

Examination of the South Worcestershire Development Plan Review

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Examination web pages: <https://www.localplanservices.co.uk/swdpreview>

INSPECTOR'S MATTERS, ISSUES AND QUESTIONS

1. We are P Lewis and E Worthington, chartered Town Planners appointed by the Secretary of State to examine the soundness of the South Worcestershire Development Plan Review Regulation 19 Publication Document, which was published for consultation in November 2022 (the Plan), and whether it meets the requirements of the Planning and Compulsory Purchase Act 2004 (the Act) and associated Regulations.
2. The examination of the Plan commenced with our appointment and to date we have undertaken initial reading of the Plan, the evidence base documents and representations, following which we posed a number of initial questions to the Councils. Our correspondence and the Councils responses are published on the examination website. This has included us inviting the Councils to review and update evidence base documents as necessary so that they are up to date. The updated evidence base documents have been published on the examination website.
3. In drafting this document, we have had regard to the Councils responses to our initial questions and the various evidence base documents which have been published by the Councils to accompany their responses. We advise you to read the Councils further submissions in preparing responses to our questions.
4. We have now identified the matters and issues and pose the key questions for the examination. These are set out in this document.
5. Please read and be familiar with the accompanying Inspectors Guidance Note (EXAM 35) which sets out important details of the organisation and conduct of the examination and the hearings, and regarding the preparation of hearing statements. We shall assume that the Guidance Note has been read by participants at the hearings.
6. It may be that some of the questions set out in this document will be answered in written statements. Consequently, we will not need to consider them further at the hearings as we would have sufficient information. Whilst we publish a draft hearings programme (EXAM 34) alongside these MIQs, the scope of specific hearing sessions will be confirmed via the examination website. It is important to note that written representations and oral

representations carry the same weight, and we will have equal regard to views put at a hearing or in writing. Representors should only address those matters, issues and questions relevant to their original representations.

7. Any reply to our questions should be in accordance with the guidelines set out in the Guidance Note and should be sent electronically to the Programme Officer by **5.00 pm on Tuesday 11 February 2025**. It is expected that hearing statements will only be submitted electronically.
8. Only those who have made representations seeking to change the Plan have a right to appear before, and be heard by, the Inspectors. If you have a right to be heard, and you wish to exercise that right, you should contact the Programme Officer by **5.00 pm on Friday 31 January 2025** indicating the appropriate Matter(s) and the session(s) you wish to attend (see the draft Programme). You need to do this regardless of what you may have indicated on the representation form. Please note that if you do not contact the Programme Officer by that date, it will be assumed that you do not wish to appear and be heard, and you will not be listed as a participant.
9. Please note that all references to the National Planning Policy Framework (NPPF) relate to the version of that document published in September 2023.

Matter 1: Procedural/legal requirements

Issue: Whether all Statutory and Regulatory requirements have been met?

Duty to Cooperate

- Q.1 Is there clear evidence that the Councils have engaged constructively, actively and on an ongoing basis with neighbouring authorities and prescribed bodies in accordance with section 33A of the 2004 Act, in respect of strategic matters with cross-boundary impacts considered through the preparation of the Plan?

Sustainability Appraisal

- Q.2 Is the Sustainability Appraisal (SA) adequate and have the legal requirements of the 2004 Act and the 2012 Regulations been met?

Habitats Regulations Assessment

- Q.3 Has the Habitats Regulations Assessment (HRA) been undertaken in accordance with the Conservation of Habitats and Species Regulations 2017?

Local Development Scheme

- Q.4 Is the Plan compliant with the Council's Local Development Scheme (LDS) in terms of its form, scope and timing? Is the scope of policy SWDPR 20 Meeting the Needs of Travellers and Travelling Showpeople within that set out in the LDS?

Community Involvement

- Q.5 Has the Council complied with the requirements of section 19(3) of the 2004 Act with regard to conducting consultation in accordance with the Statement of Community Involvement?

Climate Change

- Q.6 Are the policies of the Plan designed to secure that the development and use of land contribute to the mitigation of, and adaptation to, climate change in accordance with Section 19(1A) of the Act?

Equalities

- Q.7 In what way does the Plan seek to ensure that due regard is had to the three aims expressed in s149 of the Equality Act 2010 in relation to those who have a relevant protected characteristic?

Use of Footnotes

- Q.8 The submitted plan makes extensive use of footnotes. Is that effective? Do footnotes contain wording which should be set out in the policies of the Plan or explanatory text?

Superseded Policies

- Q.9 Whilst the submitted Plan in paragraph 9 explains that it will replace the adopted South Worcestershire Development Plan in its entirety, is the Plan clear in identifying the policies of the existing development plan which would be superseded by the Plan consistent with Regulation 8(5) of the 2012 Regulations?
- Q.10 Why does the Plan identify 'Deallocated Sites' such as in Table 17 when these are not part of the submitted Plan? Is this effective?

Matter 2: The Spatial Development Strategy

Issue: Whether SWDPR 03 Spatial Development Strategy is positively prepared and justified?

SWDPR 03 The Spatial Development Strategy and Settlement Hierarchy

- Q.11 Is the proposed settlement hierarchy justified, and would it be effective?
- Q.12 Are the proposed settlement boundaries justified and would they be effective?
- Q.13 Is the proposed distribution of development to be allocated to each category of settlement justified?
- Q.14 What is the justification for the proposed rail-based strategy for directing growth aspirations and would it be effective?

- Q.15 Is criterion G concerning additional plan led development proposals being promoted through neighbourhood plans clear, justified, and would it be effective given table 2? What is meant by the phrase 'commensurate to the size of the settlement'?
- Q.16 Does criterion H concerning meeting unmet needs of neighbours serve a clear purpose?
- Q.17 Does criterion A iv concerning the Green Belt and Significant Gaps serve a clear purpose, is it consistent with national policy for Green Belts, and if so, is it attempting to afford the same weight to the Green Belt and Significant Gaps? Is that justified and consistent with national policy?
- Q.18 Are criteria A v and A vi consistent with national policy (NPPF 174 and 120 respectively)?
- Q.19 What is the justification for the designation of the significant gaps?
- Q.20 Does the submitted Policies Map adequately identify the boundaries of the significant gaps as listed in Annex F?

Matter 3: The Green Belt

Issue: whether the Plan is justified, effective and consistent with national policy in relation to its approach to the Green Belt?

- Q.21 Do the proposed strategic policies establish the need for any changes to Green Belt boundaries?
- Q.22 Was the Green Belt Assessment undertaken on the basis of a clear methodology consistent with national planning policy for protecting Green Belts?
- Q.23 Are exceptional circumstances fully evidenced and justified for the proposed alterations to Green Belt boundaries?
- Q.24 Are the proposed Green Belt boundaries clearly defined, using physical features that are readily recognisable and likely to be permanent? (For example land to the west of SWDP NEW 10?)
- Q.25 It would appear from the submitted Policies Map that SWDPR 61 SWDP NEW 10 Land at Blackpole Road, Worcester, and SWDP NEW 77, 78, 79 and 80 Hartlebury Trading Estate are employment allocations in the Green Belt. Is this correct and if so, would these allocations be effective?

- Q.26 The Green Belt Topic Paper refers to the inseting of Waresley Manor Village from the Green Belt. Is this necessary for soundness? What are the exceptional circumstances for this, and would the proposed Green Belt boundaries be clearly defined, using physical features that are readily recognisable and likely to be permanent?
- Q.27 What if any compensatory improvements to the environmental quality and accessibility of remaining Green Belt land (after the proposed boundary alterations) would be provided consistent with the NPPF?
- Q.28 Hindlip Park is a Regional Emergency services and Civil Resilience Site in the Green Belt. Is Policy SWDPR 04F positively prepared in respect of Hindlip Park, and would it be effective?
- Q.29 Are the criteria set out in policy SWDPR 04 clear, justified and consistent with national policy and will they be effective?

Matter 4: Provision for housing

Issue: Is the overall strategy and provision for housing development effective and justified?

SWDPR 02: Employment, Housing and Retail Requirements

Local Housing Need

- Q.30 Is there any substantive evidence to demonstrate that it would be appropriate to plan for a higher housing need figure than the standard method indicates in this case as per advice set out in the PPG (Paragraph: 010 Reference ID: 2a-010-20201216)?

Unmet needs of neighbouring areas

- Q.31 Is the proposed provision of a 500 dwelling contribution to meeting housing needs of Tewkesbury Borough Council justified and consistent with national policy?
- Q.32 Is there any substantive evidence that the Plan should be making provision for unmet needs of any other neighbouring local planning authority?

Affordable Housing need

- Q.33 Is there any substantive evidence to demonstrate that there should be an adjustment to the minimum housing requirement to help deliver affordable housing with regard to the PPG (Paragraph: 024 Reference ID: 2a-024-20190220), and if so, would that be effective?

Housing needs of different groups in the community

Q.34 Is the Plan positively prepared in assessing and reflecting in its policies the size, type and tenure of housing needed for different groups in the community as per NPPF 62?

Retail requirements?

Q.35 The policy title refers to retail requirements but the policy does not specifically refer to retail? Is this in error?

Matter 5: Housing Land Supply

Issue: Do the proposed planning policies identify a sufficient supply of housing? Is the Plan justified and effective, positively prepared and consistent with national policy in this regard?

Q.36 The Councils have requested that the 5 year housing land supply (5YHLS) is confirmed as part of the examination process. The 5 YHLS should include a 10% buffer as per NPPF 74b.

What is the up-to-date supply of specific, deliverable housing sites in South Worcestershire to be considered in the 5 year housing land supply from the intended date of adoption? Will there be a five-year supply of deliverable housing sites on adoption of the Plan?

Q.37 Which specific sites make up the extant permissions included within the housing trajectory and what is the evidence that they are either deliverable or developable as per the NPPF definitions?

Q.38 What is the compelling evidence for the supply of housing from windfall sites through the plan period?

Q.39 Whilst the proposed housing allocations will be considered separately, are the broad assumptions made as to site capacity and when houses would be delivered realistic and justified?

Matter 6: Housing, health and wellbeing and Implementation and Monitoring Policies

Issue: Are the individual policies clear, justified and consistent with national policy and will they be effective?

SWDPR 09: Infrastructure

Q.40 Is SWDPR 09 consistent with NPPF 57 (and the Community Infrastructure Levy Regulations 2010) in regard to how planning obligations would be sought?

SWDPR 64: Implementation and Monitoring

Q.41 Do criteria A and B serve a clear purpose, and avoid unnecessary duplication of policies that apply to the area given the provisions of SWDPR 09 Implementation? Is SWDPR 64 consistent with NPPF 57 (and the Community Infrastructure Levy Regulations 2010) in regard to how planning obligations would be sought?

SWDPR 15: Effective Use of Land

Q.42 What is the justification for the net density requirements in SWDPR 15 E?

Q.43 Does criterion G serve a clear purpose?

Q.44 In regard to soils and Best and Most Versatile Agricultural Land, is SWDPR 15 consistent with national policy as expressed in NPPF 174, 175 and footnote 58?

SWDPR 16: Housing Mix and Standards

Q.45 What is the justification for the application of the nationally described space standard (NDSS)?

Q.46 What is the evidence that the Councils have considered the impact of using the NDSS, in terms of Local Plan viability and any effects on the affordability of new homes?

Q.47 What is the justification for the application of the optional requirements for M4(2) accessible and adaptable dwellings and M4(3)(2)(a) wheelchair user dwellings?

Q.48 What is the justification for the self or custom build requirements in SWDPR 16? Paragraph 2.29 rather than policy SWDPR 16 refers to when unsold plots can revert to sale for market homes. Would this be effective?

SWDPR 17 Sub-division, Multiple Occupation and Changes of Use of Dwellings

Q.49 What is meant in SWDPR 17 by 'an existing over concentration of such uses in the local area' in i, and 'the significant loss of large family housing' in iii? Would the policy be effective in these respects?

SWDPR 18: Meeting Affordable Housing Needs

- Q.50 Are the thresholds for the provision of affordable housing set out in SWDPR 18 justified, and would they be effective?
- Q.51 Is SWDPR 18 clearly written and unambiguous, so that it is evident how a decision maker should react to development proposals by requiring compliance with the relevant guidance published by the Conservation Board and Malvern Hills AONB Partnership, including any Housing Position Statements, which are not part of the development plan for the area?
- Q.52 Are the % split requirements set out in SWDPR 18 E justified and would the Plan be effective in meeting the affordable housing needs of the area?
- Q.53 Is SWDPR 18 G clearly written and unambiguous, so that it is evident how a decision maker should react to development proposals through the wording 'exceptionally, and usually only on brownfield sites'?
- Q.54 In the absence of the preparation of an Affordable Housing Supplementary Planning Document to provide details on how the policy will be applied, would SWDPR 18 be effective?

SWDPR 19: Rural Exception Sites

- Q.55 What is the justification that Rural Exception Sites should not exceed whichever is the lesser of 5% of the number of dwellings within the main built-up area of the village or 1ha, and would it be effective?
- Q.56 Is SWDPR 19 vi 2 clearly written and unambiguous, so that it is evident how a decision maker should react to development proposals by requiring compliance with the latest published NL and AONB Management Plans and their associated guidance on affordable housing, which are not part of the development plan for the area?
- Q.57 In the absence of the preparation of an Affordable Housing Supplementary Planning Document to provide details on how the policy will be applied, would SWDPR 19 be effective?

SWDPR 19A: First Homes Exception Sites

- Q.58 What is the justification for the site limit of the lesser of 5% of the number of dwellings within the main built-up area of the town/village or 1ha? Would this be effective?
- Q.59 In the absence of the preparation of an Affordable Housing Supplementary Planning Document to provide details on how the policy will be applied, would SWDPR 19A be effective?

SWDPR 21: Replacement Dwellings in the Open Countryside

Q.60 What is the justification for criterion iii, setting out that the replacement is not disproportionately larger than the existing dwelling and will not exceed the existing gross internal floorspace by more than 30%? Should the text in footnote 75 be included in the Policy or explanatory text to be effective?

SWDPR 22: Dwellings for Rural Workers

Q.61 What is the justification for criterion A iii in setting out that 'The dwelling does not exceed 150 sqm of net usable floorspace, unless a larger property is robustly justified', and would it be effective?

SWDPR 24: Reuse of Rural Buildings

Q.62 What is the clear justification for the proposed removal of national permitted development rights set out in criterion C and is the policy consistent with NPPF54 in this regard?

SWDPR 25: Extensions to Residential Curtilage Beyond a Defined Development Boundary

Q.63 Is criterion E concerning national permitted development rights consistent with NPPF54?

Matter 7: Meeting the needs of Travellers and Travelling Showpeople

Issue: Is the Plan positively prepared and would it be effective in addressing the likely accommodation needs of Travellers and Travelling Showpeople?

SWDPR 20 Meeting the Needs of Travellers and Travelling Showpeople

Q.64 What are the implications of the introduction of the updated Planning Policy for Traveller Sites (12 December 2024) for the Plan's approach to gypsies and travellers?

Q.65 What is the relationship of the Plan with the emerging South Worcestershire Travellers and Travelling Showpeople Policies and Site Allocations DPD?

Q.66 With regard to the Gypsy and Traveller Accommodation Needs Assessment July 2024 (EXAM 22), the Assessment of Need and Supply of Traveller Pitches and Travelling Showpeople Plots – October 2024 (EXAM 28), and the GTAA Part B December 2024, what are the minimum pitch and plot requirements for travellers and travelling showpeople for the plan period?

Q.67 Is it the purpose of this Plan to identify a sufficient supply and mix of sites to meet the objectively assessed needs of Travellers and Travelling Showpeople?

- Q.68 If the answer to Q.65 is yes, then what is the evidence that there would be on adoption of this Plan a supply of specific deliverable sites sufficient to provide 5 years' worth of sites against locally set targets, and a supply of specific, developable sites, or broad locations for growth, for years 6 to 10 and, where possible, for years 11-15 as required by the Government's Planning Policy for Traveller Sites?
- Q.69 Would the proposed policy criteria be effective in bringing forward the level of windfall sites necessary to meet the identified need for pitches and plots?

Matter 8: Economic Growth Strategy and Policies

Issue: Is the strategy and provision for employment development and town, district and local centres effective and justified and are the individual economic growth policies clear, justified and consistent with national policy, and will they be effective?

SWDPR 02: Employment, Housing and Retail Requirements

- Q.70 With particular regard to The Economic Needs Assessment Addendum (EXAM 25) and Topic Paper (EXAM 26) is the gross demand requirement for employment land of 350.50 hectares as set out in the submitted plan justified?
- Q.71 What is the justification for the inclusion of a supply buffer equal to 5 years worth of take up rates in the employment land provision, and would it be effective?
- Q.72 Is the proposed allocation of 290.7 hectares (updated to 288.90 hectares) of employment land through the Plan justified and would it be effective?

SWDPR 11: Providing the Right Land and Buildings for Jobs

- Q.73 Is criterion C consistent with NPPF87 in respect of the sequential test for main town centre uses?
- Q.74 What is the justification for the 13 strategic employment sites designated?

SWDPR 12: Promotion of Town, District and Local Centres

- Q.75 The Policy includes that 'New centres are planned for Worcestershire Parkway (SWDPR 51), Throckmorton Airfield (SWDPR 52) and Rushwick (SWDPR 53) and these will eventually be included on the Defined Centres Hierarchy. Is that statement justified, and would it be effective?
- Q.76 Should the top row of table 4 be coloured purple?

Q.77 What is the justification for the defined Town Centre Boundaries, Primary Shopping areas and Primary Shopping Frontages? Are these based on up-to-date evidence?

Q.78 Does criterion H serve a clear purpose?

SWDPR 13: Non-Allocated Employment Development

Q.79 Given that the development plan should be read as a whole, does criterion 6 serve a clear purpose?

Q.80 What is the clear justification for the proposed removal of national permitted development rights set out in B and is the policy consistent with NPPF54 in this regard?

SWDPR 14: Employment in Rural Areas

Q.81 Given national permitted development rights, would the safeguarding of existing employment sites in rural areas in A, be effective?

Q.82 Paragraph 4.3 rather than SWDPR 14 refers to a requirement for the marketing of vacant sites before conversion to an alternative use. Would this be effective?

Q.83 Are the requirements in D relating to isolated rural buildings consistent with NPPF80?

Matter 9: Strategic Housing Allocations

Issue: Are the proposed strategic housing allocations justified, effective and consistent with national policy?

SWDPR 51: Worcestershire Parkway

Overall principle

Q.84 Was the location for the proposed new settlement selected on a robust basis?

Q.85 How was the extent of the proposed new settlement defined and is the defined extent justified?

Delivery and implementation

SWDPR 51 H sets out that the proposed new settlement will deliver a scheme in accordance with an agreed comprehensive masterplan including green infrastructure for the site allocation. The masterplan must be compliant with the Concept Plan (Figure 2), the Local Planning Authority's future Spatial Framework, garden community principles and adhere to the design codes contained in the South Worcestershire Design SPD.

- Q.86 Is a Spatial Framework document prepared and adopted as a Supplementary Planning Document for the strategic allocation the appropriate vehicle to provide further detailed policy and guidance to ensure the comprehensive development and delivery of Worcestershire Parkway when it would not be part of the development plan for the area? Would this approach be effective? Why doesn't the policy require the preparation of the Spatial Framework?
- Q.87 When would the Spatial Framework document be in place?
- Q.88 There are a number of references in SWDPR 51 to development being compliant with the Concept Plan (Figure 2). The Concept Plan would not be part of the Policies Map, nor SWDPR 51 in the submitted Plan, being part of the explanatory text. Would the Plan be effective in this regard and be clearly written and unambiguous, so it is evident how a decision maker should react to development proposals?
- Q.89 What is the justification for the distribution of land uses within the Concept Plan, and would it be effective?
- Q.90 Does the Concept Plan and proposed allocation adequately address the relationships between existing land uses and those proposed?
- Q.91 Criterion H also sets out that the masterplan will be prepared by the site promoters in collaboration and agreed with the Local Planning Authority in consultation with Worcestershire County Council. Would that be effective, and is that genuinely plan-led? What is the evidence of agreement between the site promoters regarding the delivery of the site?
- Q.92 When is it intended that an agreed masterplan would be in place?

SWDPR 51 C sets out that the first phase to be delivered in this Plan period (2021-2041) will comprise approximately 5,000 dwellings, 50 hectares of employment land, a main town centre, with well-connected western and southern neighbourhoods, each with local centres, education provision, supporting services, community facilities, two Traveller sites (10 Gypsy and Traveller pitches per site), sufficient local renewable energy to power the entire development for its lifetime, at least 10% Biodiversity Net Gain (BNG) and 40% Green Infrastructure to be delivered by the end of the plan period.

- Q.93 The housing trajectory (EXAM 24) sets out a housing delivery trajectory for the proposed site, with delivery of the proposed 5,000 houses in the plan period starting from 2028-29. Is this justified? In terms of the trajectory, what is the clear evidence that the proposed allocation would (in part) be in terms of the NPPF, either 'deliverable' and/or, 'developable'?

Q.94 Is the proposed phasing of the development in the plan period and beyond 2041 justified and would it be effective?

Q.95 For a period, it is proposed that both Worcestershire Parkway and Throckmorton New Settlement will deliver houses at the same time. Is there any robust evidence to suggest that simultaneous delivery of housing from both sites would affect the overall number of housing completions from the 2 sites?

Viability

Q.96 What is the evidence that the proposed allocation at Worcestershire Parkway would be viable?

Key Principles and Requirements

Q.97 Would the requirement for 40% affordable housing be effective and is it justified?

Q.98 What is the justification for the overall site-wide average net density of 40 dwellings per hectare? What is the evidence that this requirement has been derived consistent with NPPF 124 and 125?

Q.99 Is SWDPR 51 G iii clearly written and unambiguous, so it is evident how a decision maker should react to development proposals? Is it the intention that the town centre should contain main town centre uses as defined in the NPPF?

Q.100 What is the justification for the specific education requirements set out in G iv?

Q.101 What is the justification for the supporting retail, services and other community facilities in G v?

Q.102 Would the proposed provision of Traveller sites in G vi be effective?

Q.103 What is meant by a 'Movement Strategy' in G vii? What is the justification for the specific requirements 1 to 11 and would they be effective?

Q.104 What is the evidence that any significant impacts from the proposed development on the transport network, including the strategic road network and the local highway network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree?

Q.105 When would the design codes in G8 iv be prepared and approved?

Q.106 When is it intended that the Energy and Carbon Strategy in G8 viii 1 would be approved? To be effective, why is this not dealt with in the SPD or master planning exercise?

- Q.107 Is the requirement for the design and layout of the site to be landscape led a matter for consideration in the SPD and master planning process?
- Q.108 What is the evidence that Cooksholme Meadow SSSI would be protected and enhanced as per NPPF 174?
- Q.109 What is the evidence that the particular significance of heritage assets that may be affected by the proposed allocation have been identified and assessed through the plan making process to enable us to form a view as to the likely impact of the development on the significance of heritage assets as per national policy set out in the NPPF? Would the proposed approach where a Heritage and Archaeology Strategy prepared by the site promoters is approved by the Local Planning Authority, set out a positive strategy for the conservation and enjoyment of the historic environment?
- Q.110 Was the proposed Concept Plan informed by any assessment of the significance of the proposed development on the historic environment?
- Q.111 SWDPR 51 J requires infrastructure to be provided in accordance with the latest Worcestershire Parkway Infrastructure Delivery Plan (IDP). Is SWDPR 51 clearly written and unambiguous, so that it is evident how a decision maker should react to development proposals by requiring compliance with the IDP which is not part of the development plan for the area?

SWDPR 52: Land at Throckmorton New Settlement

Overall principles

- Q.112 Was the location for the proposed new settlement selected on a robust basis?
- Q.113 How was the extent of the proposed new settlement defined and is the defined extent justified?

Delivery and implementation

SWDPR 52 E sets out that the proposed new settlement will deliver a scheme in accordance with an agreed comprehensive masterplan including green infrastructure for the site allocation. The masterplan must be compliant with the Concept Plan (Figure 3), garden community principles and adhere to the design codes contained in the South Worcestershire Design SPD. The masterplan will be prepared by the site promoters in collaboration and agreed with the Local Planning Authority in consultation with Worcestershire County Council.

- Q.114 For SWDRP 51 Worcestershire Parkway it is proposed that a Spatial Framework document is prepared and adopted as a Supplementary Planning Document for the strategic allocation. No such SPD is proposed in respect of SWDRP 52. Why is that and would the approach set out in SWDRP 52 be effective?

Q.115 There are a number of references in SWDPR 52 to development being compliant with the Concept Plan (Figure 3). The Concept Plan would not be part of the Policies Map, nor SWDPR 52 in the submitted Plan, being part of the explanatory text. Would the Plan be effective in this regard and be clearly written and unambiguous, so it is evident how a decision maker should react to development proposals?

Q.116 What is the justification for the distribution of land uses within the Concept Plan, and would it be effective?

Q.117 Does the Concept Plan and proposed allocation adequately address the relationships between existing settlements and the proposed development, existing land uses, with particular regard to the DEFRA Foot and Mouth Burial site, the existing landfill operation and existing businesses such as Malvern Optical?

Q.118 Criterion E also sets out that the masterplan will be prepared by the site promoters in collaboration and agreed with the Local Planning Authority in consultation with Worcestershire County Council. Would that be effective, and is that genuinely plan-led? What is the evidence of agreement between the site promoters regarding the delivery of the site?

Q.119 When is it intended that an agreed masterplan would be in place?

SWDPR 52 A sets out that the first phase (2030 – 2041) will comprise approximately 2,000 dwellings, a minimum of 20 hectares of employment land, local / town centre uses, educational provision, 1 Traveller site, sufficient local renewable energy to power the entire development for its lifetime, at least 10% BNG and 40% Green Infrastructure which will be delivered by the end of the plan period. It is anticipated that phase 1 of the development will not commence until approximately 2030 when the critical movement and educational infrastructure will have been provided.

Q.120 The housing trajectory (EXAM 24) sets out a housing delivery trajectory for the proposed site, with delivery of the proposed 2,000 houses in the plan period starting from 2031-32. Is this justified? In terms of the trajectory, what is the clear evidence that the proposed allocation would be in terms of the NPPF 'developable'?

Q.121 This question is repeated for the benefit of representors who may participate only in a hearing session regarding SWDPR 52.

For a period, it is proposed that both Worcestershire Parkway and Throckmorton New Settlement will deliver houses at the same time. Is there any robust evidence to suggest that simultaneous delivery of housing from

both sites would affect the overall number of housing completions from the 2 sites?

Q.122 Is the proposed phasing of the development in the plan period and beyond 2041 justified, and would it be effective in ensuring delivery of the site, services and necessary infrastructure?

Viability

Q.123 What is the evidence that the proposed New Settlement at Throckmorton would be viable?

Key Principles and Requirements

Q.124 What is the evidence that the site could be delivered given that in respect of phase 1 of SWDPR 52 states that the development will not commence until approximately 2030 when the critical movement and educational infrastructure will have been provided? How is it intended that critical infrastructure would be provided in advance of other development?

Q.125 What is the justification for the provision of an electric shuttle bus (or equivalent) linking the site with Pershore Railway Station, Worcestershire Parkway and nearby settlements and how would it be funded?

Q.126 What is the justification for the proposed enhancements to Pershore Railway Station in SWDPR 52 D i 4, are they feasible, deliverable, and would seeking them accord with Regulation 122(2) of the Community Infrastructure Levy Regulations 2010?

Q.127 What is the evidence that any significant impacts from the proposed development on the transport network, including the strategic road network and the local highway network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree?

Q.128 Would the requirement for 40% affordable housing be effective and is it justified?

Q.129 What is the justification for the overall site-wide average net density of 40 dwellings per hectare? What is the evidence that this requirement has been derived consistent with NPPF 124 and 125?

Q.130 What is the justification for the specific education requirements set out in SWDPR 52 D v?

Q.131 What is the justification for the supporting retail, services and other community facilities in D vi?

Q.132 Would the proposed provision of Traveller sites in SWDPR 52 D vii be effective? What is meant by SGA?

Q.133 What is meant by an 'Energy and Carbon Strategy' in SWDPR 52 G vii?
When are the design Codes in SWDPR 52 G vii 10 to be prepared and approved by the Council?

Q.134 What is the evidence that the particular significance of heritage assets that may be affected by the proposed allocation have been identified and assessed through the plan making process to enable us to form a view as to the likely impact of the development on the significance of heritage assets as per national policy set out in the NPPF?

Q.135 Was the proposed Concept Plan informed by an assessment of the significance of the proposed development on the historic environment?

Q.136 SWDPR 52 G requires infrastructure to be provided in accordance with the latest IDP Schedule set out in the South Worcestershire IDP. Is SWDPR 52 clearly written and unambiguous, so that it is evident how a decision maker should react to development proposals by requiring compliance with the IDP which is not part of the development plan for the area?

SWDPR 53: Rushwick Expanded Settlement

Overall principles

Q.137 Was the location for the proposed new settlement selected on a robust basis?

Q.138 How was the extent of the proposed new settlement defined and is the defined extent justified?

Delivery and implementation

SWDPR 53 E sets out that the proposed expansion of Rushwick will deliver a scheme in accordance with an agreed comprehensive masterplan for the site allocation, taking into account the Concept Plan (Figure 4). The masterplan will be prepared by the Local Planning Authority in consultation with landowners and Worcestershire County Council.

Q.139 The Concept Plan would not be part of the Policies Map, nor SWDPR 53 in the submitted Plan, being part of the explanatory text. Would the Plan be effective in this regard and be clearly written and unambiguous, so it is evident how a decision maker should react to development proposals?

Q.140 What is the justification for the distribution of land uses within the Concept Plan, and would it be effective?

Q.141 Criterion E refers to the master plan being prepared by the Local Planning Authority. When is it intended that the approved masterplan would be in place?

Q.142 The updated housing trajectory (EXAM 24) sets out a housing delivery trajectory for the proposed site, with delivery of the proposed 1,000 houses in the plan period from 2028-29. Is this justified? What is the clear evidence that the proposed allocation would be in terms of the NPPF 'deliverable' and/or 'developable'?

Viability

Q.143 What is the evidence that the proposed allocation would be viable?

Key Principles and Requirements

Q.144 What is the robust evidence that the proposed railway station site should be secured and safeguarded? Is there a reasonable prospect that the railway station would be delivered in the plan period? If so, are the specific requirements and costs known?

Q.145 If the proposed railway station was not deliverable, what would the implications be for the proposed allocation?

Q.146 What is the evidence that any significant impacts from the proposed development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree?

Q.147 Would the requirement for 40% affordable housing be effective and is it justified?

Q.148 What is the justification for the overall site-wide average net density of 35 dwellings per hectare? What is the evidence that this requirement has been derived consistent with NPPF 124 and 125?

Q.149 What is the justification for the specific education requirements set out in SWDPR 53 D v?

Q.150 What is the justification for the specific transport requirements in SWDPR 53 in D vii?

Q.151 Would the proposed provision of plots for Travelling Showpeople in SWDPR 53 D viii be deliverable and would it be effective?

Q.152 What is meant by 'Energy and Carbon Strategy' in SWDPR 52 G vii? When are the Design Codes in SWDPR 52 G vii 10 to be prepared and approved?

Q.153 What is the evidence that the particular significance of heritage assets that may be affected by the proposed allocation have been identified and assessed through the plan making process to enable us to form a view as to

the likely impact of the development on the significance of heritage assets as per national policy set out in the NPPF?

Q.154 Was the proposed Concept Plan informed by any assessment of the significance of the proposed development on the historic environment?

Q.155 To be effective, should paragraph 3.23 refer to functionally linked water, given the potential identified by Natural England for impacts on migratory fish associated with the Severn Estuary Special Area of Conservation (SAC) and Ramsar site e.g. European eels, through the watercourses that join the River Teme SSSI?

SWDPR 54: Mitton

Q.156 Was the location for the proposed allocation selected on a robust basis?

Q.157 How was the extent of the proposed allocation defined and is the defined extent justified?

Q.158 What is the evidence to justify the provision of 500 houses at Mitton to meet the needs of Tewkesbury Borough Council under the Duty to Cooperate? Should SWDPR 54 A be clear that the apportionment of 500 dwellings to meet needs arising in Tewkesbury Borough was agreed under the Duty to Cooperate?

Q.159 What is the evidence that any significant impacts from the proposed development on the transport network, including the strategic road network and the local highway network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree?

Q.160 In terms of strategic flood risk assessment, what is the evidence to justify the allocation of the site? Would the proposed development be safe from flooding during its lifetime without increasing flood risk elsewhere?

Q.161 Does SWDPR 54 adequately address the issue of functionally linked land/water in respect of the Severn Estuary SPA?

Q.162 What is the evidence that the proposed development would be designed to avoid or minimise adverse impacts with particular regard to traffic, on the Cotswolds Natural Landscape (AONB)?

Q.163 The Concept Plan would not be part of the Policies Map, nor SWDPR 54 in the submitted Plan, being part of the explanatory text. Would the Plan be effective in this regard and be clearly written and unambiguous, so it is evident how a decision maker should react to development proposals?

- Q.164 What is the justification for the distribution of land uses within the Concept Plan, and would it be effective?
- Q.165 Should the Plan be clear in regard to SWDPR 54 C iii that an active bridge crossing of the Carrant Brook would require a Flood Risk Activity Permit from the Environment Agency?
- Q.166 The Policy requires that development should accord with the Tewkesbury Garden Town Principles. Is SWDPR 54 clearly written and unambiguous, so that it is evident how a decision maker should react to development proposals by requiring compliance with the Tewkesbury Garden Town Principles which are not part of the development plan for the area?
- Q.167 Phase 1 of the allocation is expected to deliver 500 dwellings to meet the needs of Tewkesbury Borough. Would SWDPR 54 Ei, iv, v, and vi be effective given that the Joint Core Strategy does not apply to the plan area? Are these criteria justified? Should these matters be directly addressed in the Policy?
- Q.168 What is the justification for the specific service and infrastructure requirements in SWDPR 54?
- Q.169 What is the evidence that the proposed allocations would either be 'deliverable' or 'developable' as per the definitions in the NPPF?

Matter 10: Urban Extensions

Issue: Are the proposed allocations justified, effective and consistent with national policy?

SWDPR 55: Cales Farm, Malvern

- Q.170 The proposed allocation is situated near to the Malvern Hills National Landscape (AONB). What is the evidence that the proposed development would be sensitively located and designed to avoid or minimise adverse impacts on the designated area as per NPPF176?
- Q.171 What is the evidence that any significant impacts from the proposed development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree?
- Q.172 Is the requirement for investigation of opportunities for a decentralised heat network in SWDPR 55 C iv justified and would it be effective?

Q.173 What is the evidence that the site would be either 'deliverable' or 'developable' as per the NPPF definitions?

SWDPR 56: North East Malvern (Newland)

Q.174 What is the evidence that the site would be either 'deliverable' or 'developable' as per the NPPF definitions?

Q.175 In regard to existing sports facilities at the site, is SWDPR 56 consistent with national policy for open space and recreation as set out in paragraphs 98 and 99 of the NPPF, and would the Policy deal effectively with the issue of ball strike from the cricket pitch?

Q.176 Would SWDPR 56 contribute to and enhance the natural and local environment consistent with NPPF 174 in regard to the presence of any Priority Habitat?

Q.177 What is the evidence that any significant impacts from the proposed development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree?

SWDPR 57: Land at Hanbury Road, Droitwich Spa

Q.178 Was the location for the proposed allocation selected on a robust basis?

Q.179 How was the extent of the proposed allocation defined and is the defined extent justified?

Q.180 What is the evidence that the site would be either 'deliverable' or 'developable' as per the NPPF definitions?

Q.181 What, if any, are the spatial planning implications of the allocation of this site to the east of the M5 motorway?

Q.182 What is the evidence that any significant impacts from the proposed development on the transport network, including the strategic road network and the local highway network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree?

Q.183 What is the evidence that the particular significance of heritage assets (including Hadzor House) that may be affected by the proposed allocation have been identified and assessed through the plan making process to enable us to form a view as to the likely impact of the development on the significance of heritage assets as per national policy set out in the NPPF?

Q.184 Would SWDPR 57 be effective in not setting out requirements for education provision?

SWDPR 60: Directions for Growth Outside the City Administrative Boundary: Existing Urban Extensions to be Reallocated

- Q.185 What is the justification for the reallocation of the proposed urban extensions in this Plan?
- Q.186 What is the evidence that the proposed sites at B, Broomhall and C, Temple Laugherne would be either 'deliverable' or 'developable' as per the NPPF definitions?
- Q.187 Are the requirements for the provision of Traveller sites in SWDPR 60 B and C justified and would they be effective?
- Q.188 Does SWDPR 60 C and Figure 7 adequately reflect the provision of student accommodation on land within the ownership of the University?
- Q.189 Is the explanatory text for SWDPR 60 D Worcester Six Business Park reflective of the current planning position of the site?

Matter 11: Renewable and Low Carbon Energy Site allocations

Issue: Are the proposed allocations justified, effective and consistent with national policy?

SWDPR 59: Renewable and Low Carbon Energy Site Allocations

- Q.190 Were the locations of the proposed allocations selected on a robust basis?
- Q.191 How was the particular extent of each of the proposed allocations defined and is the defined extent justified?
- Q.192 In respect of the designated National Landscapes (AONBs), what is the evidence that the proposed development would be sensitively located and designed to avoid or minimise adverse impacts on the designated areas?
- Q.193 Has SWDPR 59 adequately taken account of functionally linked land in respect of the Severn Estuary SPA?
- Q.194 What is the evidence that the particular significance of heritage assets that may be affected by the proposed allocations have been identified and assessed through the plan making process to enable us to form a view as to the likely impact of the development on the significance of heritage assets as per national policy set out in the NPPF?
- Q.195 How has flood risk been taken into account in defining the proposed allocations and would they be consistent with national policy and guidance in

respect of development and flood risk?

Matter 12: Worcester City Allocations

Issue: Are the proposed allocations justified, effective and consistent with national policy?

SWDPR 61: Worcester City Allocations

Q.196 What is the evidence that the Worcester City Allocations would be either 'deliverable' or 'developable' as per the NPPF definitions?

SWDP NEW 9 Land at Navigation Road, Diglis, Worcester

Q.197 What is the evidence that the particular significance of heritage assets that may be affected by the proposed allocation have been identified and assessed through the plan making process to enable us to form a view as to the likely impact of the development on the significance of heritage assets as per national policy set out in the NPPF? Is the proposed allocation effective in this regard?

SWDP 43/aa Lowesmoor Wharf

Q.198 Given that there is a working boatyard at Lowesmoor Basin, is the proposed allocation consistent with NPPF 187 in respect of the agent of change principle?

SWDP 43/29A Chequers Lane/Henwick Road

Q.199 What is the justification for the proposed boundaries of the site, and would they be effective?

SWDP 44/4 Shrub Hill Opportunity Zone

Q.200 The explanatory text in 11.17 refers to a new canal basin. Is that deliverable and would the policy be effective in this regard?

SWDP NEW 10 Land at Blackpole Road, Worcester

Q.201 Is the amount of employment land and the site area given as 8.12 hectares correct? Should footnote 208 be incorporated into the Policy and refer to the amount of land required for flood mitigation measures? If so, should changes be made to the Policies Map?

Q.202 What is the evidence that the site can be satisfactorily accessed?

SWDP REALLOCATE 17 Worcester Woods Business Park Newtown Road

Q.203 Is the proposed reallocation of the site in the submitted Plan justified and reflective of the current position in regard to the land?

DEALLOCATE 1 etc

Q.204 Why are deallocated sites indicated in the Plan when they are no longer identified for development? Why are the sites not reallocated?

Matter 13: Malvern Hills Allocations

Issue: Are the proposed allocations justified, effective and consistent with national policy?

SWDPR 58: Three Counties Showground

Q.205 Is SWDPR 58 B consistent with SWDPR06 in respect of active travel and would it be effective?

SWDPR 62: Malvern Hills Allocations

Q.206 What is the evidence that the Malvern Hills Allocations would be either 'deliverable' or 'developable' as per the NPPF definitions?

SWDP NEW 89 Land south of Madresfield Road

Q.207 What is the evidence that the particular significance of heritage assets that may be affected by the proposed allocation have been identified and assessed through the plan making process to enable us to form a view as to the likely impact of the development on the significance of heritage assets as per national policy set out in the NPPF? Is the proposed allocation effective in this regard?

Q.208 In respect of the designated National Landscapes (AONBs), what is the evidence that the proposed development would be sensitively located and designed to avoid or minimise adverse impacts on the designated areas?

Q.209 What is the evidence that any significant impacts from the proposed development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree?

Q.210 Is the delivery of the site dependent upon land owned by the Malvern Hills Trust? If so, what is the evidence that there is a reasonable prospect of that land being available?

Land at Cales Farm

Q.211 Is the inclusion of the site in Table 18 a duplication of SWDPR 55?

SWDP NEW 91 Land at 186 Madresfield Road

Q.212 Would SWDP NEW 91 contribute to and enhance the natural and local environment consistent with NPPF 174 in regard to the presence of any Priority Habitat?

Q.213 What is the evidence that there is a reasonable prospect that a safe and suitable access to the site can be achieved for all users?

Q.214 Is the delivery of the site dependent upon land owned by the Malvern Hills Trust? If so, what is the evidence that there is a reasonable prospect of that land being available?

SWDP NEW 92 Land on the south side of Guarlford Road

Q.215 What is the evidence that the particular significance of heritage assets that may be affected by the proposed allocation have been identified and assessed through the plan making process to enable us to form a view as to the likely impact of the development on the significance of heritage assets as per national policy set out in the NPPF? Is the proposed allocation effective in this regard?

Q.216 In respect of the designated National Landscapes (AONBs), what is the evidence that the proposed development would be sensitively located and designed to avoid or minimise adverse impacts on the designated areas?

Q.217 Is the proposed allocation consistent with the identified key view in Policy MV1 of the Malvern Town Neighbourhood Plan?

Q.218 What is the evidence that any significant impacts from the proposed development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree?

Q.219 Is the delivery of the site dependent upon land owned by the Malvern Hills Trust? If so, what is the evidence that there is a reasonable prospect of that land being available?

Q.220 With regard to the waste water treatment facility, would the proposed development provide for an acceptable standard of living conditions for residents, and what is the evidence that the agent of change principle in NPPF 187 has been applied?

Q.221 Would the Policy be effective in regard to the management of surface water?

MHPH07/ CFS0042 Hope Lane

Q.222 Is the proposed allocation justified? Is the indicative housing figure justified?

SWDP NEW 95 Land south of Stourport Road, Great Witley

Q.223 Is the proposed allocation consistent with the designation of Great Witley as a Category 1 village and is it justified?

SWDP NEW 98 Land south of playing field Martley

Q.224 Given that the site is under construction, is the proposed allocation justified?

SWDP NEW 99 Lawn Farm Phase 3. Drake Street, Welland

Q.225 What is the justification for the proposed allocation and what account has been taken of the emerging Welland Neighbourhood Plan?

Suckley, Land north of Stocks Farm (MHPH12)

Q.226 Is the proposed allocation consistent with the designation of Suckley as a Category 1 village and is it justified?

Q.227 In respect of the designated National Landscapes (AONBs), what is the evidence that the proposed development would be sensitively located and designed to avoid or minimise adverse impacts on the designated areas?

SWDP NEW 101 Powick (including Colletts Green) Land south of Old Malvern Road

Q.228 What is the justification for the proposed allocation?

SWDP REALLOCATE 49 Victoria Car Park Malvern

Q.229 What is the justification for the proposed allocation and is it deliverable?

SWDP NEW 105 Park Farm, Blackmore Park, Malvern

Q.230 In respect of the designated National Landscapes (AONBs), what is the evidence that the proposed development would be sensitively located and designed to avoid or minimise adverse impacts on the designated areas?

Q.231 What is the evidence that any significant impacts from the proposed development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree?

SWDP NEW 107 Malvern Hanley Swan Between Hill View Area and Willow End Business Park

Q.232 In respect of the designated National Landscapes (AONBs), what is the evidence that the proposed development would be sensitively located and designed to avoid or minimise adverse impacts on the designated areas?

Q.233 What is the evidence that any significant impacts from the proposed development on the transport network (in terms of capacity and congestion),

or on highway safety, can be cost effectively mitigated to an acceptable degree?

SWDP NEW 108 Malvern Hanley Swan between disused railway track and Willow End Business Park

Q.234 In respect of the designated National Landscapes (AONBs), what is the evidence that the proposed development would be sensitively located and designed to avoid or minimise adverse impacts on the designated areas?

Q.235 What is the evidence that any significant impacts from the proposed development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree?

SWDP NEW 109 Land at Mayfield Road, Malvern

Q.236 In respect of the designated National Landscapes (AONBs), what is the evidence that the proposed development would be sensitively located and designed to avoid or minimise adverse impacts on the designated areas?

Q.237 What is the evidence that any significant impacts from the proposed development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree?

Malvern Land adjoining Blackmore Park

Q.238 In respect of the designated National Landscapes (AONBs), what is the evidence that the proposed development would be sensitively located and designed to avoid or minimise adverse impacts on the designated areas?

Q.239 What is the evidence that any significant impacts from the proposed development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree?

Matter 14: Wychavon Allocations

Issue: Are the proposed allocations justified, effective and consistent with national policy?

SWDPR 63: Wychavon Allocations

Q.240 What is the evidence that the Wychavon Allocations would be either 'deliverable' or 'developable' as per the NPPF definitions?

SWDP NEW 14 Land north/south of Union Lane, Droitwich Spa

Q.241 Is the indicative capacity for the proposed site justified?

Land at Keepers Cottage, Newlands Road

Q.242 What is the evidence that the site can be satisfactorily accessed?

SWDP NEW 20 Land of Wyre Road, Pershore

Q.243 Would the proposed allocation be effective in preventing coalescence of Pershore and Wyre Piddle?

SWDP NEW 21 Land of Wyre Road North, Pershore

Q.244 Would the proposed allocation be effective in preventing coalescence of Pershore and Wyre Piddle?

SWDSP NEW 22, 23, 24 Land South of the Holloway, Pershore

Q.245 What is the evidence that any significant impacts from the proposed development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree?

Q.246 Is the indicative housing figure justified?

Q.247 What is the evidence that the SSSI at Tiddesley Wood would be protected and enhanced as per NPPF 174?

Badsey Combination of land at rear of 34 Bretforton Road and Land at Brewers Lane

Q.248 Is the indicative housing figure justified?

Land adjacent to Station Road, Broadway WYPHM16

Q.249 Is the proposed allocation consistent with NPPF 98 and 99 in respect of any re-provision of playing fields?

SWDP NEW 29 Land west of Dilmore Lane

Q.250 Is the indicative housing figure justified?

SWDP NEW 13 Land off Southall Drive

Q.251 Would the policy be effective in adequately addressing the relationship of the proposed development and existing cricket pitch?

SWDP NEW 31 Land off Inn Lane, Roselands

Q.252 What is the evidence that the site can be satisfactorily accessed?

SWDP NEW 34 Land immediately adjoining southern side of Boat Lane

Q.253 Is the level of development proposed at Offenham appropriate for a category 1 settlement?

SWDP NEW 46 Land north east of Main Street

Q.254 What regard has been had to the Cleeve Prior Neighbourhood Plan in considering the proposed allocation?

Site off Main Street and Mill Lane Cleeve Prior

Q.255 What regard has been had to the Cleeve Prior Neighbourhood Plan in considering the proposed allocation?

SWDP NEW Land at the Daves, Middle Crophorne

Q.256 What is the evidence that the site can be satisfactorily accessed?

Land at Middle Lane / Field Barn Lane Crophorne

Q.257 What is the evidence that the site can be satisfactorily accessed?

Land at Mill End Racing Stables, Elmley Castle

Q.258 What is the evidence that the site can be satisfactorily accessed?

SWDP NEW 50 Land adjacent to Defford Motors, Defford

Q.259 What is the evidence that the site can be satisfactorily accessed?

SWDP NEW 51 Upton Road, Land off Main Street, Defford

Q.260 What is the evidence that the site can be satisfactorily accessed?

Defford Motors, and Land Off Upton Road

Q.261 What is the evidence that the site can be satisfactorily accessed?

SWDP NEW 52 Land adjacent to and west of Galton Arms

Q.262 What is the evidence that the site can be satisfactorily accessed?

Q.263 Would the proposed allocation be consistent with national policy and guidance in respect of development and flood risk?

SWDP NEW 53 Blacksmiths Lane, Lower Moor

Q.264 What is the evidence that the particular significance of heritage assets that may be affected by the proposed allocation have been identified and assessed through the plan making process to enable us to form a view as to the likely impact of the development on the significance of heritage assets as per national policy set out in the NPPF? Is the proposed allocation effective in this regard?

SWDP NEW 54 Land west of Upton Snodsbury Road, Pinvin

Q.265 The Councils statement of consultation refers to this site having been built out. If that is the case, is the allocation necessary?

SWDP NEW 57 Speed the Plough, Plough Road, Tibberton

Q.266 Does the proposed allocation address effectively the issue of the single track bridge at Tibberton, and would it be effective in this regard?

Q.267 Is the proposed allocation consistent with the designation of the village as a category 2 settlement?

SWDP NEW 63 Former Pipes Support Site, Salwarpe Road, Droitwich Spa

Q.268 Has the site been built out? If so, is the allocation justified?

SWDP NEW 71 South of Keytec East Business Park

Q.269 What is the latest planning status of the site? Is its allocation justified?

SWDP NEW 77, 78, 79 and 80 Hartlebury Trading Estate

Q.270 The Policies Map shows that the proposed allocations would be in the Green Belt. If that is correct, would they be effective? If it is not correct, what are the exceptional circumstances for altering the boundaries of the Green Belt and would the boundaries of the Green Belt be defined clearly as per NPPF 143?

SWDP NEW 83 Two Shires Park, Weston Road, Honeybourne

Q.271 What is the evidence that the proposed allocation would be delivered?

SWDP NEW 85 Eatons Farm, Church Lane, Tibberton

Q.272 Does the proposed allocation address effectively the issue of the single-track bridge at Tibberton, and would it be effective in this regard?

Q.273 Is the proposed allocation consistent with the designation of the village as a category 2 settlement?

Cheltenham Road (Phase 2) Evesham

Q.274 What is the current status of the site and is its deallocation justified?

Matter 15: Policies for Climate change, resource management and environmental quality

Issue: Are the individual policies clear, justified and consistent with national policy and will they be effective?

SWDPR 01: Climate Change Mitigation and Adaptation

Q.275 Does SWDPR 01 serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area and would it be effective?

SWDPR 05: Design and Sustainable Construction

Q.276 Given that Neighbourhood Plans are part of the development plan, would the Policy (Ai) be effective in stating that 'account should be taken of' them?

Q.277 What is the justification for the proposed requirement that major development should target <500 kgCO₂e/sqm upfront embodied carbon emissions, and would it be effective?

Q.278 Is the requirement in B iv that all major development shall calculate whole lifecycle carbon emissions (including embodied carbon emissions) through a nationally recognised Whole Lifecycle Carbon Assessment methodology justified and would it be effective?

Q.279 Is the requirement in B ix that expects all new major residential development to achieve a Home Quality Mark Assessment justified and would it be effective?

Q.280 Is the requirement in B x to expect non-domestic developments of 500 sqm of floorspace or above to achieve 'excellent' in BREEAM assessments justified, and would it be effective?

SWDPR 26: Design

Q.281 Is the requirement in part B that applications should demonstrate, through a Design and Access Statement or other supporting evidence, e.g., Homes Quality Mark, Building for a Healthy Life, or BREEAM assessment and how the objectives outlined in criterion A and SWDPR 5 have been addressed, justified and would it be effective?

Q.282 Is it justified that the Policy in B x seeks to require that where appropriate, development should incorporate measures for crime reduction that are consistent with those recommended by the Secured by Design guides when those guides are not part of the development plan?

Q.283 Is part B xii of the Policy consistent with national policy in respect of biodiversity and provisions of relevant legislation including the Wildlife and Countryside Act 1981?

SWDPR 32: Telecommunications and Broadband

Q.284 Does SWDPR 32 serve a clear purpose given Part R of the Building Regulations which is concerned with infrastructure for electronic communications, is it justified, and would it be effective?

SWDPR 33: Renewable and Low Carbon Energy

Q.285 What is the justification in A for the requirement that all new developments over 100 sqm gross or one or more dwellings should incorporate the generation of energy from renewable or low carbon sources, and would it be effective?

SWDPR 34: Management of Flood Risk

Q.286 Do the provisions of SWDRP 34 reflect the version of the Planning Practice Guidance: Flood risk and coastal change August 2022, and would it be effective? (eg Points Aii, L, M, N etc).

SWDPR 35: Sustainable Drainage Systems

Q.287 SWDPR 35 refers to a number of publications which do not form part of the development plan. In this regard, is the Policy clearly written and unambiguous, so it is evident how a decision maker should react to development proposals?

SWDPR 36: Water Resources, Efficiency and Wastewater Treatment

Q.288 What is the justification for the Policy requirement for the application of the optional national technical standards for water where it must be demonstrated that the daily non-recycled water use per person will not exceed 110 litres per person?

Q.289 What is the justification that for business / commercial proposals, it must be demonstrated that the water use meets the Building Research Establishment Environmental Assessment Methodology (BREEAM) 'excellent' standard?

SWDPR 37: Air Quality

Q.290 What is the justification for the thresholds for Air Quality Assessments?

SWDPR 39: Minerals and Waste Safeguarding

Q.291 Is SWDPR 39 consistent with the Worcestershire Minerals Local Plan and do all the Policy Criteria serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area?

Matter 16: Policies for Transport, Green Infrastructure, Historic Environment, Tourism, Leisure and Community Facilities

Issue: Are the individual policies clear, justified and consistent with national policy and will they be effective?

SWDPR 06: Transport

- Q.292 Would the Plan be effective in ensuring that any significant impacts from the development proposed on the transport network, including the strategic road network and local highways network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree?
- Q.293 What is meant by 'at least maintain highway safety for all users' in SWDPR 06 and is that consistent with NPPF 111?
- Q.294 Is SWDPR 06 (various criteria) clearly written and unambiguous, so that it is evident how a decision maker should react to development proposals by requiring compliance with various relevant guidance such as the Worcestershire Local Transport Plan (LTP) which is not part of the development plan for the area?
- Q.295 Are the travel plan requirements in B justified and consistent with NPPF 113?
- Q.296 Is criterion D clearly written and unambiguous in the reference to SWDPR 06 and what is the justification for all development proposals being required to, contribute financially to a package of active travel infrastructure and services?
- Q.297 Does E serve a clear purpose given Part S of the Building Regulations which is concerned with infrastructure for charging electric vehicles, is it justified, and would it be effective?
- Q.298 What is the justification for the list of transport schemes in F? What is the robust evidence for protecting these schemes in G?
- Q.299 Is Criterion H clearly written and unambiguous, so that it is evident how a decision maker should react to development proposals?
- Q.300 What is the robust evidence (NPPF 106) for protecting the sites and corridors schemes in I? Are these adequately identified on the Policies Map?
- Q.301 Would criterion M be effective given the provisions of S278 of the Highways Act?

SWDPR 07: Green Infrastructure

- Q.302 What is the justification for the requirements for Green Infrastructure in criterion A?

Q.303 Is Criterion B clearly written and unambiguous, so that it is evident how a decision maker should react to development proposals?

Q.304 Is Criterion C iii a) clearly written and unambiguous, so that it is evident how a decision maker should react to development proposals by requiring compliance with GI Concept Plans and Concept Statements which are not part of the development plan for the area?

Q.305 Is Criterion D justified and would it be effective?

Q.306 Is Criterion E clearly written and unambiguous, so that it is evident how a decision maker should react to development proposals given that the Environmental Character Areas Map is not part of the development plan for the area? What is the justification for the identification of GI assets and are they adequately identified on the Policies Map?

Q.307 Is Criterion F clearly written and unambiguous, so that it is evident how a decision maker should react to development proposals by requiring compliance with 'Building with Nature' or equivalent benchmarks which is not part of the development plan for the area?

Q.308 Is the Policy clearly written and unambiguous, so it is evident how a decision maker should react to development proposals in respect of the proposed Areas of Informal Recreation (AIRS)? What is the justification for the provision of the proposed AIRs, is the Policy clear as to why the proposed AIRs are required, or how they would be secured so as to address recreational pressures on the Malvern Hills SSSI arising from new development?

Q.309 What is the evidence that the proposed AIRs in table 3 are justified and would they be effective? If not, how should the Policy be modified to make it sound?

SWDPR 08: Historic Environment

Q.310 Does this policy duplicate national policy and is it necessary?

SWDPR 10: Health and Wellbeing

Q.311 What is required in a Health Impact Assessment?

Q.312 What is the justification for the Health Impact Assessment thresholds in criterion E?

Q.313 Does criterion B serve a clear purpose, and avoid unnecessary duplication of policies that apply to the area, and would it be effective?

SWDPR 27: Biodiversity and Geodiversity

Q.314 Does SWDPR 27 and explanatory text require updating in regard to the Environment Act 2012?

Q.315 What is the justification for the new addition Local Geological Sites and Sites of Special Scientific Interest listed in examination document CD23 SWDPR Interactive Reg 19 Policies Map Minor Modifications?

SWDPR 28: The Cotswolds National Landscape (NL) and Malvern Hills Area of Outstanding Natural Beauty (AONB)

Q.316 Is the requirement in B concerning major development consistent with NPPF 177?

Q.317 Are the requirements in D concerning development within the settings of National Landscapes / Areas of Outstanding Natural Beauty consistent with NPPF 176 and would they be effective?

Q.318 Is SWDPR 28 clearly written and unambiguous, so that it is evident how a decision maker should react to development proposals by requiring compliance with good practice guidance produced by the Cotswolds Conservation Board and Malvern Hills AONB Partnership?

SWDPR 29: Management of the Historic Environment

Q.319 Is Criterion E clear and unambiguous, does it serve a clear purpose and what is the basis for the requirement to preserve or enhance the character and appearance of a setting of a conservation area?

SWDPR 30: Landscape Character

Q.320 What is meant by 'Land Cover Parcel' in Aiii?

Q.321 What is the justification for the requirement of a Landscape and Visual Impact Assessment for all major development?

SWDPR 31: Amenity

Q.322 Is the wording of the policy consistent with the general protection of amenity set out in NPPF 130f?

SWDPR 40: Tourist Development

Q.323 Is Criterion A iv justified, effective or consistent with Section 11 of the NPPF making effective use of land?

SWDPR 41: Visitor Accommodation

Q.324 Given the distinction between development within, and outwith development boundaries in SWDPR 41 A and B, would B I be effective?

SWDPR 42: Static and Touring Caravans, Chalets and Camping Sites (Holiday Accommodation)

Q.325 Does SWDPR 42 A i serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area and would it be effective?

Q.326 What account has been taken of NPPF105 in drafting Criterion A vii which says that opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making?

Q.327 What is meant by 'small sites' and 'limited proposed extensions or improvements to...'. In this regard, is the Policy clearly written and unambiguous, so it is evident how a decision maker should react to development proposals, and would it be effective?

SWDPR 43: Built Community Facilities

Q.328 Does the reference to Neighbourhood Plans in part A serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area?

Q.329 In respect of development schemes involving part of a site or building, would criterion B be effective?

Q.330 What is the justification for the requirements for financial contributions in criterion F and would it be effective?

SWDPR 44: Green Space

Q.331 What is the justification for the designation of specific areas of land identified on the policies map as Green Space? Does the Policies Map adequately identify the identified Green Space?

Q.332 Is SWDPR 44 B consistent with NPPF 98 and 99?

SWDPR 45: Provision of Green Space and Outdoor Community Uses in New Development

Q.333 What is the justification for the Green Space and outdoor community uses requirements in criterion A?

Q.334 Have the requirements in table 9 been prepared with regard to Natural England's Accessible Natural Greenspace Standards and are they justified?

Q.335 Do criteria B and C serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (SWDPR 07)?

SWDPR 46: Playing Fields

Q.336 What is the justification for the sports facilities requirements in criterion A?

Q.337 Is criterion B consistent with NPPF 98 and 99?

SWDPR 50: Equestrian Development

Q.338 Do criteria Ai and Aiii together serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area?

Q.339 What is meant by 'all published guidance' in A iv?

Q.340 Is the Policy effective and consistent with national policy in requiring compliance with Equine Industry Welfare Guidelines which are not development plan documents?
