South Worcestershire Development Plan Review

Issues and Options Statement of Consultation Report

May 2019

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Summary of responses to the Issue and Options Consultation

1. Setting the Scene

1.1   The purpose of this report is to describe the extent of the public consultation for the Issues and Options stage of the South Worcestershire Development Plan Review, and provide a summary of the representations received during the six week consultation period over November and December 2019.

1.2   The South Worcestershire Development Plan (SWDP) is used to guide decisions on matters ranging from the location of housing, schools, parks and open spaces to the design requirements of new buildings. Policies in the SWDP are used when decisions on planning applications are made. The current SWDP was adopted in 2016 and it is now being reviewed.

1.3   The timetable below shows the stages that are involved in the preparation of the SWDP Review the preparation and completion of evidence base has been completed and the Issues and Options Consultation has been undertaken.

The SWDP Review Timetable

Stage	Date
Evidence Gathering	Commenced late 2017
Issues and Options consultation	November/December 2018
Preferred Options consultation	November/December 2019
Publication	October/November 2020
Submission	February 2021
Examination	April 2021
Inspector's report	October 2021
Adopt	November 2021

1.4   Central to the success of the above timetable is early, effective and meaningful consultation with the wider community as well as specific interested parties and key service providers. This involvement from the outset assists in producing a plan that reflects, as far as possible, community aspirations and needs by allowing issues to be identified and policy responses considered. This need to be considered alongside this national planning direction is given in the National Planning Policy Framework (NPPF), other guidance, and evidence produced in support of the Review. Furthermore a range of additional constraints also need to be reflected such as landscape character, settlement pattern, infrastructure capacity and physical characteristics of the plan area.

1.5   Therefore the above timetable will adhere to the consultation methods set out in each of the three South Worcestershire Councils' adopted Statements of Community Involvement. These have been updated for the Review and were adopted by the councils in February 2018. An overarching Consultation and Communications Strategy has also been put in place to agree a common approach to the consultation.

1.6   All the referenced documents in this report can be viewed on the website for the South Worcestershire Development Plan Review www.swdevelopmentplan.org

2. Preparatory Work

2.1   The publication of the Issues and Options consultation document in November 2018 was supported by a Consultation and Communications Strategy. The strategy clearly sets out the aim and objectives supporting the Review, covering the programme of consultation and engagement at each stage of the process. Effective and meaningful community participation and engagement is an essential element of the preparation of planning documents and the following principles underpin the approach to the Issues and Options as well as the later stages of the process. These are:

- Clear communication;

- Making it easy to get involved;

- Considering ideas and comments fairly; and

- Ensuring involvement is meaningful and effective.

2.2   Central to a coherent system of dialogue and engagement is an up to date database. The SWDP database was reviewed, updated and amended as well as checked under the General Data Protection Regulations that was introduced in May 2018. Prior to the consultation the SWDP database included 1,718 details of parties that where directly informed of the Issues and Options consultation. This comprised 1,431 consultees (e.g. individuals and interested parties) and 287 agents and developers. Following the Issues and Options consultation further details have been added and as of April 2019 the numbers on the database stood at 2,169.

2.3   The SWDP website was updated with a dedicated webpage for the Review. This was designed to raise awareness in the lead-up to the Issues and Options and also to promote the Sustainability Appraisal Scoping Report consultation which took place in July 2018. Further information on this consultation is available here https://www.swdevelopmentplan.org/?page_id=13778

3. Raising Awareness

3.1   Prior to the formal launch of the SWDP Review, district councillors were briefed about the process in late 2017. Following this the Review was launched on 31 January 2018 at The Guildhall in Worcester. The invited audience included district and county councillors as well as representatives from statutory consultees and providers, as well as a range of other interested parties. Following a presentation from officers those present engaged in a series of topic related workshops to begin an initial consideration of what the issue and options were that might be facing the Review. The launch was followed by the first of a series of press releases on 13 February 2018.

3.2   A similar briefing session was provided for all the parish and town councils across south Worcestershire held at the County Hall on 20 March 2018 attended by 35 representatives of local communities. The event was attended by a range of councillors from the rural parishes, towns and city with the event held in a similar format with workshops to inform the emerging issues and options paper.

3.3   For the remainder of the first half of 2018 the majority of the SWC time was focused on preparing technical evidence and background work to enable the Issues and Options paper to be prepared for the six weeks publication in the autumn of 2018. However more formal briefings continued for district and city councillors in May 2018 and the beginning of October 2018.

3.4   On the 13 June 2018 a Sustainability Appraisal workshop was held in The Guildhall, Worcester. This was facilitated by the SA consultants Lepus, and attendees representing statutory bodies, infrastructure providers and other interested providers were able to help develop the SA framework.

3.5   In order to meet the requirements of the Duty to Cooperate, a series of meetings have been held with neighbouring authorities and Worcestershire County Council to discuss cross boundary planning matters, the plan review timetable and to inform the preparation of a Statement of Common Ground.

4. Issues and Options Consultation

4.1   Following approval to publish the Issues and Options paper for consultation from the South Worcestershire Councils in October 2018 the six week consultation commenced on 5 November and closed on 17 December 2018. This was preceded by a press release issued on 31 October 2018 and all the organisations and individuals held on the SWDP database were provided with details of the Issues and Options consultation. Hard copies of the Issues and Options paper, summary document and response forms were placed in the Customer Service Centres and libraries across the SWDP Review plan and electronic versions of the documents on the SWDP website.

4.2   The exhibition events were supported by posts on social media in advance of each date and the 73 posts in response generated 75,823 links via Facebook and 532 engagements via Twitter. In addition a series of explainer videos were produced covering an overview of the Review; where should development go; Housing and the Economy. These were available to view on the SWDP website consultation page. The videos received 16,145 views since being put up on the website at the start of the Issues and Options consultation period to March 2019.

4.3   An early briefing was provided for parish and town councils on 6 November 2018 on the Issues and Options process at County Hall attended by 67 councils representing local communities. The consultation was supported by a series of staffed exhibitions held at the following locations:

SWDPR Issues and Options consultation events and attendance – November to December 2018			
Venue	Date	Time	Attendance
Worcester Crown Gate (Friary Walk)	Sat 10/11/18	10:00-16:00	250
Tenbury Wells, Pump Rooms	Tues 13/11/18	14:00-20:00	15
Droitwich Spa, Parish Centre	Thurs 15/11/18	14:00-20:00	25
Upton-upon-Severn, Memorial Hall	Tues 20/11/18	14:00-20:00	140
Pershore, Town Hall	Wed 21/11/18	14:00-20:00	70
Malvern, Lyttleton Rooms	Monday 26/11/18	14:00-20:00	140
Evesham, Town Hall	Thurs 29/11/18	14:00-20:00	90
Total			**730**

4.4   The exhibitions where held in the city over the course of a Saturday at the beginning of the consultation period and in the main towns during a weekday from 2:00pm to 8:00pm concluding at the end of November 2018. The events were staffed by planning officers and included an exhibition explaining the need for a review of the SWDP and a summary of the Issues and Options paper. During the summer of 2018 a Call for Sites exercise was undertaken as part of the Strategic Housing and

Employment Land Availability Assessment (SHELAA) which provides an opportunity for interested parties to submit sites to be considered for housing and employment development. The sites submitted were shown on maps at the exhibition. Approximately 730 people attended the events.

4.5   Media interest in the Issues and Options resulting from the series of press releases was limited to 5 articles. Press and media coverage has been greatly reduced compared to SWDP process. This is likely to be due to a number of reasons including the lack of detail about specific sites, limited news value of the Review, planning fatigue amongst the local press or possibly a reflection on the significant cuts to the local media in recent years since the SWDP was started. This further supports our view we need to concentrate on investing in our own communication routes (council magazines, paid for social media, email lists etc.) rather than rely on local media.

5.   Summary of Responses

5.1   A total of 466 people or organisations responded to the issues and options consultation providing 4,470 individual comments were logged. Representations were submitted predominately via email (70%), then via the Objective on-line portal (20%) and then a modest number via letter (8%).

5.2   All the individual responses received to the consultation have been summarised and provided with an officer response. This will be made available alongside the Preferred Options consultation in the autumn of 2019. In the meantime a summery is provided at Appendix 1 of this document under the headings in the Issues and Options Paper.

5.3   The nature of the feedback on the different sections of the Issues and Options paper was varied. Not surprisingly a number of options received a significant level of attention, whereas other topics were more limited.

Appendix 1

Summary of responses to the SWDPR Issues and Options

Summary of Responses to Options

Option	Summary
1. The Overall Development Strategy Should the overall development strategy be based on: a) Rail Station Focussed Development. b) Continuation of the Adopted SWDP Development Strategy. c) Increasing Densities through Regeneration. d) Large Urban Extension.	There where a total of 216 representations submitted to this option. A number of representations referred to specific sites that could deliver the options or which were opposed to being developed. Option a) was well supported with a number of respondents suggesting that this would be appropriate. However, the key concerns were: • Whether or not the 2 mile radius was suitable as it could be argued that it is too far to walk, whilst others favoured a further to increase the capacity for development around transport hubs. • There is insufficient evidence to demonstrate that the option is deliverable. • Questioned the capacity of rail infrastructure to cope with additional demand. • Additional rail stations should be opened to facilitate this. Option b) received more limited support and many respondents raised concerns that this would place too much pressure on villages which have already grown as a result of current SWDP allocations and speculative development. Option c) received strong support though many representations acknowledged that his alone would not deliver the housing numbers required. There was considerable support for a new settlement and a large number of representations suggested that

	Worcestershire Parkway rail station would be a good location for this as it provides rail based transport.
2. Development Boundary Review Should the Development Boundaries Review: 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 there 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 can not readily be identified in accordance with the methodology referred to in Option c) above.	There were a total of 169 representations submitted to this option. Several responses confused the Development Boundaries Review with the Development Strategy, and others comments on the proposed Development Boundaries Review Methodology which had already been subject to consultation earlier in 2018. A number of agents and landowners made representations promoting sites to be included in any updated development boundaries, and others commented that where there was a Neighbourhood Plan adopted or in production the development boundaries should not be amended through the SWDPR. Responses which specifically selected one or a combination of two or more of the listed options were mixed, with expressions of support and objection to all of the five options.
3. Where should new housing growth be located? a) At Worcester, towns and villages as per the SWDP. b) At a new settlement(s)/garden village(s); indicate broad location and size. c) A greater proportion of growth generally in the villages. d) A greater proportion of growth generally in the towns.	There were a total of 430 representations submitted to this option. A number of representations were made relating to specific sites and objecting to development proposals that were being promoted by developers. Given the numbers of representations received there was a broad level of support for all the options. Concerns were also voiced over the level and speed of growth and the provision of the necessary infrastructure to support the development.

e) A greater proportion of growth at Worcester (indicate broad locations). f) In the Green Belt (indicate broad locations and scale).	
4. Neighbourhood Area Housing Numbers Should housing numbers for Neighbourhood Areas be determined on the basis of: a) The proportion of dwellings currently located within the Neighbourhood Area. b) The availability of services and facilities within the neighbourhood area as per the settlement hierarchy.	There were 113 representations submitted to this option. There was overwhelming support for Option b). There was some limited support for a combination of both approaches. Overall though representations did not suggest any useful approaches to developing a methodology but either reiterated the options or cited the broad approach and direction given in the National Planning Policy Framework (NPPF).
5. Employment Growth Where should new employment be located: a) Alongside the housing growth. b) At/near to motorway junctions. c) Along trunk road corridors. d) Expand existing employment sites. e) Near existing rail stations or opportunities for new rail stations.	There were 92 representations submitted to this option. There were 28 responses in favour of locating new employment alongside the housing growth; 33 responses in favour of locating new employment near motorway junctions; 12 responses in favour of locating new employment along trunk road corridors; 16 responses in favour of locating new employment alongside existing employment sites; and 37 responses in favour of locating new employment near existing or new railway stations. There was one response opposed to locating new employment near motorway junctions, two responses opposed to locating new employment along trunk road corridors and two responses opposed to locating new employment near to existing or new railway stations. However these results were distorted by a number of identical responses submitted by a planning agent on behalf of a number of separate clients.
6. Density Should the SWDPR: a) Identify areas of Worcester city that can accommodate higher density development. b) Identify further areas and/or specific sites for higher density development.	There were 108 representations submitted to this option. 43 did not express a clear preference for a particular option. 32 supported Option a), 18 supported Option b) and 23 supported Option c). The key issues included the need for any policy on density to

c) Continue with the density policy in the adopted SWDP (SWDP13).	be in conformity with the NPPF requirements which have changed since the current SWDP policy was adopted. Further that the policy to recognise that density needs to respond to context and this differs significantly between urban and rural areas
7. Brownfield Land Should the SWDPR: a) Maximise the re-use of brownfield land by allocating all available brownfield land including land outside of development boundaries. b) Allocate all deliverable brownfield sites within the development boundaries. c) Only allocate brownfield land where sites can deliver all of the essential planning policy requirements, such as affordable housing and infrastructure contributions.	There were 128 representations submitted to this option. 46 supported Option a), 28 supported Option b) and 14 supported Option c). 47 did not express a preference for a specific option. Some responses supported more that one option or a mix of options. The key issues raised were the desire to see brownfield sites developed before greenfield sites and the need for the approach to be in conformity with the NPPF. A number of representations also suggested that brownfield sites should be assessed for biodiversity value before they are allocated or developed.

8. Best and Most Versatile Agricultural Land (BMVAL)
Should the SWDPR:
  a) Continue the current approach to resit development of 2ha or more on the BMVAL in order to minimise the amount lost to development.
  b) Allow the development of BMVAL in sustainable locations.
	There were 107 representations submitted to this option. The overwhelming response was in support of Option a) and keeping with the approach in SWDP13. A number of the responses sought an even stricter stance on the loss of any BMVAL citing the strategic importance and land quality of this designation. Where there was an opposing view support for Option b) was predominately from the development industry. The sector sought a more flexible approach to deliver housing supply and critical of SWDP13 not being inconformity with the framework as the NPPF does not set a threshold.

9. Market Housing Mix
Should the SWDPR:
 	
  a) Continue to require a specified mix of homes to meet the needs of particular types of households.
 	
  b) Not include a policy setting out the housing mix required and leave it to market forces to determine what mix of housing is delivered.
	There were 116 representations submitted to this option. All options received some support, but support for Option c) was limited with a number specifically objected to it.
	
	Other issues that were raised included:
	
	Option a):
	• Housing mix should be driven towards affordable housing, starter homes and suitable houses for ageing population.

c) Identify specific sites for executive homes. d) Remove the restrictions on sub dividing existing homes.	• Advocate target or preferred mix rather than a blanket mix. • Housing mix should be applicable to large sites only. Option c): • Policy needs to restrain the building of executive homes in favour of a mix, driven by local need. • Executive homes in some locations are appropriate. • Executive homes appropriate for small and medium sized sites. Option d): • Subdivision of dwellings is now in the NPPF should help provide more affordable homes in the rural areas, help reduce loss of green space. • Subdivision of properties is opposed as it can lead to overcrowding. Other comments: • Town centres could accommodate housing with lowered car parking provision. • SHMA should be updated regularly during the life of the plan.
10. Affordable Housing Should the SWDPR: a) Seek to apply enhanced accessibility or adaptability standards to new dwellings, e.g. to help meet the needs of older people and people who use wheelchairs. If so, what proportion of new dwellings should the standard be applied to? b) Not seek to apply the access standard to any new dwellings.	There were 94 representations submitted to this option. There was support for and objection to both options from respondents. Other issues that were raised included: Option a): • Various percentages suggested from 5% to 100%. • Policy would make it easier for people with any disabilities to find suitable accommodation. • Suggest a minimum number of bungalows within any new development ensuring level access throughout. • Any additional standards should be evidenced and justified. • Access standards should be in accordance with national policy and

	regulations. • Consider not required as specialist providers already adopt these standards through their developments. Option b): • Current Building Regulations are sufficient to deliver adaptable housing for a range of needs. General: • Need to take into account impact on heritage buildings. • Developers have been working with Registered Providers in creating wheelchair accessible homes and with future residents to meet their accessibility needs.
11. Providing Housing for Older Residents Should the SWDPR: a) Allocate certain sites specifically for accommodation for the older people. b) Require strategic sites to deliver more accommodation for older residents such as retirement apartments or a care home. c) Restrict accommodation for older residents in locations which are less accessible by public transport and have limited services and facilities.	There were 76 representations submitted to this option. There was support for and objection to all 3 options from respondents. Other issues that were raised included: Allocate certain sites specifically for accommodation for the older people: • Market alone will not always provide for the needs of older people. • Different providers will have different locational requirements depending upon the nature of the accommodation to be provided. • Avoid less accessible locations. • Distinct design and operational requirements that are best met by developers that specialise in the sector. Require strategic sites to deliver more accommodation for older residents such as retirement apartments or a care home: • SWDPR need to examine further the ability of strategic sites to accommodate retirement apartments or care home. • Provision of sites for older housing provision should be left to market forces, and avoid imposing targets or requirements on allocated sites.

	Restrict accommodation for older residents in locations which are less accessible by public transport and have limited services and facilities:
	• Option c) discriminates against older residents who would prefer to remain in the rural communities that they have lived in for long periods.
	• Encourage homes suitable for the elderly in the best locations, rather than restrict it in the worst.
	• Need to avoid perverse incentives where developers provide nothing for the elderly, because they are developing in a less connected location.
	General:
	• Should undertake a demographically-based study of the impact of an ageing population on housing need to establish e.g. if a need to plan for specific accommodation for older people.
	• Older people often wish to move into towns where there are more services and facilities available.
	• Establish how accessibility via Building Regulations can help meet the needs of older people.
	• The opportunity to better blend C2 and C3 types of accommodation as well as creating opportunities for 'self-contained' accommodation on the ground floor of two storey homes.
	• Either all or a proportion of new homes to meet Lifetime Homes Standards.
12. Self and Custom Build Housing Should the SWDPR: a) Require developers to offer a specified proportion of larger housing allocations as self and custom build plots. b) Allocate sites specifically for self and custom build housing.	There were 82 representations submitted to this option. There was support for and objection to all 3 options from respondents, some also considered Neighbourhood Plans have a role in bringing forward self build sites. Other issues that were raised included: Option a): • Unlikely that many people wanting a self build plot would want one on an estate.

c) Not have a specific policy but rely upon the development management process for self and custom build homes to come forward.	• Possibility of directing self build to smaller sites, those less than 1ha. • Option a) could result in a significant over-supply of plots which would never come forward for development and risk delivery of identified housing sites. • Should be allowed for on sites but not with a prescriptive imposition of a specific number of units to be provided. • Option a) would require mechanism to enable any self-build plots not brought forward within a specified timeframe to revert back to market housing as part of the wider scheme. • Should self build be subject to the same density rules, or would larger plots be accepted? Option b): • Allocate small self-build sites of between 5 and 10 dwellings. Option c): • If development management is to be relied upon there needs to be criteria based policy that provides appropriate guidance and encouragement. • Having no specific policy and relying on the development management process to bring forward self and custom build housing may mean demand is unmet contrary to the requirements under the Self Build and Custom Housebuilding Act 2015. General: • Establishing level of demand from self build register is misleading because many on the register may not be able to finance such a project. • Market for self and custom built housing is uncertain and should be led by landowners or promoters. • Suggest 'exception sites' for self and custom build housing. • Opportunity to include smaller sites for self builds in hamlets or outside of major

	settlement boundaries. • A separate and targeted policy should exist and be managed proactively.
13. Access Standards Should the SWDPR: a) Seek to apply enhanced accessibility or adaptability standards to new dwellings, e.g. to help meet the needs of older people and people who use wheelchairs. If so, what proportion of new dwellings should the standard be applied to? b) Not seek to apply the access standard to any new dwellings.	There were 76 representations submitted to this option. There was support for and objection to both options from respondents. Other issues that were raised included: Option a): • Various percentages suggested from 5% to 100%. • Uncertain of percentages of new dwellings should be applied. • Apply to a proportion of new dwellings that are suitable for older people and those who use wheel chairs based on an assessment of future need. • Cost of wider internal doors and electrical and light switches at a lower level is negligible, with no downside for able bodied people. • Policy would make it easier for people with any disabilities to find suitable accommodation. • Suggest a minimum number of bungalows within any new development, ensuring level access throughout. • Would help 'future proof' homes for all. • Any additional standards should be evidenced and justified. • Access standards should be in accordance with national policy and regulations. • Consider not required as specialist providers already adopt these standards through their developments, but if it is, the SWDPR should adopt national standards. • Where adaptation (or adaptability) can be designed in at little marginal cost it should be, but expensive items should be left to be added later if required. Option b): • Rely on Building Regulations. • All new homes are built to building

	Regulation Part M, Category 11 standard, which includes level approach routes, accessible from door thresholds, wider internal doorway and corridor widths etc. and benefit less able-bodied occupants. General: • Pointless having the property with the required access but the roads and systems to get to the properties are not included. • Para 127 of the 2018 NPPF and the Written Ministerial Statement dated 25th March 2015 that states that "the optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the NPPG ". • Need to take into account impact on heritage buildings. • Certain developers will willingly adopt Building for Life standards as a marketing tool. • Certain developers already working with Registered Providers (Housing Associations) in creating wheelchair accessible homes and with future residents to meet their accessibility needs.
14. Residential Space Standards Should the SWDPR: a) Apply the Nationally Described Space Standards to all new dwellings including conversions of existing buildings. b) Only apply National Space Standard to new dwellings which are not created by the conversion of existing buildings. c) Not seek to impose the National Space Standard and instead allow the market to determine the size of	There were 73 representations submitted to this option. There was support for and objection to all 3 options from respondents. Other issues that were raised included: Option b): • Conversion of existing buildings may not be able to meet the standard. • Should not apply to individual extensions, adaptations, but should apply to conversion to multiple occupancy. • Cotswold District Council's adopted Local Plan (2011-2031) applies Nationally Described Space Standards to all new dwellings.

new dwellings.	Option c): • Would significantly detrimentally affect efficiency of land use within the south Worcestershire area, irrespective of whether it is applied to new dwellings or dwellings created by conversions. • Important that developers are not burdened with increased space standards which could prove onus and impinge the viability of some schemes. • Housebuilders and specialist providers already adopt relevant and appropriate standards in their developments in any event. General: • Should be applied across all tenures, otherwise problematic. • Would need to test alongside any new density standards. • May have an impact on the viability of development and should only be introduced in accordance with paragraph 127 of the NPPF. • Introduction of any space standard should be clearly evidenced, justified and tested to ensure it is suitable. • Market led innovation and flexibility is important if all housing needs are to be met, and this should not be stifled through the blunt instrument of an overarching standard, e.g. highly efficient use of disused brownfield land and meeting the specific needs of certain groups, for example those requiring move-on accommodation.

15. Water Consumption
Should the SWDP Review:
    a) Require new dwellings to meet the tighter Building Regulations optional requirement of 110 litres/person/day as per the adopted SWDP policy.
    b) Not implement a higher water standard than is set out within
	There were 60 representations submitted in response to this option. A number of responses make reference to applying the tighter regulations in an effort to reduce climate change and this is an issue the SWC will need to consider in their implementation of the policy. 2 responses suggest that a policy of this nature is not required and to adopt the national standard. A number of

Building Regulations.	responses, similar in nature (text, layout etc.) have been submitted by planning agents on behalf of a number of clients. All of these are in favour of Option a). 3 responses make reference to the use of 'grey water' and 'water harvesting' in an effort to reduce usage. This is a consideration that may be implemented going forward following the results from options posed in the Resource Management section of the document. 20 responses were in favour of Option b); whilst 31 were in favour of Option a). 12 of the 31 suggested only implementing the tighter requirements where necessary to do so, i.e. in areas of serious water stress. Three options were proposed regarding Flood Risk; SuDS; and Water Quality within the 'Resource Management' section of the document. All options contained a series of responses either from members of the public with a similar agenda or identical/similar responses from agents acting on behalf of developers.

16. Employment Growth
Should the SWDP Review:
    a) Identify those sites that are essential to the success of the south Worcestershire economy and seek to prevent their redevelopment for non-employment sustaining uses.
    b) Include a policy that seeks to prevent the redevelopment of employment land for residential purposes (except where this is permitted by national planning policy) but is more accommodating to proposals for change of use to other employment generating uses.
	There were 40 representations submitted to this option. Ten responses supported protecting strategic employment sites and 14 responses supported protecting all employment land. Two responses supported both options. A number of other responses clearly showed support for one option but have not been included in the numbers above as the responses did not expressly support an option. One response was opposed to both options.

17. Live/Work Units Should the SWDPR: a) Continue to set out detailed requirements for live/work units in SWDP8G.	There were 43 representations submitted to this option. Nine responses favoured a policy that sets out detailed requirements for live/work units, five responses favoured only

b) Continue to encourage live/work units, but only in specific locations or as part of live/work hubs. c) Set out a more relaxed policy for live/work units to encourage more to come forward. d) Not include specific policy on live/work units and instead rely on the other policies within the SWDPR to guide decisions on employment led proposals.	allowing live/work units in specific locations, 14 responses favoured a more relaxed policy that would encourage more applications for live/work units and six responses favoured having no specific policy for live/work units. However the majority of responses suggested little understanding of what live/work units are with working from home options being confused with live/work accommodation.
18. The Rural Economy Should the SWDPR: a) Allocate sites for appropriate employment uses in rural areas to diversity the rural economy and reduce the need to travel. b) Relax planning rules to allow land owners to extend rural employment sites and encourage larger farm diversification projects than those permitted by the General Permitted Development Order. c) Include a specific policy for large scale agricultural/horticulture development. d) Extend existing rural business parks.	There were 46 representations submitted to this option. 16 responses favoured allocating appropriate sites in rural areas to diversify the rural economy and reduce the need to travel. Nine responses favoured relaxed planning rules to encourage the expansion of existing rural employment sites and larger farm diversification projects. Nine responses supported the inclusion of a specific policy for large scale horticultural development and eight responses supported the option of expanding rural business parks. Two responses were opposed to allocating sites in rural areas for employment. Five responses were opposed to relaxing planning rules for employment sites in rural areas and one response was opposed to expanding rural business parks. Many responses saw no need for employment opportunities in the rural parts of South Worcestershire and supported commuting as the best option to provide employment for rural residents of south Worcestershire.
19. How should retail centres change to meet the needs of south Worcestershire? a) Seek to consolidate stores in fewer streets. b) Allocate surplus retail units for housing development. c) Seek opportunities to bring out of town stores back into the city centre. d) Encourage café culture, with more retail units converting to cafes and casual dining restaurants.	There were 51 representations submitted to this option. Six responses were in favour of consolidating retail outlets in fewer streets. 21 responses were in favour of allocating surplus retail units for housing development. Nine responses were in favour of bringing out of town stores back into town centres. Nine responses were in favour of converting more retail units into cafes and restaurants. A number of responses were in favour of more than one option. Two responses opposed consolidating stores in fewer streets. Two responses opposed allocating

	surplus retail space for housing. One response opposed bringing out of town stores back into town centres. One response opposed converting more retail space into cafes and restaurants. A number of responses suggested that more development, housing and employment, should be allocated to town centre locations. Many responses considered that better and cheaper parking would help town centres.
20. Planning for the future of the High Street a) Increase the range of activities planning policy will support in town centre premises. b) Tighten planning controls for change of use in the most important town centre streets. c) Seek to limit the total number of fast food outlets wherever they are located, rather than just in defined centres. d) Only define the boundaries of retail centres in the main and other towns leaving smaller centres to evolve according to local demand for services. e) Encourage café culture and casual dining to replace traditional retailing activities. f) Identify specific centres/locations for public realm improvement projects.	There were 37 representations submitted to this option. 11 responses supported increasing the range of activities planning policy allows in town centre premises. Four responses supported tightening planning controls to prevent changes of use in the most important town centre streets. Eight responses supported limiting the number of fast food outlets in all parts of south Worcestershire. Four responses supported only defining retail boundaries in town centres. Five responses supported encouraging café culture to replace traditional retail stores. Ten responses supported identifying specific locations for public realm improvements. Suggested locations for public realm improvements were, Church Street, Malvern. Between Friar Street and Salters Centre, Droitwich. Evesham Conservation Area, Barnards Green and Malvern Link, Port Street Evesham, and Broadway High Street. One response was opposed to tightening controls for change of use in the most important streets, seeking to limit the number of fast food outlets and only defining the boundaries of town centres. Two further responses were also opposed to only defining the boundaries of town centres. One response was opposed to encouraging café culture.
21. Outside of the main town centres how should we promote strong neighbourhood centres and active frontages? a) Seek to protect retail uses on the	There were 30 representations submitted to this option. Six responses supported the protection of ground floor retail uses. 10 responses supported allowing retail units to be converted to other uses including housing

ground floor. b) Allow vacant retail units to be converted to other uses including housing. c) Strictly control the range of uses in neighbourhood shopping areas so that a range of commercial services is maintained and single retail uses such as takeaway food do not dominate centres.	and two responses were opposed to this option. Seven responses favoured stricter controls on the change of use of retail units in neighbourhood shopping centres to ensure uses such as takeaways do not dominate these centres.
22. Hotel Accommodation Should the SWDPR: a) Allocate a specific site for a four star hotel within Worcester city centre. b) Set out a positive development management policy for a four star hotel within Worcester city centre. c) Not make a specific allocation or include an explicit policy to attract a four star hotel to Worcester city centre. d) Seek to address other hotel accommodation needs across south Worcestershire.	A total of 31 representations were submitted to this option. There was limited support for not promoting a new hotel in the city with support evenly spread between allocating a site or including an enabling policy. There was also a similar level of support for improving the hotel accommodation offer across south Worcestershire. A limited number of comments were made which included the recommendation to improve existing accommodation, that it was not a priority and that a four star hotel could be included within the Worcester South strategic allocation in the SWDP. In response SWDP35 does provide a framework to support visitor accommodation across the whole plan area and it is appropriate that the policy continues to do so. In terms of delivery a new four star hotel in Worcester there is a level of support for this. However given the absence of a specific site that is being promoted for such a purpose the preferred option is to include the enabling policy criteria and addition to the reasoned justification as set out below.
23. Tourist Accommodation Should the SWDPR: a) Update the tourist accommodation policy to include new forms of accommodation, such as glamping, pods, and safari tents and take more flexible approach to allowing these uses. b) Update the definition of tourist accommodation so that new forms of accommodation are covered within the existing policy.	A total of 36 representations were submitted to this option. The option presented were both to update SWDP 36 with reference to new forms of accommodation, e.g. clamping, pods and safari tents, but if appropriate allow a more flexible approach to allowing these uses. There was overwhelming support to update the types and definitions of tourist accommodation but were divided evenly between retaining the criteria in the adopted policy and allowing more flexibility for these

	type of uses. The preferred option is to update the list of the range of accommodation types but it is considered the policy as worded provides a framework to consider planning applications for this type of development in a positive manner, whilst introducing a degree of constraint to safeguard the environment and locally amenity.
24. Transport Should the SWDPR: a) Promote the use of electric vehicles by requiring all new employment parking to have electric charging points. b) Promote the use of electric vehicles by requiring all new residential development to have electric charging points for all properties. c) Integrate waking and cycling routes to community facilities, retail outlets, education and employment opportunities in all new housing developments to an agreed standard. d) Seek to promote the sustainable transport options set out in Local Transport Plan 4 as a priority. e) Review HGV parking and promoted routes through south Worcestershire to minimise the impact on communities. f) Explore alternative options for rural transport to offset the impact of loss of rural transport.	There were 97 representations submitted to this option. The majority of responses were supportive of option c). In providing electric vehicle (EV) charging points significantly more comments were received on option b) than a). Option a) is easier to deliver in that the number of EV charging points we are likely to require is low relative to residential development and typically new employment buildings will be running larger currents making EV charging points more viable. As for domestic EV charging points that attracted most of the representations and predictable they were split between developers concerned that it could make development unviable or the network capacity would not cater for it, and the rest who want EV charging points for all new dwellings. Given the Government's ambitions for EVs and their commitment to phase out internal combustion engine sales by 2040 the Review should have a positive policy. In terms of development viability it will have very little impact if the requirement is simply to have new dwellings wired to host EV charging points. The limited numbers of responses received to option e) were supportive. Typically there use will not be able to compete with housing nor employment land values. Limited responses were concerned SWDP11 with those supporting it on residential amenity grounds and those against saying it could have a detrimental effect on business. Finally there were limited responses to option f) but those made were generally supportive.
25. Design Policy Should the SWDPR:	A total of 81 representations were submitted to this option. The NPPF requires design

a) Continue with the adopted design policy (SWDP21) which sets out a number of requirements which developments should meet. b) Require all new housing developments to achieve Building for Life requirements. c) Identify strategic sites and locations and include masterplanning and design codes for them within the SWDPR. d) Identify strategic sites for which masterplans and design codes will be prepared as Supplementary Planning Documents once the plan is adopted.	considerations to be an iterative process throughout the development of a scheme and this should be reflected in the revised policy. The NPPF suggests that design tools, e.g. masterplans and design codes can assist this and the Issues and Options sort views on this aspect. Responses were mixed with some support, but mirrored by concerns that mandatory requirements to use these 'tools' would be too onerous. In the context of reviewing SWDP 21 continuing the reference to encouraging the use of design tools is more aligned to the Framework and that the strategic site allocation policies are more appropriate to require masterplan and/or design codes. Comments also suggested that the policy needed to refer space standards, although in response it is felt these are more appropriately dealt with under the housing policies. It was also suggested that amendments could incorporate reference to other design policies and guidance, e.g. neighbourhood plans, AONB and update references to new SPD, and county council parking standards etc.
26. Green Infrastructure Should the SWDPR: a) Include Green Infrastructure (GI) plans or strategies for strategic sites to ensure that they link to the wider GI network and address the relevant GI priorities. b) Maintain a percentage requirement for GI (adopted policy).	There were 76 representations submitted to this option. Of the 64 respondents that did favour an option 36 (56%) supported the use of GI plans or strategies for strategic sites to ensure that they link to the wider GI network and address the relevant GI priorities. Secondly, 13 of 64 respondents opted to maintain a percentage requirement for GI (adopted policy). Although 8 of the 13 who opted for this option stated that the 40% requirement was too high. Finally 15 of the 64 respondents opted to utilise both options to steer GI policy direction. As a general summary there were also a number of respondents concerned that there is no established percentage for GI on all sites not just for residential development. Further the Environment Agency recommended an

	option to focus on the need to enhance blue infrastructure which are landscape elements linked to water such as pools, pond and wetland systems, artificial basins or watercourses; and understandably posits that alongside green infrastructure they help interconnect a network of environmental enhancements.
27. Biodiversity Should the SWDPR: a) Continue to protect all designated sites from development, including maintaining a buffer zone where appropriate. b) Encourage the biodiversity enhancement of sites through development, e.g. by allocating sites which can deliver biodiversity enhancement. c) Seek to identify opportunities for the restoration or creation of new habitat areas in association with planned development, as part of the wider biodiversity network. d) Require, through policy, increased long-term monitoring of biodiversity mitigation and enhancement measures on development sites.	There were 81 representations submitted to this option. Although comments were generally positive regarding the current policy approach of SWDP22 and agreed that the current policy was supportive of the NPPF. However there were some negative comments which generally criticised the plan for being worded in a way that was vulnerable to tokenism and 'developer pressure'. Overall there were 54 respondents who selected from the four options provided in Option 27. A majority of the respondents opted for more than one option, with this in mind, the pie chart below illustrates how many times an option was supported within comments. Option a) was most popular. Comments were supportive of measures to help protect and enhance the biodiversity of developments. With regards to Option d) some respondents were very supportive, however others thought it would be exceedingly onerous on occupiers/developers to carry this out. Overall 20 of the 54 respondent opted that all options should be carried forwards as a policy approach. Finally Natural England suggests that, due to the greater consideration in the revised NPPF, biodiversity net gain should be given greater consideration within our revision of the policy and also suggests that a Supplementary Planning Document could advise applicants how they can demonstrate a biodiversity net gain.
28. Green Space Should the SWDPR:	There were 89 representations submitted to this option. There were a total of 58

a) Continue to protect all currently designated green space. b) Review all designated green spaces and consider whether any are surplus, poor quality green space that could be released for development.	respondents who opted for Option a) in isolation. All comments appreciated the importance that green space and some felt that it would be a waste of resource to commission a review of all designated green space. A total of 20 respondents supported Option b) in isolation with a general theme that the poor quality element in reviewing green space needs to be clearly defined and considered. The Canal and River Trust informed that they do not support the official designation of their land or water as local green space and would resist any designation.

29. Areas of Outstanding Natural Beauty (AONB)
Should the SWDPR:
   a) Revise SWDP23 in the light of the revised NPPF.
   b) Include a new policy regarding development within the setting of the AONB.
	There were 54 representations submitted to this option. Most were broadly supportive of SWDP23. Suggested amendments proposed included the need to take on board the minor changes to national AONB policy in the revised NPPF. There was a level of support from individuals, parish councils and the AONB partnerships for an SWDP policy on the setting of AONB. Equally the number of representors, comprising those with a development interest, considered that there should not be such a policy as there is no equivalent one in the NPPF and leading to a constraint on much needed development in sustainable locations.

30. Health and Well-Being Should the SWDPR: a) Include a new policy for health and wellbeing that also links up with other relevant policies in the SWDPR. b) Include new health and wellbeing requirements in an already established policy, or policies, such as design and open space policies. c) Continue to rely on the Planning for Health SPD in its current form for guidance.	There were 63 representations submitted to this option. 44 responses in support of Option a), with 5 of the responses being combination of both options. Other than general support for this option, comments also included: • Requirements for a greater provision of and improvements to cycle paths and footways which are also suitable for the disabled and baby strollers. • Recognition of the role that cultural facilities can play in promoting healthy communities. • Linking health and wellbeing to transport policy when encouraging and enabling Active Travel. • Walking, cycling and jogging are to be promoted.

	- Linking the policy to the preservation of 'green space' and the role it has to play on social, environmental, health and wellbeing aspects of the community. - Protection of existing sport and leisure facilities such as playing fields. - Agreement with an updated policy to apply greater weight to Health Impact Assessments and ensuring independent review is undertaken. There were 5 responses where Option b) was included as the preferred option. These were all part of a combination choice with Option a). No responses were submitted stating Option b) as a single preference. There were 3 responses that chose Option c). There were 5 responses that were not supportive of, or provided additional/alternative commentary in relation to the health and wellbeing policy, the adopted SPD, and/or Health Impact Assessments. Comments included: - Health and wellbeing should be dealt with by other regulatory bodies. - Thresholds, density restrictions and locational/zone-based bans on hot food takeaways not supported. - The review should confirm that the SPD will only be applied to the largest allocations and applications. There were 9 responses where an option choice was either not discernible or the representation commented on another relatable health and wellbeing theme. These responses also featured a number of identical responses submitted by a planning agent on behalf of a number of clients. Comments included: - Fast food outlets, wherever they are

	located, should be limited as to promote healthier living. • Healthcare provision and accessibility should be further improved. • The Review should give added emphasis to the social element of sustainable development in order to address poor social mobility. • Requirements to provide for health and wellbeing to be evidenced justified and show they would not impact on viability and hinder the delivery of housing development. • The SWDPR should recognise the importance of designated and undesignated green space in villages which have multiple benefits in terms of landscape character, health and wellbeing, local distinctiveness, biodiversity, Flood Risk and SuDS.
31. Telecommunications Should the SWDPR: a) Retain SWDP 26 (the existing policy). b) Rename the policy Electronic Communications and revise it to facilitate the delivery of updated mobile and broadband technology as outlined above (in the Issues and Options text).	There were 57 representations submitted to this option. 97% supported option b) and the revision of the existing policy, to facilitate the delivery of updated mobile and broadband technology. Of the responses supporting option b), comments did include reference to the need to strengthen broadband in rural and remote areas, where the service provision may be poorer, and two comments that all new properties should have a fibre to premises connection. Although supporting the policy, one response queried the proposed title. Of the remaining responses, there was a single blank entry, a response which supported the proposal but did not state a preference and a query over the most sustainable approach with regard to mobile and broadband technology.
32. Flood Risk Should the SWDPR: a) Continue with the adopted policy approach (SWDP28C) of blue, red and yellow floodplain zones and continue to prevent all development and redevelopment within the blue and red zones (those with the highest flood risk).	Option 32 provided 4 choices regarding what the SWDPR should do in relation to flood risk and development. These asked whether the policy should remain as is (continue with policy approach to blue, red, and yellow flood plain zones); whether the SWCs take a flexible approach to development within the Red zone; adopt a catchment based approach (CaBA); or to only allow

b) Take a more flexible approach within the red zone, allowing alterations, extensions and redevelopment of sites which are already developed providing that this provides betterment in terms of flood risk. c) Adopt a Catchment Based Approach (CaBA) and encourage collaborative working with catchment partnerships, using catchment plans, with the aim of providing benefits to the local community by reducing flood risk, clearing pollution, protecting water resources, improving bio0diversity and amenity value. d) Identify known areas associated with flooding caused by surface-water run-off and only allow development that could affect such areas if they contribute or resolve existing problems before development commences.	development whereby they contribute or resolve existing problems prior to development commencing in areas associated with surface water flooding. There were 66 responses in total – 2 of which were blank responses; 11 provided multiple suggestions to the options posed; a small number did not direct their answer to a particular option; 10 did not suggest an option to proceed with – 2 of these were from the Environment Agency providing their thoughts on policy (these can be found within the document); 1 from the Local Lead Flood Authority providing their thoughts on policy (these can be found within the document); and a number accepted development may occur within areas of flood risk, but should only take place following robust flood risk assessment in line with NPPF guidance. Opinions have been made regarding climate change – this is something the SWCs will need to consider in their implementation of the policy. 15 responses posed opposition to any development within areas of flood risk. This figure is somewhat skewed by the submission of 8 responses that were a nuanced version of each other - 2 of these made reference to Middle Battenhall Farm; it was quite obvious a version had been devised by the Middle Battenhall Farm action group and distributed to the members for submission. In terms of gaining results for the options suggested, there were 52 responses; of which 17 responses were in favour of option A; 10 were in favour of option B; 14 in favour of option C; and 11 in favour of option D.
33. SuDS Should the SWDPR: a) Provide guidance and/or requirements on how developers should deal with the management and maintenance of SuDS components throughout their lifetime. b) Require developers to demonstrate that the three objectives of SuDS have equal standing.	There were 85 representations submitted to this option. 34 responses were in favour of Option a); 29 were in favour of Option b); and 22 in favour of Option c). These results were skewed to a certain extent in favour of Option a) given the identical responses received from a high number of developers.

c) Develop a policy that requires SuDS are provided on all development proposals unless in exceptional circumstances.	
34. Water Quality How should the SWDPR ensure that water quality is not compromised in new development? a) Require developers to demonstrate how they will prevent new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of water pollution? b) Ensure that future development addresses the issues that currently prevent the water catchment from achieving Good Ecological Status or seek to maintain it? c) Introduce a requirement for the opening of culverts? d) Introduce requirements for the inclusion of grey water recycling and rainwater harvesting methods into new development?	There were 81 representations submitted to this option. 26 responses were in favour of Option a); 16 were in favour of Option b); 13 in favour of Option c) and 26 were in favour of Option b).
35. Energy requirements in New Developments Should the SWDPR: a) Continue to require 10% of all energy within new developments to be generated from on-site renewable energy sources. b) Adopt a higher target for on-site renewable energy generation in new development. c) Not require any renewable energy generation and instead rely on carbon reduction measures which are being delivered through changes to building regulations. d) Require heat mapping for large scale allocations within the SWDPR. e) Set up a carbon reduction target rather than a renewable energy target for new development.	There were 84 representations submitted to this option. There was a fairly even split in responses between those that wanted a renewable and low carbon energy target and those that wanted reliance on carbon reduction measures &/or a carbon reduction target for new development - 41 for a renewable and low carbon energy target and 47 for a carbon reduction measures and/or a carbon reduction target for new development. The split in opinion was very marked between developers and everybody else. There were coordinated responses from the development industry that wanted reliance on carbon reduction measures which would not require the installation of any renewable or low carbon energy in new development. Nearly all other respondents who expressed a preference wanted a renewable and low

f) Establish a district level Community Energy Fund.	carbon energy target for new development, with 32 of the 41 respondents seeking a target higher than 10%. No respondents opposed heat mapping, but only 4 indicated it as a preference. 11 respondents (mainly parish councils) supported the principle of a Community Energy Fund but considered that further information was required on how it would operate.
36. Stand Alone Renewable Energy Should the SWDPR: a) Seek to allocate specific sites for specific types of renewable energy where appropriate sites come forward. b) Provide a policy framework to support the delivery of renewable energy projects without making specific site allocations. c) Identify broad areas where wind turbines could be acceptable.	There were 37 representations submitted to this option. There was a strong preference (23 responses) for the SWDPR to provide a policy framework to support the delivery of renewable energy projects without making specific site allocations. A further 10 respondents thought the SWDPR should seek to allocate sites for specific renewable energy technologies and 6 thought the SWDPR should identify sites for wind energy development.
37. Physical Constraints on Development Should the SWDPR: a) Introduce three new policies on Amenity (noise, odour and light pollution), contaminated land and land instability and Air Quality Management. b) Retain the existing approach of covering all the issues relating to physical constraints on development in one policy.	There were 80 representations made to this option. 70% expressed support for option a) and the introduction of 3 new policies, although this was qualified in four responses by the need to be proportionate to the size of the development. A further 25% supported for the retention of the existing policy approach which they felt to be successful and were concerned that the introduction of three new policies would risk overlap between planning and other regulatory regimes and that any changes to policy would need to fully justified and proportionate. This was qualified in a further two responses that revisions to the NPPF in 2018, did increase the national policy support for option a). Five percent of the responses were blank or did not express on this option.

Summary of Responses to Questions

Question	Summary
1. Evidence Base	There were 159 representations submitted to

Do you agree that the above list of technical studies is appropriate and sufficient to inform the SWDPR? If not, what is missing and why are these additional studies necessary?	this question. The responses are broadly supportive of the list of evidence base studies set out. The following key issues were raised: • Information relating to transport modelling should be more detailed and that it should include walking and cycling as well as addressing problems with existing traffic congestion and that it should be undertaken before sites are allocated for development. • Village Facilities and Rural Transport Survey (VFRTS) should include assessment of suitability of bus services for commuting, college etc. and should only include shops which sell a normal range of goods, not specialist shops. • Assessment of renewable energy generation opportunities should be included. • Concerns over whether there will be sufficient transport, health and education infrastructure to support the development. • Strategic Housing Market Assessment (SHMA) should include analysis of self build. • Need to consider impact of development on AONB. • A number of comments made specific representations on the Sustainability Appraisal information which was published alongside the Issues and Options Paper.
2. Vision The vision set out above is that which is set out in the SWDP. Is it appropriate to continue with this vision? If not, what changes should be made?	There were 158 representations submitted to this question. Most respondents were supportive of the vision. A number of respondents suggested additional issues and aspiration that the vision should include: • Greater recognition of the need to protect green spaces. • Additional text relating to the geodiversity of the area. • Greater emphasis on the range of

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employment opportunities the vision should be promoting.

- Reference to the 'blossom trail'.
- Greater emphasis on the importance of broadband provision.
- Suggestion that the vision reference the 25 Year Environment Plan.
- Suggestion that the vision should reference the east west transport limitation and the need for additional river crossings.
- Suggestion that sustainability of food supply should be included in the vision.
- Suggestion that the settlement strategy needs to change to support the vision.
- Suggested amendments to refer to active travel opportunities.
- Suggestion that the vision should refer to Neighbourhood Plans.
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3. Objectives

Are the existing SWDP objectives, as set out above, still appropriate? If not, what should be changed?
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There were 145 representations submitted to this question. Most of these representations were supportive of the objectives and a number suggested additional objectives or amendments summarised below:

- Development should address loneliness arising from isolation.
- Additions to reflect Equalities Act, the needs of travellers and the needs of those wishing to build their own home are required.
- Include an objective on climate change and reducing greenhouse gas emissions.
- Reference to biodiversity net gain.
- Ensure working with partners across the public and private sector to deliver the objectives.

A number of the representation did not support the objectives for the following reasons:

- Delivering new homes should not apply to Worcester as it is overcrowded.
- Development will harm the heritage and landscape of the area.
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	• Suggestion that geodiversity should not be included. • More emphasis on infrastructure. • Concerns that villages are already over developed and should only have to meet their own needs.
4. Housing Need The NPPF states that the output of the standard methodology for calculating housing need should be seen as the minimum growth requirement for a Local Planning Authority. Is there a case for the South Worcestershire Councils to plan for more new dwellings than the standard methodology suggests? If so, why?	There were 150 representations submitted to this question. The majority of respondents (67) thought the standard methodology was sufficient for calculating housing need and should be seen as the minimum growth requirement for the authorities. In addition due to importance of preserving heritage and landscape the standard methodology minimum should also be the maximum amount planned for. 38 respondents, largely from the development industry and agents, felt that there was a strong case for planning for more dwellings than the standard methodology suggests. These cited the need for the plan review to reflect the NPPF objective of significantly boosting the supply of housing, and the view that the standard methodology does not take into account any economic uplift and any requirement to meet the need of neighbouring authorities. These responses also contained concerns regarding affordability if only the minimum housing requirement was delivered.
5. Supply v Demand for Employment Land Do you think that the balance of employment land supply should be more evenly distributed across the South Worcestershire Councils?	There were 72 representations submitted to this question. 13 were in favour of a better balance of employment land supply across south Worcestershire and seven were opposed to this. There was no clear support for any particular location for additional employment land suggested by respondents.
6. Meeting the Needs of Travellers and Travelling Showpeople 1. Should we consider relaxing the criteria for the allocation of sites to meet the needs of Travellers and Travelling Showpeople? 2. What planning criteria should be included within a policy to determine whether sites are suitable for pitches for Travellers and Travelling	There were 32 representations submitted to this question. There was both support and opposition shown for relaxing the criteria and suggestions made for planning criteria. Comments received included: • Criteria may need to be changed to bring forward more sites. • May be appropriate to relax some policies for Travelling Showpeople sites (e.g. because of storage of large

Showpeople?	machinery) to allow development on greenfield land outside current development boundaries. • Evidence is needed from the revised GTAA before sites are allocated, but it would seem likely that sites further away from towns and 1, 2 or 3 Category Villages will need to be considered. • Not convinced that any changes to the criteria of allocating sites will increase the number of sites being offered. • Maintain the current criteria. • Concern about continuing lack of 5 year supply. • Category 3 villages are defined as having "a small range of local services and facilities and a reduced level of public transport provision". Therefore they are unsuitable for any additional housing development, including for Travellers and Travelling Showpeople. Suggested planning criteria: • Impact on supporting infrastructure, e.g. transport, schooling, health and policing. • Visual and environmental impact. • Criteria must not be aligned with the criteria for other residential development types - must allow for sites beyond settlement boundaries. • Need to be genuinely travelling. • Should be proactive in the conservation and enhancement of the historic environment. • Access to public transport, schools, GP practices and local services e.g. shops. • Assessment of the impact any new development will have on the settled community. Other comments: • For large scale urban expansions the

	policy should allow for the option of an offsite contribution in lieu of provision on site which would contribute to the acquisition a more suitably located site within the authority's area. • Developers should provide the sites if allocated in the SWDPR. • Policies should be formulated to address problems of poor living conditions on existing Traveller sites, including their redevelopment.
7. Types of Sites and Premises Are the types of premises identified in the Employment Development Needs Assessment (EDNA) should be the basis for allocating sites for employment, if there is any difference in needs between urban and rural locations and if there was anything the EDNA had missed?	There were 28 representations submitted to this question. Only eight responses agreed that the assessment of needs in the EDNA should be used as a basis for allocating sites. Six responses agreed that there is a difference in needs between urban and rural areas and only two responses directly responded to the question has the EDNA missed anything? One responding yes and one responding no. In addition one response considered the role of Hartlebury Trading Estate should be more explicitly recognised in the EDNA. Several responses wanted planning policy that delivers more space for start up and micro businesses and several responses thought all allocations should be adjacent to the primary road network. The case for removing Hartlebury Trading Estate from the West Midlands Green Belt was also made in one response.
8. Retail Centres How can the retail function of our retail centres be best maintained?	There were 24 representations submitted to this question. Common themes in responses included access by both the car and public transport should be improved, exercising controls over the use of property that is beyond the scope of planning policy, changes to taxes and parking charges, and there should be more council support for start up and expanding retail businesses.
9. The Historic Environment Do you support the proposed approach to protecting the historic environment (policies SWDP6 and SWDP24)?	There were 72 representations submitted to this question. Representations to the Issues and Options

| | were mainly supportive of the existing wording with a number of amendments suggested to bring inline with the revised NPPF. A number of representations made the point that more emphasis should be given to the importance of the setting of historic assets, especially when considering applications for new development. This response tended to relate to multiple site specific representations and that SWDP6 criteria should be applied to allocating sites in the SWDP Review. Finally it was felt that stronger reference should be made to non-designated heritage assets and specifically to ancient and veteran trees. Consideration has been given to these points in the proposed amendments to the policy set out below.

Responses to the Issues and Options consultation relating to SWDP 24 were overwhelmingly supportive of continuing with the existing policy position for determining planning applications. Several minor amendments were suggested to align the policy with the revised NPPF. |
|---|---|
| 10. Green Infrastructure
Could the policy approach be improved by including increased guidance to cover the issues set out above?
The issues considered in the SWDPR are:
• Clarify that GI is required on brownfield sites.
• Clarify that the target GI amount excludes private gardens.
• Provide greater explanation of the Environmental Character Areas Map.
• Identify the linkages between SWDP5 and other SWDP policies; and
• Emphasise the multi-functionality of GI. | There were 87 representations submitted to this question. A general theme taken from these responses are that more guidance supporting GI policies will make them more effective. A high number of respondents commented on the need to maintain and to continue to protect GI. There were very few comments detailing that the percentage approach to achieving GI on development sites is extremely onerous on developers. The majority of respondents were in support that the policy approach can be improved by increasing the guidance to cover the highlighted issues set out above. |
| 11. Geodiversity
Are there any additional geodiversity assets which should be recognised by SWDPR? | There were 12 representations submitted to this question. Of the eight people who responded four detailed that they did not know any additional geodiversity assets that should be recognised. To note, one comments placed importance on considering |

	geodiversity in the same way as biodiversity and continue to, through a policy approach, recognise and monitoring site of geodiversity importance. Another respondent requested that a publically assessable mapping layer of geological sites is published to help appreciate items of geological importance.
12. Landscape Character Should SWDP25 (Landscape Character) be revised to take into account impact on views and visual amenity?	There were 83 representations submitted to this question. A total of 75 comments were in support of the revision to the policy. The four comments that opposed to the revision of SWDP25 argue that the policy is already sufficient enough and could become too onerous if it is reviewed. All comments appeared to be understanding of the importance the impact views and visual amenity has on the landscapes character. Notably Natural England welcomed the change to the policy wording which would encourage the submission of Landscape and Visual Impact Assessments with development proposals which would impact local landscapes.
13. Site Viability It is the intention to include a policy that sets out the circumstances in which a viability assessment at the decision-making stage is required. Which circumstances do you think should be included?	There were 65 representations submitted to the question. Responses from developers either challenged the need for a policy to specify in what circumstances a viability assessment might be required or thought that a viability assessment should be required if a developer considered viability assessment was a material consideration in the determination of an application. Responses from local residents expressed concern that setting criteria for viability assessments would allow developers to avoid paying for essential infrastructure. Some responses from local residents sought viability assessments with all applications. Suggestions of what circumstances might require a viability assessment to support a planning application included: • Only for developments over suggested thresholds, e.g. 500 units. • Only where there has been a significant and relevant change since

	the adoption of the plan. • Only for windfall development proposals. • Only if applications do not comply with relevant planning policies.
14. Viability Assessments Are there any other methods of assessing site viability that should be taken into account?	There were 32 representations submitted to this question. Suggested methodologies included using site typologies to assess the viability of allocated sites; setting a threshold of 500 or more dwellings; support for every site being assessed for development viability; favour of assessing the viability of a masterplan for the delivery of a number sites; and a suggestion that neighbourhood plan policies should be included when assessing the viability of allocated sites.
15. Site Viability Thresholds Should there be a site threshold above which sites require a bespoke viability assessment rather than a typology or master plan approach?	There were 29 representations submitted to this question. Several responses did not agree there should be a site threshold above which sites require a bespoke viability assessment. Whilst the majority of responses supported there being a site threshold above which sites require a bespoke viability assessment. With suggested site thresholds ranging from 10 to 500 dwellings.
16. Interventions Which tools or interventions could be used to ensure enough infrastructure is provided by development?	There were 18 representations submitted to this question. Suggestions included: • Collect evidence to justify infrastructure requirements. • Allocate sites that can be developed with low infrastructure costs. • No need for any tools or interventions beyond Section 106 Agreements, the Community Infrastructure Levy and the standard Development Management process. • Agree Infrastructure Delivery Statements for each site allocation and make the delivery of the requirements of each Infrastructure Delivery Statement a condition of granting planning permission.

17. Review Mechanisms When and how do you think a review mechanism may be included within a planning obligation?	There were 23 representations submitted to this question. Responses to how a review mechanism could be included in a planning obligation: • Only possible to review developer contributions on development sites of 500 homes or more. • Only review developer contributions on phased schemes or permissions with five or more years for implementation. • If there is a review mechanism it should include a cap on the level of contributions that might be required. Responses to when developer contributions should be reviewed varied but the following circumstances where suggested. Once a developer has gone into receivership; at the request of the developer; at each stage of the implementation of development; at reserved matters, but not allowed after consent. Further suggestions included in accordance with the NPPG and on a case-by-case basis, rather than utilising a blanket approach set within a development plan policy. At various stages of completion of sales on site. Responses to how developer contributions should be reviewed varied but the following circumstances where suggested. No review mechanisms should be included in planning obligations. Any reviews should be on the basis of open book assessments. Developers should be required to pay bonds before commencement of development to ensure planning obligations are not avoided. It should only be possible to review developer contributions on development sites of 500 homes or more. It should only be possible to review developer contributions on phased schemes or permissions with five or more years for

	implementation. Planning obligations that include a review mechanism should include a cap on the level of contributions that might be required.
18. Funding Do you think the right scale and form of funding is available to support the delivery of the SWDPR? Which alternative sources of funding or delivery mechanisms should be investigated?	There were 30 representations submitted to this question. The Department for Education forward loan plan/fund. Ensure all residential development can pay the Community Infrastructure Levy. An amalgamation of public, private sector and national funding steams. As set out in the existing South Worcestershire Infrastructure Delivery Plan. Development should deliver more funding for infrastructure and less profit for developers and landowners. Homes England funding should be included in this list. Central Government should fund council house building. Government grants for homes and infrastructure.