered at Planning Committee on 5th January 2012 and, by resolving to support that specific proposal, has established the appropriate level of enabling development. (This includes permission for a hotel, B1 offices, public house restaurant, car showroom and motorcycle show room.) However, notwithstanding the current planning permission, it is considered that it is necessary to include this allocation in SWDP Policy to ensure, and for the avoidance of doubt, that housing development will not be acceptable in this location and that if the planning permission is not implemented the land will remain designated as Significant Gap and Green Network.</p>
	SWDP 6 – New site – Land at Chequers Lane / Henwick Road	
SOC035	Add site - Land at Chequers Lane / Henwick Road for student accommodation (of approx. 160 units)	To ensure SWDP is positively prepared and effective it needs to be amended.

	SWDP 6 – WORCESTER ALLOCATIONS	
	<p>Amend the Proposals Map to include new site.</p>	<p>A representation to Policy SWDP 6 has been received identifying this site as an omission from the SWDP.</p> <p>Having carefully considered the potential of the site (0.99ha), the policy is being amended to include this site for student accommodation (Sui Generis).</p> <p>The uses in the surrounding area have become more university related and it is considered that further university associated development would be appropriate in this area. The contribution of the University to Worcester's local economy is recognised in the SWDP and therefore this development would complement the SWDP's strategy of support for the University.</p> <p>There are a number of constraints identified on the site which will have to be fully investigated and taken into account when determining the design and layout of the site. Part of the site is within the Green Network, and the whole site is part of the Riverside Conservation area. It is currently being assessed as part of the Strategic Flood Risk Assessment; (it is understood that part of the site is within the flood plain and will therefore be out of the developable area). A full ecological survey will be required as there are known wildlife conservation issues present as well as a group tree preservation order. However taking all these considerations into account it is believed that there is potential for the provision of student accommodation on this site.</p>

	SWDP 6 – WORCESTER ALLOCATIONS	
		This student accommodation to be provided here will not contribute to the overall dwelling requirements set out in SWDP 2 as it is classed as <i>sui generis</i> use. However the provision of these units will reduce the demand on existing housing stock for student occupation which particularly affects the rented and first time buyers markets.
	SWDP 6 - New Site - A44 Service Station, Bromyard Road	
SOC036	Add site - land at A44 Service Station Bromyard Road - 10 Dwellings Amend Proposals Map to include new site.	To ensure SWDP is positively prepared and effective it needs to be amended. Development of this site of 1.10ha for housing is necessary to ensure that the amended housing provision requirement for Worcester City is met. This site has previously been allocated for housing in the City of Worcester Local Plan and also in the Balanced Housing Market DPD. Evidence has been received at the Preferred Options Stage, which identifies this site as suitable and available for development. It has been considered by the Strategic Housing Land Availability Assessment Panel which has concluded that it has potential for housing development. It is considered to be developable in the next 10 -15 years. Now that SHLAA evidence confirms it is developable the site should be reallocated for housing in the SWDP. Therefore SWDP 6 is being amended to include the site for housing. The housing provided will make a valuable contribution to the dwelling requirements of Worcester City and the redevelopment of this partly brownfield site will be in accordance with

	SWDP 6 – WORCESTER ALLOCATIONS	
		SWDP 2 and the new SWDP policy - Making the Most Effective and Sustainable Use of Land.
	SWDP 6 - New Site - Land at Stanley Road	
SOC037	Add site - land at Stanley Road - 10 dwellings Amend Proposals Map to include new site.	To ensure SWDP is positively prepared and effective it needs to be amended. Development of this site of 0.25ha for housing is necessary to ensure that the amended housing provision requirement for Worcester City is met. Evidence has been received at the Preferred Options stage that supports the allocation of this site as suitable and available for development. It has been considered as part of the Strategic Housing Land Availability Assessment process which concluded that it has potential for housing development. Therefore SWDP 6 is being amended to include the site for housing. The housing provided will make a valuable contribution to the housing requirements of Worcester City and evidence has been provided that this site is deliverable within the plan period. The redevelopment of this partly brownfield site will be in accordance with SWDP 2 and the new SWDP policy regarding Making the Most Effective and Sustainable use of land.
	SWDP 6 - New Site - Brookthorpe Close	
SOC038	Add site - land at Brookthorpe Close - 7 dwellings Amend Proposals Map to include new site.	To ensure SWDP is positively prepared and effective it needs to be amended. Development of this site of 0.17 Ha for housing is necessary to ensure that the amended housing provision requirement for Worcester City is met.

	SWDP 6 – WORCESTER ALLOCATIONS	
		<p>Evidence has been received from the Registered Social Landlord at the Preferred Options Stage which identifies this site as suitable and available for development for 100% affordable housing (7 dwellings). It has been considered as part of the Strategic Housing Land Availability Process and SWDP 6 is being amended to include the site for housing.</p> <p>The housing provided will make a valuable contribution to the affordable housing requirements of Worcester City and evidence has been provided that this site is deliverable within the plan period. The site is split into two parcels of land, one to the north of Brookthorpe Close, the other to the south. The redevelopment of the brownfield site will provide an opportunity to improve the area with the site currently comprising a number of lock up garages which the respondent describes as being of low quality, underused and a focus for anti social behaviour. Access will be gained to both sites off Brookthorpe Close.</p> <p>The allocation of this site will be in accordance with SWDP 2 and the new SWDP policy regarding Making the Most Effective and Sustainable use of land.</p>
	SWDP 6- New Site - Ullswater Close / Grasmere Drive	
SOC039	Add site - insert land at Ullswater Close / Grasmere Drive – 16 dwellings Amend Proposals Map to include new site	<p>To ensure SWDP is positively prepared and effective it needs to be amended.</p> <p>Development of this site of 0.44ha for housing is</p>

	SWDP 6 – WORCESTER ALLOCATIONS	
		<p>necessary to ensure that the amended housing provision requirement for Worcester City is met. Evidence has been received from the Registered Social Landlord at the Preferred Options Stage which identifies this site as suitable and available for development for 100% affordable housing (16 dwellings). It has been considered as part of the Strategic Housing Land Availability Assessment process which has concluded that it has potential for housing development. Therefore SWDP6 is being amended to include the site for housing.</p> <p>The housing provided will make a valuable contribution to the affordable housing requirements of Worcester City and evidence has been provided that this site is deliverable within the plan period.</p> <p>The site comprises what is described as a run down playground to the north of the site and 20 lock up garages to the south, behind a row of retail units and Ambleside Drive. The proposal is to allocate 16 dwellings on the site, 5 of which will be accessed off Grasmere Drive, the other 11 off Ullswater Close. Parking is proposed to be provided around the site, and access to the rear of the commercial properties on Ambleside Drive will be retained. The pedestrian link between Ambleside Drive and the rear of the commercial properties will be closed in order to increase security. However the vehicular access off Grasmere Drive will remain. Because of the topography of the land, a new retaining wall is</p>

SWDP 6 – WORCESTER ALLOCATIONS	
	<p>proposed to ensure the viability of the development. Landscaping and tree planting is proposed to provide an area of ecological landscape with potential to be a green link in the Green Network. Both the lock up garages and playground are described as becoming a problem for antisocial behaviour. Although the playground is described as being severely run down and in need of repair, this development will involve the loss of open space and will therefore have to be assessed against SWDP Policy 44.</p>

SWDP 7 - WORCESTER CITY CENTRE - SHRUB HILL OPPORTUNITY ZONE (SWDP 7/4)

SWDP 7/4 SHRUB HILL OPPORTUNITY ZONE	
SOC040	<p>Delete SWDP 7/4 Shrub Hill (approx. 200 dwellings) Insert <i>Shrub Hill (including approx. 350 dwellings of which 150 dwellings will be provided on the Sheriff Street area in SWDP Phase 1 2013 – 2019, with the remainder following in the second phase 2019 - 2030)</i> Amend Proposals Map to show new boundary of Opportunity Zone</p>
	<p>To ensure the SWDP is positively prepared and effective it needs to be amended.</p> <p>Development of this site for housing is necessary to strengthen the priority the Councils give to regeneration in Worcester City that delivers growth, including ensuring delivery of the economic vision and strategy, and helping to meet the amended housing provision requirement.</p> <p>Representations to Policy SWDP 7 have challenged the allocation for the Shrub Hill Opportunity Zone on the grounds that it should be extended on the Proposals Map to include the Sheriff Street / Newton Road site (approx. 3.10ha) east of the Railway line for additional mixed use development including housing.</p> <p>Taking into account these representations for the</p>

	SWDP 7/4 SHRUB HILL OPPORTUNITY ZONE
	<p>reasons explained below, the policy is being amended to include the Sheriff's Street area in the Opportunity Zone (total site area of approx. 19.6 Ha) and to make provision for further mixed use development in accordance with the criteria of Policy SWDP 7.</p> <p>This extension to the Opportunity Zone is in accordance with the SWDP strategy which focuses on economic prosperity and with the NPPF which requires local planning authorities to identify priority areas for regeneration. This is also in line with the new SWDP Policy "Making the most effective and sustainable use of land".</p> <p>At the time of the Preferred Options document the railway line was the eastern boundary of the Opportunity Zone, but acted as a barrier. Therefore accessibility issues will need to be addressed. In particular master planning for the site will need to deliver connectivity of the extended part of the site known as Sheriff Street with the existing Opportunity Zone to ensure safe and attractive access across the railway line for pedestrians and cyclists and meet the needs of the Equalities Act 2010. Similarly suitable accessibility and connectivity needs to be provided between the Opportunity Zone as a whole and the City Centre.</p> <p>Further information has been provided to demonstrate the potential and deliverability of this site in the regeneration of the Shrub Hill Area and a planning application for an urban renewal</p>

	SWDP 7/4 SHRUB HILL OPPORTUNITY ZONE
	<p>scheme has been submitted to Worcester City Council. The inclusion of the site in the Opportunity Zone is an opportunity to improve the planning of the whole area taking a broader holistic approach; link land uses east and west of the railway and facilitate robust master planning approach to the mix, phasing and delivery of developments. It is part of a wider approach towards complementing the viability and vitality of Worcester City Centre.</p> <p>In terms of the phasing of the Opportunity Zone the recent planning application for the Sheriff Street area demonstrates that this is at a more advanced stage and is likely to come forward in the SWDP Phase 2 (2013 – 2019). The remainder of the Opportunity Zone will be implemented in SWDP Phase 3 (2019 – 2030).</p> <p>The detail of the mix of land uses, layout, design etc. will require further justification and consideration. Currently it is a protected employment site within the adopted local plan, and the emphasis on economic prosperity through employment opportunities remains paramount.</p> <p>Development proposals for all the Opportunity Zones will be required to make provision for a variety of uses including a mix of employment uses. This mixed use should complement the city centre, not compete with it, in accordance with the criteria for Opportunity Zones in SWDP 7.</p> <p>Provision is made for housing but the Opportunity Zone is not housing led. However the additional</p>

	SWDP 7/4 SHRUB HILL OPPORTUNITY ZONE
	<p>provision made for housing in the Sheriff Street part of the Zone, will contribute to dwelling requirements as required in the amended SWDP 2. In addition to C3 housing, provision will also be made for C2 housing in the form of student accommodation and residential care units.</p> <p>The proximity to the railway lines will require a noise assessment as part of the development management process and design and access statements will need to address the impacts of the mix of uses within and adjoining the site</p> <p>Part of the extended site is registered with a Hazardous Substance Certificate and any contamination issues will need to be addressed in consultation with the appropriate regulatory organisations as part of the Development Management process.</p> <p>The site is currently being assessed as part of the Strategic Flood Risk Assessment.</p> <p>There are known heritage assets on the site including Listed Buildings and Buildings of Local Significance. The conservation or enhancement of these assets will be required in accordance with the new SWDP policy on the Historic Environment. The opportunity to incorporate these assets into the new scheme should be maximised where possible. Careful regard and consideration should be given to any potential impact on the adjacent Tamar Close Civil War Earthworks which is a Scheduled Ancient Monument.</p>

SWDP 8 - WORCESTER URBAN EXTENSIONS

WORCESTER URBAN EXTENSIONS	
SWDP 8/1 – BROOMHALL COMMUNITY AND NORTON BARRACKS COMMUNITY – WORCESTER SOUTH URBAN EXTENSION	
SOC041	<p>Delete “Neighbourhood Centre incorporating local shops”</p> <p>Insert “A centrally located Neighbourhood Centre of no more than 1,500m² net floorspace incorporating a range of convenience and comparison local shops and a convenience store of up to 500m² will be permitted.”</p>
	<p>To ensure that the SWDP demonstrates that it has been positively prepared, it needs to be amended.</p> <p>Development of this site is necessary to ensure that the growth of Worcester, including the amended housing provision requirement for the Wider Worcester area is met, through an urban extension that is sustainable.</p> <p>Representations expressed concern that either local facilities in nearby villages will be overstretched or conversely that new facilities in the urban extensions could impact negatively on existing shops and services in neighbouring areas.</p> <p>Taking these representations into account the policy is being amended to address this concern and to ensure clarity about the scale of provision for shops and services to serve the new development at the urban extension.</p> <p>By specifying the upper limit of the retail floor space for the neighbourhood centre (and the convenience store to be part of the development), the appropriate provision of shops and services to serve the new urban extension will be made. This upper limit will ensure that the scale of total provision is consistent with the role of a neighbourhood centre, and that it does not</p>

	WORCESTER URBAN EXTENSIONS
	<p>become a destination for a wider catchment. Furthermore the limit is intended to prevent the undermining of the vitality, viability or variety of existing village facilities or local centres in accordance with SWDP 29. This approach is also in line with paragraphs 28 of the NPPF which promotes the retention and development of local services and community facilities in villages</p> <p>As well as providing for everyday retail requirements the neighbourhood centre will also make provision for community facilities. These will include primary health care, a primary school and other uses as considered appropriate. The centre will function as a hub for the new development, reducing the need to travel and providing a clear focus for the urban extension community. The detail of the type of facilities to be provided will be determined through the master planning process and the Infrastructure Delivery Plan. Consultation with the Parish Council and existing communities will be an important aspect of working up these details.</p> <p>In order to ensure that the Neighbourhood Centre will be accessible by sustainable modes of travel and to provide greatest accessibility for the residents of the new development a central location is specified. This approach is supported by paragraphs 37 and 38 of the NPPF which require key facilities to be located within walking distance of most properties in larger scale developments. Furthermore paragraph 69 refers</p>

WORCESTER URBAN EXTENSIONS		
		<p>to the provision of 'strong neighbourhood centres' to help achieve healthy, inclusive communities whilst paragraph 70 requires planning policies and decisions to plan positively for the provision and use of community facilities.</p> <p>The upper limits of 1,500m² for the neighbourhood centre and 500m² for the convenience store are considered appropriate for the number of dwellings proposed at the urban extension based on an assessment of similar sized developments elsewhere.</p>
SOC042	<p>Delete "The inclusion of 10 pitches for Gypsies and Travellers"</p> <p>Insert "<i>Provision for two separate sites of up to 10 pitches for Travellers and Travelling Showpeople within or on the edge of the urban extension</i>".</p>	<p>To ensure that the SWDP is justified it needs to be amended.</p> <p>The local targets related to amended policy SWDP 33 indicate a an unmet need for 30 pitches in Malvern Hills District and 22 pitches in Worcester in the period to 2017. Whilst sites for longer term requirement will be considered through a further Development Plan Document, the SWDP needs to identify sufficient sites for pitches to enable the 5 year requirement to be met, consistent with the national guidance set out in the Planning Policy for Traveller Sites (2012). Evidence from monitoring of development shows that the number of pitches granted planning permission since 2007 has not yet met the need identified in the Gypsy and Traveller Accommodation Assessment 2007. Furthermore, based on the amended SWDP 33 target there is an outstanding requirement for pitches for Travellers and Travelling Show people in Malvern</p>

	WORCESTER URBAN EXTENSIONS
	<p>and Worcester and therefore further provision is required in the SWDP. The Preferred Options approach made some of this additional provision in the broad location of Broomhall and Norton Barracks Community and Temple Laughern in SWDP 33.</p> <p>The Councils consider that land at the Worcester South Urban extension has sufficient capacity to accommodate an additional site for Travellers. The urban extension's proximity to the road network, its location on the periphery of Worcester, its availability and scale offer the only realistic opportunity for identified land to make an additional contribution towards meeting the 5 year requirement at this time.</p> <p>Consultation with the travelling community has indicated that in order to meet the needs of different family groups the preferred strategy is to make the additional provision on separate sites as opposed to one larger site.</p> <p>The term 'Travellers and Travelling Showpeople' has replaced 'Gypsies and Travellers' to bring the policy into line with national guidance.</p> <p>The precise location of the groups of pitches will be determined through the master planning for the urban extension as a whole. Access to the road network will be an important consideration.</p> <p>For clarity a cross reference to SWDP 33 will be included in the written justification to this policy.</p>
	SWDP8/3 Kilbury Drive (Worcester East urban extension)

WORCESTER URBAN EXTENSIONS		
SOC043	<p>Delete Phased Delivery of approximately 300 dwellings of which 40% will be affordable Insert <i>Delivery of approximately 250 dwellings, of which 40% will be affordable.</i></p>	<p>To ensure the SWDP plan is adequately justified and positively prepared it needs to be amended.</p> <p>Development of this site for housing is necessary to ensure that the amended housing provision requirement for Wider Worcester Area is met.</p> <p>This site is allocated in the Preferred Options SWDP8/3 to provide 300 dwellings (indicative). However further analysis of the site capacity during the development management process, related to recent planning applications, indicates that the site cannot accommodate 300 dwellings. This would result in the over development of the site and would compromise the provision of open space and gardens and general amenity of residents. Therefore although the gross site area remains the same it is considered that the net developable area should be reduced and that it is appropriate to allocate 250 dwellings on the site. In view of this new information it is proposed that SWDP8/3 is amended to reflect this deliverable number of dwellings.</p>
SWDP8/4 Gwillam's Farm (Worcester North urban extension)		
SOC044	<p>Delete Phased Delivery of approximately 300 dwellings of which 40% will be affordable Insert - <i>Delivery of approximately 250 dwellings, of which 40% will be affordable</i> Amend Proposals Map (and paragraph 5.53) by redrawing site boundary to reflect reduction in numbers and increase gap separating the edge of the new built development and Bever Conservation Area.</p>	<p>To ensure that the SWDP demonstrates that it has been positively prepared, it needs to be amended.</p> <p>Development of this site for housing is necessary to ensure that the amended housing provision requirement for the Wider Worcester Area is met. The boundary alignment and the dwelling</p>

	WORCESTER URBAN EXTENSIONS
	<p>numbers of SWDP8/4 have been reassessed in view of representations received about the potential negative impact on the historic character and setting of Bevere Conservation Area, listed buildings, and open spaces. Objections were received which argued that the scale and location of the development would have an unacceptable impact on Bevere.</p> <p>Whilst the SWDP Preferred Options report acknowledges the proximity of the Conservation Area at paragraph 5.52 and the new SWDP Policy on Historic Environment will provide further protection, it is agreed that the boundary of the allocation should be redrawn to reduce the site area to create a larger separation between the new settlement and parts of the Conservation Area. As the site area is reduced to 17.68 Ha it is also necessary to decrease numbers to 250 dwellings to reflect the reduced capacity of the site. This change is consistent with the NPPF paragraph 126 which requires local planning authorities to take account of the significance of the heritage assets. This approach is also consistent with the New SWDP Policy on Historic Environment. Within the amended site boundary an area of Green Network will be provided which will act as a buffer between Bevere and the edge of the development.</p> <p>The dwellings to be provided on this site are needed to contribute to the housing provision requirement of the Wider Worcester Area as set</p>

WORCESTER URBAN EXTENSIONS		
		out in SWDP 2 and explained in the Housing Background paper. Development of the site increases the numbers of residential development sites at Worcester in the Plan period. This improves the likelihood of maintaining the 5 year housing land supply in the Wider Worcester Area by increasing the choice of location and type of sites available. By allocating land for development and making sufficient provision, the plan controls the scale of growth and avoids the risk of uncontrolled ribbon developments, consistent with Framework paragraph 47.

SWDP 9 & 10 - DROITWICH SPA

SWDP 9 & 10 – DROITWICH SPA		
SOC045	<p>Amend SWDP 10 to include appropriate wording, reasoned justification (and reference elsewhere in the section) to extension at Stonebridge Cross Business Park.</p> <p>Amend proposals map to include 10ha at Stonebridge Cross Business Park and include as an allocation in supply table SWDP 2.</p>	<p>To ensure that the SWDP demonstrates that it has been positively prepared, it needs to be amended.</p> <p>Following representations to the employment land supply position an extension of 10ha of land has been proposed to the Stonebridge Cross Business Park to meet the economic development strategy of the Plan and following agreement on a proposed significant landscape buffer to minimise the visual impact on Westwood House and its environs.</p>

SWDP 11 & 12 - EVESHAM

SWDP 11 & 12 – EVESHAM		

	SWDP 11 & 12 – EVESHAM	
SOC046	<p>Land off Vale Park – new site Amend policy SWDP 11 by addition of an employment site at Vale Park to accommodate a further 10ha of land and amend Proposals Map accordingly and change to infrastructure list to include reference to a new pedestrian / cycle bridge / crossing over the A46 at Vale Park.</p>	<p>To ensure that the SWDP demonstrates that it has been positively prepared, it needs to be amended.</p> <p>Evidence collated during the SWDP process indicates that Evesham will benefit from an additional 10 ha of employment land. The expansion of Vale Park will result in additional pressure on volume of pedestrians / cyclists crossing the A46; therefore a new pedestrian / cycle bridge or crossing as outlined in LTP 3 will be required.</p>
SOC047	<p>Land adjacent Offenham Road and the A46 – SWDP11/2 Delete site SWDP11/2 from table 13 and amend Proposals Map accordingly</p>	<p>To ensure that the SWDP is adequately justified it needs to be amended</p> <p>There are strong landscape objections to development on this section of Offenham Road and therefore it is not considered suitable to form part of the urban extension and should be deleted accordingly.</p>
SOC048	<p>Nursery at Bewdley Lane / Blind Lane – SWDP11/5 Delete site SWDP11/5 from table 13 and amend Proposals Map accordingly.</p>	<p>To ensure that the SWDP is adequately justified it needs to be amended</p> <p>This site has now been through planning committee and Members voted to grant planning permission. It can therefore no longer form an allocation and must be deleted accordingly.</p>
SOC049	<p>Abbey Gardens – SWDP11/6 Delete site SWDP11/6 from table 13 and amend Proposals Map accordingly.</p>	<p>To ensure that the SWDP demonstrates that it has been positively prepared, it needs to be amended.</p> <p>It is considered that progressing with this site would be detrimental to the existing views into the town and would impact on the setting of the</p>

	SWDP 11 & 12 – EVESHAM	
		historic Bell Tower, a scheduled ancient monument, and access to the highway i.e. Abbey Road is substandard. The site therefore requires deletion.
SOC050	<p>Land east of Offenham Road – new site</p> <p>Add site - amend policy SWDP 12 by inclusion of an additional allocation for housing at land to the east of Offenham Road and amend Proposals Map accordingly for the purpose of public consultation.</p>	<p>To ensure that the SWDP demonstrates that it has been positively prepared, it needs to be amended.</p> <p>Officers consider that this site along the road frontage could accommodate additional development but the larger area of land behind is not to be included in the allocations as there is no support for out-of-town retailing at this location. The larger site also comprises established and historic orchards which are considered to be characteristic and distinctive of this area and should not be developed.</p>
SOC051	<p>Land behind Lichfield Avenue and adjacent site – new site</p> <p>Add site - amend policy SWDP 11 by addition of the site to include land behind Lichfield Avenue and adjacent site and amend Proposals Map accordingly for the purpose of public consultation.</p>	<p>To ensure that the SWDP is adequately justified it needs to be amended</p> <p>This site was not included as a Preferred Option site initially as ownership was unknown. However, the site can now form part of the comprehensive allocation at Offenham Road.</p>
SOC052	<p>Land around new Leisure Centre, Abbey Road – new site</p> <p>Add site - amend SWDP 11 by inclusion of a housing allocation for land around the new leisure centre and Amend Proposals Map accordingly for the purpose of public consultation and change to SWDP 11 to include the following bulleted text:</p> <ul style="list-style-type: none"> • <i>An extension of the riverside meadows to the west and north linking Corporation meadows round to Boat Lane within a Green Infrastructure Network</i> • <i>a broad network of local connections to the town centre designed to afford priority for walking and cycling</i> 	<p>To ensure that the SWDP demonstrates that it has been positively prepared, it needs to be amended.</p> <p>It is considered that land around the new leisure centre should be included as a housing allocation for the purpose of public consultation to provide up to 200 units.</p>

	SWDP 11 & 12 – EVESHAM	
	<ul style="list-style-type: none"> • <i>secure the integration of the leisure centre within the town centre</i> 	
SOC053	<p>Employment site, top of Kings Road – SWDP11/4</p> <p>Amend policy SWDP 12 and table 13 to enlarge site SWDP11/4 as a housing allocation to provide up to 100 dwellings</p>	<p>To ensure that the SWDP is adequately justified it needs to be amended</p> <p>This larger site was not included as part of the PO site initially; however, officers consider it should be included as a housing allocation for the purpose of public consultation to form part of the comprehensive allocation at Offenham Road.</p>

SWDP 13 - MALVERN SITES

	SWDP 13 – MALVERN SITES	
SOC054	Delete housing allocation SWDP13/3 - land off Welland Road Upper Welland.	<p>To ensure that the SWDP is adequately justified it needs to be amended</p> <p>The site is in the Malvern Hills Area of Outstanding Natural Beauty, and the Conservation Area, and there is another allocation that can deliver housing, including affordable housing and open space in the Malvern wells area (site SWDP13/4). It is therefore considered that this site should be deleted as a housing allocation.</p>
SOC055	Add site - site allocated for 10 dwellings adjacent to the Pheasant Inn, Welland.	<p>To ensure that the SWDP demonstrates that it has been positively prepared, it needs to be amended.</p> <p>in that site will help meet objectively assessed housing requirements through allocation of a development site in a sustainable location.</p> <p>Welland is a Category 1 village and as such is supported by a number of key facilities and services, including a school and shop.</p>

	SWDP 13 – MALVERN SITES	
		As a result of renewed call for sites within the SHLAA update 2011-2012, a number of sites have been proposed and a small site adjacent to the Pheasant Inn has been put forward as a potential housing allocation. It is hoped that the development of this area of land within the same ownership of the pub will allow the pub to be retained as an important facility in Welland.

SWDP 13 - MALVERN VISION

	SWDP 13 – MALVERN VISION	
SOC056	<p>Amend - the additional text for SWDP 13 Malvern “vision” is: New wording <i>in italics</i>: 8.1</p> <p><i>Malvern is the principal urban area within Malvern Hills District. It is formed from the settlements of Great Malvern, Malvern Link, Barnards Green, West Malvern, and Malvern Wells. The urban area contains a population of over 33,600 (2009 Mid-Term Population Estimates). It is a large town, and needs to balance its special townscape, landscape and heritage qualities with the requirements of a modern and balanced local economy and for appropriate infrastructure, the need to maintain a vibrant and successful town and district centres, meet the housing and community needs of the existing and future population, whilst recognising that it is also important as a tourist and cultural destination.</i></p> <p>Add at end of 8.2</p> <p><i>The key characteristic of the Malvern urban area is its dramatic setting on the slopes of the Malvern Hills. This establishes a need to consider the implications of change and development upon both views from and to the hills from key vantage points alongside protecting the beneficial qualities of town as a whole. The setting and historic importance is reflected in the conservation area status of the larger part of Great Malvern. The Malvern Hills themselves are designated as an Area of</i></p>	<p>To ensure that the SWDP demonstrates that it has been positively prepared, it needs to be amended.</p> <p>The strategy for Malvern addresses the objectively assessed development and infrastructure needs of the area whilst delivering sustainable development.</p> <p>The further wording on the “vision” for Malvern is based on issues expressed by Malvern Members and others that the vision for Malvern needed to be more clearly stated in the supporting text. Thus the new text helps set the context for the strategy for Malvern, which shows how the need for development and associated infrastructure requires to be balanced against the sensitive environment of the town, especially its landscape setting, and its importance as a tourist destination.</p>

	SWDP 13 – MALVERN VISION	
	<p><i>Outstanding Natural Beauty. As the focus for growth to meet a significant element of the housing and employment needs of the District priority has been given to the allocation of available and deliverable brownfield sites within the urban area, although at the present time the supply is constrained. Further growth, including the allocation of land at Newland will necessarily have regard to the balance referred to in paragraph 8.1 above and protecting the setting of the town as a whole. A strong emphasis on achieving an appropriate balance however, will include embracing the highest objectives set out in this plan for sustainable development, quality of design and innovation in meeting the longer term infrastructure needs of the town.</i></p>	

SWDP 14 - QINETIQ

	SWDP 14 - QINETIQ	
SOC057	<p>Amend - the new text for SWDP 15 QinetiQ is:</p> <p><i>Additional wording in text at 8.11: To the north of the QinetiQ site is the Malvern Hills Science Park the potential and continued success of which is important to Malvern's future. The limited space that is available for future expansion and growth, and the need to provide longer term capacity for new incubator space and grow-on capacity for existing companies seeking to develop their own purpose build accommodation, means that land needs to be safeguarded for future business growth. The District Council considers that comprehensive consideration of proposals to rationalise the existing QinetiQ site, release surplus land for mixed use development and the success of the Malvern Hills Science Park offers a real opportunity to promote a Malvern Innovation and Technology Park in association with the mixed use allocation and enable a comprehensive approach to future access and servicing arrangements to be adopted.</i></p> <p>Add at 8.12:</p> <p><i>The allocation will be considered within the context of the adjacent areas, including the Malvern Hills Science Park to the north, and possibly education land between the Science Park and the allocated area. . Consideration can be given to enhance access and connections between the two sites and rationalize vehicular and pedestrian</i></p>	<p>To ensure that the SWDP demonstrates that it has been positively prepared, it needs to be amended.</p> <p>The understanding of how proposals for the site fit into the development and infrastructure requirements of the wider area is important. The proposals put forward sustainable development and the text changes seek to clarify the context of the wider area. This includes the relationship of the QinetiQ site to the Malvern Hills Science Park site and the surrounding land uses, including the school. Consultation is therefore required on revised paragraphs 8.11 and 8.12</p>

movements in the area through a potential land swap with the school.

SWDP 18 - PERSHORE

SWDP 18 – PERSHORE		
SOC058	Delete the allocation on the site (18/6).	<p>To ensure that the SWDP is adequately justified it needs to be amended</p> <p>Allocation on site has been deleted because of conservation issues; the site is in multiple ownerships, has access difficulties and abuts the floodplain of the River Avon. The deliverability of the site is therefore questioned. The site could still potentially come forward through the Development Management process as it is located within the development boundary</p>
SOC059	Amend site - the indicative number of units has been reduced from 26 to 10 (18/7)	<p>To ensure that the SWDP is adequately justified it needs to be amended</p> <p>The site has potential for a limited amount of development as it is located between the 1990's housing development at Conningsby Drive and the site granted consent for 132 dwellings, which are currently under construction. But the amount of development has been reduced in light of the size of the site and the access arrangements.</p>

SWDP 18 - PERSHORE OMISSION SITES

SWDP 18 - PERSHORE OMISSION SITES		
SOC060	Amend - land included within employment protection policy (SHLAA 72-01 and land at Wyre Road with a recent planning approval w/11/0988 refers)	<p>To ensure that the SWDP is adequately justified it needs to be amended</p> <p>This site is allocated for employment uses in the Wychavon District Local Plan. The site should</p>

		remain available for employment uses and included within employment protection policy. Similarly, the site recently granted planning permission at Wyre Road should remain available for employment uses and included within employment protection policy.
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SWDP 19 - PERSHORE URBAN EXTENSION

	SWDP 19 - PERSHORE URBAN EXTENSION	
SOC061	Amend - redrawing of boundaries of strategic site to reflect more accurately the area required to achieve a development of 600 units.	To ensure that the SWDP demonstrates that it has been positively prepared, it needs to be amended. The area will be redrawn to reflect more the size required for the delivery of 600 homes and associated infrastructure.

SWDP 20 - TENBURY WELLS

	SWDP 20 – TENBURY WELLS	
SOC062	Add site - agree additional housing required and new sites put forward as allocations.	To ensure that the SWDP demonstrates that it has been positively prepared / justified / consistent with NPPF it needs to be amended. Additional housing land is put forward based on a strategy that has been designed to meet objectively assessed needs. The additional housing sites have been judged against reasonable alternatives.
SOC063	Add site - agree site suggested should be allocated (SHLAA site MHTW09)	To ensure that the SWDP demonstrates that it has been positively prepared / justified / consistent with NPPF it needs to be amended. Additional housing land is put forward based on a

SWDP 20 – TENBURY WELLS		
		<p>strategy that has been designed to meet objectively assessed needs.</p> <p>The additional housing sites have been judged against reasonable alternatives.</p> <p>As a significant rural town with a wide range of services and facilities, Tenbury could reasonably support a larger allocation of housing than set out in the preferred options document. Therefore two sites adjacent to each other at the Haven, and adjacent to the Haven, Oldwood Road, are allocated for 40 dwellings in total. Thus the SWDP is consistent with national policy, directing more housing developments to Tenbury as a sustainable location. With the recently completed affordable housing site of 34 dwellings at Oldwood Road this will deliver approximately 100 dwellings on larger sites in Tenbury through the plan period.</p>

SWDP 21 - UPTON-UPON-SEVERN

SWDP 21 – UPTON-UPON-SEVERN		
SOC064	<p>Reduction in housing allocation from 50 to 25 dwellings at Sunny Bank Meadow, Holly Green.</p> <p>Add site - an additional housing allocation at Greenfields Road, Tunnel Hill for 18 dwellings.</p>	<p>To ensure that the SWDP demonstrates that it has been positively prepared / justified it needs to be amended.</p> <p>Taking into account the representations received on the site at Sunny Bank Meadow, Holly Green, it is now suggested that the housing allocation is reduced from 50 to 25 dwellings mitigate impact on the landscape, keeping the development on the lower area of the site, and allow better achievement of drainage and access.</p>

	SWDP 21 – UPTON-UPON-SEVERN	
		It is considered that Upton is a sustainable location, with a good range of services and infrastructure, and that it would benefit from the allocation of more than 25 dwellings in the Plan period. It is acknowledged that due to severe flood constraint within the town itself, other nearby settlements such as Holly Green and Tunnel Hill could provide some additional housing. A site at Greenfields Road, Tunnel Hill, that has been put forward through the SHLAA, and was previously looked at as a rural exception site, which can deliver a housing allocation for 18 dwellings is therefore proposed. This together with the Holly Green site provides for a total allocation of 43 dwellings in the Upton area.

SWDP 23 - CATEGORY 1 VILLAGES – GENERIC POLICY

	SWDP 23 CATEGORY 1 VILLAGES – GENERIC POLICY	
SOC065	<p>New policy proposed:</p> <p><i>“New housing for Category 1, 2 and 3 settlements will be restricted to: -</i></p> <ul style="list-style-type: none"> • <i>Specific allocations</i> • <i>“windfall”, i.e. non-allocated development within the development boundaries, as set out on the Proposals Map, where it is supportive of the development management policies</i> • <i>Local initiatives including Neighbourhood Plans, Community Right to Build Orders and Neighbourhood Development Orders</i> • <i>Affordable housing schemes (see Exception Policy SWDP XX)</i> <p><i>Reasoned Justification:</i></p> <p><i>The scale of rural development reflects the limited range of local services, a low level of public</i></p>	<p>To ensure that the SWDP is adequately justified it needs to be amended</p> <p>The settlement hierarchy is based on the findings of the Village Facilities and Rural Transport Survey, which has been updated. The VFRTS builds on the methodology employed by the settlement hierarchy policy in the current local plans. These policies were supported by the Planning Inspectorate. Adding further criteria is unlikely to change the rankings much as in general the VFRTS reflects the size of the settlements. It is acknowledged that in some</p>

SWDP 23 CATEGORY 1 VILLAGES – GENERIC POLICY	
	<p data-bbox="241 220 1435 284"><i>transport provision, fewer employment opportunities and lower housing needs relative to the urban areas.”</i></p> <p data-bbox="1480 220 2141 480">instances the level of development proposed does not directly correlate with the settlement hierarchy but there are good planning reasons for this, in particular the availability and suitability of land and the need to deliver new service infrastructure. In the main the level of proposed development increases in line with the settlement hierarchy.</p> <p data-bbox="1480 496 2141 683">The VFRTS is based on the ones employed in the current adopted local plans. They were supported by the planning departments and including additional criteria is unlikely to result in a significantly different ranking.</p> <p data-bbox="1480 699 2141 959">Disagree that villages (presently in Category 1 and 2) should be relegated to Category 3 just because they are close to an AONB. The VFRTS informs the allocation process but more detailed planning criteria are also applied. The villages within rural areas (2) are by and large much smaller.</p> <p data-bbox="1480 975 2141 1161">Most development is allocated in the urban areas so disagree re: the assertion that the settlement strategy is over-reliant on development in the rural area. The level of proposed development in the Category 3 villages is very low.</p> <p data-bbox="1480 1177 2141 1401">Acknowledge the variable amount of development allocated for Category 1 villages but this is due to either the availability of suitable land or the need to deliver specific infrastructure. Generally speaking, the higher category villages have been allocated more than the lower category ones.</p> <p data-bbox="1480 1417 2141 1442">Allocated development and windfall development</p>

	SWDP 23 CATEGORY 1 VILLAGES – GENERIC POLICY	
		will be subject to the same generic SWDP policy. The generic policy for Category 1 (and 2 and 3) rural settlements needs to be less ambiguous. Also all allocations will be subject to the new policy on landscape character.

SWDP 23 - CATEGORY 1 VILLAGES (ALPHABETICALLY ORDERED)

	SWDP 23 CATEGORY 1 VILLAGES ALPHABETICALLY ORDERED	
	Abberley Common SWDP23/2 - land west of Apostle Oak	
SOC066	Amend Table 18 Category 1 Village Sites in respect of the indicative number of dwellings on Abberley site SWDP23/2 to read 10 units instead of 27.	To ensure that the SWDP is adequately justified it needs to be amended It is considered that there are no known highway access, flooding or drainage issues which cannot be overcome in the development of the site. The development will be required to provide open space. The exact nature and location of such space within the site would need to be addressed as part of the consideration of a planning application. The capacity of the site has been carefully assessed taking into account a range of environmental, highway access, ecological and amenity aspects. The responses received to the consultation have been carefully examined and it is considered that on the grounds of scale and impact on the character of the village the number of units should be reduced from 27 to 10.
	Broadway – SWDP 23 - land to the West of Averill Close, Broadway – new site	
SOC067	Add site - amend Policy SWDP 23 to include land to the west of Averill Close, Broadway as	To ensure that the SWDP demonstrates that it

SWDP 23 CATEGORY 1 VILLAGES ALPHABETICALLY ORDERED		
	an alternative housing allocation for Broadway to accommodate up to 80 dwellings.	has been positively prepared, it needs to be amended. This site was previously ruled out by the SHLAA panels on grounds of access and it is now understood that this has been clarified, therefore officers consider that the site should be submitted for public consultation as an alternative housing allocation for Broadway.
Broadway - SWDP23/21 - Garages south-east of Sheldon Avenue		
SOC068	Delete site SWDP 23/21 from Policy SWDP 23 and Amend the Proposals Map accordingly.	To ensure that the SWDP is adequately justified it needs to be amended It is considered that due to potential access and parking issues the site should be deleted from the SWDP as a housing allocation
Broadway - SWDP23/24 - land adjacent Station Road		
SOC069	Amend Policy 23 and SWDP 23/24 and the Proposals Map to enlarge the site at Station Road and indicate the requirement for mixed uses to incorporate community facilities, new football club facilities, new car and coach parking, enhancement of the nature reserve and housing of up to 65 units to facilitate this.	To ensure that the SWDP demonstrates that it has been positively prepared, it needs to be amended. The site has been enlarged to accommodate more positive planning on this site with the incorporation of community facilities for the village. Officers have been working closely and consistently with the PCT in order to plan for the projected levels of growth within the SWDP and a new GP surgery / community facilities could be provided on this site as part of a mixed use scheme where genuine need is identified. It is also considered that the nature reserve needs to be enhanced and its inclusion within the boundaries of the mixed use scheme would

SWDP 23 CATEGORY 1 VILLAGES ALPHABETICALLY ORDERED		
		enable this to happen. A comprehensive scheme will ensure that there is an adequate buffer between any built development and the nature reserve; clearly recreational uses will be more suitable on the south-western parameters of the site. Conversely, built development would be more appropriate against the existing built up part adjacent to the site and would seem less removed from the main body of the village. Broadway Football Club would like to improve their facilities and this could be delivered in a mixed use scheme.
	Clifton on Teme - SWDP23/3- land at Hope Lane	
SOC070	Amend Table 18 Category 1 Village Sites in respect of the indicative number of dwellings on the Clifton upon Teme site (SWDP23/3) to read 30 units instead of 50 to reflect the rural character of the settlement.	To ensure that the SWDP is adequately justified it needs to be amended There is a clearly identified need for more housing in South Worcestershire over the period to 2030 and the SWDP makes provision for this by the allocation of land for new development in both the urban and rural areas. The basis for the distribution of new housing in rural areas is the settlement hierarchy, informed by the Village Facilities and Rural Transport Survey which addresses the relative sustainability of villages. Clifton is included as a Category 1 village, which has a good range of community and social facilities and good public transport services. Policy SWDP 23: Category 1 Villages states that such villages are considered appropriate for some new housing development since they are the most sustainable rural locations.

SWDP 23 CATEGORY 1 VILLAGES ALPHABETICALLY ORDERED		
		The responses received to the consultation have been carefully examined. It is considered that on the grounds of scale and impact on the character of the village the number of units should be reduced from 50 to 30.
Great Witley - SWDP23/4 - land adjacent to the Surgery		
SOC071	Amend Table 18 Category 1 Village Sites in respect of Great Witley (site SWDP23/4) to read 23 units instead of 35.	<p>To ensure that the SWDP is adequately justified it needs to be amended</p> <p>The responses received to the consultation have been carefully examined. It is considered that on the grounds of scale and impact on the character of the village the number of units should be reduced from 35 to 23. In so doing, to retain the original site area to allow a lower density development with an open buffer zone to the front of the site.</p> <p>There are no known highway safety , flooding and land drainage issues which cannot be overcome in the development of the site</p> <p>The proposed site is considered suitable in overall planning terms. It relates well to the main built up area of the village and close to community facilities e.g. school and doctors surgery.</p>
Hallow		
SOC072	Add site - Amend Table 18 Category 1 Village Sites to add a housing allocation for Hallow	<p>To ensure that the SWDP demonstrates that it has been positively prepared, it needs to be amended.</p> <p>Site can contribute to objectively assessed need, in a sustainable location.</p> <p>There is a clearly identified need for more housing</p>

SWDP 23 CATEGORY 1 VILLAGES ALPHABETICALLY ORDERED		
		<p>in South Worcestershire over the period to 2030 and the SWDP makes provision for this by the allocation of land for new development in both the urban and rural areas. The basis for the distribution of new housing in rural areas is the settlement hierarchy, informed by the Village Facilities and Rural Transport Survey, which addresses the relative sustainability of villages. Hallow is a Category 1 village and is supported by a number of key facilities and services and good public transport services. Policy SWDP 23: Category 1 Villages states that such villages are considered appropriate for some new housing development since they are the most sustainable rural locations.</p> <p>As a result of a renewed call for sites within the SHLAA Update 2011-12, a site has been identified on land to north of Orchard Close. This would be able to deliver approximately 46 dwellings.</p>
	Honeybourne	
SOC073	Delete site SWDP23/27- land behind the High Street	<p>To ensure that the SWDP demonstrates that it has been positively prepared, it needs to be amended.</p> <p>It is considered that SWDP23/26 offers a better opportunity to deliver a high quality scheme. Site SWDP23/27 could be delivered through a Neighbourhood Plan if considered necessary by the Parish Council / local community. SWDP23/26 now has a positive planning resolution for 75 dwellings.</p>

SWDP 23 CATEGORY 1 VILLAGES ALPHABETICALLY ORDERED		
SOC074	Increase SWDP23/26 High Street / Weston Road site area to accommodate an additional 25 dwellings	<p>To ensure that the SWDP demonstrates that it has been positively prepared, it needs to be amended.</p> <p>This site now has a positive resolution to grant planning permission for 75 dwellings.</p>
Inkberrow		
SOC075	Amend to include SHLAA 53-2 as an additional allocation. Together with SWDP23/28 and 23/29, the revised total allocation for Inkberrow is 100 (i.e. an increase of 10).	<p>To ensure that the SWDP demonstrates that it has been positively prepared, it needs to be amended.</p> <p>This site was originally identified by officers in earlier editions of the SHLAA but ruled out as availability was unknown. During the Preferred Options consultation period the landowner has subsequently put forward the site into the process. Therefore it is now possible to consider this site as a further allocation, on the basis that a higher overall housing number for South Worcestershire has been identified as well as consolidating the sites identified as SWDP 23/28 and 23/29.</p>
Kempsey SWDP23/7- land south of The Lawns		
SOC076	Amend Table 18 Category 1 Village Sites by increasing the indicative number of dwellings on site SWDP23/9 (land to the west of the Lawns) to 126.	<p>To ensure that the SWDP demonstrates that it has been positively prepared, it needs to be amended.</p> <p>Site can contribute to objectively assessed need, in a sustainable location.</p> <p>There is a clearly identified need for more housing in South Worcestershire over the period to 2030 and the SWDP makes provision for this by the allocation of land for new development in both the urban and rural areas. The basis for the</p>

SWDP 23 CATEGORY 1 VILLAGES ALPHABETICALLY ORDERED		
		<p>distribution of new housing in rural areas is the settlement hierarchy, informed by the Village Facilities and Rural Transport Survey, which addresses the relative sustainability of villages. It is considered that site SWDP23/9 can be better defined by the inclusion of Bight Farm, a small group of former agricultural buildings on the southern boundary of the site.</p> <p>As a consequence the capacity of the site can be increased from 114 units to 126 units</p>
SOC077	Amend Table 18 Category 1 Village Sites by the deletion of site SWDP23/8 Florence Close	<p>To ensure that the SWDP is adequately justified it needs to be amended</p> <p>When considered against reasonable alternatives. The site SWDP23/8 at Florence Close is deleted, but it is a small site, well contained by the built framework of the village, and within the settlement boundary, so it could come forward as an infill site, subject to normal development control considerations.</p>
	Lower Broadheath - SWDP23/10 - land north of Bell Lane	
SOC078	Amend the indicative number of dwellings for site SWDP23/10 - land north of Bell Lane (in Table 18 Category 1 Village Sites) to 40 instead of 55.	<p>To ensure that the SWDP is adequately justified it needs to be amended</p> <p>Further consideration has been given to the allocation at Bell Lane in the light of responses received. It is considered that the indicative number of dwellings should be reduced on the grounds of scale and the impact on the character and appearance of this part of the village. As a consequence the capacity is reduced from 55 to 40 dwellings, but the same site area is retained.</p>

SWDP 23 CATEGORY 1 VILLAGES ALPHABETICALLY ORDERED		
Martley - SWDP23/13 - land adjacent to The Crown (south)		
SOC079	Amend Table 18 Category 1 Village Sites to combine sites SWDP23/13 and SWDP23/14 to a single site with an indicative number of dwellings of 51, a reduction of 11 dwellings.	<p>To ensure that the SWDP is adequately justified it needs to be amended</p> <p>Further consideration has been given to the capacity of sites SWDP 23/13 and SWDP23/14 in the light of comments received. It is considered that the indicative number of dwellings should be reduced on the grounds of the impact on the listed buildings and the nearby Conservation Area, and the need for a landscaping area to be constructed within the site boundary.</p>
Martley – SWDP23/14 - land ADJACENT TO The Crown (West)		
SOC080	Amend Table 18 Category 1 Village Sites to combine sites SWDP23/13 and SWDP23/14 to a single site with an indicative number of dwellings of 51, a reduction of 11 dwellings.	<p>To ensure that the SWDP is adequately justified it needs to be amended</p> <p>Further consideration has been given to the capacity of sites SWDP 23/13 and SWDP23/14 in the light of comments received. It is considered that the indicative number of dwellings should be reduced on the grounds of the impact on the listed buildings and the nearby Conservation Area, and the need for a landscaping area to be constructed within the site boundary.</p>
Offenham - SWDP23		
SOC081	<p>Delete SWDP23/31 Gibbs Lane</p> <p>Replace with site off Three Cocks Lane that incorporates the cricket ground.</p>	<p>To ensure that the SWDP is adequately justified it needs to be amended</p> <p>The proposition to relocate the cricket ground to SWDP23/32 and include the land off Three Cocks Lane as part of a larger housing allocation is supported by the District Council. There is no significant Highway objection provided remedial</p>

SWDP 23 CATEGORY 1 VILLAGES ALPHABETICALLY ORDERED		
		work is undertaken to the road and junction as part of any application. Concerns have been raised by the Council's Heritage and Conservation Officers about the impact on the listed buildings Conservation Area. However, it is considered the site could be developed to ensure that the site is assimilated into the village development pattern. It is also understood that this proposal has wider support amongst the community as well as the cricket club.
SOC082	Delete SWDP23/32	<p>To ensure that the SWDP is adequately justified it needs to be amended</p> <p>The proposition to relocate the cricket ground to SWDP23/32 and include the land off Three Cocks Lane as part of a larger housing allocation is supported by the District Council. There is no significant Highway objection provided remedial work is undertaken to the road and junction as part of any application. Concerns have been raised by the Council's Heritage and Conservation Officers about the impact on the listed buildings Conservation Area. However, it is considered the site could be developed to ensure that the site is assimilated into the village development pattern. It is also understood that this proposal has wider support amongst the community as well as the cricket club.</p>
	Welland – SWDP 23	
SOC083	Add site - Amend Table 18 Category 1 Village Sites to add an allocation for Welland.	To ensure that the SWDP demonstrates that it has been positively prepared, it needs to be

SWDP 23 CATEGORY 1 VILLAGES ALPHABETICALLY ORDERED		
		<p>amended.</p> <p>Site can contribute to objectively assessed need, in a sustainable location.</p> <p>It is considered that an allocation for up to 10 dwellings on land adjacent to the public house will allow for the pub to be retained as an important community facility.</p>
Wychbold - SWDP23/35 - Land to the rear of Worcester Road		
SOC084	Amend site - increase the capacity of SWDP23/35 to 60; as an alternative to the Crown Lane site	<p>To ensure that the SWDP is adequately justified it needs to be amended</p> <p>The site is currently identified as part of the Area of Development Restraint in the Wychavon Local Plan. The site has greater capacity and officers are suggesting an increase in housing numbers on this site as an alternative to the Crown Lane site.</p>
Wychbold – new site off Crown Lane		
SOC085	Add site - as an alternative to SWDP23/35 for 60 dwellings	<p>To ensure that the SWDP is adequately justified it needs to be amended</p> <p>The site is currently identified as part of the Area of Development Restraint in the Wychavon Local Plan. The site is currently the subject of a planning application and therefore Officers are consulting on this site as an alternative to SWDP23/35.</p>
Wychbold - SWDP23/36 - land to the north of Chequers Lane		
SOC086	Delete site SWDP23/26.	<p>To ensure that the SWDP is adequately justified it needs to be amended</p> <p>It is proposed to delete this site due to the fact that Highways Officers had strong objections with</p>

	SWDP 23 CATEGORY 1 VILLAGES ALPHABETICALLY ORDERED	
		additional cars using the junction of Chequers Lane and Stoke Road.
	Wychbold SWDP23/37- British Legion Club	
SOC087	Delete site.	<p>To ensure that the SWDP is adequately justified it needs to be amended</p> <p>It is proposed to delete this site due to concerns raised over the loss of and replacement of this community facility and the fact that the site is within the development boundary (i.e. it could come forward as windfall development, subject to planning permission).</p>

SWDP 24 - CATEGORY 2 VILLAGES - GENERIC POLICY

	SWDP 24 CATEGORY 2 VILLAGES – GENERIC POLICY	
SOC088	<p>Significant change (likely)</p> <p>Some new SHLAA sites may end up being allocated in a revised Preferred Options SWDP, which would have to be subject to public consultation</p>	<p>To ensure that the SWDP is adequately justified it needs to be amended</p> <p>The additional housing sites have been judged against reasonable alternatives.</p> <p>There is a clearly identified need for more housing in South Worcestershire over the period to 2030 and the SWDP makes provision for this by the allocation of land for new development in both the urban and rural areas. The published Strategic Housing Market Assessment (GVA – February 2012) suggests that the housing requirement for the SWDP should be higher so additional sites are being considered. The basis for the distribution of new housing in rural areas is the settlement hierarchy, informed by the Village Facilities and</p>

SWDP 24 CATEGORY 2 VILLAGES – GENERIC POLICY		
		Rural Transport Survey which addresses the relative sustainability of villages. Any rural allocations will be on land that lies outside areas of high flood risk
SOC089	<p>New policy proposed:</p> <p><i>“New housing for Category 1, 2 and 3 settlements will be restricted to: -</i></p> <ul style="list-style-type: none"> • <i>Specific allocations</i> • <i>“windfall”, i.e. non-allocated development within the development boundaries, as set out on the Proposals Map, where it is supportive of the development management policies</i> • <i>Local initiatives including Neighbourhood Plans, Community Right to Build Orders and Neighbourhood Development Orders</i> • <i>Affordable housing schemes (see Exception Policy SWDP XX)</i> <p><i>Reasoned Justification:</i></p> <p><i>The scale of rural development reflects the limited range of local services, a low level of public transport provision, fewer employment opportunities and lower housing needs relative to the urban areas.”</i></p>	<p>To ensure that the SWDP is adequately justified it needs to be amended</p> <p>The settlement hierarchy is based on the findings of the Village Facilities and Rural Transport Survey, which has been updated. It is acknowledged that in some instances the level of development proposed does not directly correlate with the settlement hierarchy but there are good planning reasons for this, in particular the availability and suitability of land and the need to deliver new service infrastructure. In the main the level of proposed development increases in line with the settlement hierarchy.</p> <p>The VFRTS is based on the ones employed in the current adopted local plans. They were supported by the planning departments and including additional criteria is unlikely to result in a significantly different ranking.</p> <p>Disagree that villages (presently in Category 1 and 2) should be relegated to Category 3 just because they are close to an AONB. The VFRTS informs the allocation process but more detailed planning criteria are also applied. The villages within rural areas (2) are by and large much smaller.</p> <p>Most development is allocated in the urban areas so disagree re: the assertion that the settlement</p>

SWDP 24 CATEGORY 2 VILLAGES – GENERIC POLICY		
		<p>strategy is over-reliant on development in the rural area. The level of proposed development in the Category 3 villages is very low.</p> <p>Acknowledge the variable amount of development allocated for Category 1 villages but this is due to either the availability of suitable land or the need to deliver specific infrastructure. Generally speaking, the higher category villages have been allocated more than the lower category ones.</p> <p>Allocated development and windfall development will be subject to the same generic SWDP policy. The generic policy for Category 2 (and 1 and 3) rural settlements needs to be less ambiguous. Also all allocations will be subject to the new policy on landscape character.</p>

SWDP 24 - CATEGORY 2 VILLAGES (ALPHABETICALLY ORDERED)

SWDP 24 CATEGORY 2 VILLAGES ALPHABETICALLY ORDERED		
	Ashton under Hill SWDP24/7	
SOC090	<p>Amend site - increase size of site to allow retention of front hedgerow and sufficient planting to rear of site.</p> <p>Retain indicative number of dwellings at 6.</p>	<p>To ensure that the SWDP demonstrates that it has been positively prepared, it needs to be amended.</p> <p>Further clarification with Landscape Officer confirmed that site may be acceptable if sufficient planting was provided at the rear of the site. Also discussed the possibility of providing an access road parallel to Station Road in order to retain the hedge. For this would need to look at larger land parcel</p>

SWDP 24 CATEGORY 2 VILLAGES ALPHABETICALLY ORDERED		
SOC091	Add site - land opposite school at Elmley Road. Include as potential allocation for 12 dwellings (indicative).	To ensure that the SWDP is adequately justified it needs to be amended This site has been assessed by a SHLAA Panel following a representation made to the Preferred Options. Officers consider that the site should be subject to public consultation.
Bayton: SWDP24/1 - land adjoining Severne Green		
SOC092	Amend site - reduce indicative number of dwellings from 14 to 5	To ensure that the SWDP is adequately justified it needs to be amended Housing sites have been judged on their environmental impact (amongst other criteria) and have been minimised or deleted accordingly where said impact warrants significant change and / or suitable alternative sites are available. The allocation has been reassessed and the impact on the Conservation Area and general site capacity issues has resulted in a reduction in the number of dwellings previously suggested.
SWDP 24 - Beckford		
SOC093	New site - allocate site for housing (indicative number of dwellings 10)	To ensure that the SWDP is adequately justified it needs to be amended This site has been assessed by a SHLAA Panel following a representation made to the Preferred Options. Officers consider that the site should be subject to public consultation.
Bretforton SWDP24/8 - land north of Station Road		
SOC094	Increase allocation for site to 48 dwellings and delete Littlebrook site (see SWDP24/9). Concentrate allocations on one site.	To ensure that the SWDP is adequately justified it needs to be amended The site is large enough to accommodate an

SWDP 24 CATEGORY 2 VILLAGES ALPHABETICALLY ORDERED		
		increase in allocation and the Highway authority is supportive of one large site in the village therefore allocation increased to 48. There is no formal landscape objection to developing this site and the site forms infill in the existing built form. The applicant would need to undertake a flood risk assessment and incorporate sustainable drainage techniques.
SOC095	Carry forward allocation for 20 dwellings at Ivy Lane, Bretforton	To ensure that the SWDP is adequately justified it needs to be amended Failed to carry forward allocated site at Ivy Lane in Preferred Options. Need to include as it is a viable site for 20 dwellings.
Bretforton SWDP24/9 - Littlebrook Nurseries		
SOC096	Delete site SWDP24/9 at Littlebrook Nurseries. There are issues regarding flooding and there would be a detrimental effect on the setting of a listed building.	To ensure that the SWDP demonstrates that it has been positively prepared, it needs to be amended. Recognise that there are flood issues with part of the site although development would not have needed the whole site. The site would have an impact on the setting of this building. The site is no longer allocated as part of the South Worcestershire Development Plan.
Callow End SWDP24/3– Wheatfield Court		
SOC097	Amend site - increase indicative number of dwellings from 5 to 15	To ensure that the SWDP demonstrates that it has been positively prepared / justified it needs to be amended. Housing land is put forward based on a strategy to

SWDP 24 CATEGORY 2 VILLAGES ALPHABETICALLY ORDERED		
		<p>meet objectively assessed needs.</p> <p>The housing site has been judged against reasonable alternatives.</p> <p>There is an identified need for more housing in South Worcestershire. Callow End is considered to be a sustainable Category 2 village settlement in the Village Facilities and Rural Transportation Survey. It is considered that there is scope for a higher density of development. The site is located on brownfield land, with the current property having being severely damaged by fire.</p>
Cropthorne - SWDP24/10 - land at Field Barn Lane		
SOC098	<p>Remove site SWDP24/10 as now has outline planning permission and add new site.</p> <p>Add new site off Blacksmith Lane for 6 dwellings.</p>	<p>To ensure that the SWDP is adequately justified it needs to be amended</p> <p>The site has planning permission for 8 homes and is no longer allocated as part of the South Worcestershire Development Plan.</p> <p>Ownership details have now been submitted for SHLAA 25-1 and this site is supported in landscape impact terms and by the Highway Authority, with 2 potential access points off Blacksmith and Field Barn Lane. Therefore this is proposed as a replacement to the previous site SWDP 24/10 for 6 dwellings</p>
Drakes Broughton SWDP24/11 - Site behind Hawthorne Rise, off Stonebow Road,		
SOC099	<p>This site is not being removed from the plan but an alternative will be consulted on and a decision made post-consultation as there are some constraints with this site.</p> <p>Propose land to the west of the B4084 as an alternative site to sites SWDP24/11 and SWDP 24/13. Either the new site or sites 24/11 and 24/13 will be required, hence consultation is required on the land west of the B4084 to identify what constraints / issues there may be in</p>	<p>To ensure that the SWDP is adequately justified it needs to be amended</p> <p>The land is not in an area of high flood risk. If allocated, the surface water flooding issues can be addressed through an approved Sustainable</p>

SWDP 24 CATEGORY 2 VILLAGES ALPHABETICALLY ORDERED		
	allocating site.	<p>Drainage Scheme (SuDS). The Highways Authority advocate site access via SWDP24/11 which is in a different ownership to SWDP24/13. The site promoter has suggested an alternative access arrangement (a roundabout). There is significant space on the existing track for double tracking. We will review the position following consultation on the alternative site.</p> <p>The land to the west of the B4084 was put forward during the consultation period and following the initial SHLAA Panel assessments, it is considered to consult on this land as an alternative to SWDP24/11 and SWDP24/13. With respect to land west of the B4084 feedback from the infrastructure / service providers states there are no in-principle objections although access to the highway could be problematic.</p>
Drakes Broughton SWDP24/13 - site east of Stonebow Road, south of railway line		
SOC100	<p>This site is not being removed from the plan but an alternative will be consulted on and a decision made post-consultation as there are some constraints with this site.</p> <p>Propose land to the west of the B4084 as an alternative site to sites SWDP24/11 and SWDP 24/13. Either the new site or sites 24/11 and 24/13 will be required, hence consultation is required on the land west of the B4084 to identify what constraints / issues there may be in allocating site.</p>	<p>To ensure that the SWDP is adequately justified it needs to be amended</p> <p>The land is not in an area of high flood risk. If allocated, the surface water flooding issues can be addressed through an approved Sustainable Drainage Scheme (SuDS). The Highways Authority advocates site access via SWDP24/11, which is in a different ownership to SWDP24/13. The site promoter has suggested an alternative access arrangement (a roundabout). There is significant space on the existing track for double tracking. We will review the position following consultation on the alternative site.</p>

SWDP 24 CATEGORY 2 VILLAGES ALPHABETICALLY ORDERED		
		The land to the west of the B4084 was put forward during the consultation period and following the initial SHLAA Panel assessments, it is considered to consult on this land as an alternative to SWDP24/11 and SWDP24/13. With respect to land west of the B4084, feedback from the infrastructure / service providers states there are no in-principle objections although access to the highway could be problematic.
Fernhill Heath SWDP24/15, SWDP24/16 - Dilmore Lane		
SOC101	<p>Increase site - it is proposed to consult on larger allocation for SWDP24/16 to include 350 dwellings and a new primary school.</p> <p>It is also proposed to delete SWDP24/15</p>	<p>To ensure that the SWDP is adequately justified it needs to be amended</p> <p>In order to deliver a new replacement school for the village, it is proposed to consult on larger allocation for SWDP24/16 to include 350 dwellings and a new primary school.</p> <p>It is also considered that concentrating all the development on land between Dilmore Lane and Station Road is the best option, particularly as the agricultural land quality is better south / west of Dilmore Lane so it is proposed to delete SWDP24/15.</p>
Flyford Flavell - SWDP24/18 - land east of Boot Inn, Radford Road		
SOC102	<p>Amend site - revise allocation down to 12 dwellings for SWDP24/18 and include an area of open space.</p>	<p>To ensure that the SWDP demonstrates that it has been positively prepared / justified it needs to be amended.</p> <p>The village lacks open space and bringing forward a scheme that incorporates open space would benefit the community.</p> <p>The scale of development in Flyford Flavell would</p>

SWDP 24 CATEGORY 2 VILLAGES ALPHABETICALLY ORDERED		
		<p>not be sufficient to deliver a community facility such as a village hall.</p> <p>The design should be sensitive to the existing built form and setting and any development would benefit from an area of open space for the wider village to benefit from. The location is exposed from the east and so sensitive boundary treatment would be required as well as the retention where possible of existing hedgerows. These issues would be covered by policies SWDP 28 – Design and new policies SWDP 45 - Landscape and SWDP 46 - Biodiversity and Geodiversity. With regard to these considerations a revised allocation of 12 dwellings set around a village green is considered more appropriate for this site</p>
	Harvington SWDP24/19 - land adjacent Crest Hill	
SOC103	Amend site to include frontage to the east for total of 15 dwellings (increasing capacity by 10 dwellings).	<p>To ensure that the SWDP is adequately justified it needs to be amended</p> <p>The Preferred Option proposed site in Harvington does allocate a relatively low number of houses when considering the number of households in the village and the fact that it is ranked as a Category 2 village in the Village Facilities and Rural Transport Study. At the time of assessment, there were few suitable and available sites within the Strategic Housing Land Availability Assessment (SHLAA). As a result of the Preferred Options consultation, we have now been informed that the site is available.</p>
SOC104	Include site within GD boundary to allow for windfall.	To ensure that the SWDP is adequately

SWDP 24 CATEGORY 2 VILLAGES ALPHABETICALLY ORDERED		
		<p>justified it needs to be amended</p> <p>Site is relatively small and in assessing surrounding densities, it is not anticipated that this site would be capable of accommodating 5 units. There are no obvious planning constraints and with housing on either side, it is considered it should be included within the development boundary..</p>
Overbury SWDP24/20 - site adjacent Wine Acres		
SOC105	Delete site - Highways confirmed site access is unacceptable. Site to be deleted.	<p>To ensure that the SWDP demonstrates that it has been positively prepared, it needs to be amended.</p> <p>Proposed alternative access submitted by consultant was assessed by Highways (as current access in Preferred Options was considered to be unacceptable). Highways Officers consider alternative access is also unsatisfactory.</p>
Pinvin SWDP24/21 - land rear of Green End		
SOC106	Amend site - the indicative number of dwellings figures has been reduced from 13 to 5.	<p>To ensure that the SWDP is adequately justified it needs to be amended</p> <p>The loss of a view is not a planning consideration. It is not anticipated that the development of this site would result in the loss of residential amenity. If a planning application is submitted for this site then issues such as overlooking would be considered by the case officer.</p> <p>All infrastructure providers have been consulted on the Preferred Options sites, including Severn Trent and have not raised any concerns with the level of development we are proposing. Pinvin is</p>

SWDP 24 CATEGORY 2 VILLAGES ALPHABETICALLY ORDERED		
		<p>ranked as a Category 2 village as it has a high level of services and access to public transport. There is a well evidenced need (ONS and locally the Strategic Housing Market Assessment) for the need for additional housing both nationally and across South Worcestershire. There is not enough available land in the village development boundary (infill) which could accommodate the level of growth required.</p> <p>The indicative number of dwellings figures has been reduced from 13 to 5 to reflect the size of the site.</p>
	Pinvin SWDP24/22 – land adjacent The Workshop & Uplands	
SOC107	Amend site - reduction in the site area, but the indicative number of dwellings to remain at 14.	<p>To ensure that the SWDP is adequately justified the plan needs to be amended</p> <p>There are concerns over the loss of the view from the village to the open countryside from SWDP24/22 and as a result the top portion of this site has been deleted from the allocation. However, 14 dwellings can still be achieved on the remaining site area.</p>
	Pinvin SWDP24/23 - land north of The Green,	
SOC108	Amend site - the indicative number of dwellings figures has been reduced from 27 to 20	<p>To ensure that the SWDP is adequately justified the plan needs to be amended</p> <p>The loss of a view is not a planning consideration. It is not anticipated that the development of this site would result in the loss of residential amenity. If a planning application is submitted for this site then issues such as overlooking would be considered by the case officer.</p>

SWDP 24 CATEGORY 2 VILLAGES ALPHABETICALLY ORDERED		
		<p>All infrastructure providers have been consulted on the Preferred Options sites, including Severn Trent and have not raised any concerns with the level of development we are proposing. Pinvin is ranked as a Category 2 village as it has a high level of services and access to public transport.</p> <p>There is a well evidenced need (ONS and locally the Strategic Housing Market Assessment) for the need for additional housing both nationally and across South Worcestershire. There is not enough available land in the village development boundary (infill) which could accommodate the level of growth required.</p> <p>The indicative number of dwellings figures has been reduced from 27 to 20 to reflect the size of the site.</p>
	Pinvin Omission Sites	
SOC109	Add site - new site (land west of Main Street) for the allocation of 6 dwellings.	<p>To ensure that the SWDP is adequately justified the plan needs to be amended</p> <p>The site is on a former nursery and is occupied by some sheds / barns. It is located to the rear of a crescent of detached dwellings. The site has very little frontage to Main Street which will prevent the formation of an access to serve the whole site identified. Subject to complying with design standards a private driveway arrangement may be possible which will limit numbers to a maximum of 6. This size of development would minimise any landscape impact.</p>
	Powick and Collets Green SWDP24/5 - off Bowling Green Road	

SWDP 24 CATEGORY 2 VILLAGES ALPHABETICALLY ORDERED		
SOC110	Delete site - Highways issues cannot be resolved at the present time. Therefore recommend that the site is deleted from the SWDP housing allocations.	To ensure that the SWDP is adequately justified the plan needs to be amended Further reassessment of the site has shown that highways issues cannot be resolved at the present time, and therefore the site cannot to be shown to be deliverable. The site has been judged against reasonable alternatives.
Powick and Collets Green - land adjacent to The Crown		
SOC111	Add site - recommend new site on land adjacent to the Crown public house for 43 dwellings.	To ensure that the SWDP demonstrates that it has been positively prepared / justified it needs to be amended. Additional housing land is put forward based on a strategy to meet objectively assessed needs. The additional housing sites have been judged against reasonable alternatives. The development strategy of the SWDP promotes housing development in the rural areas with priority given to the sustainable rural settlements, i.e. Categories 1 and 2. Due to land off Bowling Green Road (SWDP24/5) being determined as undeliverable due to highways issues; suitable alternative sites have been assessed. Land adjoining the Crown public house is therefore put forward as an additional site for 43 dwellings. There are no access constraints associated with this site.
Sedgeberrow		
SOC112	Add site - amend policy SWDP 24 by inclusion of an additional allocation for housing for up to 12 units at land off Main Street, Sedgeberrow and amend Proposals Map accordingly for the purpose of public consultation	To ensure that the SWDP is adequately justified the plan needs to be amended This site was assessed by the SHLAA Panel (ref

SWDP 24 CATEGORY 2 VILLAGES ALPHABETICALLY ORDERED		
		76-06) and was not taken further as access to the site was not clear. However, the promoter has submitted further information showing control over the frontage property which would result in previous access concerns being overcome. Sedgeberrow is a Category 2 village and is considered capable of delivering a modest amount of development over the plan period. Officers suggest this site could accommodate up to 12 units.
SOC113	Add site - amend policy SWDP 24 by inclusion of an additional allocation for housing for up to 8 units at land off Winchcombe Road, Sedgeberrow and amend Proposals Map accordingly for the purpose of public consultation.	To ensure that the SWDP is adequately justified the plan needs to be amended In the previous assessment of SHLAA sites it was established that no sites were acceptable in highway terms for a housing allocation in the Preferred Options for the village, subsequently new sites have been submitted and officers consider that the site off Winchcombe Road should be offered for consultation as a site with potential for delivering up to 8 units.
South Littleton SWDP24/24 - land between Long Hyde Road & Station Road,		
SOC114	Reduction in size of site due to Landscape Officer's feedback - reduce site to road frontage only to accommodate 20 dwellings instead of 30.	To ensure that the SWDP demonstrates that it has been positively prepared, it needs to be amended. Wychavon Landscape Officer has raised some concerns regarding developing the whole of this site, suggesting only developing part of the site in the form of road frontage in order to minimise the visual impact on landscape.
SOC115	Add site - allocate site for 6 dwellings (Shinehill Lane; SHLAA site 78-04).	To ensure that the SWDP is adequately

SWDP 24 CATEGORY 2 VILLAGES ALPHABETICALLY ORDERED		
		<p>justified the plan needs to be amended</p> <p>This site was previously ruled out of the SHLAA as the availability of the land was unknown and therefore the site was considered to be undeliverable. Representations have now been received for this site and it since been assessed in the SHLAA as it is now considered to be available.</p>
Upton Snodsbury SWDP 24/27 - land between College Road and School		
SOC116	<p>This site is not being removed from the plan but an alternative will be consulted on and a decision made post-consultation as there are some constraints with this site.</p>	<p>To ensure that the SWDP demonstrates that it has been positively prepared, it needs to be amended.</p> <p>The site does have surface water issues any development would need to take account of these and incorporate sustainable drainage methods. No additional run-off must be created by the development. Only low density development could be appropriate on this site enabling suitable storm water attenuation ponds to be designed into the scheme and any other appropriate method required by environmental engineers.</p> <p>The surface water issues do not mean that this site cannot be developed but there may be an alternative site that would be preferable.</p> <p>Before any planning permission could be granted an ecological survey would need to be undertaken to understand if there are any protected species on the site and whether mitigation measures are appropriate or if the site needs full protection.</p> <p>Without this information there may be less sensitive sites that would be preferable.</p>

SWDP 24 CATEGORY 2 VILLAGES ALPHABETICALLY ORDERED		
		<p>The Highway Authority is only supportive of access through Cutts Pool by the existing service road for a maximum of 16 dwellings. There would not be a vehicle access onto Chapel Lane. There is already a pathway that connects the site to the heart of the village and provides easy access to the school, church and shop.</p> <p>All roads would be expected to meet with the Highway Authorities standards in terms of visibility splays, width for access of a full range of vehicles including service vehicles, residential developments are designed to a maximum speed of 20 mph and footpaths are installed where appropriate.</p> <p>There may be less sensitive sites that would be preferable.</p>
SOC117	<p>Add site - propose former garage site and land to the rear as an alternative to the Cutts Pool Orchard Site for 16 dwellings. One of these sites will be required, hence consultation is required on the garage site as an alternative to identify what constraints / issues there may be in allocating site.</p>	<p>To ensure that the SWDP demonstrates that it has been positively prepared / justified it needs to be amended.</p> <p>Former garage site is now a suitable alternative as the land behind is available and deliverable. The site had not been allocated before as much of the site falls within the current development boundary and has a current planning permission. However due to local opinion and concern about this site and the availability of the land behind the site there is scope to extend the site beyond the permitted development boundary to deliver a more viable housing scheme.</p> <p>This extended site is being proposed as an alternative site to that consulted on in 2011. One</p>

	SWDP 24 CATEGORY 2 VILLAGES ALPHABETICALLY ORDERED	
		of these sites is required in Upton Snodsbury and this consultation will identify which is the more suitable.

SWDP 25 - CATEGORY 3 VILLAGES - GENERIC POLICY

	SWDP 25 CATEGORY 3 VILLAGES – GENERIC POLICY	
SOC118	<p>New Policy proposed</p> <p><i>“New housing for Category 1, 2 and 3 settlements will be restricted to: -</i></p> <ul style="list-style-type: none"> • <i>Specific allocations</i> • <i>“windfall”, i.e. non-allocated development within the development boundaries, as set out on the Proposals Map, where it is supportive of the development management policies</i> • <i>Local initiatives including Neighbourhood Plans, Community Right to Build Orders and Neighbourhood Development Orders</i> • <i>Affordable housing schemes (see Exception Policy SWDP XX)</i> <p><i>Reasoned Justification:</i></p> <p><i>The scale of rural development reflects the limited range of local services, a low level of public transport provision, fewer employment opportunities and lower housing needs relative to the urban areas.”</i></p>	<p>To ensure that the SWDP is adequately justified the plan needs to be amended</p> <p>The settlement hierarchy is based on the findings of the Village Facilities and Rural Transport Survey, which has been updated. It is acknowledged that in some instances the level of development proposed does not directly correlate with the settlement hierarchy but there are good planning reasons for this, in particular the availability and suitability of land and the need to deliver new service infrastructure. In the main the level of proposed development increases in line with the settlement hierarchy.</p> <p>The VFRTS is based on the ones employed in the current adopted local plans. They were supported by the planning departments and including additional criteria is unlikely to result in a significantly different ranking.</p> <p>Disagree that villages (presently in Category 1 and 2) should be relegated to Category 3 just because they are close to an AONB. The VFRTS informs the allocation process but more detailed planning criteria are also applied. The villages</p>

SWDP 25 CATEGORY 3 VILLAGES – GENERIC POLICY		
		<p>within rural areas (2) are by and large much smaller.</p> <p>Most development is allocated in the urban areas so disagree re: the assertion that the settlement strategy is over-reliant on development in the rural area. The level of proposed development in the Category 3 villages is very low.</p> <p>Acknowledge the variable amount of development allocated for Category 1 villages but this is due to either the availability of suitable land or the need to deliver specific infrastructure. Generally speaking, the higher category villages have been allocated more than the lower category ones.</p> <p>Allocated development and windfall development will be subject to the same generic SWDP policy. The generic policy for Category 3 (and 1 and 2) rural settlements needs to be less ambiguous. Also all allocations will be subject to the new policy on landscape character.</p>

SWDP 25 - CATEGORY 3 VILLAGES (ALPHABETICALLY ORDERED)

SWDP 25 CATEGORY 3 VILLAGES ALPHABETICALLY ORDERED		
	Alfrick SWDP25/1 - south of Swan Orchard	
SOC119	<p>Amend Table 20 Category 3 Village Sites in respect of site SWDP25/1 by reducing the indicative number of dwellings to 13 instead of 15 and refer to the site as East of Chapel Meadow</p>	<p>To ensure that the SWDP is adequately justified the plan needs to be amended</p> <p>Further consideration has been given to the capacity of site SWDP25/1 in the light of responses received. It is considered that the indicative number of dwellings should be reduced</p>

SWDP 25 CATEGORY 3 VILLAGES ALPHABETICALLY ORDERED		
		to take account of the need to provide landscaping to the main site frontage. The site is renamed as East of Chapel Meadow to properly reflect its location.
	Bishampton	
SOC120	Add site - propose allocation of 6 units on SHLAA site 11-08 – land west of Main Street	<p>To ensure that the SWDP demonstrates that it has been positively prepared, it needs to be amended.</p> <p>In light of category change (from a 4a to Category 3 village) it is now considered that Bishampton is a suitable village to receive an allocation for housing and part of SHLAA ref 11-08 to the rear of the properties known as Malvern View is suggested. It has a central position within the village and is of a scale considered appropriate for the village. However, the site has restricted access which could serve a maximum of 6 dwellings.</p>
	Cleeve Prior SWD 25/3 - land east of Froglands	
SOC121	Delete - site off Froglands Lane to be removed from allocation.	<p>To ensure that the SWDP demonstrates that it has been positively prepared, it needs to be amended.</p> <p>The site falls within the extended Conservation Area (2008) and the impact on the setting of the historic landscape has been taken into consideration therefore the site is no longer being allocated through the South Worcestershire Development Plan.</p>
SOC122	Add site – include site to the rear of the school for 12 dwellings subject to Highways agreements.	To ensure that the SWDP is adequately justified the plan needs to be amended

SWDP 25 CATEGORY 3 VILLAGES ALPHABETICALLY ORDERED		
		This site, subject to Highway agreement, including widening of access track for passing, and details of water flows the site to the rear of the school could provide a sustainable location for the allocation of 12 dwellings. This site is set within the centre of the settlement and can provide easy access to all the facilities.
Clows Top SWDP25/2 - land adjacent to Highbrae		
SOC123	Amend allocation - indicative number of dwellings reduced from 25 to 17	To ensure that the SWDP is adequately justified the plan needs to be amended The facilities and services available in Clows Top have been examined under the Village Facilities and Rural Transport Survey, and it is now considered to be a category 2 rather than a category 3 settlement (the village hall is in Wyre Forest administrative area but is an integral facility for the village).
Conderton		
SOC124	Add site – allocate site for 10 houses.	To ensure that the SWDP is adequately justified the plan needs to be amended This site was not previously submitted to the SHLAA and therefore was considered to be unavailable. This site has now been brought to Officers' attention through the SWDP Preferred Options consultation and has now been assessed by the SHLAA Panel who felt that this was a suitable development site for the village.
Crowle SWDP25/4 - land opposite Village Hall, off Church Road		
SOC125	Amend western boundary of site and increase housing allocation to 25, to reflect larger site	To ensure that the SWDP is adequately

SWDP 25 CATEGORY 3 VILLAGES ALPHABETICALLY ORDERED		
	boundary.	justified the plan needs to be amended Further to pre-application discussions and public consultations held by the developers, the site boundary to SWDP25/4 was clarified and it was agreed to Amend the western boundary accordingly to represent the landholdings of the site.
Defford SWDP25/5 - land rear of Railway Inn, Main Street		
SOC126	Delete site SWDP25/5 from allocations	To ensure that the SWDP demonstrates that it has been positively prepared, it needs to be amended. Highway Authority is supportive of individual accesses to properties fronting Harpley Road. As the majority of the road frontage of the site is no longer available for development it can no longer be allocated. Extending back into the site beyond the built line of the Village Hall and Vicarage Cottage would have a significant visual impact. Therefore the site is removed from the allocations.
SOC127	Add site - to replace SWDP25/5 running along road frontage of Upper Street for 6 dwellings.	To ensure that the SWDP is adequately justified the plan needs to be amended Propose road frontage development along Upper Street for 6 dwellings. The site is now available and Highways are supportive of this site. It is within easy walking distance of village facilities
Elmley Castle		
SOC128	Amend development boundary to incorporate Sawmills site.	To ensure that the SWDP is adequately justified the plan needs to be amended This site is considered to be too small to allocate in the SWDP. However, it is considered that the

SWDP 25 CATEGORY 3 VILLAGES ALPHABETICALLY ORDERED		
		development boundary could be drawn around this site, to allow for a smaller number of houses for windfall development.
	Pebworth	
SOC129	Delete site SWDP 25/13 from table 13 and amend Proposals Map accordingly.	To ensure that the SWDP is adequately justified the plan needs to be amended Site 25/13 - Bank Farm is now considered unsuitable for development as the site fronting Chapel Road is no longer available and it is considered that the Bank Farm site cannot be developed unless in conjunction with sites 25/16 – Chapel Road and 24/14 – r/o Elm View in order to satisfy Highway concerns.
SOC130	Delete site SWDP 25/14 from table 13 and amend Proposals Map accordingly.	To ensure that the SWDP is adequately justified the plan needs to be amended Site 25/14 – land to the r/o Elm View unsuitable for development as the site fronting Chapel Road is no longer available for development and it is considered that the Elm View site cannot be developed unless in conjunction with site 25/16 – Chapel Road in order to satisfy Highway concerns.
SOC131	Delete site SWDP 25/15 from table 13 and amend Proposals Map accordingly.	To ensure that the SWDP is adequately justified the plan needs to be amended Site 25/15 – Broad Marston Road has major flood risk and highway concerns and is considered unsuitable for development.
SOC132	Delete site SWDP 25/16 from table 13 and amend Proposals Map accordingly	To ensure that the SWDP is adequately justified the plan needs to be amended Site 25/16 – Chapel Road is no longer available

SWDP 25 CATEGORY 3 VILLAGES ALPHABETICALLY ORDERED		
		for development and must therefore be deleted.
SOC133	Add site - amend policy SWDP 25 by inclusion of an additional allocation for housing for up to 10 units at land off Honeybourne Road, Pebworth and amend Proposals Map accordingly for the purpose of public consultation.	<p>To ensure that the SWDP is adequately justified the plan needs to be amended</p> <p>This site has been submitted for development and is considered to be a more suitable site for development as it is capable of being developed on its own and officers consider that the site should be offered for consultation with potential for delivering up to 10 units.</p>

SWDP 27 - PROVIDING THE RIGHT LAND AND BUILDINGS FOR JOBS

SWDP 27 – PROVIDING THE RIGHT LAND AND BUILDINGS FOR JOBS		
SOC134	<p>Insert the following additional text to the policy to support the provision of work / live units: -</p> <p><i>The South Worcestershire Council's consider that the provision of work / live units can help support small and start up businesses as well as provide sustainability benefits particularly in the more rural parts of South Worcestershire. Work / live units may be a suitable use for redundant rural buildings and afford opportunities for farm diversification subject to compliance with other South Worcestershire Development Plan policies particularly SWDPXX.</i></p> <p><i>Proposals for work / live accommodation will therefore be supported providing:</i></p> <ol style="list-style-type: none"> <i>1. The residential use is clearly ancillary with floor space split at least 60% employment and no more than 40% residential.</i> <i>2. The residential accommodation is one- or two-bedroomed.</i> <i>3. The residential and work spaces are entirely separate with separate entrances and toilet facilities.</i> <i>4. Affordable housing in accordance with SWDP?? is included within the development.</i> <i>5. All units have access to superfast broadband or equivalent infrastructure.</i> <i>6. Proposals for 10 or more work / live units should include provision for shared</i> 	<p>To ensure that the SWDP demonstrates that it has been positively prepared, it needs to be amended.</p> <p>This is required to ensure the SWDP responds appropriately to the final bullet point of paragraph 21 of the NPPF (i.e. "facilitate flexible working practices such as the integration of residential and commercial uses within the same unit.")</p>

SWDP 27 – PROVIDING THE RIGHT LAND AND BUILDINGS FOR JOBS	
	<p><i>business services, i.e. meeting rooms and basic office services.</i></p> <p>7. <i>Direct access can be provided from the development onto the primary road network (A or B classified road).</i></p> <p>8. <i>No in-curtilage parking is provided, with all parking provided on a shared basis and in accordance with an agreed scheme supported by the Highway Authority.</i></p> <p>9. <i>The proposed use does not involve the sale of goods to visiting members of the public or fall within the A3, A4, A5, B2, C1, or C2 use classes. The approved use will be controlled by planning condition and owners will be required to enter into a legal obligation (section 106 agreement) controlling the use of the premises and other relevant matters such as the number of non-resident employees who can work at the premises.</i></p> <p>10. <i>The completed development will not benefit from any permitted development rights for change of use of all or part of the premises or for residential extensions.</i></p>

SWDP 30 – 32 - MEETING HOUSING NEEDS (PARAGRAPH 21)

SWDP 30 – 32 – MEETING HOUSING NEEDS PARAGRAPH 21	
SOC135	<p>Add policy - new policy (Housing to Meet the Needs of Elderly People) has been drafted and will be subject to consultation. See SOC152</p>
	<p>To ensure that the SWDP demonstrates that it has been positively prepared, it needs to be amended.</p> <p>The Worcestershire Housing Strategy, County Council projections and the Worcestershire SHMA indicate that there will be a significant increase in the number of people aged 65+ over the next two decades. Also, the rise in the number of people aged 85+ will lead to greater requirements for different forms of supported housing. The policy should therefore actively encourage the provision of a range of housing for all including the elderly</p>

	SWDP 30 – 32 – MEETING HOUSING NEEDS PARAGRAPH 21	
		and a new policy is proposed.

SWDP 30 - HOUSING MIX

	SWDP 30 – HOUSING MIX	
SOC136	Policy has been redrafted to reflect latest evidence. Amend- see SOC141	To ensure that the SWDP is adequately justified the plan needs to be amended South Worcestershire authorities need to ensure that an appropriate mix of dwellings is provided on allocated and windfall sites to help meet local need as identified through the evidence base. Therefore, the policy and accompanying text need to clearly encourage this. The policy has been amended accordingly in light of the evidence from the latest SHMA (February 2012).

SWDP 31 - MEETING AFFORDABLE HOUSING NEEDS

	SWDP 31 - MEETING AFFORDABLE HOUSING NEEDS	
SOC137	The policy wording should be amended to reflect the sliding scale referred to in the Development Viability report. i.e. On sites of 15 or more dwellings, 40% of the units should be affordable i.e. social rented, affordable rented and intermediate, and provided on site. On sites of 10 – 14 dwellings, 30% of units should be affordable, and be provided on site On sites of 5 – 9 dwellings, 20% of units should be affordable and be provided on site On sites of less than 5 dwellings a financial contribution towards local affordable housing provision will be required.	To ensure that the SWDP is adequately justified the plan needs to be amended The policy wording should be amended to reflect the sliding scale referred to in the Development Viability report produced by Adams Integra.

SWDP 33 - TRAVELLERS AND TRAVELLING SHOWPEOPLE

SWDP 33 – TRAVELLERS AND TRAVELLING SHOWPEOPLE	
SOC138	<p>Delete paragraphs 21.40, 21.43 and replace with the following:</p> <p><i>Up to 30 pitches will be allocated through the identification of small sites (up to 10 pitches) in or adjacent to the Worcester South and Worcester West urban extensions – as outlined in Policy SWDP8 / SWLP9. The precise location of these sites will be identified through detailed masterplanning on the urban extensions. At this stage it will also be determined whether the sites on the urban extensions will be to meet Malvern Hills and / or Worcester’s pitch requirements - although there is a working assumption that a minimum of 10 pitches will be to meet Malvern Hills requirements and a minimum of 10 pitches will be to meet Worcester’s requirements.</i></p> <p><i>Provision to meet the net requirement for additional pitches in Malvern Hills and Worcester will be determined through Traveller and Travelling Showpeople Site Allocations Development Plan Documents in those local authority areas, which will be subject to further consultations.</i></p>
	<p>To ensure that the SWDP is adequately justified and in accordance with NPPF, the plan needs to be amended</p> <p>National planning policy requires local planning authorities to identify a supply of specific deliverable sites sufficient to provide five years’ worth of sites against their locally set targets. Wychavon District has met its five year pitch requirement both for the period to 2017 and for 2017 – 2022.</p> <p>There is, however, an unmet need for 30 pitches in Malvern Hills District and 22 pitches in Worcester in the 5 years to 2017.</p> <p>Due to their size and scale, it is considered that the Worcester South and Worcester West urban extensions offer opportunities for mixed use developments including, potentially, the integration of traveller sites.</p> <p>It is therefore proposed that up to 30 traveller pitches are allocated through the identification of small sites (up to 10 pitches each) in or adjacent to the urban extensions. The precise location of these sites would be identified through detailed masterplanning on the urban extensions. At this stage it would also be determined whether the sites on the urban extensions would be to meet Malvern Hills and/or Worcester’s pitch requirements - although there is a working assumption that a minimum of 10 pitches will be to</p>

	SWDP 33 – TRAVELLERS AND TRAVELLING SHOWPEOPLE	
		<p>meet Malvern Hills requirements and a minimum of 10 pitches will be to meet Worcester's requirements.</p> <p>It is further proposed that provision to meet the net requirement for additional pitches in both Malvern Hills and Worcester would be determined through Traveller and Travelling Showpeople Site Allocations Development Plan Documents in those local authority areas which would be subject to further consultations</p>

SWDP 46 - RENEWABLES AND LOW CARBON ENERGY

	SWDP 46 – RENEWABLES AND LOW CARBON ENERGY	
SOC139	<p>Significant changes were recommended to SWDP46.</p> <p>Due to the extent of the proposed significant changes to this policy, revised wording is now to be found at SOC142.</p>	

SWDP - PROPOSALS MAP

	SWDP PROPOSALS MAP	
SOC140	<p>The Roxel site should be excluded from the Green Belt.</p> <p>It is proposed to set out a boundary around the perimeter of the site. Within this boundary, the principle of infill development would be acceptable.</p>	<p>The difference between the Wyre Forest Plan and the Wychavon Local Plan is that the Green Belt boundary takes an arbitrary line cutting through the Roxel site. The Green Belt designation conflicts with PPS2 Paragraphs 1.4 and 1.5. New development on the site is likely to support and retain the 227 jobs on site.</p>