

SWDP Review - Spatial Strategy Background Paper

1. Introduction

- 1.1 The three councils of Malvern Hills District Council, Worcester City Council and Wychavon District Council have joined together to produce a joint local plan that covers the whole of the south Worcestershire area. The purpose of this paper is to provide further details on how the spatial approach proposed in the South Worcestershire Development Plan Review (SWDPR) has evolved through the plan making process.
- 1.2 The National Planning Policy Framework (NPPF) states that the purpose of the planning system is to contribute to the achievement of sustainable development (paragraph 8). Three overarching objectives – economic, social, environmental – are used to support this aspiration in the following ways:
- a) An economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
 - b) A social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and
 - c) An environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.
- 1.3 As well as being kept up-to-date, the NPPF (chapter 3) states that plans should provide a positive vision for the future of the area and be a platform for local people to shape their surroundings through early, proportionate and effective engagement between the local planning authority and the local communities, organisations, businesses, infrastructure providers, operators and statutory consultees.
- 1.4 Plans should contain strategic policies that set out the overall strategy for the development of the area during the plan period, making sufficient provision for housing, retail, employment and leisure uses, along with the appropriate levels of infrastructure and community facilities.
- 1.5 The NPPF also provides a number of tests that the SWDPR will have to meet before it can be found sound (paragraph 35). These are known as the Tests of Soundness:
- The Plan must be positively prepared – provide a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs for housing, employment, open space, retail and leisure amongst other things. The Plan must also be prepared to accommodate any unmet needs from neighbouring local planning authorities where it is able and appropriate to do so. In this case, 500 new dwellings that form part of Tewkesbury Borough Council’s housing need will be met at a strategic site at Mitton in the South of the Plan area.

- The Plan must be justified – the strategy for locating new growth must be the most appropriate for the area and sustainable, taking into account any reasonable alternatives that may have been put forward and based on proportionate evidence.
- The Plan must be effective – it must be deliverable over the plan period and based on effective joint working on cross-boundary strategic matters.
- The Plan must be consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national policy where relevant.

Current Planning Policy for South Worcestershire

- 1.6 The current plan for South Worcestershire is the South Worcestershire Development Plan (SWDP) that replaced the existing Local Plans of the three partner Councils when it was adopted in February 2016. The SWDP considers the long-term vision and objectives for South Worcestershire up to the year 2030, as well as containing the policies for delivering these objectives in a planned and cohesive manner; this has been done by allocating a range of small sites and larger 'strategic' sites across South Worcestershire and providing policies to ensure that any development is sustainable.

2. South Worcestershire Development Plan Review

- 2.1 The SWDP (2006-2030) was adopted in February 2016. The South Worcestershire Councils (SWCs) commenced a review of the SWDP in late 2017 in response to new Government requirements that Development Plans should be reviewed every five years and updated where required. Despite making good initial progress on updating the Local Plan during 2018-2019, the effects of Covid-19 during 2020-2021 on the collection of data for evidence, particularly with regard to transport modelling and other survey work has resulted in delays to the plan making process. A revised Local Development Scheme came into effect on 1st October 2021, with a view to the SWDPR being adopted in late 2023.
- 2.2 The review, provides a plan period to 2041, and updates the existing SWDP including its vision, objectives, spatial strategy and strategic policies for the future development of the South Worcestershire area. The Plan also includes site allocations, development management policies and policy designations that will provide for the development needs of the area up to 2041.

Consultations

- 2.3 A number of consultations have taken place since the review commenced in 2017:
- SWDP Review Further Regulation 18 (III) Sustainability Appraisal Consultation - consultation concluded on 19 April 2021.
 - Country Parks Call for Sites - consultation concluded on 24 July 2020.
 - Renewable and Low Carbon Energy Call for Sites - consultation concluded on 3 April 2020.
 - SWDP Review Regulation 18 (II) Preferred Options - consultation concluded on 16 December 2019.
 - SWDP Review Regulation 18 (I) Issues and Options - consultation concluded on 17 December 2018.
 - Development Boundaries Review Proposed Methodology - consultation concluded on 8 October 2018.
 - Sustainability Appraisal Scoping Report - consultation concluded on 3 July 2018.
 - SWDP Review Call for Sites and Proposed SHELAA Methodology - consultation concluded on 2 July 2018.
 - Village Facilities and Rural Transport Study Proposed Methodology - consultation concluded on 2 July 2018.

3. Informing the Spatial Strategy

- 3.1 The following sections provide the contextual background of south Worcestershire and sets out what the plan is trying to achieve in the period 2021 – 2041. The spatial portrait provides a broad picture of the physical characteristics and the current economic, environmental and social conditions that exist within south Worcestershire, the Vision sets out what the area should look like in 2041 and the objectives provide the targets and goals required to achieve the Vision.

Spatial Portrait of South Worcestershire

- 3.2 South Worcestershire covers approximately 1,300 sq.km and forms the southern limit of the West Midlands region. It borders Gloucestershire to the south west and Warwickshire to the south east. South Worcestershire is made up of the largely rural districts of Malvern Hills and Wychavon, along with Worcester, the largest urban area. Beyond the city are the three main towns: Droitwich Spa, Evesham and Malvern and the smaller towns of Pershore, Tenbury Wells and Upton-upon-Severn. In addition, there are over 200 villages of varying size, character and level of service provision. The total population of south Worcestershire is approximately 316,000 (2018-based subnational population projections). South Worcestershire has an ageing population as older age groups are expected to increase the most (2018-based subnational population projections).
- 3.3 The landscape is of a very high quality and the countryside is distinguished by the upland areas of the Cotswolds National Landscape (including Bredon Hill) and Malvern Hills AONB, as well as the river valleys of the Avon, Severn and Teme. There are approximately 5,600 listed buildings, 150 Ancient Monuments, 13 historic parks and gardens, 105 conservation areas and numerous protected trees and woodlands. In addition, the urban greenspace enhances the environmental quality of the area. All these environmental attributes mean that south Worcestershire attracts a significant number of tourists and visitors, who account for approximately 11% of local expenditure.
- 3.4 South Worcestershire is easily accessible by rail and road from the West Midlands conurbation and with the opening of Worcestershire Parkway rail station access to London has improved. Rural accessibility is an important issue, as reductions in public transport provision and increases in transportation costs will increase demand for flexible and accessible transport. Safer routes for pedestrians and cyclists will be needed to support rural communities and the rural economy.
- 3.5 Good accessibility and a high quality built and natural environment has led to the area being subject to relatively high levels of inward migration, which has kept market housing prices relatively high. Housing affordability within both the urban and rural areas is a major issue and is likely to remain so throughout the plan period.
- 3.6 The West Midlands Green Belt has been an effective planning tool in ensuring that the main settlements, in particular Droitwich Spa and Worcester, remain physically separate and distinctive.
- 3.7 South Worcestershire provides some 162,000 jobs (Nomis official Labour Market Statistics 2019), 38% of which are in Worcester. Unemployment is lower than in the West Midlands and Great Britain (Nomis 2020/21) and the last decade has seen the level of unemployment reducing. Worcester has seen the largest decrease in unemployment (Nomis 2020/21). Average wages in Worcester are lower than those in the West Midlands and Great Britain.

However, the wages in Wychavon and Malvern Hills are on a par with the West Midlands but lower than the Great Britain average (Nomis 2020/21). Commuting beyond south Worcestershire is necessary for those residents wishing to achieve higher salaries, particularly in London and the M42 corridor. Most commuting, however, generally takes place internally within south Worcestershire, with the strongest commuting flows between the towns of Malvern and Droitwich Spa and Worcester.

Vision, Aims and Objectives

Vision – background

- 3.9 The Vision is that contained within the adopted SWDP 2016. Whilst it has not been updated, the Vision is still considered to be a good basis for planning for sustainable development. This was evidenced in the representations received following the Issues and Options consultation which were predominantly supportive.

The Vision

- 3.10 In 2041 south Worcestershire remains a highly desirable place in which to live and work and a place where climate change is proactively addressed and measures are in place to reduce carbon emissions. The planned growth in housing and employment, supported by the work of the Worcestershire Local Enterprise Partnership, has created a robust, competitive local economy. This in turn has retained and stimulated significant inward investment and generated numerous job opportunities. Businesses have access to a locally based, highly skilled workforce, thanks to the high quality educational and training provision available in the area. The University of Worcester goes from strength to strength and helps to attract and retain the best and brightest graduates in south Worcestershire.
- 3.11 Residents and businesses enjoy better accessibility within and beyond the area through the implementation of major improvements to the highway network, in particular improvements to the M5 junctions, the A4440 at Worcester, the completion of Worcestershire Parkway rail station and improvements to local railway stations. A series of smaller but no less vital infrastructure improvements impact positively on the day-to-day lives of the residents of the three districts, including improvements to local roads, junctions, public transport provision, improvements to walking and cycling, drainage and water infrastructure.
- 3.12 Small-scale businesses have flourished in rural areas through the support offered by the SWDP policies including home-based working and farm diversification opportunities. Farm diversification has enabled farming and horticulture to continue to play an important role in the local rural economy, helping to sustain villages and support a woodland economy. This has been helped by significant improvements to electronic means of communication, including the roll-out of high-speed broadband and the promotion of live-work development.
- 3.13 Investment in retail and office space has enabled Worcester to compete successfully with the larger centres within and beyond the West Midlands. Worcester also provides high-class and wide-ranging leisure and service facilities. The main towns of Droitwich Spa, Evesham and Malvern are vibrant, offering a range of employment, shopping and community facilities to their residents and the wider community. The towns of Pershore, Tenbury Wells and

Upton-upon-Severn also continue to offer local services and remain at the heart of the area's rural economy. All the towns have benefited from public realm and local transport improvements.

- 3.14 South Worcestershire residents have access to a range of housing types and tenures that help to meet the needs of young families, older people and single households. High quality development has incorporated innovative, environmentally friendly solutions that have helped to reduce resource consumption, achieve sustainable communities and lessen the effects of extreme climatic impacts, particularly flooding.
- 3.15 Affordable and accessible housing is widely available and helps to secure and sustain local communities, services and facilities. Residents enjoy a high standard of living, featuring good health and education in an attractive, safe and secure, low-crime environment. The investment in green infrastructure has enabled better access to healthy opportunities and lifestyles for residents and visitors alike as well as helping to improve biodiversity interest through delivering biodiversity net-gain. A thriving tourism market is underpinned by a high quality natural and built environment, with its exceptional geological heritage, the highlights of which include the Cotswolds and Malvern Hills Areas of Outstanding Natural Beauty, the Geopark, the river valleys of the Avon, Severn and Teme, and Worcester Cathedral and the historic cores of the towns and villages. The need to protect these vital and sensitive landscapes and environments as enshrined within the SWDP forms a cornerstone of south Worcestershire's continued success as a place in which to live, work and relax.

Objectives

- 3.16 The objectives, which form the basis of the adopted SWDP, originate from a previous Sustainable Community Strategy (SCS). Whilst the SCS has not been updated, the objectives are still considered to be a good basis for planning for sustainable development. This was evidenced in the representations received following the Issues and Options consultation which were predominantly supportive.

Economic Success that is Shared By All

1. To facilitate development that focuses on improving the area's economic prosperity, delivering new jobs, retaining key employers and maximising high value employment opportunities through the right employment sites.
2. To work with partners, in particular the Worcestershire Local Enterprise Partnership, and the private sector to strengthen the urban and rural economies by enabling local businesses, including farms, to start, grow, adapt and diversify.
3. To promote the sub-regional role of Worcester as the major leisure, retail, tourist and university centre and support the sustainable growth of the city.
4. To prioritise the re-development, including mixed uses, of brownfield land within the urban areas in order to aid the regeneration of the city / town centres.

Stronger Communities

5. To deliver sufficient new homes needed by local communities and that will help support economic growth.

6. To provide a balanced mix of house tenures and types, including extra care provision, to satisfy the full range of housing needs and help create active / inclusive / sustainable communities and to sustain rural communities.

7. To maximise opportunities to deliver high quality affordable housing.

8. To allocate most development in locations where there is good access to local services and where transport choice is maximised.

9. To provide a basis for neighbourhood plans.

A Better Environment for Today and Tomorrow

10. To ensure that the scale and type of new development does not compromise landscape character or south Worcestershire's historic environment, heritage assets and their settings.

11. To ensure development is designed to the highest possible environmental standards in order to minimise carbon emissions resource consumption, pollution, flood risk and increase the proportion of renewable energy and to adapt to the impacts of climate change.

12. To maintain open landscape, including AONB, and to prevent the merging of settlements in both Green Belt and non-Green Belt locations.

13. To protect the Green Infrastructure Network and take every opportunity to increase its coverage and quality.

14. To protect, restore and enhance biodiversity by delivering biodiversity net gain, and to enhance geodiversity, landscape quality, water quality and protect the highest quality agricultural land.

Improving Health and Well-being

15. To reduce health inequalities, encourage healthy lifestyles and plan for and promote healthy developments and better living environments to improve the health and wellbeing of those who live in work in, or visit south Worcestershire.

16. To ensure that new development supports the delivery of healthcare provision and accessibility.

17. To promote opportunities and access to a range of skills and vocational training and levels of education for all generations.

Communities that are Safe and feel Safe

18. All new development to employ 'Secured by Design' and 'Design out Crime' principles.

19. All new development to contribute to the provision of accessible community infrastructure that increases the number of pedestrian movements in public places.

4. Developing the Spatial Approach

Approach of SWDP 2016

- 4.1 The adopted SWDP seeks to deliver a development strategy that supports economic growth and seeks to strike a balance between focussing the majority of development within or around existing settlements where maximum use can be made of existing or improved infrastructure whilst attempting to address the needs and constraints of the rural areas. Therefore, under the current development strategy, the majority of growth is being accommodated at Worcester and within the towns and larger villages. However, a significant element of Worcester's growth is being met through two large urban extensions. The remaining supply is being accommodated in sustainable locations using the settlement hierarchy which guides development to those areas that provide services and facilities and alternatives to travelling by private car. The strategy also focuses on reusing brownfield land, safeguarding the open countryside and maintaining the Green Belt.

Identifying the Overall Development Strategy

- 4.2 The three south Worcestershire Councils plan jointly because Worcester City cannot meet all of its own housing and employment need due to it being constrained by its tight administrative boundary. This means that some of the need arising within Worcester City will need to be met within Wychavon or Malvern Hills districts. In addition, in accordance with the Economic Development Needs Assessment (EDNA) evidence (2018 version at the start the plan update, but updated more recently in 2021), the supply of available employment land to meet the projected forecast demand to 2041 suggests that there is an overall deficit of employment land in south Worcestershire and specifically within the Worcester City and Wychavon districts. This is partly attributed to the high projected demand for employment land in Wychavon (based on recent delivery and uptake trends), and a lack of available supply in Worcester City. By planning jointly, there is an opportunity to make good any deficit across the area as a whole.

The Single Plan Figure

- 4.3 The adopted SWDP 2016 established five separate sub-areas (Malvern Hills, Worcester City, Wychavon, Wider Worcester Area Malvern Hills and Wider Worcester Area Wychavon) for dealing with housing, employment and retail provision, redistributing the requirements according to land availability and natural and environmental constraints.
- 4.4 The SWDP is now under review and as set out in the NPPF (paragraph 74), in such circumstances the calculation of the Five-Year Housing Land Supply (5YHLS) should be based on local need calculated using the Government's Standard Method. Given this, a single joint approach to 5YHLS is being adopted by the south Worcestershire councils from 2021 onwards. Any other approach would not be appropriate as it would require the redistribution of either the standard method calculation for each local authority to the five sub-areas or the supply for each of the sub-areas back to each local authority. Therefore, it is the intention of the SWDP review to formally establish a single joint approach to 5YHLS and that the south Worcestershire councils are considered as a single entity in the calculation of the Housing Delivery Test and also to assess the supply of employment land on a south Worcestershire basis for consistency.

5. Developing the Strategy (2017)

- 5.1 The development strategy and settlement hierarchy options within south Worcestershire are restricted by the availability and capacity of transport infrastructure and a number of significant constraints, including the number of flood risk areas adjacent to the rivers Severn, Teme and Avon, the amount of green belt and the area's significant landscape character, in particular the Cotswold and Malvern Hills AONBs. The constrained boundary of Worcester City also needed to be considered.
- 5.2 With regard to the issue of transport capacity, parts of Worcestershire's transport system are becoming increasingly congested due to high levels of car ownership and use, which is encouraged through low operating costs, low taxation, and cheap parking. In addition, most available funding is prioritised towards highway maintenance and improvement, leading to underfunding in passenger transport, walking and cycling measures.
- 5.3 Local Planning Authorities still have to accommodate housing and employment growth and its associated infrastructure through the development plan. This puts additional pressure on the road network, with all new housing developments generating at least one car trip per household on average, with more wealthy areas like South Worcestershire generating significantly more. This issue is exacerbated by the absence of viable and attractive travel choice alternatives (rail, bus, walking and cycling options), meaning most people choose to drive. This results in the volume of vehicular traffic in Worcestershire increasing significantly and creating congestion unless we encourage people to travel in different ways and reduce the need to travel where possible.
- 5.4 Funding for new road schemes is also becoming increasingly difficult to access and cannot be relied upon. Government guidance now requires significant local contributions (from Developers and Local Authorities) to match fund business cases for new roads. In addition, local authorities are required to demonstrate that alternative travel choices have been considered and provided before Government will consider funding new roads. This makes new roads very difficult to deliver.
- 5.5 The Worcestershire Local Transport Plan (LTP4) (2017) sets out the County Council's preferred approach to delivering travel choice across the county. The LTP contains a very strong focus on rail investment to provide much needed strategic transport network capacity and sets out ambitious plans for active travel (walking and cycling) corridors, to provide a viable alternative to driving for shorter trips.
- 5.6 In order to achieve this, the LTP4 contains the following criteria for the location of new development:
- Located within 3 miles of the nearest rail head (station);
 - Benefitting from direct, attractive walking and cycling routes which connect them to the nearest station, and to other local trip attractors;
 - Benefitting from high-speed broadband access, to support working from home and home access to some services;
 - Potential to be served by passenger transport (bus) in the future.
- 5.7 A series of workshops with Members and officers were undertaken during October/November 2017. The sessions looked at the 2016 SWDP Strategy and asked the following questions:

- whether South Worcestershire would still be capable of accommodating future housing and employment requirements;
- how we could continue to accommodate growth from Worcester City;
- to identify the priorities for infrastructure; and
- discuss how we could continue to conserve the landscape character of the area. These discussions took place in the context of LTP4 and the transport issues at the time.

- 5.8 It was agreed that the SWDP Review needs to provide existing and future residents with genuine travel choice, by focussing on providing for non-car modes first (walking, cycling and passenger transport), then considering how to provide for the increase in vehicular trips.
- 5.9 Therefore, the development strategy for the SWDP review, in line with national guidance and the Worcestershire LTP4, aims to minimise congestion and its impacts by focussing significant new development in the most accessible locations.
- 5.10 In recent years there has been considerable investment in rail transport across the county, most notably the development of Worcestershire Parkway Station, but also enhancements to Malvern Link railway station and Worcester Foregate Street railway station. Therefore, with regard to the development strategy for the review of the SWDP, it was agreed that the location of new development close to public transport modes could be an appropriate option, as new housing growth will influence the type of new transport infrastructure required, the travel choices people make, as well as the feasibility and costs of integrating new development into the existing network.
- 5.11 Adapting to and mitigating the effects of climate change are integral to the spatial strategy and cut across all policies. The impacts of climate change will be addressed in a number of ways, including locating the majority of growth in places with good, sustainable public transport links, with access to jobs and services, thereby providing opportunities to reduce the need to travel by private vehicle and mitigating against some of the adverse environmental impacts associated with the built environment.

6. Issues and Options (2018)

6.1 With this in mind, the Issues and Options consultation document explored a number of options that it was felt paid regard to the transport and landscape constraints while still meeting the Plan's objectives of:

- prioritising the redevelopment of brownfield land,
- delivering the number and mix of new homes to meet future needs,
- providing high quality affordable housing,
- maintaining good access to local services and transport choice,
- protecting the green infrastructure network, biodiversity and the open landscape.

6.2 The options paid particular regard to the likely impacts on existing transport networks and any required future infrastructure.

6.3 The following options were considered as part of the Issues and Options consultation:

- Rail Station Focussed Development – the location of all significant new development within two miles of an existing, enhanced or proposed rail station.
- Continuation of the Adopted SWDP Development Strategy – locate new development throughout south Worcestershire on the periphery of the city, towns and villages linking to the existing road network.
- Increasing Densities through Regeneration – the location of new development in existing urban areas, through intensification in urban centres and regeneration of underused or vacant sites, taking advantage of active travel and sustainable transport hubs, and reducing the need to travel.
- Large Urban Extension – the location of new development in large urban extensions, using existing transport corridors.

6.4 As well as identifying the best possible strategic development strategy, consideration was also given as to whether it would be necessary and appropriate to release any Green Belt land for development and which locations would be most appropriate for locating any additional housing growth.

6.5 The Issues and Options consultation set out the following options for the location of housing growth:

- At Worcester, towns and villages (as per the adopted SWDP).
- At a new settlement(s)/garden village(s).
- A greater proportion of growth generally in the villages.
- A greater proportion of growth generally in the towns.
- A greater proportion of growth at Worcester.
- In the Green Belt.

6.6 Noting the constraints, it was considered likely that a combination of these options would be required to meet the needs going forward.

Development Boundaries Review

6.7 The adopted SWDP 2016 identifies development boundaries around settlements throughout the area. The purpose of the development boundaries is to help direct most development to the more sustainable locations and protect the character of the open countryside. In

Malvern Hills and Wychavon Districts, the development boundaries were first defined in the 1998 Local Plans and had only been amended to include minor revisions as part of the 2006 Malvern Hills Local Plan process and to include those SWDP allocations which share a common boundary with the development boundary. Worcester City's Development Boundary is defined as its administrative boundary and the outer site boundaries of the Worcester urban extensions (excluding SWDP45/6 Worcester Six Technology Park). Given the length of time since the development boundaries were established and the scale of development on the ground since, it was considered appropriate to undertake a review as well as potentially identify new boundaries in higher category villages (1,2 and 3).

6.8 The Issues and Options consultation identified options for the review of the boundaries that were seen as meeting the Plan's objectives of:

- Strengthening the urban and rural economies
- Delivering sufficient new homes needed by local communities
- Providing a range of housing to help sustain rural communities
- Locate development in sustainable locations
- Ensure a high standard of development to protect the local character
- Protect the GI and biodiversity of an area
- Ensure the provision of appropriate infrastructure

6.9 The following options were included within the Issues and Options consultation with respondents being asked to comment on each:

- a. Make no changes to the current development boundaries.
- b. Progress with current Development Boundaries and only amend to include SWDPR housing, employment and mixed-use allocations where they share a common boundary with a development boundary.
- c. Review existing Development Boundaries and identify new development boundaries in higher category villages where one does not already exist, using methodology which was subject to consultation (amended where appropriate) in August-October 2018.
- d. As for Option c above, plus extend development boundaries to include proposed SWDPR allocations where they share a common boundary with a current development boundary.
- e. Accept that certain smaller settlements can accommodate development of an appropriate scale even if a development boundary cannot be readily identified in accordance with the methodology referred to in c above.

Employment Land

6.10 Alongside housing growth, it is necessary to consider which locations would be suitable for the provision of new employment land. Employment sites should also generally be in accessible locations, but importantly also attractive to employers and investors. The Councils commissioned an Economic Development and Needs Assessment (EDNA) in 2018 (updated in 2021) to identify the amount of employment land required and to also identify the attributes required for suitable employment sites to assist with the identification of suitable locations. The SWDP 2016 has already allocated a number of sites for employment development which have not yet been delivered, therefore, there was also a need to assess whether any of these sites would still be suitable to be included within the review document as employment sites, or whether they could be used for alternative land uses.

- 6.11 As stated above, the EDNA (2018 and 2021 update) concludes that overall, south Worcestershire has a deficit of employment land supply against projected demand to 2041, with Worcester City and Wychavon in deficit. Malvern Hills has a surplus of employment land supply. The geographic relationship of the three councils lends itself to a distinct planning area and by planning jointly there is an opportunity to redistribute the deficit across south Worcestershire.
- 6.12 The Issues and Options document set out a number of options for the location of employment growth that were seen as meeting the objectives of:
- Improving economic prosperity, delivering new jobs and retaining key employers
 - Enabling local businesses to start, grow, adapt and diversify
 - Promoting opportunities and providing access to a range of skills and training opportunities
 - Locate development in sustainable locations
 - prioritising the redevelopment of brownfield land
 - Ensure the provision of appropriate infrastructure
- 6.13 The consultation asked whether employment should growth be located:
- a. Alongside the housing growth
 - b. At/near motorway junctions
 - c. Along trunk road corridors (for example the A46)
 - d. Within expanded existing employment sites
 - e. Near existing rail stations or opportunities for new rail stations

Issues and Options - Conclusions

- 6.14 A number of representations were received with regard to the options for the overall development strategy and locations for new housing growth. Generally, there was support for a rail-based strategy in conjunction with increasing densities through regeneration. There was also support for continuing with the current strategy and the existing allocations as this has been largely successful in delivering housing growth. However, other respondents were concerned that this approach would put pressure on the surrounding villages. There was strong support for a large urban extension and/or new settlements and many respondents suggested Worcestershire Parkway as a suitable location for growth. There was also an acknowledgement that one option alone would not deliver the level of housing required.
- 6.15 With regard to the options presented for employment locations, there was support for locating employment in areas of need and with good accessibility that recognises the locational requirements of a range of uses. The option to locate employment growth near to motorway junctions also received support. There was also a request not to overlook employment opportunities in rural areas. Overall, the responses favoured employment land being more evenly distributed across all three districts, with allocated sites being well located and meeting the requirements for a range of employment uses. However, the EDNA evidence (2018 and later 2021) projects a much higher projected demand of employment land in Wychavon district, and Worcester City cannot meet its projected demand due to its constrained boundary. On a south Worcestershire basis, strategic sites such as Worcestershire Parkway will help meet some of the projected need. It was also recognised that the green belt should be reviewed. The green belt review did not result in the

identification of any areas of the green belt that could be released for housing but did result in the identification of one area of Worcester City's green belt that could be released of employment uses. The Green Belt Review forms part of the evidence base for the review of the SWDP.

Development Boundary Review

- 6.16 The methodology for reviewing the development boundaries was consulted on in 2018 and included in the Issues & Options consultation with a number of mainly supportive representations received. The methodology was amended to reflect the comments received where appropriate. This methodology was then applied to the 133 existing SWDP development boundaries in south Worcestershire, plus a number of other areas where, according to the methodology, development boundaries could appropriately be put in place. This formed part of the Preferred Options consultation.

Sustainability Appraisal 2018 - Issues and Options Regulation 18(i)

- 6.17 The sustainability appraisal (SA 2018) tested each of the options for the overall development strategy. Options A (rail-based development) and C (increasing densities through regeneration) were identified as the best performing options with regard to sustainability. Option A would be likely to result in more benefits to the local landscape, educational opportunities and in particular, sustainable transport options within south Worcestershire. Option C, on the other hand, would be expected to result in benefits to local flooding issues, biodiversity assets and natural resources. Therefore, it was recommended that a mix of both options could potentially result in a greater number of sustainability benefits.
- 6.18 The options for accommodating new housing growth were also assessed. Option B (at a new settlement) was seen as the most sustainable option for allocating housing growth. This option would help to ensure new residents would have good access to educational facilities and employment opportunities as well as boost local economies. Option B would also provide the SWCs with greater scope for increasing available health facilities and would help to decrease the risk of placing new residents in Flood Zones across the plan area.
- 6.19 With regard to the options for employment land, as informed by the Economic Development Needs Assessment (EDNA) (2018 and 2021 update), the development of new employment sites will ensure that the right type of jobs situated in the right locations, potentially based on accessibility, local need or overall sustainability. The SA (2018), concluded that all of the employment options would help to ensure that the employment floorspace needs of the local area are met through new sites that can be accessed via the strategic road network. However, this strategy would require development on relatively large greenfield sites, resulting in permanent losses of natural resources, an alteration to the local landscape character and fragmentation of the local ecological network.

7. Preferred Options Consultation (2019), Sustainability Appraisal Regulation 18 (II) (2019) and Sustainability Appraisal Regulation 18 (III) consultation (2021)

- 7.1 It was clear from the responses to the Issues and Options consultation and the sustainability appraisal of each of the options, that there was a need to look at a variety of options to meet the future needs for south Worcestershire.
- 7.2 The option to continue with the current SWDP 2016 strategy was not considered to be the best environmental option going forward to 2041. This was because the option focuses most of the new growth into urban extensions around the edge of Worcester. While this option would meet some of the plan's objectives and meet the criteria of being able to accommodate Worcester City's housing and employment needs, this option fails in many other ways, including:
- New housing and employment growth would be located further away from the urban area where most of the services and facilities are located.
 - The new housing would be located further away from a rail station which is not in accordance with the strategy set out in LTP4.
 - Local bus routes are declining which is not in accordance with the strategy set out in LTP4
 - The private vehicle would be the most dominant mode of transport which will make for a heavily constrained highway network which is not in accordance with the strategy set out in LTP4.
 - There would be an adverse impact on infrastructure.
 - There would be potential for the some of the smaller existing settlements to coalesce with the urban area.
- 7.3 Therefore, this option was discounted due to its potentially adverse impacts on the environment and not being in accordance with the strategy set out in LTP4.
- 7.4 In terms of locations for new housing growth, it was considered that significant additional housing numbers within the smaller towns and villages of south Worcestershire would not be sustainable as there is not the infrastructure in place to provide for the increase in population and many suffer from a lack of public transport. The constrained boundary of Worcester City would also not provide any significant areas for housing growth and the green belt review did not identify any areas that could be released for housing from the green belt. However, Worcester City has allocated a site for employment land in the Green belt in an area where the impact has been assessed as 'limited to moderate'. Therefore, these options are not taken forward due to their potentially adverse impacts on the environment and the existing town and village communities.

The Preferred Spatial Strategy

- 7.5 The most sustainable spatial strategy was considered to be one that promotes rail-based growth, i.e. locating all significant new development within three miles of an existing, enhanced or proposed station, with a combination of developing under-used and vacant brownfield sites, sites that are located close to active travel and sustainable travel hubs and allocating other smaller sites in sustainable locations. This strategy will also incorporate those existing site allocations that have not yet been developed but are still considered to be in sustainable locations. However, this strategy alone will not deliver sufficient housing and

employment land and so, there was a need to look at how housing and employment land could be delivered through the allocation of larger strategic growth areas.

- 7.6 The delivery of housing and employment land through the identification of larger strategic growth areas, including a new settlement, was supported by respondents to the Issues and Options consultation. In addition, employment sites need to be accessible by both the strategic highway network and rail facilities and need to address the locational requirements of the various sectors.
- 7.7 Therefore, taking all of these factors into account, the option for growth that best met the objectives of the Plan was a combination of rail-based growth, regeneration of brownfield sites and the allocation of sustainable strategic growth areas. This formed the basis for identifying the strategic sites and other allocations.
- 7.8 The further Regulation 18 (III) Sustainability Appraisal (2021) also found the provision of a large new settlement to be the most sustainable and environmentally preferable option for delivering new housing and employment opportunities.

Identifying Site Allocations

- 7.9 A key component of the evidence base for identifying suitable site allocations was the Strategic Housing and Employment Land Availability Assessment (SHELAA).
- 7.10 1230 sites were submitted through the 'Call for Sites' process. During the Preferred Options consultation, 503 sites were identified as having potential for development and were therefore considered as reasonable alternatives in the Sustainability Appraisal Regulation 18 (II) Report (2019). A further 41 sites (and 79 proposed reallocation sites) were also considered as reasonable alternatives in the Sustainability Appraisal Regulation 18 (III) Report (2021). The Regulation 18 (III) SA Report also assessed 9 potential strategic locations (see below). A final batch of 106 reasonable alternative sites were assessed in the Sustainability Appraisal Regulation 19 Report (2022). The remaining sites were not taken forward for reasons such as:
- physical limitations or problems such as access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination;
 - potential impacts including the effect upon landscapes including landscape features, nature and heritage conservation, landscape character and sensitivity;
 - appropriateness and likely market attractiveness for the type of development proposed; contribution to regeneration priority areas;
 - environmental/amenity impacts experienced by would be occupiers and neighbouring areas
- 7.11 In addition, a number of sites which were either in the vicinity of a village categorised as being in Category 4 or below, or in the open countryside, were not carried forward for further consideration due to their location.
- 7.12 Full details of the SHELAA process, including the full schedule of the assessment, can be found by following the link below:

[Strategic Housing and Employment Land Availability Assessment - South Worcestershire Development Plan \(swdevelopmentplan.org\)](https://www.swdevelopmentplan.org)

Identification of Strategic Sites

- 7.13 The SHELAA submissions also featured a number of available land holdings large enough to accommodate a new or expanded settlement of a size which could deliver a reasonable degree of self-containment, would be likely to meet the criteria for a strategic growth area and would meet the objectives of the Plan review.
- 7.14 The main criteria required for a strategic location were as follows:
- they are able to accommodate sufficient land, homes, employment and other land uses;
 - they are in close proximity to a railway station (existing or planned) which is on a line(s) where there is or could be passenger growth capacity;
 - they are not overly constrained by environmental constraints e.g. flooding, landscape sensitivity etc;
 - they have the potential to create a high-quality environment for a new community; and
 - they could reasonably meet some of Worcester City’s housing and employment needs.
- 7.15 Each of the sites was assessed using the criteria and the Plan objectives, recognising that not all of the potential strategic locations would meet the criteria in full.
- 7.16 Those sites that met the criteria were all partially assessed as various separate land parcels during the SA process for the Regulation 18 (ii) Preferred Options consultation in 2019 but were not recognised as strategic location reasonable alternatives at the time. Mitton was not a strategic location at the time of Regulation 18 (ii), but the individual land parcels were still assessed.
- 7.17 An update to the Sustainability Appraisal (SA Regulation 18(iii) 2021) provided an analysis of, and reasoning for, the selection and rejection of reasonable alternatives for the strategic location sites. The SA Regulation 18 (iii) 2021 assessed the following nine potential strategic locations:
- Worcestershire Parkway (Norton Parkway)
 - Rushwick
 - Throckmorton
 - Kempsey (Land South of Worcester South)
 - Lower Broadheath (Land West of Worcester West)
 - Hinton on the Green (Land South West of Evesham)
 - Hanley Castle
 - Land at Mitton (a Duty to Co-operate consideration with Tewkesbury Borough Council)
 - Strensham
- 7.18 A broad indication of the best performing strategic locations was identified. The SA Regulation 18 (iii) 2021 also assessed 41 further reasonable alternatives and 79 proposed SWDP reallocation sites.
- 7.19 The full results can be found by following the links below:

Regulation 18 (ii) 2019

https://www.swdevelopmentplan.org/component/fileman/file/Documents/South%20Worcestershire%20Development%20Plan/SWDP%20Review/Evidence%20Base/SA%20and%20HRA/PO%20LC-503_SWDP_SA_Reg18II_7_171019LB.pdf?routed=1&container=fileman-files

Regulation 18 (iii) 2021

<https://www.swdevelopmentplan.org/component/fileman/file/Documents/South%20Worcestershire%20Development%20Plan/SWDP%20Review/Reg%2018%203%20SA%20Consultation/SWDPR%20R18%28III%29%20Sustainability%20Appraisal%20Report%20FINAL.pdf?route=d=1&container=fileman-files>

7.20 The sites were also assessed as to how they best meet the objectives of the Plan review and the criteria required for a strategic location.

Conclusion of Site Assessments

1. Worcestershire Parkway

7.21 The best performing option and therefore the most environmentally preferable option, by a significant margin was Worcestershire Parkway. When assessed as part of the Sustainability Appraisal, this proposed strategic location performed particularly well in the following areas:

- The provision of 50ha of employment land to provide jobs and an on-site railway station to provide access for commuters to and from the site.
- Good transport links through the railway station, potential capacity for bus routes and a network of foot and cycle paths.
- Proximity to the hospital and improved community infrastructure and facilities which will contribute to the enhanced well-being for residents
- The potential for a large number of houses will provide a range of house types and tenures, ensuring that all needs are catered for.
- The potential to reduce the impact of the new development on the biodiversity of the site and provide some protection and betterment.
- The potential to mitigate against the effects of climate change by providing opportunities for renewable energy including solar panels and heat source pumps.

7.22 The proposed new settlement at Worcestershire Parkway most effectively satisfies the Plan's objectives of:

- Economic success by providing the right employment sites in the right locations.
- Providing stronger communities by delivering a balanced mix of house tenures and types and making a major contribution towards meeting the overall housing target.
- Provision of housing and employment land in locations where there is access to local services and provide transport choice.
- Restoring and enhancing biodiversity through net gain, improving water quality and landscape quality and increasing and improving the green infrastructure of the area.
- Ensuring that new development will support the delivery of healthcare provision and accessibility.

7.23 In addition, the site also meets the five main criteria for a strategic growth area (as set out in para 7.14 above)

2. Throckmorton

7.24 The second highest performing option was Throckmorton. When assessed as part of the Sustainability Appraisal, this proposed strategic location performed particularly well in the following areas:

- Much of the site will be powered using solar energy generation which will significantly reduce the area's reliance on fossil fuels.
- This site will have the least impact on biodiversity if suitable mitigation measures are used.
- Due to the presence of a significant area of brownfield land, the potential for development to have adverse impacts on the landscape will be reduced.
- There is capacity on the site to deliver 60ha of employment land to provide jobs for the local population.

7.25 The proposed strategic site at Throckmorton also effectively meets the Plan's objectives of:

- Economic success by providing the right employment sites in the right locations.
- Providing stronger communities by delivering a balanced mix of house tenures and types and making a major contribution towards meeting the overall housing target.
- Prioritising the redevelopment of brownfield land.
- Ensuring development is designed to the highest possible environmental standards to minimise carbon emissions and increase the proportion of renewable energy to reduce the impacts of climate change.
- Ensuring that the landscape character and heritage assets of the area are not subjected to harm.

7.26 In addition, the site also meets 3 of the 5 main criteria for a strategic growth area (as set out in para 7.14 above). There are environmental constraints on the site, but it is anticipated that these will be addressed through mitigation measures. Also, the site is located too far away from the Worcester City administrative boundary to be considered able to accommodate its needs.

7.27 The next best options were Mitton, Rushwick, Kempsey and Lower Broadheath which achieved similar overall rankings through the sustainability appraisal.

Mitton

7.28 When assessed as part of the Sustainability Appraisal, this proposed strategic location performed particularly well in the following areas:

- It is close to a rail station
- Flood risk issues can be mitigated
- Low impact on landscape and townscape due to its location near Tewkesbury and the M5 motorway
- It only requires a small area of best and most versatile (BMV) agricultural land
- It has a greater scope to avoid adverse impacts on the cultural heritage of the area.
- Its proximity to schools and other community facilities is good.

7.29 The proposed strategic site at Mitton also best meets the Plan's objectives of:

- Providing stronger communities by delivering a balanced mix of house tenures and types and making a major contribution towards meeting the overall housing target.
- Ensuring development is designed to the highest possible environmental standards to minimise carbon emissions and increase the proportion of renewable energy to reduce the impacts of climate change.

- Ensuring that the landscape character and heritage assets of the area are not subject to harm.
- Ensuring development is designed to mitigate the impacts of climate change.

7.30 In addition, the site also meets 4 of the 5 main criteria for a strategic growth area (as set out in para 7.14 above). There are environmental constraints, but it is anticipated that these will be addressed through mitigation measures. Also, the site will be able to contribute towards the housing needs of Tewkesbury Borough Council through the Duty to co-operate.

Rushwick

7.31 When assessed as part of the Sustainability Appraisal, this proposed strategic location performed particularly well in the following areas:

- The proposal includes a future railway station
- There is little mitigation required to deal with flood risk
- Levels of air pollution can be controlled through mitigation
- There is capacity to provide some employment land

7.32 The proposed strategic site at Rushwick also best meets the Plan's objectives of:

- Providing stronger communities by delivering a balanced mix of house tenures and types and making a major contribution towards meeting the overall housing target.
- Ensuring development is designed to the highest possible environmental standards to minimise carbon emissions and increase the proportion of renewable energy to reduce the impacts of climate change.
- Ensuring that the landscape character and heritage assets of the area are not compromised.
- Ensuring development is designed to mitigate the impacts of climate change, particularly with regard to flood risk.

7.33 In addition, the site also meets 4 of the 5 main criteria for a strategic growth area (as set out in para 7.14 above). There are environmental constraints, but it is anticipated that these will be managed through mitigation measures. Also, the site could also accommodate some of Worcester's housing needs.

Lower Broadheath (Land to the West of Worcester West Urban Extension – SWDP 45/2)

7.34 When assessed as part of the Sustainability Appraisal, this proposed strategic location performed particularly well in the following areas:

- The site can accommodate fewer dwellings, lessening the impact on the landscape and townscape
- The site is well-located for community facilities, schools and the hospital are close to the boundary with Worcester City
- There is capacity to provide some employment land

7.35 The proposed strategic site at Lower Broadheath also meets the Plan's objectives of:

- Providing stronger communities by delivering a balanced mix of house tenures and types and making a major contribution towards meeting the overall housing target.

- Ensuring development is designed to the highest possible environmental standards to minimise carbon emissions and increase the proportion of renewable energy to reduce the impacts of climate change.
- Ensuring that the landscape character and heritage assets of the area are not compromised.
- Ensuring development is designed to mitigate the impacts of climate change.

7.36 In addition, the site meets 3 of the main criteria for a strategic growth area (as set out in para 7.14 above). However, the development of this site would incur the most impact on BMV land which would compromise the landscape character of the area; and it is not located close to a rail station which is further contrary to the overall development strategy for the plan review.

Kempsey (Land to the South of Worcester South Urban Extension – SWDP 45/1)

7.37 When assessed as part of the Sustainability Appraisal, this proposed strategic location performed particularly well in the following areas:

- The smaller scale of the proposed site would have a lesser impact on the environment
- The smaller scale of the proposals will reduce the impact on natural resources in the area
- Kempsey is closer to the facilities located within Worcester City, including the acute Worcester Royal Hospital.
- There is a lower adverse impact on the area's culture and heritage as there is only one listed building on the site
- The proposed site is closer to both primary and secondary schools
- The site has the capacity to deliver 20ha of employment land

7.38 The proposed strategic site at Kempsey also meets the Plan's objectives of:

- Improving the prosperity of the area by providing 20ha of employment land.
- Delivering new homes that meet the needs of the local community.
- Providing access to community facilities and social infrastructure.

7.39 In addition, the site meets 3 of the main criteria for a strategic growth area (as set out in para 7.14 above). However, the site is not close to a railway station and therefore has reduced sustainability and will have some impact on the landscape character of the area.

7.40 The lowest ranked, and potentially the least sustainable options, were land at Hanley Castle, Strensham and Hinton on the Green.

Hanley Castle

7.41 When assessed as part of the Sustainability Appraisal, this proposed strategic location performed particularly well in the following areas:

- It is a relatively small site which consequently will have a reduced adverse impact on the environment.
- Its development will have a lower adverse impact on pollution due to it being further away from an AQMA.
- The development of the site could provide new homes for local people.

7.42 The proposed strategic site at Hanley Castle also meets the Plan's objectives of:

- Delivering new homes that meet the needs of the local community.
- Ensuring new development is designed to the highest possible environmental standards. to minimise carbon emissions and reduce resource consumption.

7.43 In addition, the site meets 2 of the main criteria for a strategic growth area (as set out in para 7.14 above). However, the site is not close to a rail station, it has several environmental constraints and will not meet any of the employment and housing needs of Worcester City.

Strensham

7.44 When assessed as part of the Sustainability Appraisal, this proposed strategic location performs well in that:

- It could provide 15ha of employment land.
- The development of the site could provide new homes for local people.

7.45 However, the site did not perform well in the following areas:

- It is a large site in a remote location.
- It is close to the River Avon and therefore it will be difficult to mitigate against the impact of climate change.
- Any new development will potentially have an adverse impact on a priority habitat (Cotswolds AONB).
- New development will be located close to the AQMA around the M5 which may increase the level of pollution in the area.
- New development could be adversely impacted by the existing AQMA.
- Any proposals for new development will require significant infrastructure improvements, including new schools and upgrades to the M5.
- There is no rail station in the vicinity of Strensham.

7.46 With regard to the Plan's objectives, the proposed strategic site at Strensham meets the following:

- Delivers economic success through the provision of employment land.
- Delivers a range of new homes for local communities, including affordable housing.
- Any proposed new development will not compromise the landscape character or cultural heritage of the area.

7.47 Although Strensham does not meet any of the main criteria for a strategic growth area (as set out in para 7.14 above), the proposal has been assessed due to the potential capacity of the site to deliver new homes.

Hinton on the Green

7.48 The strategic location which is least suitable for development has been identified as Hinton on the Green, which is a very large site situated away from suitable transport options. When assessed as part of the Sustainability Appraisal, the site was found to have a potentially adverse impact on both the Bredon Hill SAC and the Cotswold AONB. It would require a significant amount of new infrastructure, including improved access to a rail station and improved road access.

7.49 However, with regard to the Plan's objectives, the proposed site at Hinton on the Green would deliver a range of new homes, including affordable housing.

Responses to the Preferred Options Consultation – Strategic Sites

7.50 As expected, there were a number of representations with regard to the strategic sites:

Worcestershire Parkway

Objections to the strategic site allocation at Worcestershire Parkway include:

- Loss of local character;
- Increase in the number of flooding incidents;
- Lack of infrastructure in the area;
- Impact on biodiversity;
- Increase in congestion and pollution;
- Coalescence of villages;
- Loss of green fields.

7.51 Representations of this type are expected at this stage of the plan-making process as much of the evidence base around the delivery of these sites had yet to be provided, including concept and masterplanning work, evidence of delivery and the details of the policy itself. It has been anticipated that the additional work considering viability, delivery and the provision of infrastructure would demonstrate that many of these concerns have either been addressed or mitigated.

7.52 Reasons for supporting the strategic allocation included:

- Its sustainable location adjacent to a railway station;
- The potential to create a well-designed new settlement similar to Poundbury;
- The provision of a choice of new homes;
- The ability to create a walking and cycling network;
- Support for the provision of 40% green infrastructure.

Throckmorton Airfield

7.53 Objections to the strategic site allocation at Throckmorton Airfield include:

- The road network is not capable of taking the additional traffic;
- There will be an adverse impact on the wildlife in the area;
- Increased levels of traffic and therefore pollution;
- Existing infrastructure is unable to cope;
- Public transport provision is poor;
- The proposals will create an out-of-town housing estate;
- The sense of identity and character of the area will be lost;
- The airfield runway should be retained for the future;
- There will be health issues arising from the presence of landfill.

7.54 As with those for Worcestershire Parkway, representations of this type were anticipated at this stage of the plan-making process as much of the evidence base around the delivery of these sites had yet to be provided, including concept and masterplanning work, evidence of

delivery and the details of the policy itself. It has been anticipated that the additional work examining viability, delivery and the provision of infrastructure would demonstrate that many of these concerns have either been addressed or mitigated.

7.55 Reasons for supporting the strategic allocation included:

- Redevelopment of a brownfield site rather than releasing green belt;
- New infrastructure may improve the traffic situation;
- Welcome properly planned development with new infrastructure;

Rushwick

7.56 Objections to the strategic site allocation at Rushwick include:

- Changing the character of the village;
- Increased congestion leading to gridlock;
- Increased flooding events;
- Loss of ancient trees and countryside;
- No infrastructure to serve the new development;
- A new station will increase traffic;
- Risks to biodiversity.

7.57 As with those for Worcestershire Parkway, representations of this type are expected at this stage of the plan-making process as much of the evidence base around the delivery of these sites had yet to be provided, including concept and masterplanning work, evidence of delivery and the details of the policy itself. It has been anticipated that the additional work looking at viability, delivery and the provision of infrastructure would demonstrate that many of these concerns have either been overcome or mitigated.

7.58 Reasons for supporting the strategic allocation included:

- There is a need for more housing in the area;
- Improvement to the infrastructure will be welcomed;
- Hopeful for a new bus service in the area;
- Provision of 40% green infrastructure.

Mitton

7.59 Objections to the strategic site allocation at Mitton include:

- Over-development of a rural area;
- Increase potential for flooding;
- Already too much traffic;
- No infrastructure;
- Cross boundary implications – council tax will be paid to Wychavon but the costs will be borne by Tewkesbury;
- Increase in anti-social behaviour;
- Conflicts with Bredon Parish Neighbourhood Plan;
- Will reduce the natural buffer between Tewkesbury and Bredon.

7.60 As with those for Worcestershire Parkway, representations of this type were expected at this stage of the plan-making process as much of the evidence base around the delivery of

these sites had yet to be provided, including concept and masterplanning work, evidence of delivery and the details of the policy itself. It has been anticipated that the additional work looking at viability, delivery and the provision of infrastructure would demonstrate that these concerns have either been overcome or mitigated.

8. Preferred Locations for Strategic Sites for New Development

8.1 As a result of the assessments, the following areas have been identified as the preferred locations for new strategic development in the SWDP Review:

Worcestershire Parkway (WP)

8.2 A new settlement focused around WP station is considered an appropriate location for the following reasons:

- The quantum of development considered deliverable by 2041 at WP is 5,000 dwellings with an additional 5,000 dwellings post 2041, 50 hectares of employment land and associated infrastructure which would include a secondary school, four primary schools, a town centre (to include retail and other commercial space, leisure centre, medical service provision) and a minimum of 40% Green Infrastructure. This development will be phased over at least 10 years. The new station itself will start providing services for both the Cotswold and Malvern line and the north east – south west main line. The station is the essential element of infrastructure necessary to reduce and shorten the length of car trips.
- The area is within 3km of the urban edge of Worcester, such that it is reasonable to envisage that it can meet some of the city's unmet employment and housing needs.
- The quantum of available land (approximately 1,130 hectares) is sufficient to create a new settlement with an appropriate mix of land uses.
- There are no identified significant planning policy or environment constraints that would prevent development of this scale. There is more than enough land to accommodate new development in Flood Zone 1. The land is neither Green Belt nor in an AONB and there are only a few important localised environmental designations which can be protected through the plan policies and subsequent masterplanning.
- In terms of infrastructure requirements beyond the railway station, these have been assessed through the preparation of an infrastructure delivery plan (IDP). The IDP will be subjected to ongoing review; it has been accompanied by a viability assessment which demonstrated that the site is economically viable and deliverable. This evidence will be further supplemented as detailed masterplanning progresses.
- A comprehensive Spatial Framework Supplementary Planning Document (SPD) is being produced by council officers in conjunction with Homes England, the Combined Landowners and other statutory organisations. This will be complemented by a masterplan and further supplementary planning guidance which will inform the delivery of the site.
- The landowners are actively collaborating to support and deliver the allocation.

Throckmorton Airfield

8.3 Throckmorton Airfield has been identified as a suitable broad location for growth with the quantum of deliverable growth by 2041 set at 2,000 dwellings and 20 hectares of employment land, with an additional 3,000 new homes and another 40 ha of employment land post 2041. The provision of associated infrastructure will include primary schools, a town centre, two local centres with retail and leisure uses. The new settlement will require a new, direct road from the centre to the A44 before any development commences. In addition, high quality pedestrian and cycle links will cover the 3km from the new settlement to Pershore railway station. This will incorporate a new 500 space car park at the station. A

new settlement focused on Throckmorton is considered an appropriate location for growth for the following reasons:

- The quantum of suitable land in the broad area, i.e. land bounded by the A44, B4082 and the C class road linking Bishampton with Fladbury, is sufficient to enable the creation of a new settlement with an appropriate mix of land uses.
- The core of the site is brownfield land. However, there will be some mitigation required before development can commence.
- The site is close to Pershore Railway Station and is easily linked by new walking and cycling routes, making this a sustainable location.

Rushwick

8.4 An expanded settlement focused on Rushwick is considered an appropriate location as a strategic site for the following reasons:

- The suggested quantum of development considered deliverable by 2041 is 1,000 dwellings.
- The quantum of suitable land within the broad area, i.e. land bounded by the A4440, A4103 and the River Teme, is sufficient to accommodate an expanded settlement which will contain a new primary school and Local Centre (retail and leisure uses) and some employment land.
- The proposed delivery of a rail station. However, the land necessary for the future delivery of the railway station and associated infrastructure should be secured to ensure the operational delivery of the railway station during the Plan period.

8.5 The quantum of development and high-level infrastructure requirements are set out in the infrastructure delivery plan and shown on the concept plan.

Mitton

8.6 The site at Mitton was considered an appropriate location for a strategic site for the following reasons:

- It has potential to provide a balanced mix of house types and tenures to meet the housing needs of both South Worcestershire (500 dwellings) and Tewkesbury (500 dwellings).
- There is considerable potential for improving both the green and blue infrastructure of the area and providing SuDS.
- The area around Carrant Brook provides an excellent connection to the Cotswolds National Landscape.
- The site is in proximity to a railway station and has good access to Tewkesbury which provides schools, health and other community facilities.
- Part of the site has already been established under the Duty to Cooperate.

Sites Not taken Forward

- 8.7 The sites at Kempsey and Lower Broadheath performed well in the Sustainability Appraisal and met many of the plan objectives and main criteria for becoming a strategic location. However, they were not taken forward into the preferred options for the following reasons:
- They are considered to form urban extensions and will therefore, be situated further away from facilities and key infrastructure.
 - They are not close to rail stations and will have fewer buses and cycling/walking connections, increasing the reliance on the car.
 - Additional traffic will place more pressure on an already constrained highway network which will negatively impact the environment.
 - Further urban extensions could result in the coalescence of settlements between the urban extensions and Worcester City, particularly at Kempsey and the development of the site at Lower Broadheath would result in the loss of a significant piece of highly valued open space.
 - There is potential for encroachment into land unsuitable for development, e.g. flood risk at Worcester and Kempsey, the green belt and AONBs.
- 8.8 For these reasons, the above sites were considered to be environmentally inferior to the four chosen strategic sites and were subsequently discounted.
- 8.9 The sites at Strensham, Hanley Castle and Hinton on the Green are the least sustainable sites, they met the fewest of the plan's objectives. None of these three sites are close to railway stations, they would require significant infrastructure provision to make them accessible. Hinton on the Green in particular is a large tract of land with no transport infrastructure. In addition, all three sites would have an impact on the Cotswold AONB and contain some areas of flood risk.

9. Working towards Publication (Regulation 19) (2022)

- 9.1 The Regulation 18 Preferred Options consultation received in the region of 7000 responses from statutory consultees, agents, landowners, members of the public, and any interested party. Responses were received via a consultation portal, email, or hard copy through the post, with in excess of 2000 people attending roadshow events. The information contained within the responses have, where appropriate, been used to inform the plan review in order to progress toward Regulation 19 Publication.
- 9.2 The consultation identified several issues of a technical nature concerning the interim Sustainability Appraisal for the Preferred Options relating to the assessment of sites and consideration of the wider supporting assumptions in the appraisal document. Therefore, in order to ensure that the Sustainability Appraisal was robust and technically correct, a further update to the interim Preferred Options Sustainability Appraisal was undertaken and a targeted consultation followed.
- 9.3 The consultation raised other areas of concern including regarding climate change and sustainable design and construction. Therefore, in response to a proclamation of a climate change emergency across the 3 councils, and responses from the Preferred Options consultation, a policy on climate change: Climate Change (SWDPR 01) and a policy on design and sustainable construction: Design and Sustainable Construction (SWDPR 05) were introduced and included as strategic policies for the plan review. These new policies will also help achieve the objectives set out in the following strategies:
- Wychavon Intelligently Green Plan [Intelligently Green - Wychavon District Council](#),
 - Malvern Hills Destination Zero Report [Destination Zero report - Malvern Hills District Council](#);and
 - Worcester City Environment Sustainability Strategy [PowerPoint Presentation \(worcester.gov.uk\)](#).
- 9.4 Other issues included a response from Historic England regarding the omission of an Historic Environment Topic Paper and site assessments not having appropriate regard to the Historic Environment. The Issues and Options document stated that a topic paper was to be produced for the Reg 18 consultation; this has subsequently been produced for the Reg 19 consultation. Further, site assessments, as part of the Strategic Housing and Land Availability Assessment have now considered aspects of the Historic Environment as appropriate.
- 9.5 Minor changes, resulting from the consultation, have occurred to a number of policies post Preferred Options; a summary of these can be found here: [SWDPR Preferred Options Responses Summary Report - Part 1 \(Policies\).docx](#).
- 9.6 In addition, a number of other policies have been amalgamated/introduced to the plan review; the bullets below highlight some of the main changes:
- Following internal discussions, a Green Belt policy (SWDPR 4) has been introduced to provide clarity on the councils' position on greenbelt.
 - Housing policies have had a number of changes including:
 - the policies on Access and Space Standards, and Self-Build have been combined into the Housing Mix policy (SWDPR 16);

- A policy has been added on Sub-Division (SWDPR 17) to provide clarity in this area;
- Following the inclusion of Entry-Level Exception Sites into the NPPF (para 72), a policy pertaining to First Homes Exception Sites has been introduced (SWDPR 19A).
- There has been an increase in allocation policies seeing Land at Mitton (SWDPR 54) included as a strategic site and a number of urban extensions having their own policy; the reintroduction of an employment allocation of Three Counties Showground (that was omitted in error from the Preferred Options – SWDPR 58); and a Renewable and Low Carbon Energy Site Allocations policy (SWDPR 59).
- There have also been some amendments to the policy position concerning Environmental / Resource policies with the inclusion of a Minerals and Waste Safeguarding (SWDPR 39).

Sustainability Appraisal

9.7 The Regulation 19 SA Report has been prepared to summarise the SA process to date and help inform the examination stage of the preparation of the SWDPR. The Regulation 19 SA presents the findings of the sustainability appraisal of the SWDPR, which is composed principally of 64 policies including four strategic site allocations, 166 non-strategic site allocations, three AIRs and nine renewable energy sites.

9.8 The SA Report also contains an assessment of reasonable alternative strategic and non-strategic sites (including an assessment of 106 additional reasonable alternative non-strategic sites identified since the previous SA stage), AIRs and renewable energy sites.

9.9 The purpose of the SA of the SWDPR is to:

- Identify, describe and evaluate the likely sustainability effects of the SWDPR proposals and their reasonable alternatives;
- Inform the SWCs' decision making and preparation of the SWDPR; and
- Provide an opportunity for statutory consultees, interested parties and the public to offer views on any aspect of the SA.

10. The Final Strategy

10.1 In conclusion, the final strategy is the most sustainable spatial strategy in that it:

- promotes rail-based growth, i.e. locating all significant new development within three miles of an existing, enhanced or proposed station;
- develops under-used and vacant brownfield sites;
- allocates sites that are located close to active travel and sustainable travel hubs, and
- allocates other smaller sites in sustainable locations.

10.2 This spatial strategy is supported by the allocation of four strategic site allocations at:

- Worcestershire Parkway;
- Throckmorton Airfield;
- Rushwick;
- Mitton