

# BACKGROUND PAPER

## South Worcestershire Development Plan

### Development Strategy and Strategic Site Allocations

#### Contents:

1.	<b>Purpose of the background paper</b>	1
2.	<b>Section One - Context for a Joint South Worcestershire Development plan</b>	1
	Vision and Objectives	2
	Process to date	2
	Evidence base and consultation feedback	3
	Characteristics and challenges facing South Worcestershire	3
	Environmental issues	4
	Flooding	5
	Water supply	5
	Housing Costs	6
	Housing Supply:	7
	Population forecasts/ Household formation	7
	Accessibility / Transport	7
	Employment	9
	Reassessment of Plan	9
3.	<b>Section Two Strategic Development sites- Context</b>	11
	Constraints and opportunities	12
	Influence on strategic site allocations	12
	Sustainability Appraisal – Background	12
	Public Consultation responses	12
	Consultation Responses- Vision and Issues and Options	13
	Evidence Base	17
	Strategic Housing Land Availability Assessment (SHLAA)	17
	Transportation issues	19
	Village Facilities and Rural Transport Study (VFRTS)	22
	Strategic Flood Risk Assessment	23
	Green Infrastructure	23
	Discussion of strategic sites in relation to evidence base and consultation.	24
4.	<b>Specific Sites</b>	25
4.1	<b>Worcester Development Options:</b>	
	Worcester related sites	25

4.2	<b>Malvern Hills District Development Options:</b>	38
	Malvern Hills sites	
4.3	<b>Wychavon Development options</b>	55
	Wychavon Sites	
5.	<b>Strategic sites- Progress since Preferred Options Document and Targeted Consultation events</b>	64
	Appendix 1 Matrix of potential Strategic Site Allocations	A1

## **1. Purpose of the background paper**

- 1.1 This background paper is in two parts. **Section one** provides background evidence and identifies the process and rationale for the Development Strategy and sets out why the proposed strategy is considered to be the most appropriate one for South Worcestershire for the plan period to 2030. **Section Two** provides more detail on the approach to the selection of individual site allocations put forward in the South Worcestershire Development Plan Preferred Options document and the updated Significant Changes document.

## **2. Section One - Context for a Joint South Worcestershire Development plan**

- 2.1 The principal raison d'être for the South Worcestershire Development Plan and its predecessor the South Worcestershire Joint Core Strategy, is the lack of available / suitable development land within the administrative boundary of Worcester to meet its objectively identified<sup>1</sup> housing and employment needs. This issue was considered by the Planning Inspectorate (PINS) during the examination of the Worcestershire County Structure Plan in 2000. PINS concluded that beyond the plan period ending 31<sup>st</sup> March 2011, Worcester would need co-operation from Malvern Hills and Wychavon District Councils to meet the city's projected employment and housing growth.
- 2.2 In December 2006, Malvern Hills, Worcester and Wychavon Councils agreed with the Government Office for the West Midlands to work together on a replacement plan for the whole area to be referred to as South Worcestershire.
- 2.3 The partnership approach to delivering Worcester's growth needs were clearly acknowledged in the revision of the West Midlands Regional Spatial Strategy (WMRSS). The WMRSS Preferred Option (December 2007) sets out a total housing requirement for the period 2006 – 2026 of 10,500 for Worcester. Of this total, the WMRSS advocated that 7,300 of the requirement would be delivered in Malvern Hills and Wychavon Districts, the assumption being that the urban capacity of the city at that time was 3,200 dwellings. Whilst factors such as the Office for National Statistics revised Household Projections 2008 (WMRSS Preferred Option was based on 2006 household projections), increased urban capacity estimates and the revised Strategic Housing Market Assessment (GVA Grimley 2012) have changed the figures to a degree, the fact remains that much of Worcester's growth can only be delivered beyond its administrative boundary.

---

<sup>1</sup> Initially the assessment was carried out by the West Midlands Regional Planning Authority in their work on the Regional Spatial Strategy. More recently the SHMAA (2012) informs the overall housing growth.

- 2.4 Unlike Malvern Hill's and Wychavon's growth, Worcester's housing needs<sup>2</sup> are locally driven i.e. mainly natural increase in the local population rather than net in-migration from adjoining areas and beyond. Taking that fact on board and the relative size and function of the city it was considered appropriate to place Worcester at the top of the development hierarchy. It was considered most appropriate to meet Worcester's housing needs as close to the city as possible i.e. urban extensions rather than a dispersal or new settlement approach.

### **Vision and Objectives**

- 2.5 A wide range of consultation events have been held (please refer to the published consultation reports for more details). The first of these was held with infrastructure and service providers in April 2007. It was evident that the cost of providing public services would be partly dependent on the development strategy adopted e.g. a dispersal approach would be more costly for education, health and social services etc. Of more significance was the so-called "Vision Day" (May 2007) at which key stakeholders across the study area and beyond spent a day looking at an appropriate vision for South Worcestershire. The vision developed at this event was one that could not be effectively delivered through a dispersed or new settlement development strategy approach. A [report on the Vision Day](#) is available to view on the SWDP website. Notwithstanding this the South Worcestershire Joint Core Strategy Issues and Options document included a number of potential development strategies. This document was published for 6 weeks' consultation in November 2007. The consultation effort included a number of specific events targeting various interest groups (details can be found in the [SWJCS Issues and Options Consultation Report](#), September 2008). Nearly 2,200 representations were made and it was fairly evident that there was broad support for both the proposed vision and the plan objectives (only 16% of representations disagreed). The proposed settlement hierarchy, as a basis for a development strategy, had the strongest level of support (83%). This was reflected in the proposed development strategy set out in the SWJCS Preferred Options (2008), which was launched with a "Question Time" public event held at the Swan Theatre (Worcester) on 15<sup>th</sup> September 2008.

### **Process to date**

- 2.6 The joint development plan for South Worcestershire has undergone several iterations, and stages, as legislation has changed.

The key stages are shown below:

---

<sup>2</sup> Includes affordable housing needs and the demand for open market housing

<u>Date</u>	<u>Stage</u>	<u>Comment/ type of plan</u>
<u>Dec 2006</u>	<u>Resolution of Worcester City, Malvern Hills &amp; Wychavon Councils to work together on South Worcestershire</u>	<u>Joint CORE STRATEGY</u>
<u>Jan 2007</u>	<u>Joint Core Strategy (SWJCS) Joint Advisory Panel set up</u>	
<u>May 2007</u>	<u>Vision event</u>	
<u>Nov 2007</u>	<u>SWJCS Issues and Options consultation</u>	<u>Joint CORE STRATEGY</u>
<u>Sept 2008</u>	<u>SWJCS Preferred Options consultation</u>	<u>Joint CORE STRATEGY</u>
<u>Oct 2009- March 2010</u>	<u>Targeted consultation on potential strategic allocations and smaller specific allocations( Towns and villages separate consultation)</u>	<u>Joint Site Allocations and Policies DPD, to be run in parallel with SWJCS</u>
<u>Sept 2011</u>	<u>Preferred Options Consultation for a South Worcestershire Development Plan (SWDP)</u>	<u>Joint Core Strategy AND Site Allocations and Policies DPD</u> <u>(The current SWDP)</u>
<u>August 2012</u>	<u>Significant changes to SWDP Preferred Options</u>	<u>Joint Core Strategy AND Site Allocations and Policies DPD</u>

### **Evidence base and consultation feedback**

- 2.7 Since the outset of the joint plan-making process (2006), there have been numerous consultation events, the outcomes of which have helped to inform the proposed development strategy. With regard to technical evidence, both the SWJCS and SWDP processes have been subject to Sustainability Appraisal at each stage (SWJCS Issues and Options 2007, Preferred Options 2008; SWDP Preferred Options 2011, Significant Changes (to the Preferred Options 2012). These Sustainability Appraisals demonstrate that the proposed development strategy should help deliver sustainable development.

### **Characteristics and challenges facing South Worcestershire.**

- 2.8 Through early public engagement and visioning exercises, and with reference to technical evidence, the key characteristics and challenges facing South Worcestershire, have been defined. These are expanded on in the Issues and

Options and Preferred Options reports, and the accompanying Sustainability Appraisals. These can be summarised as:.

- Recognition of both potential and need for growth at Worcester through population projections/ household projections/ Regional policy, the adopted version (2004) of which identifies Worcester as a Sub- Regional Focus. Whilst carrying no particular weight at that time, the emerging Phase Two partial review (2007) and subsequent panel report that came from the Examination in Public, identified Worcester as a Settlement of Significant Development.
- Roles and growth requirements of larger/ smaller towns of Droitwich Spa, Evesham, Malvern, Pershore, Tenbury Wells, and Upton-upon-Severn
- Sustainability of larger villages, and those villages within the hinterland of Worcester City and the towns in South Worcestershire
- Issues of economic and social viability of the more remote rural areas within Malvern Hills and Wychavon Requirements for the delivery of infrastructure and services

2.9 Constraints and opportunities have been considered, and details are given in evidence bases associated with the SWJCS/ SWDP. These can be briefly summarised as:

#### **Environmental Issues:**

2.10 South Worcestershire contains two Areas of Outstanding Natural Beauty (AONB); it also contains other significant areas of high landscape value, including historic parks and gardens. There is designated Green Belt to the north of Worcester, Droitwich Spa, and south of Redditch. This is taken into account as a policy constraint to any large scale development in these areas. Additionally a [Green Belt Review](#) was carried out and published in 2010. This report was commissioned to examine if the current Green Belt boundaries are still relevant in terms of Government guidance (PPG2, now superseded by the National Planning Policy Framework (NPPF)) and whether the Green Belt boundary should be altered, to allow for development, or extended to protect new areas from development. For the SWJCS Preferred Options document, given the large quantity of non-Green Belt land available for development,(as suggested through the Strategic Housing Land Availability Assessment (SHLAA - see paragraph 3.13) an assumption was made that there was unlikely to be justification for releases of land for strategic development in the Green Belt, so no such areas were put forward as broad areas for growth. At the stage of the “targeted” consultation (January – March 2009), two areas of Green Belt, at Claines, Worcester and at Hill End, Droitwich Spa were included in the consultation. The subsequent Green Belt study confirms that there are no areas of the existing Green Belt that are considered inappropriate to the purposes of the Green Belt, and that the existing Green Belt boundary should remain, except for one very minor amendment at Hanbury Road, Droitwich Spa.

2.11 The County Council published an [Interim Green Infrastructure Study](#) in November 2009. It comprised desktop information on earlier Landscape

Character Assessment, and Historic Landscape Assessment, open space and recreation studies, high level Strategic Flood Risk Assessment and national, international and local ecology designations. The South Worcestershire Interim Green Infrastructure Study was an initial / interim assessment of the individual elements that comprise GI, rather an integrated assessment of GI (see paragraph 3.27 regarding further progress on this work).

- 2.12 The work informed the suggestions in the SWJCS Preferred Options allocations, for example that broad locations for growth should be steered away from the two Areas of Outstanding Natural beauty. Continuation of this work has also informed discussions on “targeted” consultations on specific site allocations.
- 2.13 The existing City of Worcester Local Plan has an M5 Protection Corridor policy (NE 11) which was put in place in order to retain the green edge to the city from the motorway. The picture of Worcester being a county town in a rural setting was important in regard to the City’s historic and landscape character. Some limited commercial development is now proposed in this location and other sites adjacent to the M5 have been considered for development, but found unsuitable due to access and other constraints. The intention is that development can take place without significantly compromising the landscape character and semi rural nature of this location.
- 2.14 There is also high reliance on the private car for transport, and this leads to high per capita CO<sup>2</sup> [carbon dioxide] emissions (see SA Report- Issues and Options, page 17)

### **Flooding**

- 2.15 Worcester and all the main towns except Malvern are located on main rivers. Therefore flood risk from fluvial flooding is high in all main towns, except Malvern. There are also significant surface water run-off issues to consider. This is examined in the SFRA Level 1 & 2 reports, which look at flood risk generally and specifically with respect to the Site Allocations. The work on housing land supply (the Strategic Housing Land Availability Study - SHLAA) methodology also generally excluded areas in Flood Zones 2 & 3 from the search for potential housing development land. The [SFRA 2009 Report](#) is available to view online at the SWDP website.

### **Water supply**

- 2.16 [A Water Cycle Study](#) was commissioned by the South Worcestershire Authorities in 2009, and reported in 2010 - based on the emerging larger site allocations. A sequential approach was undertaken to develop this water cycle study, four stages were considered when assessing the impact of the development on the infrastructure, water resources, water quality/environment and flood risk. Firstly the current status, secondly the potential pressures, thirdly the impact of the new development and finally the how the impact can be managed.

- 2.17 As water resources are scarce in the South Worcestershire area, demand management options are a vital consideration when planning and building any developments within the proposed strategic site allocations to provide sustainability both in terms of the aquatic environment and water supply. Severn Trent Water propose household retrofitting (the installation of water efficient products in existing developments) as well as other water efficiency options and works to reduce leakage.
- 2.18 Since the previous WCS, there have been a number of changes to the planning system including the Localism Act (2011) and the National Planning Policy Framework (2012) with accompanying Technical Guidance. In addition, some policies relating to water supply and sewerage have emerged or been updated, as well as supporting documents. As such, there have been a number of changes to the allocation sites, with some sites removed, additional sites included and modifications to some sites, and therefore an update to the WCS is required to provide supporting evidence for these changes. However the WCS update does not adversely impact on the strategic site allocations.

### **Housing Costs**

- 2.19 Housing affordability is a major issue in South Worcestershire due to high house prices/ rents relative to incomes. Evidence shows there is a considerable need to provide for subsidised housing for social rent and part mortgage, now and in the future. Relevant studies include the Strategic Housing Market Assessment (SHMA), published in April 2007 and 2012. The [2012 SHMA report](#) is available to view online on the SWDP website.
- 2.20 A detailed Local Housing Needs Report for the 3 South Worcestershire Districts was published in September 2007. This has been subsequently updated through the SHMA 2012. This shows the high level of need for affordable housing in the South Worcestershire (See the [Housing Background Paper 2012](#) – subject to updates).
- 2.21 The Sustainability Appraisal Associated with the Issues and Options paper also flagged up lack of affordable housing leading to migration away from rural areas.
- 2.22 Potential housing sites would need to demonstrate that affordable housing requirements can be delivered on any allocated sites, including Strategic Sites Allocations. An [Affordable Housing Viability Assessment \(2008\)](#) and a supplementary [Market Review and Property Prices Report \(2010\)](#) has helped inform the policy base for affordable housing provision. There is a need to consider the requirements for affordable housing both in the towns and in the rural areas.

### **Housing Supply:**

- 2.23 The adopted local plans had included significant windfall allowances (unidentified housing sites) which reduced the overall requirement for formal housing allocations. The NPPF now lets Local Authorities justify a windfall allowance, and the South Worcestershire Authorities have taken this on board (See the [Housing Background Paper 2012](#)).

### **Population forecasts/ Household formation**

- 2.24 South Worcestershire has a high percentage of over 60 year olds compared to the national average. It is a popular retirement area which places increased demands on health and social service facilities. Also, much of the growth at Worcester would be to serve the natural increase in the population in Worcester- i.e. people already born here. This requires household growth over and above that which can be accommodated within the existing city boundary. Migration assumptions in population and household projections for Malvern Hills in particular are very high, as this is based on historic migration rates. The Sustainability Appraisal also highlights the ageing population, placing higher demand on health and social services. The Demographics background paper explains this in much more detail. (See the [Demographics Background Paper 2012](#)).

### **Accessibility / Transport**

- a. The M5 and M50 motorways pass through South Worcestershire. Whilst mainline (Inter-City) rail services to London and the South East can be accessed directly at Worcester and Malvern, the Bristol – Birmingham mainline bypasses Worcester (and South Worcestershire). This reduces accessibility to Birmingham, (and the North West/North East/East Midlands) and Bristol (and the South West and South Wales), which is a constraint on economic development and encouraging increased use of rail for longer distance journeys.
- b. There are regional rail services between South Worcestershire and Birmingham (via both Kidderminster and Bromsgrove), although there are issues in terms of frequencies and overcrowding. The rail service between Worcester and Cheltenham and Gloucester is poor in terms of frequency, periods of operation and journey times.
- c. The bus network is the primary provider of local passenger transport in South Worcestershire and provides access to key employment, training, health and social opportunities. The performance of this network is constrained by infrastructure, information and the level of service provided on a commercial basis by bus operators. Over recent years there has been some investment in infrastructure with the aim of improving the performance of local public transport, although significantly more needs to be done, in view of any growth planned for South Worcestershire and the importance of local public transport in helping to manage travel demand and reduce congestion.
- d. In terms of new development this will require that infrastructure to support the operation of efficient and attractive local passenger transport services is designed into proposals from the outset (e.g. services are protected from the

effects of congestion, provision of high quality stop/station facilities and associated access links and real time information systems). In addition, improvements to infrastructure along the key urban and inter-urban corridors will be required to improve journey times and reliability.

- e. There are capacity constraints over key parts of the highway network. This is particularly the case in and around Worcester City and along key inter-urban corridors. There are a series of key pinch points on the network including:
- A4440 Worcester Southern Bypass
  - Key radial and orbital corridors in Worcester
  - A number of junctions along the A38 Corridor between Fernhill Heath and M5 Junction 5
  - A number of junctions along the A44 Corridor between M5 Junction 7, Pershore and Evesham
  - A number of junctions along the A449 Corridor between Malvern Town Centre and Worcester

In addition, within the Evesham, Malvern and Pershore urban areas there are junctions which have capacity constraints that will have to be addressed to accommodate planned growth.

The constraints across all modes of transport are considered to represent a potential constraint on economic prosperity and further investment in employment across wider South Worcestershire. The Highways Agency and The County Council have been working together to appraise the effects of projected growth levels on the Strategic Highways network.

- 2.25 Also, the rural network, with the exception of the major arterial routes (which act as a focus for bus based public transport services and road freight) is generally more constrained in terms of capacity and alignments. This will impact on the ability to accommodate the transport demands of major strategic allocations should they be located in rural areas (i.e. further away from the key inter-urban corridors).
- 2.26 Consolidating mixed use development (housing and employment) in the existing urban areas, and via urban extensions at Worcester, Droitwich Spa, Malvern, Pershore and Evesham will help to ensure that the transport impacts of new development are manageable (albeit requiring investment in transport infrastructure, services and information across all modes of transport). By clustering new development near to existing services (health, education, employment etc) and ensuring that new developments themselves provide a balance of homes, jobs and services will help to reduce the distances that people need to travel. Importantly clustering development near existing urban areas means that there is likely to be greater opportunity to increase usage of existing public transport services, walk and cycle networks and make more viable the necessary improvements to these modes' infrastructure, services and information systems.

- 2.27 There will be a need for targeted investment in the transport network (infrastructure, services and information, as set out in the SWIDP). This should address the cumulative impact of all of the development proposed in the SWDP (rather than be on a site by site basis). This reflects the statement in the NPPF that suggests that (para 32) "...development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe."
- 2.28 (The benefits of this approach were also recognised in the Sustainability Appraisal of the SWDP Preferred Options which stated (in para 6.14) that "Effects on travel and transport are uncertain in the short term, although directing development to areas with existing infrastructure and requiring sustainable transport options to be integral to new development ....will potentially promote positive outcomes and effects in the medium to long term.")
- 2.29 The level of services and public transport available in the villages is monitored in the Village Facilities and Rural Transport Study ([Link to VFRTS 2010](#)).

### **Employment**

- 2.30 Travel to Work Data suggests some commuting to the Birmingham conurbation from South Worcestershire, but not on as large a scale as previously. Generally South Worcestershire is fairly self-contained in employment terms, that is, local people can access jobs locally. National policy formally in PPG13, PPS3, and PPS1, and now in the NPPF- e.g. Core Planning Principle bullet 11) seeks to reduce the need to travel. Therefore it is considered there is a need to reduce commuting or at least maintain current levels, and balance housing and employment. Other issues include the wish to support the high technology research and development industries, embraced in the three local planning authorities existing adopted Local Plans). The Employment Land Review suggests that there is scope to deliver some of Worcester's employment growth at the edge of Worcester (See the [Economic Prosperity Background Paper 2012](#)).
- 2.31 More recently, with the expected demise of the West Midlands Regional Spatial Strategy, a Worcestershire Local Enterprise Partnership (LEP) has been formed from local business and employment and council interests to further economic development and prosperity in the area, replacing the work previously done by Advantage West Midlands.
- 2.32 Nationally, the Government is strongly promoting economic growth, intending to give this more prominence in future planning considerations.

### **Reassessment of Plan**

- 2.33 In 2010, with the election of the new coalition Government, and the steer from the Secretary of State that the Regional Strategies were to be abolished, the

three South Worcestershire Authorities took the opportunity to reappraise the SWJCS and whether the housing and employment targets within it should be revised, and the Development Strategy reviewed. The result of this was a reaffirmed commitment to a joint South Worcestershire plan, to be called the South Worcestershire Development Plan (SWDP), with a revised timescale to 2030 ( to allow for delays that had built up in production of the plan through the uncertain times of the election), and to commit to an economic development led plan, in the light of the Government's growth agenda, and the ability to set our own local derived housing evidence base.

2.34 Through further evidence gathering and consultation the same broad development strategy was set out in the South Worcestershire Development Plan Preferred Options (2011). The plan was to be focused on economic prosperity. Although the housing numbers are slightly below the SWJCS targets, the evidence on housing requirements has still directed the authorities to significant housing figures that address local needs, migration assumptions and the link between housing provision and economic prosperity. The [Housing Background Paper](#) 2012 contains the technical evidence on more recent influences household change and dwelling requirements. It also contains, in Appendix 7, an appraisal of all the options for housing location considered.

2.35 Through the SWDP Preferred Options consultation, of the 256 representations received on SWDP 1 (Development Strategy and Settlement Hierarchy), 170 were objections. However, of those 160 were site-specific objections rather than objections to the overall spatial strategy. With regard to the spatial strategy objections related to the following: -

- More development in the rural areas (2)
- Include sustainable settlements in neighbouring authorities' areas (3)
- More development should be allocated in Malvern Hills
- More development on small sites on the edges of the urban areas and a new town approach

2.36 With regard to allocating more development to the rural areas or pursuing a new town approach there is insufficient technical evidence to suggest that these development strategies would perform any better than the one currently promoted. Also, they are considered inappropriate as there are insufficient suitable and available rural sites which meet the strategy to respect the scale and character of rural settlements, to implement a dispersal option. A detailed capacity exercise has been undertaken, through further planning analysis of SHLAA sites in the most sustainable rural settlements, followed by public consultation, to conclude that further large scale dispersal of housing and

employment to the villages would not be appropriate, in terms of village character, nor in terms of the sustainability of those settlements in providing key employment, education and health services for much higher population figures. The new town approach will fail to meet Worcester's outstanding housing needs, which are considered to be required within or adjacent to the City, and the levels of suggested housing in potential "new settlement" locations would not deliver the required education, health, retail and road infrastructure. The resulting development strategy therefore favours urban extensions at Worcester and the main towns, with some dispersal to those villages with higher levels of services and facilities.

- 2.37 With regard to neighbouring settlements, the plan acknowledges the duty to co-operate and is flexible enough to meet the development needs that are set out in adopted local plans for neighbouring authorities. It is considered inappropriate however to allocate land at this stage as the need has not been confirmed nor would it meet the housing needs of South Worcestershire.

### **3. Section Two Strategic Development sites- Context**

- 3.1 The National Planning Policy Framework published in March 2012 replaces earlier guidance on strategic development proposals brought forward through the development plan process. The NPPF gives guidance on what "Local Plans" should contain. This says that plans should be "aspirational but realistic" (paragraph 154). The Local Plan needs to set out the Strategic priorities for the area, which includes strategic policies to deliver the homes and jobs needed in the area; commercial development; associated infrastructure, including community and cultural infrastructure; and conservation and enhancement of the historic environment, along with climate change mitigation and adaptation.
- 3.2 The plan should also allocate sites to promote development and flexible use of land, and provide detail on form, scale, access and quantum of development where appropriate.
- 3.3 The .emerging Development Plan, began as a Core Strategy (South Worcestershire Joint Core Strategy- SWJCS), a strategic plan that looks at broad development requirements and infrastructure to serve the whole South Worcestershire area, and defines housing and employment numbers, and associated services and infrastructure to be delivered, and the policies needed to guide such development. The original Core Strategy only defined broad locations for development, not specific site allocations.
- 3.4 The development plan has moved on and is now a joint Core Strategy (strategic plan) and detailed site specific plan that includes more local development management guidance, as well as strategic policies. It also includes site specific strategic allocations.

- 3.5 The Strategic site allocations are the larger housing, employment and mixed use sites that are the main sites required to deliver the development plan housing and employment numbers, and the associated community, environmental and technical infrastructure for South Worcestershire during the Plan period.
- 3.6 The SWDP has brought forward the Strategic site allocations and smaller site allocations based on detailed work on the Vision and Objectives of the three South Worcestershire Local Authorities, the characteristics and challenges for South Worcestershire, and on a wide variety of consultation and detailed evidence that show that the sites selected are considered to be the best alternatives and that they are sustainable, suitable and deliverable.

### **Constraints and opportunities**

- 3.7 These are expanded on in the Issues and Options and Preferred Options reports, and the accompanying Sustainability Appraisals.

### **Influence on strategic site allocations:**

- 3.8 The strategic site allocations have been brought forward via a range of considerations. The exact site allocations and boundaries have been influenced by the emerging development strategy and settlement hierarchy. This in turn has been influenced by successive public consultation responses, and detailed technical and professional evidence from environmental bodies (e.g. for flood risk, landscape and biodiversity), technical work, liaison with landowners such as through the Strategic Housing Land Availability Assessment (SHLAA), and economic considerations such as through the Employment Land Review, and Local Enterprise Partnership. The strategic site allocations have been tested by Worcestershire County Council using a range of analytical tools including the Worcester Transport Model (a 4-stage multi-modal variable demand model), an SWDP area specific Vehicle/Trip Generation Gravity Model and the Worcestershire accessibility model. It has also been informed by the Sustainability Appraisal that has been conducted at each stage of the plan and consulted upon.

### **Sustainability Appraisal – Background**

- 3.9 The Planning and Compulsory Purchase Act 2004 requires a Sustainability Appraisal (SA) to be carried out for all Local Development Documents in order to assess and direct the sustainability of development, in terms of the social, environmental and economic impacts of strategies and policies. Sustainability appraisal is still required under NPPF. Paragraph 165 states that a sustainability appraisal which meets the requirements of the European Directive on strategic environmental assessment should be an integral part of the plan preparation process, and should consider all the likely significant effects on the environment, economic and social factors. In particular NPPF states a clear definition of what sustainable development is, outlining the

distinct three areas of economic, social and environmental roles that the planning system has to perform (paragraph 7).

- 3.10 The SA has run parallel with the site selection and public consultation stages of the development plan, from the initial Issues and Options stage for the earlier SWJCS Core Strategy to the most recent Significant Changes proposals and consultation for the strategic and smaller site allocations in the plan, as well as an assessment of the affects of proposed general policies on sustainability.
- 3.11 Site options (originally broad locations for sites, then specific sites) have been considered against a Sustainability Appraisal Framework, which relates options to a series of locally distinctive sustainability objectives. It should be noted that these sustainability objectives were subject to public consultation at an early stage in the preparation of the development plan, with initial objectives being drawn up through a Sustainability Appraisal workshop held in July 2007 at Worcester Woods Country Park in order to draw up a framework for the SA.
- 3.12 A sustainability colour key and symbol highlights the basic sustainability against each option. In many cases it is difficult to precisely compare the sustainability effects. Very few options chosen had severe sustainability constraints that could not be mitigated, because the Sustainability Appraisal provided the context for the Development Strategy itself and the settlement hierarchy on which site selection is based. Thus, at an early stage, locations or policies that were considered not to be sustainable were not pursued.

### **Public Consultation responses**

- 3.13 The South Worcestershire Authorities conducted a widespread Issues and Options Consultation in the autumn of 2007 for the SWJCS. The large number of responses (over 2,000) helped inform the selection of broad locations for proposed major housing and employment development. As these responses relate to the accepted hierarchy of urban centres and pattern of rural settlements the feedback they have provided has been immediately transferable to the preparation of the South Worcestershire Development Plan, and the locational requirements for Strategic Allocations. Three subsequent public consultations stages have taken place and these are referred to in the [Consultation Reports](#).
- 3.14 Here is a brief resume of the consultation stages and responses in relation to strategic allocations. It should be noted that the consultation questions were fairly open ended and concerned broad brush locations.
- 3.15 **Consultation Responses- Vision and Issues and Options**

The responses to the proposed vision and objectives were generally supportive. In summary, responses included support for these objectives:

- Location of development in sustainable locations, with access to range of services available, and including by public transport

- To provide for a mix of housing including affordable housing
- To maximise the employment potential of the Central Technology Belt
- To maintain and enhance the sub-regional role of Worcester as a major retail, leisure, university and tourist centre.
- To ensure the continued viability of towns in South Worcestershire.
- To ensure development is sustainable through the efficient use of land, reducing the consumption of natural resources, through environmentally friendly construction
- To address “climate change” issues through take up of renewable energy, considering flood risk, water harvesting and reducing waste and pollution
- To protect the built heritage
- To protect the character of rural settlements by ensuring the scale and location of development is in keeping with their size/ character and function.
- To conserve, restore and enhance biodiversity, geodiversity, landscape character, air and soil and water quality.

3.16 Below is a brief summary of those responses that have a spatial element that have informed the locational elements of the strategy. Responses are summarised in more detail in the [Issues and Options Consultation Report](#) itself.

- The hierarchy of city/ towns and villages – allocating development in accordance with the settlement hierarchy, with Worcester at the top of the hierarchy was largely supported; also support for development to strengthen the roles of Droitwich Spa, Evesham and Malvern and strengthen the role of the villages. There was significant support for a new town, as long as infrastructure is provided, but no agreement as to where such a town should be located. The County Council stated that on the basis of the proposed settlement hierarchy and pattern of development, targeted investment in infrastructure and services across all modes of transport is needed across the SW area, but specifically along the key inter-urban corridors and in the urban areas.
- The broad settlement hierarchy, of city, larger urban areas, smaller towns and villages reflects the hierarchy in the West Midlands Regional Spatial strategy, which in turn reflects the acknowledged comparative sustainability of these settlements.
- Where should Greenfield land be identified to meet development needs? The majority of respondents favoured identifying land on the edge of Worcester and on the edge of the main towns. A majority were against identifying greenfield land on the edge of category 1 & 2 villages.

A small majority (52%) were against concentrating development in a new settlement.

Generally it was felt that green field land within settlements should be protected. The County Council’s response on eco-towns suggested that

for a new settlement, a population of 10,000 people would be an appropriate size for education infrastructure purposes.

- Green Belt boundaries: There was strong agreement from the public to retain the current Green Belt boundaries. The County Council in general felt that there was a case to review Green Belt boundaries, but it would need to take account of accessibility of sites and their ecological value. The West Midlands Regional Assembly (WMRA) considered only minor amendments to the Green Belt would be supported. A [Green Belt Review \(2010 update\)](#) was commissioned by the South Worcestershire authorities, but it did not recommend changes to the current Green Belt boundaries.
- How should we cater for Worcester's Housing growth?  
A majority of the public (63.5%) said this should be east of Worcester, (the option for responses did not distinguish whether this meant east of the motorway), 47.4% to the west, 49.3% to the north and 48.5% to the south. There was an almost even split (49% for) for a new settlement to serve Worcester's needs but no agreement at all about where this should be. The West Midlands Regional Assembly considered that a new eco-town would not be in conformity with regional policy. Worcestershire County Council considered that investment in the transport network would be required to support any sustainable urban extensions.

The Highways Agency was concerned about the potential negative impacts on junctions 6 and 7 of the M5 motorway if growth was to be located east of Worcester. There was also concern about impacts on the A46 (T) at Evesham. Growth in these areas would require more infrastructure for the strategic road network.

- Which broad areas should be targeted for housing growth in Malvern Hills and Wychavon? There was most agreement to the majority of growth going to Droitwich Spa, Evesham and Malvern and the balance to the other towns and Category 1 & 2 villages. Caution about growth at Tenbury Wells and Upton-upon-Severn was expressed because of their location with respect to the flood plains of the River Severn and River Teme. There were some suggestions that smaller scale development might be appropriate in some Category 3 settlements.
- Where should new employment development be generally located in order to contribute to sustainable development?  
Responses were evenly split between those who agreed with employment growth principally at Worcester, and those who did not. There was more support for employment growth principally at Worcester, with the remainder in the towns. There was also strong support for employment growth in locations adjacent to junctions along the M5 motorway, and also in the Central Technology Belt. There was significant support for employment development to be close to homes, and close to public transport, and the need to balance housing and

employment growth. There was also strong support for employment development principally at the potential Worcestershire Parkway station area, south east of Worcester, although this and development mainly along the M5 were not in conformity with regional policy. The Highways Agency supported development growth that promotes the use of rail or water for the movement of freight. Worcestershire County Council was concerned that a concentration of employment growth near M5 motorway junctions would increase long distance commuting.

- How can the development needs of rural communities be best met?  
There was strong support for small scale employment development in Category 1 & 2 villages. There was also support for mixed use development in settlements with few facilities, in order to improve their sustainability. Also there was some support for villages to expand and encourage affordable housing, and in order to support local services. There was also support for locating development near to good services, public transport and to help improve existing services. The County Council made the point that in some areas school rolls are falling, and that small amounts of housing development in villages may not be sufficient to keep schools open in unsustainable locations. The AONB Officer Steering Group (Malvern Hills) considered that development in rural areas should be small scale and within existing villages.
- What can be done to reduce the need to travel by car in South Worcestershire and encourage more sustainable means of travel?  
There was strong support to locate new development in areas easily accessible by a range of transport as an alternative to the car; strong support to protect existing rural shops and community buildings; and strong support to attract more jobs to South Worcestershire to reduce out-commuting. In particular it was considered there was a need to provide a cheaper and more reliable and accessible public transport network, that is integrated (e.g. buses and train ticketing and timetables, integrated and co-ordinated). Rail connections and Park & Ride Schemes were also generally supported. Scope for a new rail station with park & ride facilities at the potential Worcestershire Parkway station at Norton to the south east of Worcester. The County Council considers that investment is required in local and regional public transport infrastructure, services and information systems. This includes improvements to infrastructure at existing rail stations, a new Worcestershire Parkway station, improved local public transport (bus) services particularly in urban areas and along key inter-urban corridors. This is particularly important in terms of services to/from/within Worcester City where the highway capacity constraints are most acute. Congestion charging was not supported, but there was some support for increasing traffic management and parking controls in Worcester and the main towns. Community transport was supported. There was also support for increasing the use of canals for freight.
- What should the priorities be for improving transport infrastructure?

In terms of Worcester there was very strong support that development should not proceed without the provision of essential transport infrastructure; and that public transport improvements were needed. There was also strong support for the dualling of the Southern Link Road, and the need for a North-West by-pass for Worcester.

For the wider South Worcestershire area there was strong support to safeguard land around rail stations, to improve passenger facilities and transfers, and improve the capacity of motorway junctions. The Highways Agency stated that all development, as far as possible should be located so as to reduce the need to travel; and that improvements to the strategic road network would be required to meet RSS housing numbers.

- How do we ensure the provision of infrastructure in advance of development?

Generally it was considered that development should not proceed until all types of infrastructure are provided; that priorities for infrastructure to serve new development need to be set out. There was a need for a clearer definition of infrastructure requirements. S106 contributions could contribute to infrastructure needs. [Note this consultation happened ahead of any clear ideas on a Community Infrastructure Levy]

- How can affordable housing (e.g. rented or shared ownership) and special housing needs best be met?

There was strong support for setting thresholds and targets for affordable housing to be delivered through residential development. There were mixed responses to providing 100% affordable housing developments on the edge of villages, but strong support for allocating affordable housing sites in the towns. The County Council considered that Local Authorities should set minimum affordable housing targets.

- To what extent should existing employment areas be protected?

There was some support for protecting all employment areas, but more support for requiring developers to demonstrate that continued employment use is not viable before letting sites go for other uses.

### **Evidence base**

#### **Strategic Housing Land Availability Assessment (SHLAA)**

- 3.17 The South Worcestershire authorities, in line with requirements in earlier Government guidance in PPS3 Housing and continuing advice in NPPF have produced a joint Strategic Housing Land Availability Assessment (SHLAA). The work was commenced in 2007, with the drawing up of a methodology and consultation with interested parties. The SHLAA report provides background

evidence on the potential supply of housing land in South Worcestershire. It has helped establish whether broad directions for development growth are feasible in terms of land availability, deliverability, and in what potential timeframe the land can be made available.

- 3.18 The methodology has remained largely unchanged in subsequent annual updates to the SHLAA. The SHLAA has generally excluded land within the floodplain within zones 2 & 3 and land nationally and internationally designated for its ecological value, such as Sites of Special Scientific Interest. As all the main towns in South Worcestershire with the exception of Malvern are situated on large rivers, the flood zone criterion has excluded large areas of land. Following the Green belt Review, green Belt sites were also ruled out. The [2012 SHLAA](#) maps (and previous SHLAA editions) can be viewed online via the SWDP website.
- 3.19 **The SHLAA does not select the Preferred Options-** it merely provides background evidence on the amount and location of potential housing land within an area, and an examination of whether they are available, suitable and developable/ achievable. Site selection is done when policy considerations are applied at a later stage, based on a whole range of other evidence, consultation, context (e.g. national/ regional policy), etc.
- 3.20 NPPF requires each local authority to make sure that enough housing land is identified sufficient to provide five years housing against their housing requirements, with an additional buffer of 5% to allow for choice and completion in the market for land. The authority also needs to identify sites or broad locations for growth for years 6-10 and where possible for years 11-15. The situation on the land supply is contained in the [Housing Background Paper 2012](#) and through the Annual Housing Land monitoring reports that are published on the three Council's websites.
- 3.21 Originally the South Worcestershire SHLAA document was required to identify housing land that could show housing land availability in broad locations to meet strategic housing needs up to 2026. This information has helped inform the broad directions for growth shown in the SWJCS Preferred Options document (2008). The SHLAA has also informed the progression to the consideration of specific strategic site allocations, resulting in the "targeted" consultations held in the main towns to discuss more specific site areas in the public consultation exercises held in spring 2009, and the SWDP Preferred Options (2011) and Significant Changes (2012) options and consultations
- 3.22 The findings of the SHLAA are important in that they have shown that in South Worcestershire there is very little vacant or derelict "brownfield"/ previously developed land available for future housing development. The only settlement where there is any significant brownfield land with housing potential is Worcester and much of this is neither vacant nor derelict. The SHLAA has been updated regularly. The first report was published in June 2008. A subsequent partial update was published in October 2008, and a full update published in January 2010. A further annual update was published in

the May 2011. For additional information on the SHLAA refer to the latest update report, published in December 2012.

- 3.23 The SHLAA has clearly shown that there is insufficient surplus brownfield land within or adjacent to Worcester to deliver housing requirements there. When Greenfield land that is not considered valuable urban green space, or protected by an ecological or landscape designation is considered there is still insufficient available land within the city boundary to deliver the required number of new homes. Thus the next available “sequentially “ preferable land is seen as land on the edge of Worcester, to meet Worcester’s longer term housing land supply requirements. This approach is clearly supported by the SA and the consultation responses at Issues and Options and SWJCS Preferred options stages.
- 3.24 With regard to the other main towns within South Worcestershire, there is even less “urban capacity” on brownfield land. The SHLAA therefore demonstrates that there is no scope in any of the Worcestershire towns to meet the full updated housing requirements within the current settlement boundaries, and especially not on brownfield land. The SHLAA has therefore contributed to the Preferred Options broad locations, in terms of identifying site availability and subsequent updates have confirmed these findings.

#### **Urban/ Rural capacity work**

- 3.25 The SHLAA only looks at one aspect of capacity- land supply and availability. But this ignores wider planning policy requirements which impact on appropriate housing allocations. Thus, at each stage, officers have carried out more detailed area and site capacity work, overlaying SHLAA information with policy considerations emerging from the feedback from consultation and technical work. For instance, it is clear that a dispersal of large amounts of housing to the villages would need to take account of the level of services in each village (see Village Facilities and Rural Transportation Survey references), and the character and scale of the host settlements and their ability to assimilate housing and employment growth. This work was informed by detailed criteria for assessing site suitability, which was endorsed by the Joint Advisory Panel , and reflects current and emerging Local Plan policy and government policy.
- 3.26 Through this work, as well as through the SA work, the three authorities felt that there was not scope for large scale dispersal of housing growth to the rural areas.

#### **Transportation issues**

- 3.27 The original consultations on the SWJCS and then the SWDP from Worcestershire County Council, as Transportation Authority, and from the Highways Agency has helped shaped the broad locations for growth set out in the SWJCS Preferred Options document, and the later SWDP Preferred Options. Regard was also had to evidence of Travel to work (TTW) data,(2001 Census) showing commuting patterns within, and in and out of

South Worcestershire. Strategic development along the M5 corridor, to serve Worcester was considered to be problematic in terms of overloading junctions on the M5 motorway, where Highways Agency funding was not prioritised (regionally). It was also considered likely to increase out-commuting. There was also no certainty that proposed rail development of the Worcestershire Parkway station could be delivered in the plan period, thus meaning that development to the south east of Worcester could not be well linked to public transport options. Developments on the periphery of Worcester in terms of urban extensions would help deliver financially sustainable Park and Ride facilities which if linked to commercial services between the urban extensions and key destinations across Worcester City could increase the attractiveness and use of public transport for journeys to/from/within the city and thus help to manage travel demand and traffic congestion

- 3.28 Comments from Worcestershire County council have informed the transport infrastructure, services and information systems required to support the delivery of sustainable strategic sites. The sites have also been subject to transport modelling, and assessment the results of which take account of the travel demand generated by each individual site and the resulting cumulative impact on the transport network (across all modes of transport). This work has formed the basis of the identification of the transport infrastructure, service and information measures needed to support the planned growth.
- 3.29 The Worcestershire County Council Local Transport Plan 3 establishes a broad framework within which to consider the selection of locations for development. In addition the County Council has undertaken an assessment of the impact on the transport network of the planned growth and identified the infrastructure, service and information measures needed to support the plan. The findings of this work are contained within the SWIDP and also referenced within the Transport Policy Background Paper. The assessment has used the latest assumptions in respect of the planned growth (i.e. it takes account of the SWDP Significant Changes).
- 3.30 The major development sites, proposed through the SWDP, will contribute to mean additional local and longer distance traffic routing through along the inter-urban network and the key corridors in and around Worcester. This has an impact on the location and scale of transport schemes resulting from SWDP. In particular there is a need to address capacity constraints to the south of Worcester City and to ensure that the planned major urban extensions are designed from the outset to maximise use of walk, cycle and passenger transport modes, particularly for journeys to/from/within Worcester City.
- 3.31 The location and type of investment in and around Worcester is guided by the Worcester Transport Strategy and multi-modal transport modelling undertaken using the Worcester Transport Model. By focussing new development with a mix of land uses in or adjacent to the existing urban area and close to existing services and facilities and supported by a high quality walk, cycle and public transport network, will ultimately help to reduce the need to travel and help to create more sustainable patterns of development. The strategy of focussing

development in/close to established urban areas means that there are opportunities both to make use of existing public transport networks and walk/cycle routes and also to improve upon and extend these in the future.

- 3.32 The different characteristics of locations within the SWDP area have been taken into consideration when identifying the transport measures needed to support the plan. Whilst there is always an emphasis on the provision of sustainable transport alternatives, there is also an acknowledgement that the schemes must be appropriate for the journey being made and location of the start and end points.
- 3.33 In Worcester there has been an emphasis on dealing with the capacity problems on the strategic highway network (in particular the A4440 southern and eastern bypass), improving conditions for all modes of transport along the key radial and orbital corridors and in the city centre. Crucially this has to be supported by and integrated with the provision of passenger transport, cycle and walk transport infrastructure, services and information systems such that they can provide alternatives for journeys to/from/within the city. The assessment indicates that in combination, these measures will help to manage the forecast increases in traffic and congestion as a result of growth in the demand for travel.
- 3.34 In the South Worcestershire towns a similarly balanced approach has been adopted, identifying both highway and more sustainable measures. In the rural areas, whilst the use of sustainable modes is to be encouraged, it is acknowledged that highway access and capacity issues must be addressed to enable both car and local passenger transport trips to use the network efficiently.

This balanced and integrated approach to transport schemes development is set out in policy SWDP4 and detailed in LTP3.

#### Droitwich, Evesham Malvern, and Pershore Transportation Issues:

- 3.35 The analysis for Droitwich, Evesham, Malvern and Pershore and indicates a number of key junctions within these towns that are performing at levels approaching, at or over capacity. These junctions occur at key intersections on the main routes through and around the towns. In addition, the accessibility assessments have indicated that improvements to walk, cycle and public transport infrastructure and services will be required to support the SWDP. Mitigation schemes for all modes have been identified and their costs estimated.
- 3.36 In September 2012, the Significant Changes land use assumptions were fed into Worcestershire County Council's transport models. This was related to an update in forecast for travel demand to 2030. In October 2012, an assessment has been undertaken by the County Council of the impact of the potential development on highway links, on key junctions, on passenger

transport networks, and on cycle and walking networks. The findings are generally similar to earlier assessments, identifying the following key issues:

- Significant improvements will be needed to the A4440 Worcester Southern bypass
- Improvements to key junctions on the A4440,A38, A44and the A449
- Key corridor improvements for traffic flow
- Enhanced signal systems
- Improvements to Worcester Foregate Street Station
- Improved access/ information/interchange to rail facilities at Droitwich, Evesham, Malvern Link, Pershore, and Worcester Shrub hill stations
- Improved walk and cycle access to stations
- New Worcestershire Parkway station
- Buses- key corridor enhancements, integrated services with new developments/ real time information.
- New developments linked to existing walk and cycle networks/ infrastructure to overcome severance issues/ improved facilities for cyclists/ pedestrians in Town and City centres

3.37 The Highways Agency (HA) originally had a holding objection to SWDP development that impacted on junctions 4,5 and 6 of the M5 motorway. However, in the autumn of 2012,the objection has now been lifted after the Highways Agency and Worcestershire County Council have done further modelling of the impact of traffic on the motorway junctions and the HA have done an initial mitigation/ costs report.

### **Village Facilities and Rural Transport Study (VFRTS)**

3.38 As part of the evidence gathering work for the SWJCS and the SWDP Malvern Hills and Wychavon District Council have been assessing the existing provision of social, community and public transport facilities within the rural areas. To inform the Village Settlement Hierarchy as part of the emerging plan there is a need to assess whether the settlements currently identified in the respective Local Plans remain relatively sustainable. This builds on earlier work carried out for the Malvern Hills Local Plan review in 2004.

3.39 To accord with national and strategic planning policy a sustainable development strategy for rural areas seeks to direct development to those rural settlements which contain a range of services and community facilities and where reasonable public transport services exist. The results of village surveys indicate those rural settlements that have a range of services and facilities and are accessible by public transport. These settlements with a broader range of services are considered to be appropriate locations for housing and employment development. However, in line with the Development Strategy and Settlement hierarchy, no strategic sites are allocated in the open Countryside or adjacent to the rural village settlements ([Link to VFRTS 2010](#)). The 2012 VFRTS update is available [here](#).

## **Strategic Flood Risk Assessment**

- 3.40 Early information available from the EA, in terms of flood risk maps was also used to inform the consideration of broad locations, as outlined under the SHLAA evidence base above. A further Strategic Flood Risk Assessment (SFRA) was published in [November 2009](#), and updated in November 2012. The earlier commissioned SFRA looked at the flood risk within the South Worcestershire Joint Core Strategy area as a whole, and allowed an informed decision to be taken when allocating future development sites, and sets out the procedure to be followed when assessing sites in the future. The 2012 SFRA update looked at additional sites and used further modelling to allow for surface water run-off and climate change scenarios. This has resulted in certain smaller sites being ruled out or modified, but has generally confirmed that the key strategic sites are sound in terms of flood risk. The 2012 SFRA update is available [here](#).

## **Green Infrastructure**

- 3.41 The South Worcestershire authorities have been working closely with Worcestershire County Council and other partners such as Natural England and the Worcestershire Wildlife Trust, on a [Green Infrastructure Strategy](#) (2009 Interim Report) for South Worcestershire.
- 3.42 This desk top based study has been used to inform the sensitivity of areas of land that may have development potential, and acts as an evidence for development constraint. The report covers individual constraint information on biodiversity, landscape designations and sensitivity, the historic environment, geodiversity, and open space and recreation opportunities. It also outlines the Green Infrastructure credentials/ scope of the potential strategic sites. However, it is not a full integrated GI assessment. [The Historic Environment Study](#) (2010) was commissioned to look at the South Worcestershire area in terms of the sensitivity of the historic environment, in relation to broad areas and the potential strategic sites.

Since then, more coordinated work has been done through the County Council to assess integrated Green Infrastructure requirements for key strategic sites at Worcester South ( Broomhall), Worcester west (Temple Laugherne), and Newland in Malvern.

- 3.43 In May 2008, following the development of the SWJCS Preferred Options, a detailed appraisal of the preferred options document was undertaken against the full SA Framework Objectives. Commentary was provided on how the Preferred Options would progress SA objectives, and where appropriate, recommendations for enhancement and mitigation were provided. A final SA report on the Preferred Options was published in August 2008 for public consultation and placed on the old swjcs.org website.
- 3.44 A number of suggestions were made for improving the emerging vision, objectives, issues and options during their development and these were taken forward into the SWJCS Preferred Options. The appraisal included an

assessment of impacts on health, and equality and diversity and overall it was considered that the Preferred Options progress the aims of ensuring a more inclusive environment for all social groups.

3.45 The [Sustainability Appraisal Report](#) (2008) was prepared by consultants (Enfusion) to assess the relative sustainability of the potential Strategic Sites Allocations using an SA framework, which considered different sustainability objectives. It covered objectives such as developing a healthy economy, promoting social inclusion, delivering infrastructure, providing good quality housing for all, reducing the need to travel, promoting good design, protection and enhancement of biodiversity/ landscapes/ historic environment, minimisation of pollution, and management of water sustainably.

3.46 The assessment was based on specific sites that were put forward based on the broad locations in the SWJCS Preferred Options document. The key findings of the SA for the Preferred Options, in terms of the location of development are:

3.47 All sites display a mixture of positive sustainability impacts, some unknown, and some negative effects. The sites which flagged up the most adverse sustainability impacts were:

- Land off Cheltenham Road, Evesham- for 800 dwellings

This site scored poorly on economic effects; delivery of infrastructure, climate change mitigation and pollution

- Land off Offenham Road, Evesham for 800 dwellings

However, because the potential strategic sites are generally in the more sustainable locations, having stemmed from earlier consultation and SA discussions, within or adjacent to the main towns it is difficult to assess their *overall* sustainability *relative* to each other, although they will meet the SA objectives to varying degrees.

### **Discussion of strategic sites in relation to evidence base and consultation**

3.48 The above sections of the report outline the evidence base and public consultation stages that have helped shape the development strategy and settlement hierarchy for the SWDP. The Strategic allocations sit within this context. Below, more detailed locations are discussed.

## 4 Specific Sites

### 4.1 Worcester Development Options:

#### Moving towards Preferred Options

- 4.1.1 The key to joint working for the South Worcestershire authorities is the need to consider how to accommodate Worcester's growth in the future. For Worcester related development, the only real indication coming from the SWJCS Issues and Options consultation and Sustainability Appraisal in regard to direction of growth was a general lack of support for development in the Green Belt. Although several developers put forward various assessments as to why this was appropriate or why the Green Belt designation was inappropriate, the policy position is that it is designated Green Belt and no exceptional reasons have been put forward as to why development should be considered within it. There was reference to the Regional Spatial Strategy regarding the possible need to have a minor Green Belt adjustment in order to accommodate growth. At this stage this is not considered necessary. NPPF which will eventually supersede guidance to Green Belt in the WMRSS, allows for the consideration of new Green Belt, only in exceptional circumstances (paragraph 82). Existing Green Belt can also only be altered by a Local Plan review. The formal [Green Belt Review](#) (2010 update) confirms that the boundaries of the Green Belt are robust and the land contained within it meets the criteria as laid out in Planning Policy Guidance, so no further review is put forward at this time. Strategic allocations in the Green Belt are therefore not put forward in the SWDP to meet any housing or employment needs.
- 4.1.2 The other option which has not been pursued is that of a new settlement. (See also responses at Issues and Options stage above) It has been assessed that this would not meet Worcester's growth in a sustainable manner in that it would have little if any relationship with the city and would not increase the vitality and viability of Worcester itself. Unless there are overriding reasons why the proposed development cannot be accommodated adjacent to the city boundary then looking elsewhere would be inappropriate. However, it could be an option for long term growth (post 2030) 4.1.3 At this stage the emerging evidence base was proving to be a little contradictory for the remaining options. The Highways Agency was concerned that the junctions 6 & 7 on the M5 motorway cannot cope with additional journeys likely to occur if development is focussed to the east of the city. However, the business community including the regional economic body Advantage West Midlands were strongly in favour of a motorway location. In the general community consultation most marginally favoured going east of the city, with south west and north gaining equal support and rejection. The evidence from the SHLAA demonstrates that there is some available land in all the locations and developers were also putting forward their case for development on the area of land in which they had an interest. In particular, Sir Bert Millichip Sports and Crest Nicholson to the north, Hallam Land Management, Oxford Colleges to the east, Bloor Homes and Hallam land Management to the west,

and St Modwen, Agincourt Developments, Wellbeck Land, and Taylor Woodrow to the south.

4.1.3 All comments were assessed together with the emerging technical evidence including the on-going Sustainability Appraisal to establish in planning terms, (ignoring political boundaries) the most sustainable directions for growth which would meet the vision for South Worcestershire in respect of the City of Worcester.

4.1.4 In determining the most suitable locations for development the emerging evidence indicated four issues that should play a significant role in defining how and where Worcester should grow to meet its economic and housing growth requirements. These are:

- **Accessibility.** Providing access to jobs and essential services is a key part of delivering sustainable and inclusive communities. Developing at locations where these can be accessed by means other than the private car reduces the need to travel. It can also improve the local environment, quality of life, promote social inclusion, and help manage traffic congestion.. There was considerable support for a strong and prosperous economy in Worcester. . As set out in Sections 2 and 3, above, and in the Transport Policy Background Paper Worcestershire County Council has undertaken analysis of the impact on the transport network of the SWDP planned growth and has identified the transport infrastructure, services and information system measures needed to support this

The Highways Agency has (in conjunction with the County Council), identified the improvements needed at M5 Junctions 6 and 7.

- **Preserving the historic character and setting of Worcester.** The emerging evidence, not only from the consultation exercise but also the technical studies such as the Green Infrastructure Study and the Green Belt review emphasise the importance of the historic environment and the value of open land particularly in regard to visual landscape, recreation and biodiversity. This all goes to improving quality of life and general health. It is important that coalescence of villages is avoided as their individual identity and separation are important in their own right, but also contribute to the attractive rural setting of the city. In determining direction of growth it was important to recognise that Worcester is a County town within a rural setting, which is locally distinctive. Protecting important views and defining character were significant issues raised through the consultation.
- **Nature Conservation.**  
NPPF states that Local planning authorities should:  
“set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure; and (paragraph 114)

Worcester's Green Network is well established and valued, and the Green Infrastructure studies support this approach, and promote a similar approach in potential development areas.

- **Flooding.**

To reduce further damage to property and infrastructure and to maximise public safety, areas liable to fluvial flooding were ruled out of any locational search for future development sites through an initial desk top study. However, it is important that surface water flooding which was a significant element resulting in the 2007 floods is also considered. This was a major concern of consultees and the public and the South Worcestershire Flood Risk Assessments have looked at all these issues to give guidance in regard to potential development sites. The latest SFRA updated information on the suggested Strategic sites has been published (Sept 2012). No strategic sites have been ruled out on flood risk grounds, although some smaller sites have been. The 2012 SFRA update is available [here](#).

### **Worcester: The Preferred Spatial Strategy.**

- 4.1.5 In moving forward the focus has to be on creating a sustainable pattern of development, which is either small enough to be accommodated with the existing infrastructure of the city or large enough to be sustainable in its own right.
- 4.1.6 An analysis of the emerging evidence referred to earlier demonstrates that large sustainable extensions would be inappropriate to the north of the city (Green Belt and coalescence of settlements being particularly significant), and to the east (historic landscape, accessibility/ highways and links to the city, and character of the city being particularly relevant).
- 4.1.7 However, it was important before committing to large extensions to assess smaller areas within the city and those areas of land which abut the city boundary for their ability to accommodate some growth.
- 4.1.8 In this respect the only sites which have emerged are land to the rear of Kilbury Drive, on the eastern edge of Worcester, which could potentially deliver approximately 250 dwellings. And a site at Gwillams Farm, just on the city boundary, to the north, has come forward- for 250 dwellings. These sites meet the development strategy requirements to deliver land within or on the edge of the City.
- 4.1.9 Additional land for development has been put forward in the Significant Changes document, and includes land North and South of Warndon Woos; land at Stanley Road, Sherriff Street; Old Northwick Lane; Brookthorpe Close; Blackpole Road; Ullswater Close; Barbourne Road, Dudley Close; Chequers lane and Bromyard Road.

4.1.10 These are additional sites to support higher housing numbers coming through the Strategic Housing Market Assessment (SHMA). Even with these additional sites there is still considered to be a requirement for strategic allocations to deliver growth beyond the city boundary.

**Kilbury Drive site**: The advantages of this site are that:

- It is well related to the existing city.
- It is within the ring road, so no coalescence issue with Whittington Village.
- No major new infrastructure is required although there will be a requirement for investment in transport infrastructure and services
- The only visual landscape issue relates to the higher land in the north.
- It is well located in regard to local schools, employment sites, and the hospital and sport and recreation facilities.
- Minor surface water flooding issues can be addressed.

4.1.11 A “targeted” consultation event was held at Worcester Woods Country Park (18<sup>th</sup> Feb 2009), outlining the potential site and assessing provision for up to 300 dwellings. The main responses from the public were:

- Traffic congestion on Spetchley Road, and potential problems for emergency vehicular access.
- More noise and pollution from extra traffic
- Danger of Kilbury Drive/ Bayman Drive being used as a rat-run- as now.
- Suggestions that access should be from the by-pass, rather than Spetchley road
- Improvements needed to bus services
- Current drainage / flooding issues- made worse by new development
- Capacity of local schools/ where will extra children go
- Will require additional health care facilities for new dwellings
- Site is part of ancient heritage and should be protected
- More local shops needed/ local shops will be more viable with development.
- Open space required- but not close to existing properties
- Sheltered housing required in the area.
- Concern over impact of any social housing
- A community hall is required

4.1.12 The Sustainability Appraisal May / Dec 2009, assessed this site for approximately 300 dwellings. It concluded that the site should have no significant issues integrating with existing development, and that there is potential for the site to provide new neighbourhood facilities which can be used by existing development. It is also well located for local employment/ recreation/ health and education facilities. It acknowledged there may be issues with surface water flooding, in which case a Flood Risk Assessment should be prepared. There could also be issues of noise and pollution from A4440.

- 4.1.13 Apart from the above two sites, the only remaining directions for growth that could accommodate large sustainable urban extensions adjacent to the city boundary would be to the west and south of the city.

#### **West of Worcester site**

- 4.1.14 A very broad-brush capacity assessment taking into account the issues raised through the Issues and Options consultation together with emerging technical evidence suggested that the west could accommodate approximately 3,500 dwellings together with 15 hectares of employment land, a local centre to include health care, retail, community and leisure facilities, and provision for the emergency services. A primary school and secondary school would also be required.
- 4.1.15 By locating to the west and ensuring the appropriate infrastructure is provided there it would be possible to provide a sustainable self contained community dependent on the city centre for major shopping, leisure and wider employment, The proposed large scale West of Worcester development was not tested as part of the identification of the transport elements of the SWIDP. However, previous transport work had identified that a large development on this site would require significant investment in transport infrastructure and services, in particular to provide high quality and attractive (to users and operators) public transport, cycle and walk links into and across the city and improved capacity highway links to the Strategic Road Network (M5). . The benefits of choosing west as a direction of growth were:
- It is immediately adjacent to the existing built up area of the city, and therefore in visual and physical terms is a natural extension of the city.
  - There are no physical constraints which would prevent pedestrian/cycle links being extended, the green network corridors being encompassed in the design, and use of the existing schools, shops and community facilities in the early stages of development.  
In terms of public transport a successful funding bid enabled improvements to the quality of infrastructure along the Bromyard Road, which would link the proposed site with the city centre. It should be noted that whilst this scheme could support up to 500 new dwellings to be delivered in the West of Worcester area without new major road infrastructure. additional transport infrastructure and services would definitely be required if development exceeded this level
  - It would strengthen the vitality and viability of the St John's District centre, and encourage enhancement of the City centre.
  - It would provide west Worcester with much needed sport and community facilities.
  - Jobs could be created in association with the nearby university of Worcester and their emerging plans.
- 4.1.16 A "targeted consultation event was held at Hallow Parish Hall on 28<sup>th</sup> January 2009. A potential site for 3,500 dwellings and 15 ha of employment land was discussed.

Issues raised by the public included:

- Many people felt the development should not go ahead without the completion of a North West Link Road for Worcester.
- It would create a large increase in traffic congestion
- Problems with rat-running through Crown East/ Lower Broadheath
- Traffic impact on Southern Link Road and Hallow Road ( North of Worcester)
- Traffic impact on Henwick Road and Hylton Road Martley Road at Worcester
- Poor bus links into Worcester at present- would need to be improved.
- Need to take account of access to hospital
- Traffic impact on St. John's district centre
- Improve A4440 to dual carriageway status.
- Potential impact on Holt Heath Bridge for River Severn crossing
- Scope for rail halt in the area.
- Why are homes needed - too many empty homes.
- Mix of homes required for all ages
- More homes for the elderly needed
- Housing design should reflect village communities- range of designs
- Affordable homes are required
- Recreational open space required
- Light pollution from street lights
- Need to retain gap between Hallow and the city
- Should consider a smaller number of houses here- and more elsewhere
- New homes should be energy efficient
- Do not build on Earls court Farm ( adjacent site)
- Little employment possibilities therefore will be a dormitory town
- Loss of agriculture/ horticulture jobs
- Loss of agricultural land
- Need jobs first before the housing
- Hallow and Chantry Schools are a capacity
- Need provision for sixth form this side of the river
- Need a new primary school for this area
- Need additional policing facilities
- Need additional health care facilities
- Retain separate identity of Crown East/ Hallow/ Lower Broadheath
- Preserve the Green Belt (NB, this is not Green belt land)
- Need to protect Eastbury Manor
- Need sports facilities in the area- e.g. Swimming pool, gyms, sports centres
- Combined use of community facilities a good idea.
- Protect footpaths/ bridle ways
- Protect Birchen Wood
- Protect Laughern brook as a green corridor/ for wildlife
- Concern over wildlife- newts etc.
- Keep the woods and largest trees

- Retain fishing pools for recreation/ wildlife.
- Protect Broadheath Common from development
- Keep existing historic hedgerows/ woodland
- Need a large open green recreational area for development and wider area.

4.1.17 Although there were not considered to be any in principle planning reasons not to go in this direction there were issues that would need to be taken into account:

- The further west and north development is considered the more elevated and sensitive the landscape becomes indicating that development should be kept close into the city boundary
- It is important that the local villages of Crown East, Lower Broadheath and Hallow retain their integrity and character as independent settlements. Currently the area is defined as a Significant Gap in the Malvern Hills Local Plan. Whilst a significant gap policy is not there to inhibit future development, the issue of separation of settlements and not allowing them to coalesce is still very important.
- There are significant green corridors which will need to be protected.
- The availability of substantial funding required to deliver the north-west link road.

4.1.18 The Sustainability Appraisal assessed the potential for this level of development and found that there were no absolute sustainability constraints to development in this location. It is considered that the site is of a scale to deliver necessary infrastructure including improvements to public transport, walking and cycling links. There is some concern that there are no clear definable physical boundaries to the west and the transition from urban development to open countryside will need careful management. Surveys would need to be undertaken to understand the importance of the ponds. Development should be kept away from the Laughern brook for flood risk reasons.

4.1.19 Indications from the Employment Land Review (ELR) is that employment development to the west of the city may be less attractive to businesses that depend on motorway access, for wider communications. The Economic Prosperity emphasis on the South Worcestershire Development plan (as opposed to the earlier South Worcestershire joint Core Strategy) means that in strategic employment terms, significant employment is more likely to be deliverable to the South of the City. Given the Economic Prosperity objectives this could be deemed to be significant.

4.1.20 A planning application for 3,950 dwellings and 5 ha of employment land was submitted in 2010. This was subsequently withdrawn.

4.1.21 At further public consultation in September 2011, and as part of the transition of the Core strategy ( SWJCS) to a joint Core Strategy and Site allocations and policies plan (SWDP), a much smaller allocation at west of Worcester was tested, for 975 dwellings and 5ha employment land. This also scaled down the required community provision, to exclude the

secondary school. This was partly a response to technical evidence response from businesses and economic development concerns that additional employment land could be delivered at Grove Farm (to the south of the site) and at Worcester South, as the main preference; and a response from public consultation that stressed concerns of coalescence of Worcester with the nearby villages of lower Broadheath, Crown East and Hallow.

#### SWDP Preferred Option consultation responses

- 4.1.22 There were continuing objections to the building of 950 (sic) homes, and no justification for such large housing numbers for Worcester. In particular there was concern that if development takes place here, land to the west needed to be safeguarded from development in the future via the redrawing/safeguarding of a significant gap. Some suggested Green Belt here would be preferable.
- 4.1.23 There was some concern that the North West link Road would not be delivered in this plan period and a fear that the route would be lost in the future unless it could be safeguarded in any masterplan for the site. Generally there were concerns about the impact of such development on the road infrastructure around Worcester, and suggestions that the dualling of the Southern link Road and a North West link Road should be prerequisites of any development here.
- 4.1.24 There were also objections that any employment land would be preferable need the motorway, to the east of the City, rather than to the west
- 4.1.25 On the other hand there was considerable support for the much lower scale of development for a western urban extension at Worcester. This was related to less impact on landscape, less threat of coalescence to villages to the west of Worcester, less impact on the highway network and the southern link road in particular

#### **South of Worcester Site:**

- 4.1.26 The second direction of growth is to the south of the city. The initial broad brush approach to assessing available land taking into account the physical constraints raised through consultation would indicate approximately 3000 dwellings together with 25 hectares of employment, a local centre to include community, primary health care, retail, emergency services and leisure facilities together with a primary school and small secondary school.
- 4.1.27 Again no issues were raised which were considered to be an in principle objection to developing in this direction. However, there are certain issues which will need to be addressed in developing in this area:
- The Southern Link Road is a very busy major road which acts as a barrier to north-south movements at present, particularly for cyclists and pedestrians. This could increase if dualling takes place without appropriate mitigation measures. So it will be essential that segregated

crossings are made available for pedestrian and cycle movements into and out of the city.

- It is imperative that high quality public transport links are provided between the development and key destinations in and around Worcester such that this mode is attractive for such journeys. Failure to achieve this will adversely impact on traffic congestion, particularly along the A38 Bath Road Corridor, in the city centre and along the A4440 corridor
- Norton Barracks/ Brockhill Village are an independent community which should not be lost in the urban extension.
- The green gap between Kempsey and Worcester.
- Flooding issues downstream at Kempsey.

However, on the positive side:

- Development would bring essential facilities presently lacking in the area particularly in terms of health, employment and community recreation.
- The provision of a secondary school would shorten children's journey to school as many at present have to travel to Pershore.  
The provision of high quality walk, cycle and public transport links between the site and the city will support the aim of increasing travel choice and help to manage traffic congestion and transport generated environmental costs.

4.1.28 A targeted consultation event was held at Kempsey (St Mary's Church) on 23<sup>rd</sup> February 2009, and at St. Peter's in Worcester, to consider a site that could accommodate up to 3000 dwellings and 25ha of employment land.

Issue raised by the public included:

- The Southern link road needs to be dualled.
- Some considered a North West By-pass for Worcester was also required
- Work will be needed to improve Junction 7 of M5 motorway
- A rail link should be provided between Norton and Worcester
- Impact on safety of Norton Road for pedestrians
- Use of Norton as a rat-run to the motorway will worsen
- Traffic congestion worsened at junctions on Southern Link- e.g. Ketch roundabout
- A strong case for Worcestershire Parkway ( Rail) must be made
- Traffic congestion on A38
- Development here will lead to more motorway commuting
- Considerable public transport improvements would be needed
- Issue of pedestrians crossing on the southern link- safety and access issues
- Poor drainage on parts of the site- e.g. Lower sports field-Norton/ Broomhall Cottages
- Impact on flooding down stream at Kempsey (via Hatfield Brook)
- Sewerage capacity a problem
- Concern over school capacity and catchments

- Need secondary education provision without need for long bus journeys
- Need a local secondary school
- Concerns over capacity of hospitals
- Need health centre accessible by bus for those without cars
- Scope for churches to be built
- Need more open space and recreation for children and teens
- Need a local community centre
- Retain footpaths, cricket ground/parks
- Protect Hatfield Brook
- Retain village status at Norton
- Retain hedgerows- for wildlife
- Need infrastructure before development
- Keep green belt between Ketch and Kempsey ( note –area is not Green belt)
- Need a buffer zone either side of A38
- Need more policing facilities
- Cabling for super fast broadband needed
- Development should be supported by local employment
- Need housing to be balanced/ affordable
- Need some single storey housing/ live –work units
- 40% social housing mix too high
- Need a play area at Norton
- Need more sports facilities in South Worcester
- Concern over increased pollution from traffic
- Current supermarkets overloaded
- Can Tesco's move to this site
- Provide smaller / local shops on this site
- Provide a Country park

4.1.29 The Sustainability Appraisal looked at the potential for development of this scale as part of a strategic allocation to the south of Worcester. No absolute sustainability constraints to development were found. The main sustainability concerns were that the site is cut off from the city by the A4440, and will require safe pedestrian and cycle links to encourage social integration and sustainable travel options. Walking and cycling access to St. Peters is poor. Any site layout must consider noise and air pollution from the M5 and the railway.

4.1.30 At further public consultation in September 2011, and as part of the transition of the Core strategy (SWJCS) to a joint Core Strategy and allocations Plan (SWDP), a slightly smaller allocation at south of Worcester was tested, based on work carried out on the capacity of the site within the defined boundaries (as opposed to a broad location), for 2,450 dwellings, and 20ha of employment land

## SWDP Preferred Options responses

4.1.31 There continue to be a large number of objections to the development for 2,450 dwellings and 20 ha of employment land at this site. These include:

- The scale of the development, involving loss of countryside
- Some people suggested a figure of 1,000 dwellings would be more appropriate, with the balance to the west of Worcester.
- That Worcester's growth should be contained within its own boundaries
- That the character of nearby villages will be swamped, and especially the potential coalescence of Worcester and Kempsey village to the south, and Norton to the east..
- That there will not be enough local jobs to support the increase in population, and that the site will encourage commuters.
- That development should not happen until the Southern link Road has been dualled.
- If development occurs there should be a green buffer zone between the development and Norton Road/ Broomhall.
- Any development should not obstruct views of the Malvern Hills.
- The current Significant gap between Norton and Worcester City should be retained.
- Road improvements will be inadequate to cope with the traffic increase.
- Increased flood risk from surface water run off impact on Hatfield Brook and eventually Kempsey to the south.
- Local village facilities will be overstretched

There was some support though, including from the local Enterprise Partnership concerning the new employment opportunities here.

### **Fernhill Heath and North of the City:**

4.1.32 The majority of land immediately north of the city is Green Belt, and presently ruled out for development (see earlier). Fernhill Heath is a category 2 settlement, within Wychavon District, and is in close proximity to Worcester and therefore has potential to meet some of Worcester's housing needs. West Mercia ( police authority) has promoted their headquarters at Hindlip as a specialist Criminal Justice Park. Not enough evidence was put forward to justify allocating such a use and the ability for it to be assimilated into the Green Belt without detriment but this would support the provision of some housing within Fernhill Heath. The Justice Park proposals have not been progressed.

4.1.33 The proposal for a Community Sports Hub based on the Hindlip area has also not been progressed. Various elements of the scheme are of local, sub regional and even national significance and importance in the delivery and implementation of educational and skills training through sport. Only if this comprises primarily open air uses would it be compatible with Green Belt

policy. It would employ a significant number of people which would support housing provision in the locality, but not in the Green belt.

4.1.34 It was considered that 500 dwellings could be accommodated to the north west of Fernhill Heath outside the Green Belt. It could be associated with the provision of shopping, social, health and community facilities as well as education in the form of a site for an expanded first school. This would elevate Fernhill Heath to a Category 1 village resulting in enhanced facilities for both existing and future residents. However, without the associated Justice Park and Sports village proposals, it is not considered appropriate for Fernhill Heath to expand in this manner. Furthermore, the Gwillams Farm site has come forward, which is better related to the City, abutting the boundary to the north of Worcester (see below). There may be scope for some smaller scale development at Fern hill Heath to meet the needs of that settlement.

#### **Gwillams Farm, North Worcester.**

4.1.35 Consideration of this site came about through responses to the Preferred Options consultation, the site having been put forward by the landowner. To test the appropriateness of the site, further consultations were carried out with the public, service and infrastructure providers, and through the Sustainability Appraisal. A targeted consultation event was held at Perdiswell's Young People's Club in February 2011. Key issues raised concerning the site were:

- Congestion on Ombersley Road/ Droitwich Road/ The Tything/ Barbourne (Worcester)
- Narrowness of Checketts Lane/ Green Lane for cyclists
- Congestion at Claines roundabout A449/ M5, junction 6
- Capacity of local roads in Claines/ Bevere
- Safety for walkers- e.g. at Northwick School
- Requirement for dedicated cycle paths
- Need a second River bridge from Claines to Hallow ( NW Link Road)
- Access/ quality of local high schools
- Need reliable/ cost-effective public transport
- Flooding at site access
- General surface water flooding in Bevere
- Low water pressure in the area
- Need for more doctors
- Impact on hospital facilities
- Impact on Bevere historic environment/ Conservation area.
- Villages of Claines and Bevere would be spoilt
- Loss of Green Belt ( NB this is not Green Belt land)
- Need to build carbon neutral properties
- Need starter homes/ affordable homes
- Look at Poundbury for design
- Need bungalows for older people
- Retain farm shop for employment

- Where will the jobs be.
- Protect wildlife / hedges.
- Landscape sensitivity around Bevere
- Increase in air pollution from traffic
- Keep green corridors
- Need outdoor sports facilities
- Keep Northwick lodge open space
- Need new play areas
- Outdoor sports available at Perdiswell centre
- Don't want a Tesco store
- Local shops needed
- Issue of overhead electricity cables
- Gas pipeline across the Gwillams Farm site
- Unstable land- sand and gravel
- Loss of high grade agricultural land?
- Concern over sewerage capacity

4.1.36 The Sustainability Appraisal assessed the Gwillams Farm site (Land North of Worcester (Bevere)) for 500 dwellings. The SA findings were that the site does not suffer extraordinary infrastructure demands and that there should be no significant issues with integrating with existing development. Good access to the countryside and footpath links should form the basis of green infrastructure. Corn Meadow Lane is part of the national cycle route, and there is scope to improve cycle access to site. There will be increased pressure on health facilities. Primary schools in the area would need to be expanded and access improved.

4.1.37 The County Council considers that the existing local bus service (32) will need to be extended to serve the site and its frequency increased such that it is compatible with a sustainable urban extension.

4.1.38 Development on the site has the potential to lead to loss of part of a conservation area in the North West of the site.

#### **Church Farm Site- North Worcester:**

4.1.39 This site was brought forward via responses to the SWJCS Preferred Option Consultation, being promoted by the landowner. The key issue for this site is that it is in the West Midlands Green Belt. The site raises significant sustainability issues over the effect on the openness of the Green belt and on the small settlement of Claines, which is historically and architecturally important [Conservation Area status]. Positive effects on the SA objectives are for housing, health and strengthening communities- but no complementary employment provision.

4.1.40 As a result of the [Green belt Review](#) (2010 update), this site has not been pursued, as no releases from the green belt are supported.

## **Specific Employment Allocations;**

- 4.1.41 In terms of employment it is suggested the two larger urban extensions will require employment land within them to be sustainable, to balance employment and housing provision and give choice to those who are unable or do not wish to commute out of the area for jobs. Worcester's location within the Central Technology Belt was supported by Advantage West Midlands Economic Strategy. The West Midlands Regional Spatial Strategy is supportive of economic investment in these locations and is still part of the Development Plan. The evidence does support the provision of a sub-regional employment site meeting the needs of the city which to be effective would need to be associated with either junction 6 or junction 7 on the motorway and located to the east due to the lack of suitable sites within the city boundary.
- 4.1.42 Subsequently, planning permission has been granted for an employment site (Worcester Technology Park Phase One) on land to the south east of M5 junction 6. The SWDP also allocates a further 16ha of employment land in this location, Worcester Technology Park Phase Two.
- 4.1.43 The Sustainability Appraisal for the SWJCS Preferred Options concluded in regard to the Spatial Strategy for Worcester City (Policy CS3) that the spatial portrait takes clear account of core sustainability constraints identified at Issues and Options Stage: flooding risk; long term sustainable transport solutions; the impact of developing isolated settlements; and the need for integrated communities that can develop sustainably from the outset.
- 4.1.44 The measures outlined in the proposed policy progress the SA Framework objectives well, particularly in relation to travel, transport, the economy and employment. Worcester city has been identified as a growth point and delivering these aspects sustainably will be central in ensuring that the city becomes an attractive and accessible location for all sections of the community. The approach takes forward earlier appraisal commentary regarding the need for integrated, multi-modal and sustainable transport solutions for Worcester City. The only unknown quantity related to the Health Impact Assessment where it concluded that there was 'potential for positive benefits as a result of the core population being closer to services and facilities. There may be short term issues as a result of development impacts from construction/disruption etc., as well as the potential increases in traffic prior to transport networks being established. (Preferred Options Sustainability Appraisal report p28 and 36 and Appendix 4).

## **4.2 Malvern Hills District Development Options:**

### **Moving towards Preferred Options**

- 4.2.1 The above paragraphs deal with strategic sites relating to development growth arising in, and related to Worcester City, although some of the sites

are adjacent / near to the city boundary, and located in Malvern Hills and Wychavon Districts. The discussions on the merits of these sites are not therefore repeated below. Key issues that have shaped the Preferred Options locations in the rest of Malvern Hills District include:

### **Sustainability**

- 4.2.2 The SWJCS Issues and Options consultations, the Sustainability Appraisal and the discussions with infrastructure and service providers did not provide precise sites for locations for future development within Malvern Hills District but have guided the locational principles. The consensus is broadly that the most sustainable options are to locate development principally at Malvern, with some development at Tenbury Wells and Upton and in the larger villages (mainly Category 1 and 2 settlements). Within Malvern Hills District, Malvern is the only large town, with a population of some 35,000 people. It has a full range of facilities and services, large scale employment opportunities, retail, community uses, including a new community hospital.
- 4.2.3 The main constraints to development growth at Malvern are the topography of the Malvern Hills, landscape quality considerations, such as the AONB designation, accessibility issues regarding vehicle access through the built up areas, and lack of development land within the existing settlement boundary itself, particularly brownfield land.
- 4.2.4 Feedback from the SWJCS Issues and Options and Sustainability Appraisal suggests that open “green” land within settlements should be retained where it contributes to open space and recreation requirements, as part of wildlife corridors, and as a contribution to the character of towns such as Malvern. Such sites have been examined under the Malvern Urban Green Space study (MUGS) as part of the adopted Local Plan evidence base, and conclusions made about the role of each site. Thus it is concluded that there is little green land within the current Malvern town boundary that can contribute to new housing or employment development. The Town Council itself has been looking for new allotment and cemetery land within or adjacent to Malvern for some considerable time.
- 4.2.5 Analysis of the Strategic Housing Land Availability Assessment sites within or adjacent to Malvern reveals very few brownfield sites. Key brownfield sites that have development potential include the QinetiQ site, in the southern part of the town, and education sites (former school site, and youth club site, although these are subsequently shown to be more likely needed for future educational purposes). QinetiQ’s site owners have been pursuing a masterplan since the Local plan adoption to rationalise the site. The QinetiQ site is under-utilised in part, due to low density, out of date war-time premises, which could yield greater job density if redeveloped, and thus release land for housing uses.
- 4.2.6 The AONB landscape constraints mean that further larger scale development growth to the south of the town, on the hills to the west, and in

the north west of the town would not be appropriate, being against the purpose of the AONB designation.

- 4.2.7 Development to the east, north and north east of Malvern are not constrained by the AONB designation, although landscape issues are still important. The North Site development in the north-west of the town has been challenging in terms of catering for highway and vehicular access and movements throughout the town, and it is considered that any further development in this area would have to deal with these issues.
- 4.2.8 The land to the north of Malvern, west of the railway is part of a current local plan designation as a “Significant Gap” (Local Plan Policy DS17), to protect the open character of the land between Malvern and Leigh Sinton. The issue is whether this designation continues to be required when weighed against the future requirements for more housing and employment land.
- 4.2.9 The significance of views to and from the Malvern Hills needs to be taken into account with respect to the setting of the town. The AONB Joint Advisory Committee has endorsed a study which identifies important views from the town towards the hills and views from key vantage points on the hills. In addition the Worcestershire Landscape Character Assessment has identified the sensitivity of particular landscape types, such as open landscape areas to the south east of the town in the vicinity of the Three Counties Showground which is particularly prominent in views from the hills and Malvern Wells.
- 4.2.10 Malvern itself is comprised of a series of interconnected Conservation Areas and Malvern Hills District Council is likely to investigate further designations. In addition to Conservation Areas within the town there are also important conservation interests on the edge of the town, including the Madresfield and Newland Conservation Areas, important approaches to the town such as the Guarlford Road (with associated common land) and numerous important listed buildings.
- 4.2.11 A large area of land to the south west of Malvern is within the protection zone, or “Cordon Sanitaire” of the sewage works. The reasons for the Cordon Sanitaire designation included the need protect properties from noxious smells etc. Although these reasons have not been shown to be redundant, Severn Trent Water (STW) has also stated that future housing and employment development will require improvements to the sewage works. Any housing development within the Cordon Sanitaire would need to demonstrate to the satisfaction of STW that future odour impacts would not create problems for new residents. Vehicular access to the Cordon Sanitaire would have to be via residential roads, or from the Guarlford Road, via Mill Lane (that would need improvement) or further along the Guarlford Road. Constraints in this area include ownership of the verges by the Malvern Hills Conservators. It is not therefore considered that there is any planning merit for development within the Cordon Sanitaire. However, the landowner here has subsequently put forward land for approximately 150 dwellings on land adjacent to east Malvern, within the Cordon Sanitaire. The landowner would

need to show that earlier constraints identified as the Cordon Sanitaire designation, transportation requirements, and flood risk can be overcome.

- 4.2.12 The current adopted Local Plan concentrates development growth in Malvern and to a lesser degree in Tenbury and Upton, with mainly local needs development within the larger villages (Category 1 and 2 settlements) and with very limited development in lower category settlements, and only recognised exceptions in the open countryside. The current adopted Local Plan has been able to allocate all brownfield sites for housing and employment in Malvern, but these are now being built out and it is clear from the SHLAA that few brownfield sites will be available in the future, with the exception of the QinetiQ site. There is not considered to be any land suitable for housing growth within Upton because of severe flood constraints. Tenbury also suffers from severe and regular flooding, especially in the main built up part of the town, and no large scale appropriate sites for housing have been identified here, although up to 70 dwellings on smaller sites are now shown to be deliverable.

### **Preferred Spatial Strategy**

- 4.2.13 From the above considerations, and the Sustainability Appraisal, several Preferred Options were put forward for Malvern Hills District. Malvern is the only town in the Preferred Options document where alternative options for housing and employment growth were consulted upon at the SWJCS stage.

### **Malvern Preferred options**

- 4.2.14 Responses to the SWJCS Preferred Options consultation and the evidence all pointed towards Malvern being the preferred location for the majority of any development growth within the district, setting aside consideration of any possible growth associated with the City of Worcester which may need to be located within Malvern Hills District. Taking account of development constraints discussed above, and sustainability issues it was felt that development should be located within or adjacent to the existing Malvern settlement boundary. The Regional Spatial Strategy figures outlined targets for 4,900 dwellings and 33 ha of employment land in Malvern Hills District. Given existing commitments, allocations and the need to deliver some housing and employment growth to other areas of Malvern Hills District it was felt that up to 1,600 dwellings would need to be delivered at Malvern. Some additional housing and employment allocations in Upton and Tenbury, as the next largest towns, and therefore the most sustainable settlements, and the balance to meet housing and employment needs in the most sustainable rural settlements.
- 4.2.15 Work has now moved on with the progression of the South Worcestershire Development Plan (SWDP), Significant Changes consultation (August 2012) with adjustments to housing figures. A figure of 4,900 dwellings is still put forward for Malvern Hills, but over a longer timeframe to 2030 (over 24 years rather than 20 years).

4.2.16 Broad locations for development at Malvern, to reflect the constraints and opportunities for development within the settlement or on its edges, were suggested in the SWJCS PO at:

- Newland- 1,100 dwellings and 10 ha of employment land
- Land to the south of Townsend Way, east of Mayfield Road, for 500 dwellings and 7ha of employment land
- Land at QinetiQ site for employment and housing - no housing or employment land figures were suggested at that time

Alternative sites were also suggested at

- Land to the North West of the railway, to the north of Malvern for up to 900 dwellings
- Land to the east of Moat Crescent for up to 500 dwellings

### **QinetiQ site**

4.2.17 The only brownfield site of any size put forward is the existing QinetiQ employment site, within the settlement boundary to the south. It was originally put forward for solely employment development. From more recent discussions with the landowners and agents through their response to the SWDP Preferred Options consultation, and their master planning work, it is considered that the site could deliver up around 250 dwellings and a minimum of 4.5 ha of employment land. This would constitute a mixed use redevelopment which retains QinetiQ's current operations on a reduced footprint to the north-west of the existing site making the fullest use of recent investment in office / research accommodation. Development here has the following advantages:

- It is brownfield land
- It is within the existing settlement boundary
- It would help regenerate the existing employment site, and help retain the important high technology jobs within Malvern
- It can support the former Central Technology Belt objectives for high technology research and development
- The site is closely related to the existing Malvern Hills Science Park with opportunities of spin off developments from both the Science Park and QinetiQ
- It is well located for existing services such as schools, shops, G.P services within the town
- It is in a reasonably sustainable location, served by public transport, cycling and walking
- There are no major historic environment constraints.

There are issues however that need to be addressed in terms of:

- Vehicular access to the site
- Existing and forecast congestion both in the vicinity of the current site and along the key links towards the town centre and the A449
- Segregation of employment and housing land uses (and accesses)
- Public open space and other provision on site

- Potential impact on Malvern Hills Conservators' land
- 4.2.18 The landowner considers that the site can deliver 300 dwellings and 4.5 ha of employment land.  
In terms of transport infrastructure and services further work is required by the promoter to confirm the scale of the mitigating measures. As such the SWIDP technical work has used the lower figure of 250 dwellings as part of the assessment of the transport measures needed to mitigate the impact of the cumulative growth in travel demand.
- 4.2.19 The Green Infrastructure Interim report considered that in landscape and biodiversity terms the site is predominantly urban land and there are no concerns about development. Historic environment considerations require a watching brief. The site is adjacent (south east corner) to common land and a sensitive approach to vehicular access requirements there is important.
- 4.2.20 At the SWJCS Preferred Option consultation, public responses were generally supportive of some residential development at the QinetiQ site, in order to retain QinetiQ as a key employer within the town. There were some concerns that this could be the start of downsizing the employment part of the site.

#### **QinetiQ site- targeted consultation responses**

Key concerns / considerations associated with potential development at the site were:

- Traffic generation causing congestion, especially in Court Road/ St. Andrews Road. Longridge Road- issue re access for emergency vehicles.  
- And impact at Barnards Green Centre/ Pickersleigh Road.
- Poolbrook Road towards Three Counties Showground very narrow- not suitable for more traffic.
- Will be difficult to exit Arosa Drive because of traffic.
- Access into and out of Britten Drive a concern, concern at over traffic at Poolbrook Gate
- Traffic calming required to slow traffic
- Poolbrook Road/ Longridge Road dangerous for pedestrians.
- Fear of "rat-running"- Geraldine Road
- Noise pollution from traffic.
- Schools in the area full- primary and secondary. One primary just closed
- Drainage- surface water flooding- Arosa Drive/ Court Road/ Thirlstane Road/ Longridge Road- drainage not adequate.
- Impact on adjacent Poolbrook Common land- adverse effect on wildlife
- Contaminated land on site
- Need good facilities for youngsters/ nursery places
- No more shops as would harm Barnards Green Centre
- Need more GP/ Dentist services
- Parking from QinetiQ employees on Geraldine Road.
- Train service not good for people living in new development

- Site better suited for employment than housing/ employment should be a priority

Opportunities from development suggested were:

- Nimbyism not valid - a sympathetic design could improve view from Hills (QinetiQ ugly)
- Keep height of new buildings to 2 storey
- New housing requires adequate parking/ garages
- Opportunity for cheap bus fares for people working locally
- Scope for cycle track to link development to Chase School. And priority for cycling/ footpaths
- Need for affordable housing, not executive homes.
- Support for use of brownfield site but density suggested too high
- Mix of housing required- for over 50's, not just families.
- Buffer zone/ careful design needed to prevent overlooking of bungalows in Arosa Drive
- Need a balance between housing to buy and housing to rent.

4.2.21 A key objection at the SWDP PO stage came in the form of a petition of 1,405 signatures that stated that the Council should abandon “their unnecessary plans for large scale development at Elms Farm [Newland] and QinetiQ which we believe will seriously affect the nature of our community, destroy valuable agricultural land and public footpaths, cause significant damage to wildlife and create huge traffic problems on our already congested local infrastructure”. In terms of the QinetiQ site, the references to agricultural land and wildlife are not relevant.

The Town Council considers that access arrangements to the site must be given proper consideration.

Other comments were that it provides an important opportunity for Malvern’s economic future. The allocation is also supported by the LEP.

### **Newland Area.**

4.2.22 At the SWJCS Preferred Options stage, the area at Newland was put forward as a broad location, for 1,100 homes and 10 ha of employment land. But a detailed site was promoted by several landowners. The advantages of the site are considered to be:

- It is adjacent to the existing built up area of Malvern, in a sustainable location and could be designed as an urban extension.
- It is reasonably close to existing facilities and services within the town, in particular retail services at the nearby retail park, and jobs at the industrial estates to the east.
- It can be large enough to accommodate employment and community uses as well as housing to serve new and existing residents.

- It is adjacent to the main highway route into the town, and subject to investment in walk, cycle and public transport infrastructure, services and information systems as well as highways infrastructure both adjacent to the site and elsewhere in South Worcestershire (as set out in the SWIDP), would be in a reasonably sustainable location. Although the landscape is important in the vicinity, it is considered to be less sensitive (see Green Infrastructure studies) than the AONB, or the east of Malvern sites. The site is not within or adjacent to the AONB
- There are no major flood risk constraints.
- The site is large enough to accommodate a large buffer zone for the smaller settlement of Newland, to prevent coalescence.
- There is potential for historic environment findings across the site but not to act as a key constraint to development.

There is however issues that needs to be considered:

- There would need to be clear separation of new development from the nearby settlement of Newland.
- The site is adjacent to a Conservation Area.
- Any vehicular access from the east would be sensitive in terms of the adjacent Conservation area
- Access to the site would need to have regard to landscape and conservation impacts.
- There are long distance views to and from the Malvern Hills in parts of the site that would need to be addressed
- There is a gas pipeline that traverses the site.

4.2.23 The Green Infrastructure Interim report considered that the southern part of the site would be an acceptable location for development, but with substantial tree planting as a screening buffer. The northern part of the site should remain as open countryside to protect the special landscape character and view from the Malvern Hills. However, a subsequent detailed Green infrastructure assessment for the site, co-ordinated by the County Council suggests that with appropriate mitigation, some development in the northern section of the site could be appropriate, and in particular could accommodate substantial open space uses such as school playing fields, allotments, a cemetery and informal corridors for wildlife and recreation.

#### **SWJCS Preferred Options responses**

4.2.24 A petition was received in October 2009 via the Clerk of Newland Parish Council containing 757 signatures. The petition reads:

*“Object to the building of 1600 new homes and 17 hectares of industrial development on Greenfield sites bordering Malvern, in preference to brownfield sites in the town first and allocating more dispersed and sympathetic development to the surrounding areas, so as to preserve the services and vibrancy of those more dispersed rural communities.*”

*Object to the damage which the proposal will cause to the unique natural setting of Malvern, the impact it will have upon the wildlife of the proposed area of development; and to the lack of commitment to the provision of proper supporting infrastructure before the development is imposed on the town”*

4.2.25 The South Worcester Authorities have addressed the issue of brownfield sites through the SHLAA, and as stated above, there is insufficient derelict/ under-used brownfield land to deliver sufficient housing and employment land in Malvern. Responses to the Preferred Options consultation show that generally the public and infrastructure / service providers favour housing growth in and adjacent to the main towns and in those villages with more services, but a general dispersed approach to development in rural communities is not favoured. Responses from the Infrastructure and Service providers and the Sustainability Appraisal suggest that such dispersal is not considered to be sustainable, nor likely to deliver the required strategic infrastructure. Furthermore, since then additional detailed capacity work feeding into the SWDP Preferred Options stage and the Significant changes stage have shown limited appropriate capacity in the villages to take significant additional development.

4.2.26 The Targeted Consultation Report 2010 outlines responses from public consultation concerning this site. On the day of the consultation, the public were asked to put comments on yellow post-it notes related to topic areas, and to put coloured stickers on maps of the potential strategic allocation sites. The results are reported in detail in the Targeted Consultation Report, but are briefly summarised below:

**Newland site- targeted consultation responses 2009:**

Key concerns / considerations associated with potential development at the Newland site were:

- Traffic congestion, and impact on narrow lanes, e.g. through Madresfield Village and impact on emergency services. Also associated pollution.
- Impact on Southern Link Road congestion- needs to be dualled
- Need a detailed transport plan first
- Impact on Lower Howsell Road - narrow at north end.
- Adequacy of train and bus services
- Potential for rail halt / P & R at Stocks Lane/ free parking at Malvern Link station/ upgrade stations for disabled access
- Implications of higher population on GP / dentists and other health services.  
Query as to whether the new hospital in Malvern can accommodate the additional population.
- A concentration of affordable housing would create future social problems.
- Queries re the capacity of nearby schools/ higher education/ although one comment stated that development could raise school numbers that are currently declining.

- Make best use of Newland site compared to spreading it in smaller areas.
- Settlement boundaries at Malvern should be respected
- Look at Cales Farm site as an alternative
- Need to build on brownfield sites instead of greenfield
- Drainage at the site is a problem- e.g. at fields adjacent to railway/ fields to r/o Elm House and the Swan Inn. Flooding at Lower Howsell Road an issue.
- Stocks lane regularly floods affecting access from A449-the Hereford/ Worcester Road
- Newland village is a distinct rural settlement, with views across to the northern hills, which should be preserved.
- Do not build between Malvern and Worcester.
- Need to protect local wildlife- mention of different species on site including water vole, bats, great crest newts etc. Existing farmland important for wildlife conservation .Wide range of habitats/ ponds etc. around Newland /Howells
- Need to retain agricultural land for food production
- Retention of footpaths from Lower Howsell Road to Newland important.
- Archaeology important at Newland- Roman pottery association
- New housing should go first to those on Malvern's waiting list- not overspill from big cities.
- Who can buy all these houses- where will they get mortgages?
- Look at Empty Homes Agency figures first.
- Character of Newland not compatible with modern estate housing
- Build smaller housing developments
- Need a buffer zone between existing and proposed housing.
- Impacts on Malvern as a tourist destination

Opportunities from development suggested were:

- Allotments should be provided on new site
- Development can create local jobs
- Facilities needed for young people
- Require sports fields and community centres
- Keep Swan at Newland as a country pub
- Put aside sites for churches
- Need a crossing over the Worcester Road, close to Morrisons – in order to catch the bus to Worcester
- Youth Club for teenagers needed
- Skate park for young people (supported by some, not by others)
- Small local shops needed near new housing
- Provide free car parking at Malvern Link station to encourage less car use.
- Scope for re-opening Newland halt station
- Scope for a residential care home
- Scope to build bungalows- not being built elsewhere- e.g. North site
- Employment should be a high priority- need a variety of jobs.

### SWDP Preferred Options responses:

- 4.2.27 A key objection at the SWDP PO stage came in the form of a petition of 1,405 signatures that stated that the Council should abandon “their unnecessary plans for large scale development at Elms Farm [Newland] and QinetiQ which we believe will seriously affect the nature of our community, destroy valuable agricultural land and public footpaths, cause significant damage to wildlife and create huge traffic problems on our already congested local infrastructure”.
- 4.2.28 Malvern Town Council considered that any development in the area should be restricted to a maximum of 50 homes, along with the Former Allotments site in Lower Howsell Road. This appears to relate the site to the nearby settlement of Newland rather than as a potential urban extension to Malvern itself. The CRPE were concerned that the topography of the Newland site (largely flat) would block views to the Malvern Hills from the eastern perimeter of the site. However, the AONB “Views” study shows the areas as “medium” in terms of important views of the Hills, and less sensitive than land further south on the eastern edge of the town.
- 4.2.29 Many of the objections including from Newland parish Council and Guarlford parish Council were that the scale of suggested development (700 homes and 10ha of employment land) was too great, and that the allocation just favoured the developer.
- 4.2.30 Many of the objectors to the site favoured more dispersal of housing to the villages, and to Blackmore Park Industrial area, south of the town boundary. The reasons for not pursuing a greater dispersal to the villages is outlined earlier, and any village developments throughout the South Worcestershire area have proved very unpopular, as is usually the case in rural settlements.
- 4.2.31 Some objectors to this site also suggested relocating growth further south and east, to the east of Mayfield Road, South of Townsend Way ( see below) where it could be seen as” infill”. However, as outlined under that site, the area is much more difficult to obtain satisfactory vehicular access, to, via smaller lanes/ or across Conservators Land , and will need to be assessed more in terms of traffic impact on Barnards Green as well as Townsend way and the A449. The area is also considered to be more sensitive in landscape terms.

### **South of Townsend Way**

The area south of Townsend Way, east of Mayfield Road, was considered as a broad location, although the landowner submitted a detailed site area in response to the Preferred Options consultation, and a landscape appraisal. The advantages of the site are considered to be:

- It is adjacent to the existing built up area of Malvern, in a sustainable location and could be designed as an urban extension

- It is close to existing facilities and services within the town, in particular retail services at the nearby retail park, and jobs at the industrial estates to the west.
- It can be large enough to accommodate employment and community uses to serve new residents.

It is adjacent to the main road route into the town, and subject to investment in walk, cycle and public transport infrastructure, services and information systems as well as highways infrastructure both adjacent to the site and elsewhere in South Worcestershire (as set out in the SWIDP), would be in a reasonably sustainable location

There are however adverse implications of development here that need to be considered:

- In terms of Landscape Assessment work carried out by the County Council the site is considered to be highly sensitive.
- The topography of the site means that it would be difficult to place any development on the site without it being highly visible over very long distances from the east. This would in particular make it difficult to accommodate major employment uses.
- Any access to the site from the north adjacent to Townsend Way would impact on Conservators' land.
- Access along the current North End Lane would be difficult because of the narrowness of the road- and any improvements to the road width would have a significant impact on the character of the urban edge here. This would also be an issue for land from the south, along Madresfield Road and Mayfield Road.
- The need to contribute toward the wider transport infrastructure and services needed to support the delivery of the SWDP (e.g. the WTS and transport infrastructure and service enhancements in Malvern Link and Great Malvern)
- 

### **Land east of Moat crescent**

The area East of Moat Crescent was put in the Preferred Option as an alternative broad location. However, in response to the Preferred Option consultation it was put forward as a detailed site by the landowner in conjunction with the site South of Townsend Way (see above). The advantages of this site are considered to be:

- It is adjacent to the existing built up area of Malvern, and that subject to investment in walk, cycle and public transport infrastructure, services and information systems as well as highways infrastructure both adjacent to the site and elsewhere in South Worcestershire (as set out in the SWIDP), would be in a reasonably sustainable location. It is close to existing facilities and services within the town.
- There are no major constraints from flood risk, although surface water drainage issues would need to be addressed.

- It could be linked in deliverability terms to the site to the north
- The site is not adjacent to the AONB, although there is some landscape sensitivity

There are however adverse implications of development here that need to be considered:

- The site is very sensitive in landscape terms
- Access would require crossing Conservators' land.
- Drainage issues are a concern in terms of surface water retention.
- There are historic environment concerns as the site encompasses a Scheduled Ancient Monument (SAM).

4.2.32 The Green Infrastructure Interim report looked at both the above areas together. It recognises the high landscape sensitivity of the area and on these grounds recommends that none of the site is suitable for development. In terms of biodiversity it considers there is some scope for sustainable development north of the Madresfield Road, and the two large arable fields to the south of Madresfield Road. In terms of the historic environment, the area south of the Madresfield Road is sensitive in relation to the listed farmhouse and a Schedules Ancient Monument. Also, historic field patterns in the area are important.

### **Targeted Consultation responses 2009**

#### **Site east of Moat Crescent-/ East of Mayfield Road/ South of Townsend way targeted consultation responses:**

Key concerns / considerations associated with potential development at the site were:

- Traffic generation/ congestion, nr site; Malvern Link/ Pickersleigh Road/ by Retail park/ Barnards Green/ Pound Bank.
- Narrow lanes/ windy roads near sites, e.g. Mayfield Road
- Need another river crossing at the Rhydd to connect to motorway.
- Need road link between Townsend Way and Guarlford Straight. (road)
- Concern about vehicle access via Teme Ave
- Need better bus services, Malvern to Worcester Road.
- Concentration of affordable housing will lead to future ghettos
- Will the new hospital accommodate the additional population?
- Capacity of doctors, dentists etc.
- Will there be enough school capacity? With Malvern Hills schools closed, Great Malvern PS and the Grove PS will be stretched
- Protect green sites and use brownfield sites instead.
- Flood issues at Clevelode Farm where several brooks converge.
- Flooding issues at Moat Way/ Mayfield Road/ Baldenhall/ Hall Green Lane/ Chances Lane/ Sherrards Green.
- Back gardens at Teme Avenue marshy- fields help soak up water at the moment.
- Wildlife/ ecology importance of area, particularly birds.
- Are public footpaths to be protected?

- Moat Farm scheduled ancient monument
- Do not build south of Madresfield Road
- Increased community facilities needed adjacent to local housing
- Need increased policing.
- Concern that any new shops to serve development will detract from Barnards Green shops
- Improve shops in Madresfield/ Moat Way

Opportunities from development suggested were:

- Consider retaining/ mothballing Malvern Hills Primary school (just closed).
- Sports facilities / community facilities required.
- Mixed views on whether skate board park required
- A good supermarket will be needed in Barnards Green.

4.2.33 These sites east of Mayfield Road and East of Moat Crescent were not pursued further as options. They were seen as less deliverable for larger scale housing and employment and community uses against the north east (Newland) area of Malvern. The key difficulties were considered to be transportation links and scale of road infrastructure to the rest of the town and key commuting routes, as well as the need to take Conservators land for improvements; landscape sensitivity and topography making it more difficult to accommodate employment uses in design terms; drainage issues; conservation and historic environment issues related to the Scheduled Ancient Monument east of Moat Crescent; and drainage issue, particularly to the south east of Mayfield Road and to the West of Chance Lane.

### **Land to North of the railway, North of Malvern**

This area of land to the north of Malvern was put in the SWJCS Preferred Option as an alternative broad location. However, in response to the Preferred Options consultation a specific site area at Great Beckman's Farm was put forward by the landowner as a potential site allocation. The advantages of this site are considered to be:

- If combined with the potential site at Newland the site could be accessed across the railway and be part of a large sustainable urban extension to the north of the town

There are however more adverse implications of development here that need to be considered.

- The site is not considered to be appropriate on its own because of the issues of vehicular access for this amount of housing development on to the Leigh Sinton Road. No element of costing for a road to cross the railway to link the site to the A449 to the east has been done, and the two landowners have not presented a joint case.
- The site is in an area identified as a "Significant Gap" in the adopted Local Plan. Whilst this need not totally inhibit its consideration in relation

to future strategic development needs, the issue of coalescence between Leigh Sinton and Malvern is a significant one.

- The site is unlikely to be able to deliver employment development in association with the housing because of the above access issues.
- The site is within an area of high landscape sensitivity
- There are some localized flooding issues associated with the White Acres Brook.

At the SWJCS Preferred Options stage very few specific comments were received on this site. The main concerns were;

- That the “significant gap” designation should be retained- no development
- Existing farmland around Great Buckman’s Farm/ Newlands important for wildlife
- Do not build on farmland
- Transport links required to access shopping facilities.

4.2.34 The landowner who is promoting the site through the consultation process and the SHLAA, (as site MHMT47, and a wider area) considers that the site can be brought forward with access from Grit Lane and Lower Howsell Road. However the WCC Transportation team does not support any significant development from Lower Howsell Road or Grit Lane. The landowner also considers that objections concerning development in a “Significant Gap” (Local plan policy DS17) is not relevant in respect of PPS7, and that landscape considerations are less important as the site is not in the AONB.

4.2.35 At the SWDP Preferred Options stage, there were few responses that supported any growth in the Significant Gap here, apart from smaller potential housing sites on the northern edge of the town in the vicinity of Grit Lane and Eastward Road. To date these sites have not been able to demonstrate that they can mitigate traffic generation impacts.

4.2.36 The latter two sites were not based on the Preferred Options broad locations. The Cales Farm site was put forward as a site by the landowner for housing and employment uses as a consultation response. The Blackmore Park site was not put forward by the landowner, but had been suggested as a sustainable location for housing, near Malvern by many of the respondents who were objecting to the site at Newland.

#### **Land at Cales Farm, N.W Malvern Hills District Council:**

4.2.37 This alternative strategic site is being promoted by the landowner. It is situated in north-west Malvern, to the south of the current development site known as the North Site, or Malvern Vale. The owner submitted a response through the Preferred Options targeted consultation in January 2009 and considers it can deliver 500 dwellings and 2-3 ha of employment land, and 7ha of sports pitches. It suggests the site can be accessed via the adjacent North Site, although the North Site Traffic Impact Assessment has not taken

this into account, and this solution was not supported by the Inspector at the last Local Plan inquiry. The landowner's consultation response considers that the site could be contained by the Cowleigh Park Farm escarpment up to the AONB to the west, although again, the Local Plan Inspector supported the Council's concerns about the nearness of the site to the AONB, and consequently implications for landscape concerns.

4.2.38 Few comments were received at the consultations concerning the site. At the Towns consultation event at Malvern (November 2009) on Site Allocations and Policies DPD (SAP) evidence gathering events), the site was referred to in the officer presentation and in the SHLAA sites information available at the event. The subsequent analysis of SWJCS Preferred Options and SAP responses shows only one formal representation for the site (apart from the landowners) and 2 against the concerns being:

- Pressure on infrastructure, schools, drainage, road systems
- Impact on natural environment
- Keep existing farmland as near AONB
- Affect on views to & from the Malvern Hills. And for, opportunities to extend the adjacent North Site development.

4.2.39 The site has not been pursued through the SWDP as a further option. The developer has not been able to demonstrate that the site can be accessed without creating further congestion on local residential roads in the vicinity. He had suggested that the site could be accessed through the adjacent development site (North Site) but has not tested this with that landowner or through detailed traffic modelling. The site is also closer to the AONB/ Hills and considered more sensitive in landscape terms.

#### **Blackmore Park (Broad location)**

4.2.40 This area was put forward as a potential area for larger scale housing by members of the public, on the assumption that the site is a derelict brownfield site and within reasonable distance of Malvern. The site is not being promoted as a housing site by the landowner. In fact the landowner is promoting the site for employment uses, and already has outline planning consent, is pursuing more detailed consents, and has recently built a B1 office based development on the site. In planning terms the site is not adjacent to the built up part of Malvern and could not benefit from becoming an urban extension. It is also not particularly well served by road infrastructure, nor public transport (bus routes) and is considered less sustainable than the other broad areas considered above with respect to residential development. Generally those members of the public who were suggesting this site through the SWJCS Preferred Options consultation because it is a brownfield site were objecting to development on the Newland area site. A few responses were received in support of the site for employment uses, and suggesting it as a good site for Gypsy and Travellers pitches, because of the current caravan site there.

4.2.41 At the SWDP Preferred options stage, many members of the public promoted the site for a housing site to replace housing or mixed housing and

employment site instead of development at Newland. Hanley Castle Parish Council considered that local infrastructure should be completed before any extension to the site. Madresfield Parish Council considers the area to be second rate agricultural land, and should be considered for housing development. It was suggested that it is a more sustainable location and would put less pressure on access roads around Newland. However, it is difficult to see how the site can be considered more sustainable than Newland. It is not located adjacent to the urban edge, and thus creates few if any opportunities for pedestrian and cycle links to the town. The site is located off a B road that crosses common land towards the town. It is less well located in terms of access to the main road network and jobs/ retailing than the Newland site. It is also in a more environmentally sensitive location than Newland, being nearer the AONB, and Langdale Wood SWS site. .

4.2.42 There was some support for more employment development at Blackmore Park. The landowner wishes to promote more employment land here. The AONB partnership felt views to and from the Hills need to be taken into account in any development here.

**Responses to Preferred Options document from infrastructure/ service providers and other stakeholders.**

- Advantage West Midlands (AWM) support housing development at QinetiQ to secure existing jobs- but not additional employment allocations here. It also supports new land supply separately allocated at Malvern to provide additional B1, B2 and B8 employment land supply. Also rural renaissance should have a higher profile. There is also a need to support the Three Counties Showground as an important employment site.
- The Environment Agency response related to proper flood risk assessment of options, and the need to assess water resources and water efficiency.
- English Heritage responses included the need for urban extensions to be informed by an historic landscape assessment.
- The Highways Agency endorsed the Preferred Options locations for development. Its main concern was the potential impact of new development on junctions 5, 6 and 7 of the M5 motorway, and possible impact on the A46 at Evesham. It endorsed the strategy of trying to reduce the need to travel, particularly by car.
- Malvern Town Council does not accept that the number of new homes proposed is necessary and reasonable. They are concerned about water shortages. They do not see the need for increases in employment land. They are generally against urban extensions of Malvern, and consider that green fields should be preserved for food production.

4.2.43 The Malvern Hills Partnership response covered the following.

They consider that the importance of climate change mitigation and the acceptance of peak oil should be stressed.

4.2.44 To achieve the reduction in outside commuting there needs to be HQ/ large regional office firms encouraged. Need also for a world class conference and hotel complex. More mention should be made of tourism. Also the development of ecologically sustainable food supplies- along with more promotion of farming and horticulture. Category 3 villages should not be excluded from any housing development- affordable housing development in such villages can maintain local facilities and services and become more sustainable. The Code for Sustainable Homes requirements should be brought forward. They support the principles of the location strategy (CS2). They suggest that the building of Worcester Parkway station should be encouraged by the council- can then be a focus for housing and commercial development. They support the proposed strategy for the villages (CS10) - but note that credence should be given to established Parish Plans. They do not support the infrastructure policy (CS11). Major transport infrastructure is required before development can take place, including completion of the Worcester ring road, and an M5 to Malvern link road. Concerns were expressed that new housing should be of a mix to meet predicted change in demographics, i.e. more, elderly and one-person households- but understand policy to build family sized housing to retain families. Support protection of existing employment land, and provide premises for start up businesses. The flood policy is also generally supported.

4.245 Natural England support proposed policy CS4 which outlines broad locations for development at Malvern, as the locations will minimise visual impact on the AONB, and avoid encroachment on valued public open space. Also that the proposed locations for growth should provide opportunities to promote Green Infrastructure, through connecting existing areas of access land and including linear features such as railways, and watercourse. Scope to use GI to reduce flooding downstream of Malvern brooks by wetland creation, SuD's etc., slowing the release of water into the Severn at Severn Stoke and Upton upon Severn

### **4.3 Preferred Options: Wychavon District**

#### **Moving towards Preferred Options / Development Options:**

4.3.1 Evidence obtained from the Issues and Options consultation supports focusing housing growth on the main towns. Feedback also confirmed strong support for the following:

- safeguarding employment sites;
- encouraging rural regeneration;
- urban focus for tourism opportunities;
- maintaining the viability and vitality of town centres

4.3.2 Thus the basis for the preferred strategy for Wychavon, is as for other areas of south Worcestershire, with a concentration of development within the most sustainable settlements; the 3 main towns of Droitwich, Evesham and Pershore; and the higher category villages.

#### **Targeted Consultations 2009**

4.3.3 Following the formal six week Preferred Option consultation the decision was taken to carry out a further series of targeted consultation events from January to March 2009, as for the other areas in South Worcestershire.

4.3.4 Within Wychavon District, targeted events were held as follows:

- Droitwich Spa St Andrews Church and Parish Centre      27 January 2009
- Evesham Town Hall      3 February 2009
- Pershore Town Hall      10 February 2009

#### **Wychavon SWJCS Preferred Options - Droitwich Spa**

4.3.5 Droitwich Spa is, along with Evesham, the largest settlement in Wychavon District with a population of 23,600 (2009 Mid-year estimate). It is also a spa town with an important industrial heritage. Droitwich Spa provides a wide range of education, health and retail services along with considerable employment opportunities to the north of the town. There is a strong two way commuting pattern between Droitwich Spa and Worcester and, like Malvern and Worcester, it is a key settlement within the Central Technology Belt (This term is not now applicable-as came from WMRSS- see Economic Prosperity Papers). Being close to Worcester it is not surprising that many Droitwich Spa residents use the city for non-food retail purchases. The opening of the Droitwich Spa canals will be a significant tourist attraction and will reinforce links with Worcester.

4.3.6 In identifying appropriate levels of growth for Droitwich Spa the following has been taken account:

- Natural barriers: River Salwarpe, Elmbridge Brook, steep slopes and landscape impacts;
- Man-made barriers and severance: M5, A38 / Roman Way, Green Belt;
- Historic settlement patterns, listed buildings and historic gardens, specifically Westwood House.

4.3.7 Broad locations for development to provide for the requirements of Droitwich Spa have been identified as:

- Town centre – retail, residential and employment
- South – residential and mixed use development comprising approximately 800 dwellings at the Area of Development Restraint identified in Wychavon District Local Plan referred to as Copcut Lane

- Residential development, comprising 750 dwellings on greenfield land referred to as Yew Tree Hill
- The south of the town currently provides minimal employment opportunity so in order to re-dress this balance and to satisfy Droitwich Spa's role as a centre in the Central Technology Belt, employment land should be provided for in the Area of Development Restraint

4.3.8 This gives a total of 2050 dwellings and 3.5 ha of employment land for Droitwich Spa detailed below: ***These details are updated in the spreadsheet at the end of the report, in relation to the SWDP proposed preferred options.***

**Copcut Lane, Droitwich:** Assessment for a specific site here are based on

- Phased delivery of around 1,500 dwellings
- Phased delivery of approximately -10 hectares of employment land.
- A local centre to deliver shops and community facilities
- Measures to improve accessibility by pedestrian cycle and local passenger transport routes to Droitwich Spa town centre, local employment areas, schools, sports, health and community facilities
- The protection and enhancement of the Community Woodland and enhancement of the 'Green Necklace' surrounding the town

The targeted public consultation event held at Droitwich in January 2009, raised the following issues:

- concern over capacity/ congestion of Copcut lane/ A38 roundabout
- Chawson Lane prone to flooding
- some support for this site as infilling
- impact on historic environment
- general points about need to expand high school facilities.
- need for more local shopping facilities.

4.3.9 The sustainability Appraisal assessed the development of 800 dwellings, and 10 ha of employment land. The main concern is that the site is peripheral to the town and cut off by the A38 by-pass, making physical and social integration of new development a problem. It needs careful consideration of the relationship of the site to Salwarpe village. Transition from existing development towards the Green Belt would need careful handling. There are concerns over increase in air pollution problems in Droitwich, and on the site from the bypass and railway.

### **Yew Tree Hill, Droitwich Spa**

Following the 2008 SWJCS Preferred Options consultation a revised site allocation was considered at the subsequent targeted consultation. Assessment for a specific site allocation here is based on:

- Phased delivery of around 750 dwellings (previously 250).
- An extra care home facility.
- A local centre and police post.

- Measures to improve accessibility by local passenger transport, pedestrian and cycle to Droitwich Spa town centre local employment areas, schools, sports, health and community facilities.
- The protection and enhancement of the Community Nature Reserve.
- Incorporation of the 'Green Necklace'.

The targeted public consultation event held at Droitwich in January 2009, raised the following issues to a larger allocation at Yew Tree Hill:

- concern over road capacity / width of Pulley Lane
- rat runs through Pulley Lanes and surrounding roads
- dangerous junction at corner of Pulley Lane and A38
- pulley lane not good for emergency services
- surface water run off- land slopes to Pulley Lane
- existing surface water flooding in Pulley Lane
- concern over wildlife and the environmental impact
- impact on hedgerows
- impact on views of development from top of hill
- need public access to top of yew Tree Hill re footpaths
- retain routes/ open space for walkers/ cyclists/ horse riders.
- concern over anti-social behaviour from new housing
- no local employment
- concern about the capacity of the High school
- need an additional high school or separate sixth form college.
- more local shopping centres needed in Droitwich

4.3.10 The Sustainability Appraisal for the site assessed the impact of 750 dwellings. No absolute sustainability constraints were raised. Topography may make integration difficult with the existing community. Transition from existing development towards the Green Belt would need careful handling. The scale of the development may exacerbate air pollution problems in Droitwich. There is a case for strong sustainable transport measures if the site is not to be car dependent, which would result in greater impact on the A38 and Pulley Lane.

### **Wychavon Preferred Options – Evesham**

4.3.11 Evesham is the main settlement, population 22,800 (2009 mid-year estimate) in the south of the study area. It provides a full range of education, health and retail services with employment opportunities focused to the south of the town at Vale Park. Like the other towns it has a fine heritage reflected in a comprehensive Conservation Area. It has a relatively large hinterland reflected in a bigger retail centre than would otherwise be expected. Whilst there is a functional relationship with Worcester particularly with regard to education and shopping it also has easy access to other higher order centres such as Cheltenham, and by rail to Oxford and London.

4.3.12 Feedback from the Issues and Options consultation, along with the evidence of the open space and Strategic Housing Land Availability Assessment studies demonstrate that post 2011 growth will have to be accommodated

outside the development boundary. In identifying appropriate directions of growth for Evesham the following has been taken into account:

- Natural barriers: Avon and Isbourne Rivers and their floodplains
- Man made barriers and severance: A46 (T)
- Historic settlement patterns, Conservation Areas / Listed Buildings / Scheduled Ancient Monuments etc.
- Accessibility to services

4.3.13 Broad locations for 1,700 dwellings (including the additional option site off Cheltenham Road referred to later) and 10 ha of employment land are identified in the Spatial Strategy for Evesham. With regard to retail development the evidence suggests only comparison goods i.e. non-food floorspace is needed for the period to 2017. The requirement is for between 2,000 and 7,400 sq. metres and in the first instance this should be provided for in the town centre.

4.3.14 Taking the above factors into account the Preferred Spatial Strategy for Evesham sets out the following broad locations for development:

- town Centre - employment, residential and retail
- east (within the A46T) residential development comprising 750 dwellings on Greenfield land to the North of Offenham Road;
- west – residential development comprising 400 dwellings on greenfield site off Pershore Road, Hampton;
- south West – Greenfield site off Cheltenham Road comprising 550 dwellings;
- south – employment land comprising 10ha at Vale Business Park.

#### **Offenham Road, Evesham**

Assessment of a strategic allocation here looked at:

- Phased delivery of around 750 dwellings.
- Relocation of Bengeworth First School.
- Measures to improve accessibility by walk, cycle and passenger transport to Evesham town centre, local employment areas, schools, sports and health and community facilities.
- Appropriate contributions to improvements to existing middle and secondary schools within the catchment area.
- Improvements to the junction of Badsey Road/ Offenham Rd and the two central bridges and the wider transport network (including the A46T) to mitigate any negative impacts caused by additional development.
- Maximisation of the benefits to nature conservation, leisure and recreation by provision of a comprehensive network of green spaces and linkages forming an integral part of the development, encompassing existing waterways.

The targeted public consultation event held in Evesham on 3<sup>rd</sup> February 2009 considered the potential for 750 dwellings, which is half of the SWJCS Preferred Option figure of 1,500 dwellings, based on a reduced site area, and other early site assessment considerations. The main issues raised were:

- The traffic capacity of Badsey road
- Capacity of Offenhan Road. Badsey Road/ elm road junction
- Pedestrian / cycle access route across the river towards Evesham town centre
- Preservation of important wildlife
- Retention of Orchards
- Flooding at Bengeworth Brook/ Surface water run off
- Too many houses suggested for site/ density too high
- Air pollution from traffic
- Loss of open space/ market garden land
- Geologically unstable- reference 1960's report

4.3.15 The Sustainability Appraisal assessed the potential development of the site for 800 dwellings. This found that the site has potential to be physically well integrated with existing development, and has clear boundaries (A46 and railway). Proposal can improve open space and play provision for existing residents too. Main issues include air pollution from A46, which runs along the eastern boundary, the cumulative impact of development on the transport network. The site also comprises grade 2 agricultural land.

### **South of Pershore Road, Hampton, Evesham**

Assessment for a strategic site allocation was based on:

- Approximately 400 dwellings
- Expansion of the existing First School at Hampton
- A network of green spaces including children's play facilities, allotments and green corridors that will form the focal point for the community
- Sustainable transport infrastructure and facilities for cycling and walking including safe and well designated footpaths and cycle paths with appropriate links to the surrounding footpath and cycle network, and facilitating a new bridge across the River Avon to the town centre.

The targeted public consultation event held in Evesham on 3<sup>rd</sup> February 2009 considered the potential for 400 dwellings. The main issues raised were:

- Concern over traffic congestion on the Pershore Road
- Ditch at rear of St Andrews Road floods
- Few local jobs available

4.3.16 The Sustainability Appraisal assessed the potential development of the site for 400 dwellings. The site performs well against several Sustainability

Appraisal objectives. The main concern is poor pedestrian and cycling access to the town centre of Evesham from the south-western area of Evesham which is separated from main part of Evesham by the River Avon , , maximising the use of sustainable modes would help in limiting issues of existing air pollution problems.

### **Strategic Employment Site - Vale Park, Evesham**

Assessment for a strategic site allocation was based on:

- Ten hectares of employment land.
- Provision of public transport infrastructure and services including bus stops and shelters
- Sustainable transport infrastructure and facilities for cycling and walking including safe and well designed footpaths and cycle paths with appropriate links to the surrounding network
- A sustainable movement framework including greater accessibility for non-car borne traffic to the town centre
- Assessing the cumulative impacts of the site on the A46(T) and the wider transport network
- 
- Provision of public open space to serve as both a facility for employees and a setting for the development
- Appropriate boundary treatments that will respect the existing landscape and provide a natural progression to the open countryside whilst sensitively protecting views into the site

### **Wychavon Preferred Options – Pershore**

- 4.3.17 Pershore is the smallest main town within Wychavon with a population of 7,000 (2010 mid-year estimate). It is a historic market town and provides a range of education, leisure and retail services along with employment opportunities centred on Keytec Industrial Estate to the north of the town. With fine Georgian buildings at the centre of the town, the focus of an extensive Conservation Area, it is a popular tourist destination. There is a strong functional relationship with Worcester, reinforced by the Cotswold's and Malvern railway line and for a principal bus route, particular for education, employment and retail.
- 4.3.18 Evidence from the Strategic Housing Land Availability Assessment and the Issues and Options consultation support the distribution of a proportion of the West Midlands Regional Spatial Strategy housing requirement to market towns such as Pershore.
- 4.3.19 Therefore, in order to meet the housing and employment targets set for Wychavon District in the West Midlands Regional Spatial Strategy it is necessary to direct a proportion of this growth to Pershore. In identifying locations for growth of approximately 1,050 dwellings and up to 5ha of employment land the town will need to expand beyond the existing

development boundary as defined in the Wychavon District Local Plan 2006 due to limited urban capacity. With regard to retail development the evidence suggests that only comparison goods i.e. non-food floorspace is needed for the period to 2017. The requirement is for a range between 200 – 2,000 m and in the first instance this should be provided for in town centre.

4.3.20 In considering the directions of growth for Pershore recognition has been given to the significant issues relating to physical and natural environmental constraints. In particular the views into and out of the town, the historic settlement pattern, the River Avon and its functional flood plain, and Allesborough Hill. In addition the findings of the Strategic Housing Land Availability Assessment supported the proposed directions of growth.

4.3.21 Taking the above into account, it was suggested that development of 1000 dwellings and 5 ha of employment would take place in Pershore in the following broad locations:

- south west – residential comprising 150 dwellings off Three Springs Road;
- north – residential comprising 400 dwellings off Station Road;
- north east – residential comprising 450 dwellings either side of Wyre Road;
- north east – employment 5ha at Keytec 7;
- town Centre – retail, comprising up to 2,000 sq. metres;

#### **Station Road and Wyre Road, Pershore**

Assessment of a strategic site allocation was based on:

- Approximately 850 dwellings
- 5 ha of employment land at Keytec site
- Consideration of the need for a link road over the railway between Wyre Road and A44 bypass;
- Improving accessibility, including greater accessibility for bus passengers, pedestrians and cyclists to the town centre, schools and railway station.
- Opportunities to enhance the existing education provision within the town will be embraced.
- A network of green spaces linking to the wider countryside and the River Avon, incorporating children's play facilities, allotments, informal parks, recreational areas and nature conservation areas.
- Facilitate improvements to local nature conservation and tourism opportunities with particular focus on the River Avon.
- Opportunities for incorporating sporting facilities and enhancing the railway station infrastructure will be investigated.

**Three Springs Road** – (NB; this has now been moved to a non- strategic site allocation site as it is considered too small for a strategic allocation.

Permission was granted in 2011 for 132 dwellings and the site is now being built out.).

- Approximately 150 dwellings
- Maximisation of the benefits to nature conservation, leisure and recreation by provision of a comprehensive network of green spaces and linkages forming an integral part of the development.

(N.B. The smaller sites in the towns / villages were addressed separately through the Site Allocations and Policies document.)

- 4.3.22 There were 2 new areas considered in relation to Droitwich Spa and Evesham- These are Hill End at Droitwich, and Land west of Cheltenham road, Evesham Hill

**Droitwich North (Hill End) –**

This site was brought forward as a response to the Preferred Options consultation

This was looked at as a potential strategic allocation but is no longer being considered following the Green Belt review due to it's location within the Green belt.

Responses from the targeted public consultation event, held at Droitwich Spa in January 2009, were concerned with the following issues:

- access on to A38 a major concern
- concern that Pridzor Road being used for access to development
- surface water flooding fears on Hanbury Park Estate. Waterside/ town centre
- some support for building on high land here rather than in Salwarpe
- retain Hill End/ Pridzor Hill woodland
- need quality housing on approach to Droitwich Spa
- concern about impact on Chateau Impney listed building

- 4.3.23 The Sustainability Appraisal assessed this specific site for 250 dwellings. Generally the site performs well against sustainability objectives for housing and strengthening communities, and affords good opportunities for countryside recreation. There are local and inter-urban passenger transport services in the area. It also has good public transport. Adverse effects are in terms of landscape, and harm to the openness of the Green Belt.

**Evesham South - Land west of Cheltenham Road, Evesham**

This was considered as it became clear on through further work that the Offenham Road site would not be able to deliver the number of potential new homes outlined in the Preferred options consultation.

- Approximately 550 dwellings.
- A network of green spaces including children's play facilities, allotments and green corridors.

- Sustainable transport infrastructure and facilities for cycling and walking including safe and well designated footpaths and cycle paths with appropriate links to the surrounding footpath and cycle network.
- Sustainable passenger transport services to provide greater accessibility by public transport to the town centre, railway station and other facilities.
- Appropriate contributions towards expansion and improvements to existing schools within the catchment area.

The following issues were raised during the consultation process and need to be considered:

- Traffic issues – comments were received referring to the heavy traffic especially during morning rush hour. Eastwick Park exit is considered to be presently very difficult and suggestions that traffic lights be replaced by a roundabout.
- Concerns about access through Eastwick Park in that it would put intolerable pressure on the small single entrance to the existing estate. Suggestions that access should be off Cheltenham Road and not through a new road to be developed from a cul-de-sac.
- Wildlife concerns were raised in particular how proposed houses would affect the wildlife in the area – bats, buzzards, owls, woodpeckers, squirrels, foxes and otters. Also concerns about the protected fruit trees off Cheltenham Road.
- Concerns were raised about flooding of the area; in particular the fields south of Cornmill Road have been heavily affected previously. Concerns that further building will increase surface water run off into the Rivers Isbourne and Avon.
- General concerns were raised about the number of houses being far too high and loss of open space contributing to more noise and air pollution along Cheltenham Road. Also the issue of the loss of prime market garden land and loss open spaces for walking was raised.
- The issue was raised that there are presently no community facilities at Cheltenham Road and none likely in the future even with the amount of houses proposed.
- A positive comment was received referring to Cheltenham Road as a good location as it is the natural planning line and development area for the town.

## **5. Strategic sites- Progress since Preferred Options Document and Targeted Consultation events**

- 5.1 The development plan work has progressed from the Core strategy work for the South Worcestershire Joint Core Strategy (SWJCS) to current work on the South Worcestershire Development Plan (SWDP). The changes have come about through changing legislation, as mentioned earlier in the report, additional evidence gathering and local policy changes.

5.2 The table below attempts to briefly summarise the main changes that have occurred to preferred options locations and in particular Strategic sites between the SWJCS and SWDP Preferred Options and Significant Changes documents. The summary does not represent a detailed account of the merits and difficulties associated with any of the options identified.

## Appendix 1 Matrix of potential Strategic Site Allocations

Strategic Broad location	Preferred Option 2008- Land uses/ quantities	Put forward as a specific strategic site area in 2011? If not why? (taken out/ / with p.p etc.).	2011 SWDP Preferred options site- Land uses/ quantities	2012 SWDP Sig Changes Land use/ quantities	Reasons for changes/ other comments
West of Worcester	3,500 dwellings 15 ha employment Secondary School, Primary School	Yes- but reduced. Now referred to as Temple Laughern	975 dwellings and 5ha employment land Primary school	No change	<p>Increased Worcester urban capacity- ( from 3,200 to around 5,600 in dwellings) .Response to public consultation on SWJCS PO 2008 doc- need to separate any Worcester urban extension further from Lower Broadheath area.</p> <p>Review of ELR- Worcester remains a centre for growth and should accommodate additional employment land within or around the city. However, as housing allocation reduced, and new employment park promoted at nearby Grove Farm site , employment allocation reduced to 5ha.Potential for employment land allocation to link up with future University development/ expansion.</p> <p>GI additional info concerning need for large amount of buffer/ open space/flood protection, and importance of ecology, especially along Laugherne Brook.</p> <p>- Master planning work and background evidence submitted at planning application stage and associated consultations on this helped shape views on site specifics.</p> <p>SFRA work/ Severn Trent responses.</p>

Strategic Broad location	Preferred Option 2008- Land uses/ quantities	Put forward as a specific strategic site area in 2011? If not why? (taken out/ / with p.p etc.).	2011 SWDP Preferred options site- Land uses/ quantities	2012 SWDP Sig Changes Land use/ quantities	Reasons for changes/ other comments
					<p>Review of household projections for South Worcs.</p> <p>Worcester Transport Strategy consultation/LPT3 re NWLR/ Southern Link improvements./ NW link Road not funded in plan period</p> <p>SWDP to be economic prosperity lead with emphasis on provision of employment land and jobs in the right locations (preference for strategic expansion to South of the City).</p>
South of Worcester	3,000 dwellings 25ha employment land Primary school Dualling of Southern link Rd	Yes- but reduced Now referred to as Broomhall Community, and Norton Barracks Community	2,450 dwellings 20 ha employment land 10 pitch gypsy site Primary school Planning permission has been granted for 74 dwellings at Norton-Barracks which forms part of the general Wychavon commitments	Specific retail floorspace provision (local centre) outlined. Site for additional 10 pitches for Gypsy and Traveller site .	Increased Worcester urban capacity- (from 3,200 to around 5,600 dwellings). Response to public consultation on SWJCS PO doc. Need to clearly define urban extension boundary at Broomhall Lane to separate urban extension from Kempsey, by defining Significant Gap . GI study concerning buffer zones, Significant Gap/ flood risk, drainage/ wildlife/ archaeology SWDP to be economic prosperity lead with emphasis on provision of employment land and jobs in the right locations (preference for strategic expansion to South of the City). ELR review re: employment requirements- South Worcester site confirmed as important

Strategic Broad location	Preferred Option 2008- Land uses/ quantities	Put forward as a specific strategic site area in 2011? If not why? (taken out/ / with p.p etc.).	2011 SWDP Preferred options site- Land uses/ quantities	2012 SWDP Sig Changes Land use/ quantities	Reasons for changes/ other comments
					<p>employment location. Capacity work by developer suggests 2,450 dwellings and 20ha employment land is maximum.</p> <p>Proximity to key transportation link / infrastructure for enhancement (LEP priority).</p>
Kilbury Drive, on eastern boundary of Worcester	300 dwellings	Yes	Planning application anticipated summer 2011 for 300 dwelling. Revised application for 240 dwellings due to site capacity		Developer estimates capacity approx. 240 dwellings through discussions/ planning application work. Informed by GI and 2012 SFRA
Fernhill Heath	500 dwellings	NOT strategic Two sites for 60 dwellings each,(120 total) off Dilmore lane		350 dwellings and new school off Dilmore Lane/ Station Rd.	Considered not to be required at 2011 PO stage. -As Quantity not appropriate- more preferable site at Gwillams Farm. At Significant changes, additional housing capacity required, therefore 350 dwellings promoted. Subsequent more detailed SFRA No WCC commissioned transport study has drawn this conclusion.
Regional investment Site, adj junction 6 of	25ha employment land	Yes, Worcester Technology Park phase 1 and 2 with, potential	Worcester Tech Park Phase 2 for 16ha	None	Has planning permission for 46ha for possible occupation by Worcester Bosch. Balance of 16ha to be allocated for strategic employment Worcester Technology Park.

Strategic Broad location	Preferred Option 2008- Land uses/ quantities	Put forward as a specific strategic site area in 2011? If not why? (taken out/ / with p.p etc.).	2011 SWDP Preferred options site- Land uses/ quantities	2012 SWDP Sig Changes Land use/ quantities	Reasons for changes/ other comments
M5		occupation of phase 1 by Worcester, The Bosch Group.			
Gwillams Farm, North of Worcester ( in Wychavon District)	No	Yes	Gwillams Farm, North Worcester for 300 dwellings. Was subject to planning applications for 324 dwellings	Amended to 250 dwellings in terms of site capacity, taking account of conservation issues/ SRFA comments. New application anticipated for 250 dwellings Dec/Jan	New Site at targeted consultation stage spring 2011 as response to PO consultation. Considered preferable to Fernhill Heath strategic extension- closer and better related to Worcester. Need to ensure development is comprehensive and not piece meal and Bever Conservation Area is protected and enhanced by any development. Subject to 2 separate planning applications for 324 dwellings from Bellway and Cala Homes. Latest pre-app shows 250 dwellings due to more detailed site capacity work.
Copcut Lane, Droitwich Spa	1,200 dwellings 10 ha employment land	Yes- but reduced capacity	750 dwellings 3.5ha employment land	None	Additional targeted consultation in 2009 and site specific studies including GI, transportation/ access issues, based on PO 2008 responses, including from Salwarpe Parish Council. Planning Approval for 740 dwellings, and 3.5ha employment land from William Davies
Yew Tree Hill, north of Pulley Lane,	250 dwellings	No	Not allocated	None	Further targeted consultation in 2009. Current planning app for 800 dwellings (200 extra care facility), and mixed use- from Burberry Homes.

<b>Strategic Broad location</b>	<b>Preferred Option 2008- Land uses/ quantities</b>	<b>Put forward as a specific strategic site area in 2011? If not why? (taken out/ / with p.p etc.).</b>	<b>2011 SWDP Preferred options site- Land uses/ quantities</b>	<b>2012 SWDP Sig Changes Land use/ quantities</b>	<b>Reasons for changes/ other comments</b>
Droitwich Spa					Does not including employment element.
Salwarpe, nr Droitwich Spa	300 (forming part of Copcut Lane allocation)	No	Not allocated	None	Feedback from consultation responses- site ruled out due to adverse impact of any development on Salwarpe Conservation Area.
NEW SITE Stonebridge Cross Business Park	10ha employment land	No	Not allocated	Included as a Significant Change	Included in the Significant Changes consultation following representations to Preferred Options from the landowner and LEP. Object to negative impacts on Westwood House/ Parkland dropped Wychavon landscape and conservation officers following details on landscape buffer. Site included in the Pre-submission draft.
Offenham Road, Evesham	1,500 dwellings	No	Has planning permission for 508 dwellings.	None	Appropriateness of broad area confirmed, but capacity much reduced- further work on capacity e.g. GI/ highways and transportation .Now permission granted for 508 dwellings
Hampton, Evesham	800 dwellings	Yes- but reduced capacity	- South of Pershore Road, Hampton 400 dwellings New pedestrian/ cycle bridge	None	Hampton originally a proposed broad location for 800 dwellings in 2008 PO paper. Subsequently removed due to new strategic site at Cheltenham Road identified with capacity for 800. Currently, due to overall Wychavon urban / village capacity, Hampton site ruled back into revised Preferred Options.
West of Cheltenham Road,	Up to 800 dwellings	Yes, part of site has p.p for 158 dwellings on	West of Cheltenham Road 400 dwellings	None	Appropriateness of Broad area confirmed, but number of dwellings reduced due to more detailed examination of site capacity.

Strategic Broad location	Preferred Option 2008- Land uses/ quantities	Put forward as a specific strategic site area in 2011? If not why? (taken out/ / with p.p etc.).	2011 SWDP Preferred options site- Land uses/ quantities	2012 SWDP Sig Changes Land use/ quantities	Reasons for changes/ other comments
Evesham		land off Salisbury Drive, Cheltenham Road	Green corridor along River Isbourne		
Vale Park Evesham	10ha	Yes	10ha split into two plots of 5ha each of employment land.	Additional 10ha employment.	Extension of current Local plan allocation This is seen as the most appropriate and logical direction for employment development for the town.
Three Springs Road, Pershore	150 dwellings	No	Has planning permission for 132 dwellings	None	Site has begun to be built out by Bloor Homes
North Pershore- Station Road / Wyre Road	850 dwellings in total split between three parcels of land of 400 dwellings 400 dwellings 50 dwellings	Yes	600 dwellings on three parcels of land. Issue of new link road between Wyre Road and by-pass over railway	None	850 dwellings was considered to be too high and was reduced.. GI network, landscape buffers, proximity of flood plain, topography. Study currently being produced on cost and required land take of link road.
Land at Wyre Road adj. Keytec Business Park	5 ha employment land	Yes	5 ha employment land	None	Endorsed in reviewed ELR.
Newland area, east of railway Malvern	1,100 dwellings 10 ha employment land Primary school	Yes, but reduced dwelling capacity based	700 dwellings 10 ha employment land Primary School, Cemetery	None	Feedback from public targeted consultation 2009; GI interim report and more detailed WCC GI assessment re further land for green buffer/ protect conservation area/ landscape

Strategic Broad location	Preferred Option 2008- Land uses/ quantities	Put forward as a specific strategic site area in 2011? If not why? (taken out/ / with p.p etc.).	2011 SWDP Preferred options site- Land uses/ quantities	2012 SWDP Sig Changes Land use/ quantities	Reasons for changes/ other comments
		on land parcels and feedback from public and technical consultation.	Allotments Police post.		issues. Need to promote employment land in accessible location which is attractive to the market and meets the needs of existing firms wishing to stay (but grow) at Malvern and inward investment. Supported by the LEP Other alternative sites not so suitable for strategic employment sites. Review of household projections for South Worcs. GI Assessment progressed by WCC -Can accommodate 40% GI and other community facilities.
QinetiQ	As a broad site but no suggested capacity	Yes	250 dwellings and minimum of 4.5 ha employment land	Minor wording changes to associated QinetiQ site with adj. Malvern Science Park.	Employment land allocation brought forward from the adopted local plan allocation. Housing figures based on site review and potential redevelopment of partial area of surplus employment land for housing. Endorsed by review of ELR and need to retain QinetiQ and adjacent high tech employment focus in Malvern and A38 technology corridor. Features in LEP prospectus. Significant brownfield site within settlement boundary - capacity to reduce overall greenfield land take at Malvern.
Land south of Townsend	500 dwellings 7 ha employment	No	No allocation	None	GI study concerning landscape sensitivity of area/ drainage/ ecology issues. Vehicular

Strategic Broad location	Preferred Option 2008- Land uses/ quantities	Put forward as a specific strategic site area in 2011? If not why? (taken out/ / with p.p etc.).	2011 SWDP Preferred options site- Land uses/ quantities	2012 SWDP Sig Changes Land use/ quantities	Reasons for changes/ other comments
Way, east of Mayfield Road	land				access over Conservators land required . Targeted consultation responses 2009. The site has not been assessed in terms of transport modelling Review of household projections for South Worcs.
<b>Alternative site.</b> Land east of Moat Crescent	500 dwellings	No	No allocation	None	GI study concerning landscape sensitivity, drainage, ecology. SFRA (drainage) Scheduled Ancient Monument setting. Access issues re wider transportation network (access to main road network). Targeted consultation responses 2009 Review of household projections for South Worcs. WCC interim transportation response.
<b>Alternative site.</b> Land to North, North west of the Railway.	900 dwellings	No	No allocation	None	Transportation issues- access from Leigh Sinton Road not considered suitable for level of development- no potential opportunity for access over railway from Newland area. GI study- sensitivity of landscape/ closer to Malvern Hills and AONB. Within existing Significant Gap. Targeted consultation responses 2009 Review of household projections for South

Strategic Broad location	Preferred Option 2008- Land uses/ quantities	Put forward as a specific strategic site area in 2011? If not why? (taken out/ / with p.p etc.).	2011 SWDP Preferred options site- Land uses/ quantities	2012 SWDP Sig Changes Land use/ quantities	Reasons for changes/ other comments
					Worcs. WCC interim transportation response.
Blackmore Park, south of Malvern	No	Yes, but for employment uses	Blackmore park 4.5ha employment land	None	Alternative to employment land to east of Mayfield Road. Based on expansion of existing employment area that is actively being promoted (extant p.p for employment, and new employment application.). Opportunity for green technology in line with existing permissions. Part brownfield / part greenfield site. Not well related to Malvern and its facilities to promote housing use. Less well related to public transport than Newland site for housing Landscape / ecology issues re Arles Wood and stream to south of site.
Tenbury Wells- broad area west of Oldwood Road	100 dwellings	Yes- but reduced capacity	Now site specific, Land opposite Morningside 30 dwellings	Additional Site at The Haven for 40 dwellings	Landscape, topography, SFRA (severe flood risk) issues in Tenbury some scope for housing in broad location but because of above, capacity is considered to be limited. Recent construction of affordable housing exception (34 dwellings). SAP consultation feedback. Additional site at Haven came through SHLAA update. Some support through Sig changes

Strategic Broad location	Preferred Option 2008- Land uses/ quantities	Put forward as a specific strategic site area in 2011? If not why? (taken out/ / with p.p etc.).	2011 SWDP Preferred options site- Land uses/ quantities	2012 SWDP Sig Changes Land use/ quantities	Reasons for changes/ other comments
					consultation. This site plus the 30 at Morningside, plus the exception site deliver approx. 100 dwellings in Tenbury which is considered appropriate Consideration of overall level of housing to be provided both north and South of River Teme, through discussions with Shropshire County Council. Levels at Burford to be only 25-45 dwellings
Upton upon Severn Holly Green and Tunnel Hill villages	50 – Holly Green 50 Tunnel hill	Yes , now site specific but with reduced capacity	Land at Sunny Bank Meadow, Holly green 50 dwellings	Additional site at Greenfields Rd, Tunnel Hill for 18 dwellings. Sunny Bank Meadow site reduced to 25 dwellings on landscape reasons.	SFRA - very significant flood constraints within in urban area- no capacity at Upton. Based on analysis of available sites ( SHLAA) and their planning impact Public consultation responses on preferred option. SAP consultation feedback. Need for affordable housing in area. Town Council supporting development numbers but not sites. Site at Upton Marina promoted by owner/ Town Council, but not shown as deliverable. Sunny Bank Meadow site still considered deliverable.