Extraordinary meeting of Council

10th December 2012

Report of Head of Planning, Economy and Housing

South Worcestershire Development Plan: Significant Changes Consultation and SWDP Pre-Submission Document

1. Purpose of Report

1.1 The purpose of this report is to:


2. Provide a summary of the key changes recommended to the South Worcestershire Authorities by the South Worcestershire Joint Advisory Panel (15 – 16 November 2012);

3. Seek approval for the changes made as a result of the Significant Changes Consultation and note the schedule of additional minor changes.


5. Advise Council on the progress of the Infrastructure Delivery Plan (IDP) and to approve the Infrastructure Delivery Plan and Appendix Y.


7. Apprise members of the SWDP consultation statement and arrangements for the proposed pre-submission publicity.

8. Seek approval of the revised LDS / Project Plan for production of the SWDP

9. Seek Council’s approval for the Pre-Submission document for further technical consultation prior to the submission of the plan to the Secretary of State.

10. Note that delegated approval for any further minor changes arising from the technical consultation and work to complete the submission document is given to the Lead officers in consultation with the Leaders, Portfolio leads and Managing Directors of the 3 Councils along with the decision to submit the final version of the South Worcestershire Local Plan to the Secretary of State.
1.2 The report has a number of Appendices:

- Appendix 1: SWDP Pre-Submission document (attached and available electronically)
- Appendix 2: Full Schedule of Issues and Responses - including maps showing the final proposed sites. (available electronically only)
- Appendix 3: Summary of and full copy of the Integrated Assessment of the Proposed Changes. (available electronically only)
- Appendix 4: Infrastructure Delivery Plan (available electronically from 30 November 2012)
- Appendix 5: Overall Viability Study (available electronically from 30 November 2012)
- Appendix 6: SWDP Consultation report (available electronically only).
- Appendix 7: Recommended consultation programme for the technical consultation into the pre-submission document (available electronically only).
- Appendix 8: Revised LDS / project plan (attached, available electronically or in the members’ room).
- Appendix 9: Updated Strategic Flood Risk Assessment and Water Cycle Study (available electronically only)
- Appendix 10: The Background Papers relating to the Plan including housing, demographics, Strategic Flood Risk Assessment and Duty to Co-operate (available electronically only)
- Note: All documents can be accessed via the three District Council website or directly at www.swdevelopmentplan.org.

1 The “Integrated Assessment” comprises the statutorily required Sustainability Assessment (SA) and Habitats Regulations Assessment (HRA) supplemented by a non-statutorily required Equalities Assessment and Health Impact Assessment.
Recommendations that -

(i) notes the representations received in response to the Significant Changes consultation (Appendix 2 – Schedule of Issues and Responses) and approves the associated officer’s recommendation related to the comments received;

(ii) notes the schedule of minor changes made since the Preferred Options and Significant Changes stages;

(iii) in relation to the SWDP Pre submission document:

- Endorses the contents of the document and appendices as being sound and deliverable.

- Delegates authority to the relevant Heads of Service in the three districts in consultation with the Planning Portfolio holders (Executive Member in Wychavon) to make further essential revisions relating to formatting and presentation to the Pre submission documentation prior to its publication for consultation.

- Approves the pre-submission document (Appendix 1) for technical consultation purposes and subsequent formal submission to the Secretary of State.

- Prior to the submission of the plan to the Secretary of State delegates authority to the relevant Heads of Service in the three districts in consultation with the Leaders and Planning Portfolio Holders (Executive Member in Wychavon) to make further minor changes via a schedule of changes to the Pre-Submission document as a result of the responses received from the technical consultation and any further changes deemed necessary to ensure that the document remains in conformity with National Planning Policy guidance.

- Delegates authority to the relevant Heads of Service in the three districts to make appropriate arrangements for the submission of documents to the Secretary of State and any consequential actions as directed by the Inspector relating to the Examination.

- Approves the document as amended by the above for formal submission to the Secretary of State.

- Delegates authority to the relevant Heads of Service in the three districts to make any consequential actions as directed by the Inspector relating to the Examination.

(iv) in relation to the Integrated Assessment (see footnote 1, p2):

- Endorses the summary of conclusions set out in Appendix 3.

- Notes that the assessments form an integral part of the preparation of the Local Plan.

- Prior to the submission of the plan to the Secretary of State delegates authority to the relevant Heads of Service in the three districts in consultation with the Planning Portfolio holders (Executive Member in Wychavon) to make further minor changes to the documents as a result of comments received from the technical
consultation and to ensure the document remains up to date.

(v) in relation to the Infrastructure Delivery Plan and South Worcestershire Viability Study:

- Notes and approves the contents of the Infrastructure Delivery Plan (IDP) (Appendix 4).
- Notes the findings of the Viability Study (Appendix 5).
- Prior to the submission of the plan to the Secretary of State delegates authority to the relevant Heads of Service in the three districts in consultation with the Planning Portfolio holders (Executive Member in Wychavon) to make further minor changes to the document as a result of comments received from the technical consultation and to ensure the document remains up to date.

(vi) approves the Consultation Report (Appendix 6) and consultation programme (Appendix 7) for technical consultation into the pre-submission document; and

(vii) approves the updated SWDP LDS / Project timetable (Appendix 8).

2. Introduction

2.1 The SWDP Pre-Submission document and issues and response schedule will be reported to Malvern Hills District and Worcester City Councils on 10 December 2012. Wychavon District Council will consider the matter on 18 December 2012.

2.2 The Pre-Submission document has evolved following extensive evidence gathering and significant public consultation over a number of years. The document (Appendix 1) and recommendations set out below are identical for each Council.

2.3 All three partner councils in south Worcestershire are being asked to consider the recommendations unaltered as listed and in their entirety. In the event that the recommendations are not passed as stated by any Council, based upon the advice of the South Worcestershire leaders, it will be assumed by the other authorities that they do not wish to continue with the South Worcestershire Development Plan.

2.4 Given the implication of the National Planning Policy Framework, the submission of the plan in early April, its consideration at an Examination in Public in the Summer of 2013 and adoption in late 2013 is critical if South Worcestershire is to secure up to date plan coverage at the earliest possible date and make the most effective use of the extensive investment in developing the SWDP evidence base and associated policies.

2.5 Should all three Councils fail to approve the recommendations and therefore the timetable set out in the report, then all the attendant and very serious risks as set out will apply. Only a vote of approval from all three Councils can enable the SWDP to progress according to the timetable.
2.6 Failure to make joint progress on the South Worcestershire Development Plan will incur the following risks:

- Where councils are unable to demonstrate an adequate 5 year supply of land to meet housing needs the requirements of the National Planning Policy Framework will apply and current adopted local plan policies will be deemed to be out of date. This means that councils will need to grant planning permission for developments outside of their current local plan policies and proposed development plan strategy. This is of particular relevance to Wychavon and Malvern Hills.

- Delay would impact upon the to the ability to adopt a Community Infrastructure Levy (CIL) Charging Schedule as it would not have the benefit of an essential up to date Development Plan policy to support its implementation or provide a basis for testing its appropriateness. From April 2014 pooled contributions for development will be restricted to 5 developments or less, so collection of funds towards any strategic infrastructure will be compromised;

- The evident benefits of joint working in terms of a co-ordinated approach to dealing with cross boundary sub-regional issues and compliance of the legal duty to co-operate across South Worcestershire will be lost;

- Delay also means that some elements of the evidence base will become outdated and will need to be updated incurring further costs.

3. Background

3.1 The South Worcestershire Development Plan is based upon a vision and approach for the area which is:

- Economic prosperity-led with a focus on jobs and investment.

- Predicated on the future growth of the city of Worcester needing to take place around the city in the adjacent areas of Wychavon and Malvern Hills through the development of urban extensions.

- Focussed on local housing need requirements based on assessment of the latest household projections, migration reports and housing market assessments.

- Supported by an overarching Infrastructure Delivery Plan setting out where new infrastructure needs to be provided, when it needs to be provided, how much it will cost and who will be responsible for delivering it.

- Supported by investment in strategic transportation within and around Worcester.

3.2 Consultation on the SWDP Preferred Options document was completed in November 2011 and a further consultation into the proposed significant changes was completed in the Summer / Autumn of 2012. Approximately 2,000 responses translating into around 10,000 representations were made as a result of the initial consultation with 3,500 representations received as a result of the consultation on the proposed significant changes.
Since the conclusion of the latest consultation period, officers have considered the comments received and where necessary, have recommended changes to the Plan. Where changes are recommended, the change is described under one of the following categories:

- “No change” (to recommendation made previously); or,
- “Minor change” – defined as those that do not require further consultation such as changes to text and minor amendments to policy which do not require consultation; or,
- “Significant change – requiring consultation” - defined as those requiring further consultation such as changes to site allocations or significant changes to policy.

It should be noted that Appendix 2 identifies a number of important changes to the emerging pre-submission document. These are considered essential to aid understanding of the Plan, make minor corrections, address technical issues and respond to matters raised by responses to the significant changes consultation and updating of the SWDP evidence base. Whilst important to the overall ‘soundness’ of the SWDP these changes are NOT considered to be so substantial or new so as to require further additional formal consultation as ‘Significant Changes’. This is why they are identified as minor changes in Appendix 2.

The Significant Changes Consultation

The Significant Changes consultation took place over a 6 week period during August and September 2012. The materials produced for the consultation events consisted of:

- Schedule of proposed significant changes which included proposed amended and new policies and proposed amended and new site allocations.
- Maps of the proposed changes to allocations for housing, employment, retail or mixed use development and policy designations.
- The Infrastructure Delivery Plan Interim Position Statement and associated Appendix Y.
- Relevant background papers.

The consultation approach made use of a variety of methods to reach as wide an audience as possible. Members of the community were invited to view and to respond to the consultation via the Councils’ websites and SWDP dedicated website. Articles were published in various Council publications, on the websites and via the local media to inform people of what was happening, where events were taking place and how they could get involved. Arrangements were put in place to ensure that alternative provision could be made for people with visual impairment or speakers of English as a second language as well as ensuring that all venues were accessible. 20 events were held across the South Worcestershire area which were attended by a total of approximately 2100 people.
4.3 Overall the consultation has generated a good level of representations reflecting local residents and community groups, stakeholders, and those connected with the development process. In terms of residents and community groups these have tended to mirror the main areas of development proposed, but there has also been a high level of response to the vision and proposed development management policies laid out in the Preferred Options. The Significant Changes consultation, not a requirement at this stage in the process, provided for a further opportunity to comment and allow for the content to be further fine tuned. It has built on the previous consultation for the SWJCS and successfully conveyed the SWDP change of direction, both in terms of the process and content.

4.4 The key concerns/ comments raised can be summarised as follows:

- Comments from residents and developers as to whether the levels of anticipated housing and employment growth were correct.
- There was limited comment in relation to the proposed amendments to the policies of the plan or the new policies proposed.
- Concerns were expressed about the proposed allocations – in particular the housing allocations.
- Concerns were expressed about the amount, the cost and the phasing of key infrastructure to support the delivery of the Plan.
- Suggestions were made as to alternative or additional sites that could be developed in the Plan area.
- Support was received for the provision of employment land from the Local Enterprise Partnership.
- The Highways Agency and Worcestershire County Council accepted the proposals set out in the plan and the information set out within the Infrastructure Delivery Plan.
- No adverse comments from adjacent District Councils.

4.5 Appendix 2 necessarily summarises representations and in keeping with this format only relatively brief officer assessments and responses can be given. In providing assessments and responses officers have had regard to the existing SWDP evidence base and associated technical information, together with draft background documents and previous consultation feedback and responses. In some instances officer assessments necessarily represent very condensed statements and it is only through examination of the supporting material that a comprehensive picture of issues and the underpinning evidence can be established.

4.6 The Schedule attached as Appendix 2 reports the Issues, Officer considerations and recommendations regarding Proposed Significant Changes, but more detailed technical analysis of the related housing provision and supply issues arising from that stage as well as previous stages are set out in the Housing Background Paper.
4.7 The full Schedule of Issues and Responses referred to in Appendix 2 is a large document and has been made available to Members electronically and in hard copy form in Members’ rooms in each of the three Councils.

4.8 The Schedule of Issues and Responses document provides a detailed summary of all of the issues raised from the recent consultation along with the response and any recommended officer change. No significant changes are recommended.

4.9 Detailed briefings have been given to the South Worcestershire Joint Advisory Panel (JAP) on the Schedule of Issues and Responses and the proposed changes.

4.10 The following new policies are recommended for inclusion with the SWDP;

- SWDP 14 - Housing mix
- SWDP 13 - Making Effective Use of Land (includes housing density)
- SWDP 9 - Creating and Sustaining Vibrant Centres
- SWDP 7 - Infrastructure
- SWDP 25 - Landscape Character
- SWDP 22 - Biodiversity/ Geodiversity
- SWDP 23 - Areas of Outstanding Natural Beauty (AONB)
- SWDP 6 and 24 - Historic Environment
- SWDP 32 and 33 - Minerals and Waste
- SWDP 26 - Telecommunications and Broadband.

4.11 It should be noted that whilst essential adjustments have been made to some SWDP policies and to the detailed housing and employment figures to reflect changes to specific site allocations and other aspects of the emerging plan, the pre-submission version of the plan carries forward intact the key strategic elements of the emerging Plan. Specifically:

- The Vision for the Plan area up to 2030
- An overarching commitment to the delivery of sustainable development (now set out in SWDP 1).
- The strategic objectives for the plan area and the recommended Economic Development Strategy
- The development principles, development strategy and associated settlement hierarchy
- The overall level of employment and housing growth to be accommodated across South Worcestershire up to 2030 (now set out in SWDP 3).
- A commitment to regular review of the plan and early review of the plan if this is deeded necessary.
- An emphasis on the identification and delivery of proportionate critical infrastructure and overall viability.
• A framework of environmental policies which reflect the specific qualities and characteristics of South Worcestershire and the need for appropriate protection and enhancement of the natural and built environment.

• Clear links between policies / proposals and the SWDP evidence base.

4.12 In relation to specific site allocations the following is recommended:

**Worcester and urban extensions**

• Delete allocation at Land North of Warndon Woods as its deliverability cannot be demonstrated for access reasons and the need to assess the effect of this site on the natural environment.

• Delete the site extension of Old Northwick Farm proposed by SOC033, which would be contrary to Policy SWLP21 (Biodiversity and Geodiversity). Delete the land at 22a Northwick Lane, as this land is not available for development.

• Delete allocation at Church Farm, Claines, for Park & Ride and Cemetery. The site could be delivered if it were part of an urban extension to the east of the A449. However, as the SWDP does not propose an urban extension to the east of the A449, SWDP6/16 is to be deleted, as there is no evidence that that a parking hub could be delivered in that location at this time.

• Delete allocation at A44 Service Station, Bromyard Road, as the latest emerging Strategic Food Risk Assessment evidence shows that most of this site is in Flood Zone 3b (functional flood plain), including the frontage access to the main road.

• Remove reference in Policy 44/4 Shrub Hill Opportunity Zone to the phasing of housing development within the opportunity zone.

• Amend policy Worcester South Urban Extension (Broomhall Community and Norton Barracks Community) to reflect the Neighbourhood Centre should not include more than 2,000sqm net of retail floorspace and no single convenience store should exceed 1,500 sqm.

• Amend the site boundary at Worcester North Urban Extension (Gwillam’s Farm) to exclude the steeply sloping rectangular parcel of land adjoining Beechwood House, which lies within the Conservation Area.

• Additional amended wording to the following policies / reasoned justifications:
  • Cedar Avenue Depot
  • Land South of Warndon Woods
  • Worcester Old Brewery Service Station
  • Nunnery Way / Worcester Football Club
  • Land at Chequers Lane / Henwick Road
  • Ullswater Close / Grasmere Drive
  • Shrub Hill Opportunity Zone
  • Worcester East Urban Extension (Kilbury Drive)
• Worcester South Urban Extension (Broomhall Community and Norton Barracks Community)
• Worcester North Urban Extension (Gwilliam’s Farm)
• Worcester Technology Park.

Malvern Hills

• At Malvern the proposed housing site; Land off Welland Road, Upper Welland for 24 dwellings (former SWDP13/3) is recommended for deletion.

• As a result of the updated Strategic Flood Risk Assessment (SFRA) two sites at Malvern are deleted, namely, Land at Poolbrook, (Meadowsweet Court) for 12 dwellings; Former allotments, at Mayfield Rd, for 12 dwellings.

• Two additional sites (now joined together, for 40 dwellings) at Tenbury Wells are recommended bringing the total number of dwellings proposed at Tenbury to 70.

• At Upton upon Severn, the additional site consulted upon at Greenfields Road Tunnel Hill (SOC064) (should be deleted. The site at Sunny Bank Meadow, Holly Green (former SWDP21/1) (is to be confirmed for 25 dwellings. An additional 75 dwellings are recommended to be allocated to Upton as a broad location, to come forward through a Neighbourhood plan.

• Across the rural areas a number of changes have been made to the rural allocations which are recommended to be confirmed as:

  • A modest housing allocation for 10 dwellings is recommended at Welland adjacent to The Pheasant PH (SOC055) which is aimed at supporting the retention of the public house;
  • The level of housing growth for Clifton Upon Teme is reduced to 30 dwellings (SOC070 former SWDP23/3).
  • The level of housing growth for Abberley Common has been reduced to 16 dwellings (SOC066 former SWDP23/2).
  • The Bowling Green housing site at Powick and Collett’s Green is recommended for deletion (SOC110 – former SWDP24/5). The new site adjacent to the Crown Inn which was consulted upon (SOC111) but cannot be shown as deliverable at this stage so should also be deleted, retaining one allocation for 30 dwellings at Winsmore (former SWDP24/6).
  • The housing number recommended for Martley is reduced to 51 dwellings (SOC080 former SWDP23/14).
  • The identification of a housing allocation for Hallow of 46 dwellings (SOC072).
  • The level of housing at Great Witley to be reduced from 35 to 23 dwellings (SOC071WDP23/4).
  • The level of housing at Kempsey to be increased from 126 to 138 dwellings (SOC076).
  • The level of housing on Land at Bell Lane, Lower Broadheath to be reduced to 40 dwellings (SOC078 former 23/10)
  • The level of housing on land at Severne Green, Bayton to be reduced from 14 to 5 dwellings (SOC092 former SWDP24/1).
- The level of housing at Wheatfield Court, Callow End to be increased from 5 to 15 dwellings (SOC097 former SWDP24/3).
- The level of housing at Alfrick to be reduced from 15 to 13 dwellings (SOC119 former SWDP25/1).

(Note: The pre-submission version of the SWDP re-orders and re-numbers the policies from earlier versions. The site allocations references at the Preferred Options stage are provided here to assist cross referencing).

Wychavon

Wychavon District: Taking into account the representations on the SWDP Significant Changes and updates to the evidence base the site specific changes, with respect to the SWDP Preferred Options (2011) are as follows:

Urban Areas:

Droitwich Spa

- Delete east of Salwarpe Road
- Reduce (24 to 10) Willow Court
- Confirm SCs allocation of 10ha employment land at Stonebridge Cross.

Evesham

- Delete SWDP 11/2 Offenham Road/A46 (T)
- Increase (76 to 100) SWDP 11/4 Kings Road
- Delete SWDP 11/6 Abbey Gardens
- Confirm SCs allocation Abbey Road (200)
- Confirm SCs 10ha employment land at Vale Park
- Confirm SCs site at Offenham Road (East) (15)
- Confirm SCs site at Offenham Road (Wet) (20)

Pershore

- Reduce (26 to 10) SWDP 18/7 Conningsbury Drive
- Delete SWDP 18/6 Rear of High Street
- Reduce (20 to 13) 18/2 Priest Lane

Rural Areas

Category 1 Villages

- Broadway, delete SWDP 23/20 – south of Bibsworth House
- Broadway, delete SWDP 23/21 – south east of Sheldon Avenue
- Broadway, increase (40 to 65) SWDP 23/24 – Station Road
- Honeybourne, increase (50 to 75) SWDP 23/26 – High Street/Weston Road
- Honeybourne, delete SWDP 23/27 – rear of High Street
- Inkberrow, increase (90 to 100) SWDP 23/28,29 – Stonepit Lane/Withybed Lane
- Offenham, delete SWDP 23/31 – Gibbs Lane
- Wychbold, delete SWDP 23/35 – west of Worcester Road
- Wychbold, delete SWDP 23/26 – Chequers Lane
- Wychbold, delete SWDP 23/37 – British Legion Club
Category 2 Villages

- Ashton under Hill – allocate SCs’ site at Elmley Road (12)
- Bretforton – delete SWDP 24/9, Littlebrook Nurseries
- Bretforton – increase (27 to 48) SWDP 24/8, north of Station Road
- Drakes Broughton – delete SWDP 24/11 and 24/13, Stonebow Road
- Drakes Broughton – allocate SCs’ site, south of B4084 (50)
- Fernhill Heath – delete SWDP 24/15, west of Dilmore Lane
- Fernhill Heath – increase (60 to 120) SWDP 24/16, Dilmore Lane/Station Road
- Pinvin – reduce (13 to 5) SWDP 24/21, Green End
- Pinvin – reduce (27 to 20) SWDP 24/23, The Green
- Upton Snodsbury – delete SWDP 24/27, College Road/School Lane
- Upton Snodsbury – allocate SCs’ site, south of A422 (16)

Category 3 Villages

- Bishampton – allocate SCs’ site, west of Main Street (6)
- Conderton – allocate SCs’ site, Conderton Close (6)
- Defford – allocate SCs’ site, Upper Street (6)
- North and Middle Littleton – delete SWDP 25/12, south of Arrow Lane
- Pebworth – delete SWDP 25/13, 14, 15, 16
- Pebworth – allocate SCs’ site, west of Stratford Road (10)

5. National Planning Policy Context

5.1 The NPPF provides a framework within which local people and their accountable councils can produce their own distinctive local plans, which reflect the needs and priorities of their communities (Paragraph 1) and must be taken into account in the preparation of local plans (Paragraph 2). Policies in paragraphs 18 to 219 of the NPPF, when taken as a whole, constitute the Government’s view of what sustainable development means (Paragraph 6) and reinforces the role plan-making has in the delivery of sustainable development:

“Local Plans are the key to delivering sustainable development that reflects the vision and aspirations of local communities.” (Paragraph 150, NPPF)

5.2 As reported in July to the Full Council meetings, officers considered the published NPPF and in light of the document set out and consulted on a suite of new and amended policies for inclusion into the SWDP. These polices, as amended have been included into the Pre Submission document and officers consider that the Pre Submission Document is generally consistent the NPPF.

6. South Worcestershire Joint Advisory Panel (JAP) Recommendation to Full Council

6.1 The SWDP JAP was set up to oversee the development of the South Worcestershire Development Plan (SWDP and previously the South Worcestershire Joint Core Strategy).

6.2 The JAP consists of 5 elected members from each of the South Worcestershire authorities and a representative from Worcestershire county Council. JAP is
responsible for advising on the SWDP, making recommendations to the three Councils and to “report on and aim to promote and recommend the Panel’s recommendations to their respective District Council decision making bodies”.

6.3 The JAP has no executive powers and therefore can only make recommendations back to each of the three councils. At present the 5 representatives for each authority are set out below:

- Malvern Hills - Councillors D.Hughes, D.Harrison, P.Tuthill, V.Myatt and D.Clarke.
- Worcester City – Councillors M.Bayliss (chairman), R.Rowden, G.Williams, S.Askin and D.Wilkinson.
- Wychavon – Councillors J.Pearce (vice-chairman), A.Steel, L.Robinson, K.Jennings and A.Darby.
- Worcestershire County Council also have a non-voting representative on the SWDP JAP: Councillor E. Eyre

6.4 The JAP has been working on the development of the South Worcestershire Development Plan Draft Preferred Options Document since the summer of 2010. More recently it has considered the document’s development in detail at a series of workshops running from March through to November 2012. The workshops and JAP meetings have covered:

1. The impact of the NPPF on the Plan
2. New evidence on housing from the Strategic Housing Market Assessment (SHMA)
3. The Infrastructure Strategy and Infrastructure Delivery Plan (IDP)
4. Community Infrastructure Levy and the South Worcestershire Viability Study
5. Transport implications for the proposed Plan
6. The outcome of the SWDP Preferred Option consultation and proposed changes
7. The outcome of the SWDP significant changes consultation, proposed changes and draft pre-submission document
8. The outcomes of the Malvern Hills Full Council meeting of the 13 November in relation to the work of the Council Policy Group.

6.5 All of this work culminated in meetings held on the 15 and 16 November at which JAP Members were presented with all of the draft information that would be presented to Full Councils on 10 and 18 December.

6.6 At the end of the 16 November meeting of the JAP, the Panel proposed the following recommendation to go to the Full Council meetings at Malvern Hills, and Worcester on 10 and Wychavon on 18 December 2012:

In relation to the resolution made by Malvern Hills at their meeting of the 13 November:

*The Joint Advisory Panel notes the comments of the MHDC Council Policy Group. JAP also note the documents submitted to the 13 November Full Council to include the Chief Officers’ views, legal advice and the Leaders’ letters. The majority of changes proposed would be significant changes to the plan which would require a review of the evidence base and if justified further public consultation. However, it is JAP’s view that the majority of the proposals are unlikely to represent a sound and deliverable alternative*
to the plans and policies set out in the emerging SWDP. A review of the evidence base and further public consultation would result in significant delay to the delivery of the plan which is considered to be unacceptable.

JAP notes the suggestion to seek greater energy efficiency standards and renewable energy standards but is mindful to the overall costs of this and the need to ensure that the plan remains viable and sound. The current evidence suggests that even with the proposed standards for energy efficiency viability may be an issue and certainly any increased measures would further compromise the scope to secure CIL from development for much needed strategic infrastructure.

JAP also notes the suggestions for Upton/ Tunnel Hill, Ryall, Holly Green and Powick (Crown Inn) as well as the detailed policy comments and consider that these proposals should be further considered by JAP alongside the comments received as part of the Significant Changes consultation.

In relation to the Pre Submission document:

The Joint Advisory Panel has considered the development of the South Worcestershire Development Plan and the amendments arising from the recent Significant Changes Consultation, recent evidence and the National Planning Policy Framework. Together these have formed the basis for the preparation of the proposed Draft Pre-Submission Document. In support of the recommendations set out below the SWJAP wishes to advise the three councils that:

- The Panel accepted that the draft document considered on 15-16 November 2012 represented a “work in progress” and further editing is required for legibility, formatting and correction. Further refinements are also required and contextual diagrams and photographs added to improve presentation of the document.

- The Panel has considered the emerging evidence base in detail and considers that it is robust and proportionate, furthermore it is supportive, in principle, of the recommended strategy and related policies.

The Panel recommends that:

The draft Pre-Submission Document and associated Sustainability Appraisal be approved for technical consultation by Malvern Hills, Wychavon and Worcester City Councils commencing 11th January 2013 for 6 weeks;

Any changes recommended for inclusion by the Panel will be incorporated into the draft and agreed by the Chair of JAP in consultation with the planning portfolio holders prior to its presentation to the three South Worcestershire Councils.

7. Regional Spatial Strategy

7.1 The Localism Act clearly indicates the Government’s intention to abolish Regional Strategies including the West Midlands Regional Spatial Strategy (WMRSS). The Localism Act strongly advocates a greater emphasis on bottom up planning and feedback received from local communities during previous stages of consultation clearly indicated dissatisfaction with the levels of housing
growth that were set out in the emerging WMRSS Phase 2 Partial Review. It was originally anticipated that the WMRSS would no longer be part of the Development Plan by the time the South Worcestershire Local Plan is submitted for Independent Examination. This is now not likely to happen and at the time of writing this report the Government has published its environmental report on the likely significant environmental effects of revocation of the West Midlands Regional Spatial Strategy and the Regional Economic Strategy (which together form the Regional Strategy in force for the West Midlands). Responses on any aspect of the report are invited by Thursday 24 January 2013. This report succeeds the previous Environmental Report for the revocation of the West Midlands Regional Strategy which was consulted on between October 2011 and January 2012. It is a stand alone document the intention of which is to provide the reader with an up-to-date comprehensive assessment of the environmental effects of the revocation of the West Midlands Regional Spatial Strategy and the Regional Economic Strategy without the need to refer back to the previous Environmental Report.

7.2 The conclusions of this consultation will determine whether the West Midlands RSS can be revoked. Until the RSS is abolished, the SWDP is required to be in general conformity with the RSS. Following questions raised in Parliament by local MPs Peter Luff and Harriett Baldwin, the Planning Minister Nick Boles has confirmed that:

‘Councils can bring forward proposals, such as housing targets, which have a local interpretation to them in their plans, based on their own sound evidence base where that is justified by the local circumstances. That evidence base is likely to be more up to date than that included in the regional strategies. Each case will depend on the particular facts.

Regional Strategies remains part of the statutory development plan until such time as they are abolished, so a local plan document must be in general conformity with the regional strategy at the stage that the plan is submitted for examination. It is up to each authority to demonstrate to an independent inspector how its plans are in general conformity with regional strategies’

7.3 Accordingly, officers consider that the evidence base and background papers completed in preparation of the SWDP provide sufficient information to justify local circumstances and therefore conclude that the proposed plan can be considered to be in general conformity with the RSS.

8. Infrastructure Delivery Plan

8.1 The purpose of an Infrastructure Delivery Plan (IDP) is to identify the key infrastructure to support future housing and employment growth proposed by the SWDP up to 2030. National planning policy provides the framework for this. The IDP seeks to assess the current physical, social and green infrastructure provision across South Worcestershire along with what investment and improvement schemes are planned and programmed in the plan period.

8.2 The South Worcestershire Infrastructure Delivery Plan (Appendix 4) provides the latest position on the document. This document is a ‘living document’ and will be amended over time to ensure that it remains up to date. In addition to this document, Appendix Y, which forms part of the Pre-Submission document sets out the current assessment of crucial infrastructure requirements needed to support development.
8.3 In order to support infrastructure delivery a new policy (SWDP 7) is proposed in order to give due prominence to infrastructure delivery issues across South Worcestershire, provide an anchor to the final IDP and in order to secure delivery of necessary infrastructure.

8.4 The IDP has been developed in parallel and in liaison with work being done by the County Council on an emerging Infrastructure Strategy for Worcestershire.

8.5 The Highways Agency is currently responsible for the M5 (including junctions 5, 6 and 7) and also the A46 in South Worcestershire. In response to the SWDP Preferred Option in Autumn 2011, the Highways Agency put in a holding objection to the SWDP. Subsequent to the publication of the IDP interim position statement (which was endorsed by all three councils at their meetings of the 3 July) the Highways Agency has been working with the County Council to ensure that there is sufficient evidence to support the policies and proposals and therefore ‘sound’.

8.6 That transport evidence base has been finalised and the appropriate Highways Agency schemes are now included in the Infrastructure Delivery Plan.

8.7 The Highways Agency’s conclusions are that there are no showstoppers to the highways network arising from the changes to the Plan although 5 programmes of work will be required on the A46 to mitigate impacts of new development, no additional works to Junction 5 of the M5 but access improvements will be required for Junctions 6 and 7. The total anticipated cost of these works are around £10m.

8.8 The Highways Agency has also undertaken to work with Worcestershire County Council and the three south Worcestershire Councils to ensure that the transport evidence is sound and that a coherent partnership position can be put forward at an Examination in Public.

9. Integrated Assessment (footnote 1, above)

9.1 The Planning and Compulsory Purchase Act 2004 requires a Sustainability Appraisal (SA) of the Strategy and Policies in their Local Development Frameworks. The SA is intended to assess the impact of plan policies from an environmental, economic and social perspective. It is intended to test the performance of a plan against the objectives of sustainable development and thereby provide the basis for its improvement. The SA is an ongoing assessment of the South Worcestershire Development Plan, at all its stages.

9.2 A Sustainability Appraisal Framework has been developed and all emerging options and policies have been tested against this. It is an essential aspect of assessing the alternative options alongside consultation responses. Within the Preferred Options Document a list of the Alternatives Considered has been included following each policy.

9.3 A summary of the Sustainability Appraisal process and how this has helped to shape the Preferred Options is attached to this report at Appendix 3. The Integrated Assessment also includes the Habitats Regulations Assessment which is required under the Strategic Environmental Directive. The SA broadly indicates that the changes being made, especially the new policies are positive in improving the required mitigation of the effects of the proposed development.
10. Duty to Co-operate

10.1 Section 110(3) of the Localism Act amends Section 20(5) of the Planning and Compulsory Purchase Act 2004 (PCPA 2004) by requires the Local Plan Inspector to consider (alongside legal compliance and soundness) ‘whether the local authority complied with any duty imposed on the Authority by Section 33A in relation to its [the plan’s] preparation’. Section 33A being the new duty to co-operate inserted into the Planning and Compulsory Purchase Act 2004 by Section 110(1) of the Localism Act.

10.2 Relevant planning policy issues to be considered under the duty to cooperate are also explained in National Planning Policy Framework (paras 178-181 and 156) - specifically ‘the Government expects joint working on areas of common interest to be diligently undertaken for the mutual benefit of neighbouring authorities.’ (para 178). Cooperation should be a continuous process of engagement from initial thinking through to implementation and should consider cross boundary issues such as:

- homes and jobs needed in a geographical area
- infrastructure projects
- retail, leisure and other commercial developments
- social infrastructure
- landscape and the natural and historic environment.

10.3 This duty to cooperate also extends to a range of statutory agencies including Highways Agency, Environment Agency, Natural England and English Heritage.

10.4 Throughout the SWDP process there is strong evidence that the Duty to Cooperate has been respected even before it became a requirement in November 2011. Perhaps the most tangible evidence of this being the concept and preparation of a joint plan by the three South Worcestershire authorities in response to the particular needs of the sub-region. Similarly the formulation, moulding and refinement of the SWDP have been heavily influenced by dialogue with a number of other agencies including the County Council, the necessary statutory agencies, neighbouring and other interested local authorities, the Local Enterprise Partnership and Local Nature Partnership members.

10.5 The “Duty to Cooperate” Background Paper summarises how the South Worcestershire Councils have ensured the benefit of this requirement and embedded it in their approach to partnership working.

10.6 Council is advised that the duty to co-operate across South Worcestershire has been effectively discharged through the production of a joint South Worcestershire Development Plan. In the event that a decision of any of the South Worcestershire authorities results in the production of separate Local Plans for each district within South Worcestershire it will be legally necessary for the three South Worcestershire Authorities to demonstrate at three separate Examinations in Public to the satisfaction of three different Inspectors that the legal test has been met.
11. Overall Viability Study

11.1 The National Planning Policy Framework formalises the requirement for Councils to ensure that the plan is deliverable and viable. Accordingly, consultants were commissioned to undertake an independent assessment of the overall viability of the Plan. Their conclusions were considered by the Joint Advisory Panel on 16 November 2012. The final report is available as part of the SWDP evidence base and is denoted Appendix 6 to this report. The key conclusion of the report is that the policies set out in the SWDP and the proposals to introduce CIL in 2014 will not put the implementation of the plan at serious risk. It is important to have this independent verification before taking the plan forward for approval to these December Council meetings.

12. Pre Submission

12.1 The pre – Submission Document is attached as Appendix 1.

12.2 The Pre – submission document consists of the following key elements:

- Vision and objectives – to establish an overall approach for achieving future aspirations for south Worcestershire, creating the spatial element of the ‘Shared Vision’;
- Spatial context – to provide a brief overview of south Worcestershire, describing its context in terms of social, demographic, economic and environmental conditions, and going on to identify specific key issues that need to be addressed through the strategy;
- Key issues and challenges in relation to evidence base to include matters related to housing and population, and employment and jobs.
- A set of policies – to achieve the spatial strategy, setting out what considerations new development should take into account, providing a framework for making planning decisions; this includes the distribution approach, strategic and non strategic allocations and – to set out how and where future development will be located; and,
- A set of plans to illustrate and identify particular policy designations.

12.3 These elements are supplemented by a monitoring framework to consider and evaluate how the policies are being implemented and whether they are achieving what they are intended to do.

12.4 Prior to the publication of the document for technical consultation, further work will be required to enhance its format for consultation purposes. It also requires detailed proof reading and further attention to cross references, appendices and footnotes. These are classed as minor amendments and prior approval will be sought from the Planning Portfolio Holders, for their inclusion in the document.

12.5 If approved the Pre-Submission document will undergo a technical consultation based on the ‘tests of soundness’ and legal tests. Given that this is a statutory stage in the process of consulting on the Development Plan, it is necessary for those providing comments to do so in line with questions around whether they feel the Development Plan is ‘legally compliant’ and ‘sound’. Where a respondent feels that the Plan is unsound, they must indicate which one of the three tests of soundness they have concerns around. These tests being whether the plan is ‘justified’, ‘effective’ and ‘consistent with national policy’.
12.6 The Tests of Soundness are packaged in the context of two basic principles of 'justification' and 'effectiveness'. The Plan also needs to be consistent with National Policy. In summary the principles are defined as:

- **Justifiable:**
  - Founded on a robust and credible evidence base
  - The most appropriate strategy when considered against reasonable alternatives

- **Effectiveness:**
  - Deliverable
  - Flexible
  - Able to be monitored

**Consistent with national policy** - The DPD should be consistent with national policy. Where there is a departure, LPAs must provide clear and convincing reasoning to justify their approach

**Legal tests:**

12.7 The following legal tests need to be taken into account prior to submission of the Plan:

- Has the Plan been prepared in accordance with the Local Development Scheme (LDS)?
- Has the DPD had regard to any Sustainable Community Strategy for its area?
- Has the Local Plan in compliance with the Statement of Community Involvement (SCI) and has the Planning Authority carried out consultation consistent with the SCI?
- Has the DPD been subject to sustainability appraisal? Has the LPA provided a final report of the findings?
- Is the Plan in general conformity with the West Midlands Regional Spatial Strategy (RSS)?

12.8 Respondents will be asked what changes they would see as necessary to make the Development Plan legally complaint or sound.

12.9 A scanned version of all comments received will be placed on to the SWDP website, with all personal details (other than respondent name) being removed.

12.10 Officers will consider any responses received from the formal consultation and in accordance with the formal recommendation above and make minor changes to the plan if required in consultation with the portfolio holders / executive member.

12.11 It should be noted that should there be a need for significant changes to the Development Plan following the Pre-Submission consultation, there will be a requirement for each of the Full Councils to consider the Pre-Submission afresh. In the event that significant changes are required a further round of public consultation to ensure opportunities to comment on any such changes will be required.
12.12 Once complete the document will be ‘submitted’ for examination, at which time a Planning Inspector will be appointed to consider the Development Plan in the context of the tests of soundness and the representations that have been received through an Examination in Public. Subsequently, the Inspector will prepare a report to set out his views on the soundness of the plan and whether the plan should be adopted. It is anticipated that an Examination in Public will take place in the summer of 2013 with the Inspector’s report being received in the Autumn 2013 and formal adoption of the plan in late 2013.

13. Next Steps

13.1 The overall timetable is driven by the need to adopt the South Worcestershire Development Plan by the end of 2013. This will replace the three Local Authorities saved Local Plans, which are becoming out-dated within the context of changing National Planning Policy Framework.

13.2 Due to a slight delay in reporting the Significant Changes consultation and the pre-submission document to the three Councils it is necessary to make some very modest adjustments to the project plan accompanying the approved LDS. Council will recall that adjustment of the project plan was approved in February this year. The modest adjustments set out in Appendix 8 still ensure adoption of the SWDP by the end of 2013.

13.3 The amended timetables for inclusion in each of the South Worcestershire Authorities’ Local Development Schemes (as agreed by respective committees in February 2012) sets out the following key milestones:

<table>
<thead>
<tr>
<th>Key Stages</th>
<th>Dates</th>
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<tbody>
<tr>
<td>Pre-Submission Consultation</td>
<td>January/February 2013</td>
</tr>
<tr>
<td>Submission to the Secretary of State</td>
<td>Early April 2013</td>
</tr>
<tr>
<td>Examination Hearing</td>
<td>July 2013</td>
</tr>
<tr>
<td>Inspectors Independent Report</td>
<td>October 2013</td>
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<tr>
<td>Adoption</td>
<td>December 2013</td>
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</tbody>
</table>

13.4 In accordance with the Planning and Compulsory Purchase Act 2004, the Council has a statutory duty to prepare planning policy, which has been reinforced through the NPPF and Localism Act 2011. At this stage of the process certain documentation must be submitted to the Secretary of State in accordance with Regulations including the sustainability appraisal report, policies map (formerly known as Proposals Map), consultation report, copies of representations received at the last formal stage of consultation and other evidence base documents supporting the development of the Development Plan (e.g. background papers, habitats regulations assessment).

13.5 The Consultation Report (Appendix 6) sets out how consultation has been undertaken with respect to SWDP. At each stage the proposed consultation arrangements for each consultation exercise has been approved by the three
South Worcestershire Councils. Appendix 7 includes arrangements for the proposed technical consultation in January/February 2013.

13.6 With respect to the process of submitting the SWDP to the Secretary of State it should be noted that earlier this year the three South Worcestershire Councils formally agreed the following recommendation:

‘iii) it be noted that in order to achieve adoption by the end of 2013, acceptance of the revised timetable means that should Members approve the publication plan for Regulation 27 purposes at Full Council in October 2012, they will need to delegate approval to the relevant senior officers at Worcester City, Malvern Hills and Wychavon councils in consultation with the relevant portfolio leads to decide:

a) Whether any minor changes to the published plan are required.

b) That the Development Plan Document is sound and ready for examination.

c) To submit the publication of the Plan to the Secretary of State for independent testing through examination in February 2013.

14. Corporate Considerations

<table>
<thead>
<tr>
<th>Resource Implications:</th>
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</thead>
<tbody>
<tr>
<td>Resource Implications:</td>
</tr>
<tr>
<td>(Identify Financial, Legal, Property and Personnel issues)</td>
</tr>
<tr>
<td>The District Council has already approved resources for local plan production up to 2013. Collaboration on a single Local Plan has enabled savings at key steps in the plan production process, where duplication can be removed.</td>
</tr>
<tr>
<td>Progressing a single Local Plan for South Worcestershire represents a major logistical task. It has benefited from combining the skills within each of the authorities involved, although it has been necessary to reduce capacity for other areas of work.</td>
</tr>
<tr>
<td>The publication of a revised SWDP Preferred Options document, an additional Preferred Options consultation and the necessary refresh / updating of elements of the evidence base were not in the original project budget. At present these costs are being absorbed within the overall project budget for LDF work across the three South Worcestershire Authorities. However, overall project costs will require close monitoring going forward.</td>
</tr>
<tr>
<td>In the event that a decision of one or more of the South Worcestershire Councils were to bring about the production of separate Local Plans district based for South Worcestershire this would result in significant resource implications for each authority in terms of direct costs, delay and access to adequate officer support and expertise. It should be noted that such a departure from joint plan production would require the...</td>
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production of three separate documents, three separate consultation programmes, three separate Examinations in Public (at which each authority will need to be represented) and three separate inspector’s reports.

<table>
<thead>
<tr>
<th>Policy Implications:</th>
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</thead>
<tbody>
<tr>
<td>(Identify how proposals link to Council priorities and the current policy framework, and if they do not, identify implications)</td>
</tr>
<tr>
<td>Pre-submission consultation will be managed under Regulation 18 (of the Town and Country Planning Regulations 2012).</td>
</tr>
<tr>
<td>The production of the South Worcestershire Development Plan provides a comprehensive basis for reviewing existing land use, transportation, social, economic and environmental policy covering the district.</td>
</tr>
<tr>
<td>The South Worcestershire Development Plan will address all of the Council outward facing priorities and objectives.</td>
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<table>
<thead>
<tr>
<th>Consultation:</th>
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</thead>
<tbody>
<tr>
<td>(what public or other consultation has been undertaken in relation to this matter?)</td>
</tr>
<tr>
<td>The South Worcestershire Development Plan will address a wide range of social, environmental and economic issues which will include identifying and addressing the needs of groups within the community with specific / additional needs. The provision of strategic infrastructure, affordable housing, and improved accessibility to employment opportunities will be critical policy areas to be covered within a Joint Local Plan. The submission version of the SWDP will be accompanied by a full range of assessments which address equalities, health, environmental and sustainability considerations.</td>
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<table>
<thead>
<tr>
<th>Equalities Issues:</th>
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</thead>
<tbody>
<tr>
<td>Has an Equality Impact Assessment Screening Report been completed Yes/No? If not, why not?</td>
</tr>
<tr>
<td>The South Worcestershire Development Plan will address a wide range of social, environmental and economic issues which will include identifying and addressing the needs of groups within the community with specific / additional needs. The provision of strategic infrastructure, affordable housing, and improved accessibility to employment opportunities will be critical policy areas to be covered within a Joint Local Plan. The submission version of the SWDP will be accompanied by a full range of assessments which address equalities, health, environmental and sustainability considerations.</td>
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15. Risk Assessment

15.1 Any slippage from the programme detailed above, would make it extremely difficult to meet the key milestones set out in the Revised Local Development Scheme (LDS). Ultimately, the absence of an appropriate and up-to-date Development Strategy and policies presents the likely risk of development decisions by planning appeal, which may fail to deliver the full range of supporting infrastructure. The original timetable has already been adjusted on several occasions due to technical, evidence and legislative reasons alongside the joint decision to leave the South Worcestershire Joint Core Strategy behind and prepare the SWDP involving additional, previously unscheduled, consultation stages. Given the NPPF and the status of our existing adopted Local Plan policies – further delay should be avoided at all cost.

15.2 Ultimately the South Worcestershire Development Plan will be judged at public examination in the context of meeting the ‘tests of soundness’. Failure to meet one or more of the tests would result in the plan being found unsound. This
would leave South Worcestershire without an appropriate and up-to-date spatial strategy.

15.3 At examination, it will be necessary to show a clear trail of progression from issues and options, appraisal, selection or rejection of alternatives and the role that the Sustainability Appraisal and community engagement have played in the process. The SWLP Project Manager is responsible for updating the Soundness Self Assessment toolkit at each stage in the Development Plan process as recommended by the Planning Inspectorate. This will be submitted alongside the Plan at Examination stage for consideration by the Inspector and is an important audit trail document.

<table>
<thead>
<tr>
<th>Risk Identified</th>
<th>Inherent Risk Evaluation</th>
<th>Proposed measures</th>
<th>Residual Risk Evaluation</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Failure to strategically and comprehensively address the needs of South Worcestershire and specifically the cross boundary implications of growth associated with the City of Worcester could lead to inappropriate and incremental development which does not maximise community benefits and incurs adverse environmental consequences.</td>
<td>Risk Score 8</td>
<td>• Progress the development of the South Worcestershire Local Plan as a basis for developing and implementing common policies and addressing specific sub-regional issues by the publication of the Preferred Options Paper, as recommended by the Joint Advisory Panel.</td>
<td>Risk Score 5</td>
</tr>
<tr>
<td>• Failure of the three Councils to agree the content of a Joint Development Plan and adhere to the LDS timetable could lead to delays and even possible failure of the new tests for soundness.</td>
<td>Risk Score 8</td>
<td>• The three South Worcestershire Councils approved a Revised LDS in February 2011 and recommended for updating by this report.</td>
<td>Risk Score 5</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Increase in Member representation from Malvern Hills, Wychavon and Worcester and new representation from Worcestershire County Council on Joint Advisory Panel and the respective District Councils to receive regular progress reports with respect to LDS commitments / milestones and undertake corrective action whenever necessary.</td>
<td></td>
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<td></td>
<td></td>
<td>• Briefings provided for all Council members in all 3 Councils at relevant stages of the Plan.</td>
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<td></td>
<td></td>
<td>• Regular monitoring and management of the SWDP costs and identification of potential</td>
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</table>
overspend at an early stage in order for appropriate action to be taken by the 3 partner councils

- Ensure that all documentation and evidence for the Plan is accessible and a handover period is built into any key member of staff leaving.
- Regular meetings with Team Leaders to monitor workloads and address capacity issues.

NB: Risk Score derived from level of Impact and Likelihood, calculated from the Guide to Report Writing

16. Conclusions

16.1 The South Worcestershire Development Plan Pre-Submission document is based on a comprehensive review of up-to-date local evidence. It represents a clear change away from regionally determined housing and employment targets and focuses on the following priority outcomes:

- Economic Prosperity across South Worcestershire through the creation of jobs, improving the competitiveness of the sub-region and ensuring a balanced portfolio of available land for employment generating uses.
- Delivering housing which first supports economic prosperity, reflects local housing aspirations and addresses affordable housing needs.
- The delivery of essential strategic infrastructure, including transport improvements
- Sustainable development which respects the environmental qualities and capacity of South Worcestershire.

16.2 The publication of the Pre Submission Document is a significant step in the preparation of the South Worcestershire Local Plan. By approving the Pre-Submission Document for technical consultation and submission to the secretary of state, members are taking an important decision to shape the future of the south Worcestershire area. Also, once submitted, the proposed Plan gains significant weight within the planning development management process.

Gary Williams
Head of Planning, Economy and Housing
### Appendices:

- **Appendix 1:** SWDP Pre-Submission document (attached and available electronically)
- **Appendix 2:** Full Schedule of Issues and Responses - including maps showing the final proposed sites. (available electronically only)
- **Appendix 3:** Summary of and full copy of the Integrated Assessment of the Proposed Changes. (available electronically only)
- **Appendix 4:** Infrastructure Delivery Plan (available electronically from 30 November 2012)
- **Appendix 5:** Overall Viability Study (available electronically from 30 November 2012)
- **Appendix 6:** SWDP Consultation report (available electronically only).
- **Appendix 7:** Recommended consultation programme for the technical consultation into the pre-submission document (available electronically only).
- **Appendix 8:** Revised LDS / project plan (attached, available electronically or in the members’ room).
- **Appendix 9:** Updated Strategic Flood Risk Assessment and Water Cycle Study (available electronically only)
- **Appendix 10:** The Background Papers relating to the Plan including housing, demographics, Strategic Flood Risk Assessment and Duty to Co-operate (available electronically only)

### Technical Studies:

- Infrastructure Development Plan (Update-November 2012)
- Overall Viability Study November 2012
- Strategic Flood Risk Assessment / Water Cycle Study (update – November 2012)

### Background Papers:

- Report to Full Councils dated 3 July 2012 and appendices.
- Background Papers (Nov 2012)
- Development Strategy
- Housing (update)
- Transport
- Duty to Cooperate
- Draft Background Papers June 2012 (subject to further development and review):
  - Demographics
  - Housing
  - Economic Prosperity
- Revised Local Development Scheme (December 2010) Timetable updated Feb 2012
 Draft Background Paper: Broad Locations for Development Growth and Strategic Site Allocations (June 2011)


**Related Information:**

Other relevant information/References

**References:**

(To or from other Committees)

This matter is to be reported to Malvern Hills District and Worcester City Councils on 10 December and Wychavon District Council on the 18 December.

As set out in the introduction the councils are asked to consider the recommendations as listed.

**Report Author/Contact Officer:**

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e-mail: gary.williams@malvernhills.gov.uk