

South Worcestershire Development Plan Review Submission (Regulation 22)

Topic Paper

Areas of Informal Recreation (AIRs)

December 2024



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1. Introduction

This topic paper has been prepared to inform the review of the South Worcestershire Development Plan (SWDPR). The focus of the topic paper is the Areas of Informal Recreation (AIRs) and the purpose of the paper is to:

- assess the performance of the existing proposed policy in the SWDPR following changing circumstances since the submission of the SWDPR to the Secretary of State for Examination in September 2023;
- examine the latest research, guidance and evidence that will impact on the policy;
- highlight any gaps in knowledge in the accompanying evidence base and the requirements in terms of generating additional areas of further research; and
- propose recommendations to ensure Policy SWDPR07 Green Infrastructure meets the spatial objectives of the SWDPR.

This topic paper is one of a suite of documents which sets out the South Worcestershire Councils (SWCs) planning policy position as relates to the SWDPR. It provides an overarching approach to the allocation and implementation of the AIRs within South Worcestershire, the progress made to date, and considers future options.

2. Context

2.1. Aims and Objectives of the AIRs

The Worcestershire [Green Infrastructure Framework 3: Access and Recreation Document \(2020\)](#) highlighted limited opportunities to expand existing informal recreation sites across Worcestershire.

The report identified areas of search for sites for new recreation assets in the county, including three location recommendations in south Worcestershire¹. The focus for these areas was on the creation of new, large strategic informal recreation sites that form part of a wider network of accessible greenspaces, and to take pressure off existing Green Infrastructure (GI) assets, such as the Malvern Hills Site of Specific Scientific Interest (SSSI).

In seeking to address recreational pressures, the South Worcestershire Council's conducted their own 'Call for Sites' consultation in relation to identifying suitable locations for Areas of Informal Recreation (AIRs) (then termed Country Parks) as part of the SWDP Review. The AIRs are proposed as part of Policy SWDPR07 Green Infrastructure in the SWDPR and are intended to provide strategic green infrastructure provision alongside development, address recreational pressures, and to provide mitigation to address recreation impacts to the Malvern Hills (in conjunction with the Malvern Hills SSSI Mitigation Strategy) and other existing green infrastructure assets.

To complement this work as part of the SWDPR, research undertaken by Footprint Ecology relating to recreational impacts on the Malvern Hills SSSI ([Recreation Impacts Report \(2021\) \(ENV3\)](#) and [Mitigation Strategy \(2022\) \(ENV4\)](#)), also established that there is a need to address recreational pressures on the Malvern Hills SSSI due to previous local plan growth and the growth planned in the SWDP Review. It is recognised in the report that further housing growth will increase pressure on the Malvern Hills SSSI, and the role that strategic planning has in ensuring adequate protection.

The AIRs have four key aims:

1. To form new, large strategic informal recreation sites increasing access to greenspace;
2. To form part of a wider network of accessible greenspace above and beyond any standard provision provided alongside new development;
3. To provide mitigation to address recreation impacts to the Malvern Hills (including the SSSI) and to take pressure off existing green infrastructure assets; and
4. To provide mitigation for recreational pressures related to the growth set out in the plan as whole.

¹ The locations in the Green Infrastructure Framework 3: Access and Recreation Document (2020) are different sites to those sites submitted through the Call for Sites process undertaken by the SWCs.

2.2. Aims and Objectives of the Malvern Hills SSSI Mitigation Strategy (MHMS)

The Malvern Hills SSSI Mitigation Strategy (ENV4) provides recommendations for a package of mitigation measures to address impacts to the Malvern Hills Site of Special Scientific Interest (SSSI) from increased recreation (associated with new housing growth).

The 2021 'Recreation Impacts on the Malvern Hills SSSI to inform the South Worcestershire Development Plan Review' Report (ENV3), hereafter the Recreational Impacts Report, underpins the MHMS. This Report was commissioned to consider the impacts of recreation on the Malvern Hills SSSI and the implications of new housing growth for the site.

The report identified major impacts on the SSSI from recreational use from existing residents and visitors but also highlighted that new housing growth will exacerbate the current pressures.

For onsite mitigation, both the Recreational Impacts Report and the MHMS recommended restrictions on development within 500m of the SSSI. Accordingly, the SWDPR proposes no new allocations within 500m of the SSSI.

Both the Recreational Impact Report and the MHMS also recommended onsite mitigation measures to be funded through the collection of contributions from housing development within a 25km Zone of Influence (ZOI).

This distance represents the 75th percentile (i.e. distance within which 75% of visitors originated, rounded to the nearest km), and is based on those travelling on a short visit, directly from home only. The Recreational Impacts Report acknowledges that this is a very large ZOI, drawn to reflect the particular circumstances of the Malvern Hills and the particular visitor experience that they provide.

The MHMS states that alternative zone options were considered but all but one ZOI approach uses a single zone and this has now become a 'standard approach for recreation mitigation applied to European sites' (Liley et al, 2022).

The Malvern Hills SSSI, whilst also a National Landscape, is not part of the National Site Network (European site) such as a Special Area of Conservation or Special Protection Area. There is no obligation in the case of sites that are solely SSSI to provide a set level or 'target' of green infrastructure provision as a mitigation measure/strategy.

Nevertheless, there are duties on public bodies including LPAs, in respect of SSSIs, in particular the general duty under section 28G(2) of the Wildlife and Countryside Act 1981 to "take reasonable steps, consistent with the proper exercise of the authority's functions to further the conservation and enhancement..." of the SSSI. This is a positive duty to do something rather than a more passive duty. There must be some discretion on the planning authority to reach a view on what is considered to be reasonable steps and whether those steps are consistent with the proper exercise of its functions. The SWCs have considered what active steps it can take to conserve and enhance the SSSI and how reasonable it is in the circumstances to undertake them, justifying the proposed way forward.

It is within the MHMS that the AIRs are first recognised as having potential to provide offsite mitigation to the Malvern Hills SSSI by acting as alternative recreational provision.

The AIRs are intended to work in partnership with the recommendations set out in the MHMS.

2.2 National Policy and Guidance and Evidence Base

The publications in Table 1 below have informed and supported the production of the AIRs and SWDPR policy:

Table 1: Supporting Policy and Evidence Base Documents			
Publication	Produced by	Purpose	Link
National Planning Policy Framework (NPPF)	Department for Levelling Up, Housing and Communities (DLUHC)	The NPPF sets out government's planning policies for England and how these are expected to be applied.	National Planning Policy Framework (publishing.service.gov.uk)
Planning Practice Guidance (PPG)	Department for Levelling Up, Housing and Communities (DLUHC)	PPG supports the NPPF through additional policy guidance on a range of topics.	Planning practice guidance - GOV.UK (www.gov.uk)
Environment Act (2021)	Department for Environment, Food and Rural Affairs (DEFRA)	Legislation that aims to protect and enhance the environment for future generations. The Act proposes to halt the decline in species by 2030, require new developments to improve or create habitats for nature, and tackle deforestation overseas. The Act aims to clean up the country's air, restore natural habitats, increase biodiversity, reduce waste and make better use of our resources.	Environment Act 2021 (legislation.gov.uk)
Areas of Informal Recreation (AIRs) Site Allocations Background Paper (March 2022)	South Worcestershire Councils	This background paper provides a guide to the process of the assessment of the proposed site allocations for the AIRs in the SWDPR.	Areas of Informal Recreation (AIRs) Site Allocations Background Paper

Country Park – Call for Sites: Site Assessments	South Worcestershire Councils	To assess the submissions from the call for sites consultation for their suitability as a potential site allocation for an AIR in the SWDPR.	Country Park – Call for Sites: Site Assessments
Recreation Impacts on the Malvern Hills SSSI (2021)	Footprint Ecology (for the SWCs)	This report presents visitor survey results, details of the ecological impacts from recreation and discusses the implications in terms of access management and mitigation options.	Recreation Impacts on the Malvern Hills SSSI (ENV3)
Malvern Hills SSSI Mitigation Strategy (2022)	Footprint Ecology (for the SWCs)	This strategy provides a package of mitigation measures to address impacts to the Malvern Hills Site of Special Scientific Interest (SSSI) from increased recreation (associated with new housing growth). The strategy recommends how recreation impacts from the housing growth in South Worcestershire Development Plan Review (SWDPR) can be addressed.	Malvern Hills SSSI Mitigation Strategy (ENV4)
AIRs Report (2024)	Footprint Ecology (for the SWCs)	This report informs policy development relating to two specific proposed AIRs and their role in supporting the delivery of the requirements outlined in the SWDPR.	AIRs Report (2024) (EXAM17)
Worcestershire Green Infrastructure Framework 3: Access and Recreation Document (2020)	Worcestershire County Council	This document is one of a suite of GI evidence base papers prepared to support the Worcestershire GI Strategy and the wider work of the GI Partnership. It is a guidance document that aims to enable the strategic planning, co-ordination, delivery and management of existing and	Worcestershire Green Infrastructure Framework 3: Access and Recreation Document (2020)

		future green spaces. This paper identifies key principles and constraints surrounding the existing provision and creation of new recreation opportunities in Worcestershire.	
Natural England RP04518 Edition 1 Compilation and Review of Evidence Leading to SANG and SAMM Provision	Natural England	This study reviews 16 Local Planning Authority (LPA) case studies to understand the methods and evidence used for mitigating potential recreational impacts arising from housing growth on ecologically sensitive sites, particularly European designated sites.	Natural England RP04518 Edition 1 Compilation and Review of Evidence Leading to SANG and SAMM Provision

2.3 AIR Allocations and Updated Positions

The Country Park (now AIRs) Call for Sites consultation was undertaken in June 2020 and received 17 submissions. These submissions were then assessed against the site assessment criteria set out in Appendix 1 to form a shortlist of six sites (Table 2). The site assessments for the [17 submissions can be viewed online as part of the SWDP Review evidence base.](#)

Table 2: Shortlist of Sites Following Site Assessment			
Name	Call for Sites Reference	Status	Officer Summary (original site assessment circa 2020)
Lower Hall Farm, Hampton Lovett	CP001	Selected.	Good site with no major constraints in a location near to current and planned growth. As such, site is proposed to be allocated alongside CP003 and CP006f.
Land south of Jennet Tree Lane	CP003	Selected.	Good site with no major constraints in a location near to the currently over-capacity Malvern Hills. As such, site is proposed to be allocated alongside CP001 and CP006f.
Land adjacent to Throckmorton	CP005a, CP005d & CP005e	Ruled in but not allocated.	Good site with no major constraints, although there are some access concerns relating to CP005c and CP005e. Given the location of site and its juxtaposition with the proposed Throckmorton New Settlement, it is more appropriate to consider it as part of the wider Throckmorton New Settlement Masterplanning. As such, the site is not proposed to be allocated.
Land north of Broad Marston	CP006c, CP006d & CP006e	Ruled out on access.	Ruled Out on Access.
Land north of Honeybourne	CP006f, CP006h, CP006i & CP006j	Selected (CP006f only).	CP006f-j (aside from CP006i which is also Ruled Out on Access) is a good site overall. Not deemed appropriate to allocate all land parcels due to scale; CP006f deemed most appropriate to allocate given location and existing woodland on site. CP006g, CP006h and CP006j are all small parcels which are slightly detached from the main parcels CP006f and CP006h, with CP006h of a significant scale.

New Farm, Norton	CP010b	Ruled in but not allocated.	Good site for a Country Park overall, including being in a location of reduced accessibility to land for recreation, however due to concerns surrounding the potential impact on nearby Windmill Hill SSSI and Nature Reserve, and some concerns relating to change in levels in some areas of the site, CP010 is not carried forward for allocation and CP001, CP003 and CP006f are preferred.
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The three sites that were proposed for allocation following the Call for Sites and site assessment process were as follows:

- **AIR01 (CP001):** Lower at Hall Farm, Hampton Lovett (Wychavon District);
- **AIR02 (CP003):** Land south of Jennet Tree Lane, Deblin’s Green – hereafter referred to as just ‘Jennet Tree Lane’ (Malvern Hills District); and
- **AIR03 (CP006f):** Land north-east of Blenheim Farm, Honeybourne – hereafter referred to as just ‘Honeybourne’ (Wychavon District).

The original Call for Sites process did not include the term ‘AIR’ but specifically used the term ‘Country Parks’. The proposals have undergone several name changes throughout the assessment process and the infrastructure provisions expected have also been reevaluated through the Call for Sites process and the Regulation 19 consultation, as the [Country Park / Recreational Green Space Site Allocations Background Paper](#), (2022) states:

“2.7. During the assessment process, it became clear that the initial expectations of allocation and delivery (of) a single Country Park site which could achieve accreditation were not necessarily achievable or appropriate, and that sites which became (~~may be~~) available for more general recreational use without the facilities required to become an accredited Country Park are equally as important in seeking to limit recreational pressures on existing sites, as identified in the evidence base. This is particularly pertinent given there is currently only one accredited Country Park in south Worcestershire, Worcester Woods Country Park, supported by a network of informal recreational green spaces with varying degrees of facilities and accessibility.

2.8. It was also observed that the term ‘Country Park’ is vague and can be interpreted in a number of ways, several of which are not appropriate in this context. As a result, the focus of the process has been altered to include the provision of recreational green space, with site allocations provided with a description of the anticipated uses on site.”

During the process, the term ‘Recreational Green Space’ was changed to ‘Area of Informal Recreation’ (AIR).

AIRs/Country Parks SWDP Review Representations (Regulation 19)

The following representations were submitted as part of the Regulation 19 consultation:

Table 3: AIRS/ Country Parks Representations received at Regulation 19 stage			
Rep ID	Consultee	Summary (click the Rep ID link to access the full Reg 19 submission)	Response to Representation
2106	Madresfield Estate Trust	<p>The Trust indicate their site (CP003) was submitted for discussion, but that further detailed discussion was required around delivery, funding and management of the site. In particular, the Trust concerns lie around inflexible wording and the need to allow the AIRs to be self-sustaining and include complementary visitor facilities.</p> <p>Without the required further discussion and clarification on these issues, the Trust considered it must therefore object to the use of the site.</p>	<p>The updated Footprint Ecology report (2024) provides further discussion on the AIR funding and management.</p> <p>While it would appear that visitor facilities (i.e. cafés) are not important drivers for those visiting Malvern Hills or in general GI guidelines, they can be important factors in drawing visitors and also relevant in terms of income revenue. They could be relevant at the AIR.</p>
561	Worcestershire Wildlife Trust	<p>Supports the policy but adds that <i>“further detail on funding and management mechanisms for the proposed AIRS”</i> would be helpful. Believes that reference to the Environment Act 2021 specifically to Biodiversity Net Gain and Conservation Covenants would be important for long term management.</p>	<p>More consideration and details of potential funding sources are given in the updated Footprint Ecology report (2024), including reference to Biodiversity Net Gain.</p>
830	Natural England	<p>NE supports the AIRs, however <i>“SWDPR needs to set out how the AIRs are to be funded and delivered”</i>. NE advise that measures set out in the Malvern Hills Recreation Mitigation Strategy should be integrated into the plan for mitigation. NE state <i>“As the policy does not adequately protect SSSI, the plan is not compliant”</i></p>	<p>The updated Footprint Ecology report (2024) provides additional detailed evidence from the Malvern Hills SSSI to support the mitigation requirement and has further explored likely costs and funding opportunities.</p>

841	Natural England	NE states that the “ <i>standards of provision that are behind current thinking</i> ”. They refer to key guidelines in the ANGSt standards such as those related to size and proximity to ensure new residents have access to some form of greenspace.	The updated Footprint Ecology report (2024) checks the level of provision and location against a range of standards, including reference to Natural England’s Greenspace Standards.
871	Malvern Hills Trust	AIRs are welcome and supported, however Footprint Ecology evidence suggests AIRs should be one element to mitigate impacts to the Malvern Hills. Concerns relate to the need for a wider strategic set of mitigation measures and that AIRs should include “ <i>appropriate and relevant facilities</i> ” to minimise negative impacts on existing GI/ important sites in close proximity.	<p>The AIRs will sit alongside the measures included in the Malvern Hills Mitigation Strategy (targeted towards management of the Malvern Hills themselves). Together the AIRs and the mitigation strategy provide a comprehensive set of measures to address the increased recreation pressure on the Malvern Hills. Indeed, greater confidence in the mitigation is likely to be achieved by the overall package as there is scope for the different approaches to dovetail.</p> <p>The updated Footprint Ecology report sets out ideas for what appropriate and relevant facilities might look like.</p>

2.4 Evidence Base and site status updates during and following submission

The Country Parks/AIRs were not fully assessed as part of the Infrastructure Delivery Plan (IDP) (2022) and so they fell outside of the costed measures of the SWDP Review which has led to a potential gap in how they could be funded, delivered and managed. The [‘AIRs’ Footprint Ecology Report \(June 2024\) \(EXAM17\)](#) attempts to address this gap by providing the indicative costs for delivering and maintaining the AIRs and listing the potential funding sources that could be used to secure delivery. The ‘AIRs’ report only features AIR02 and AIR03 as AIR01 had previously been determined as unavailable in November 2023. Following completion of the draft report, AIR02 was also announced as being unavailable in November 2024.

As of December 2024, the costs for the AIRs at Jennet Tree Lane (AIR02) and Honeybourne (AIR03) have now been factored into the viability testing evidence base for the SWDP. The individual site updates below provide further information on the status of each site.

2.5 Hampton Lovett (AIR01)

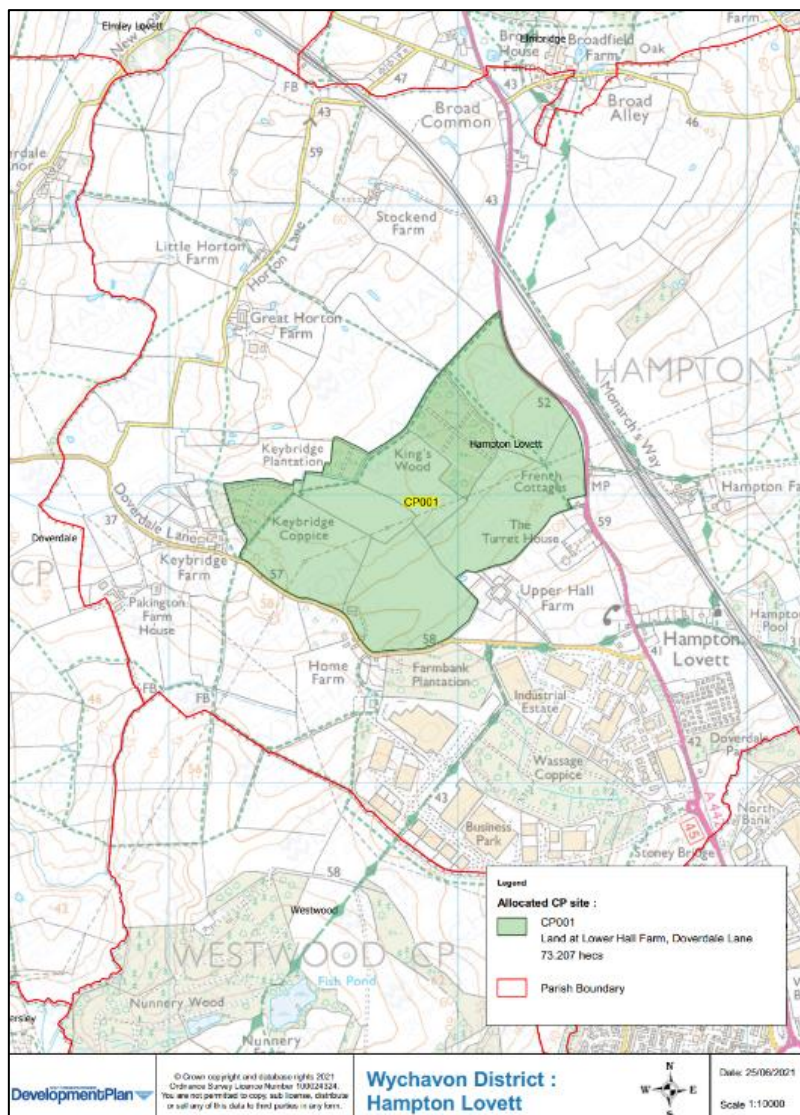


Figure 1: Hampton Lovett AIR (AIR01)

The Hampton Lovett AIR (AIR01) was the largest of the proposed sites (73.21ha) and is privately owned. The site description in policy SWDPR 07 states: *“Creation of traditional parkland on existing agricultural land with new access routes incorporating woodland, hedgerow, and wetland features. Provision of a small-scale café and car parking facilities”*. However, following the Regulation 19 consultation and the submission of the plan to the Secretary of State for Examination, in November 2023 the South Worcestershire Councils were informed by the landowner that the site at Lower Hall Farm (CP001) was no longer available for the provision of an AIR and accordingly would need to be withdrawn from the plan.

Status (December 2024): Is the site still available as a proposed AIR allocation in the SWDPR? **NO.**

2.6 Jennet Tree Lane (AIR02)

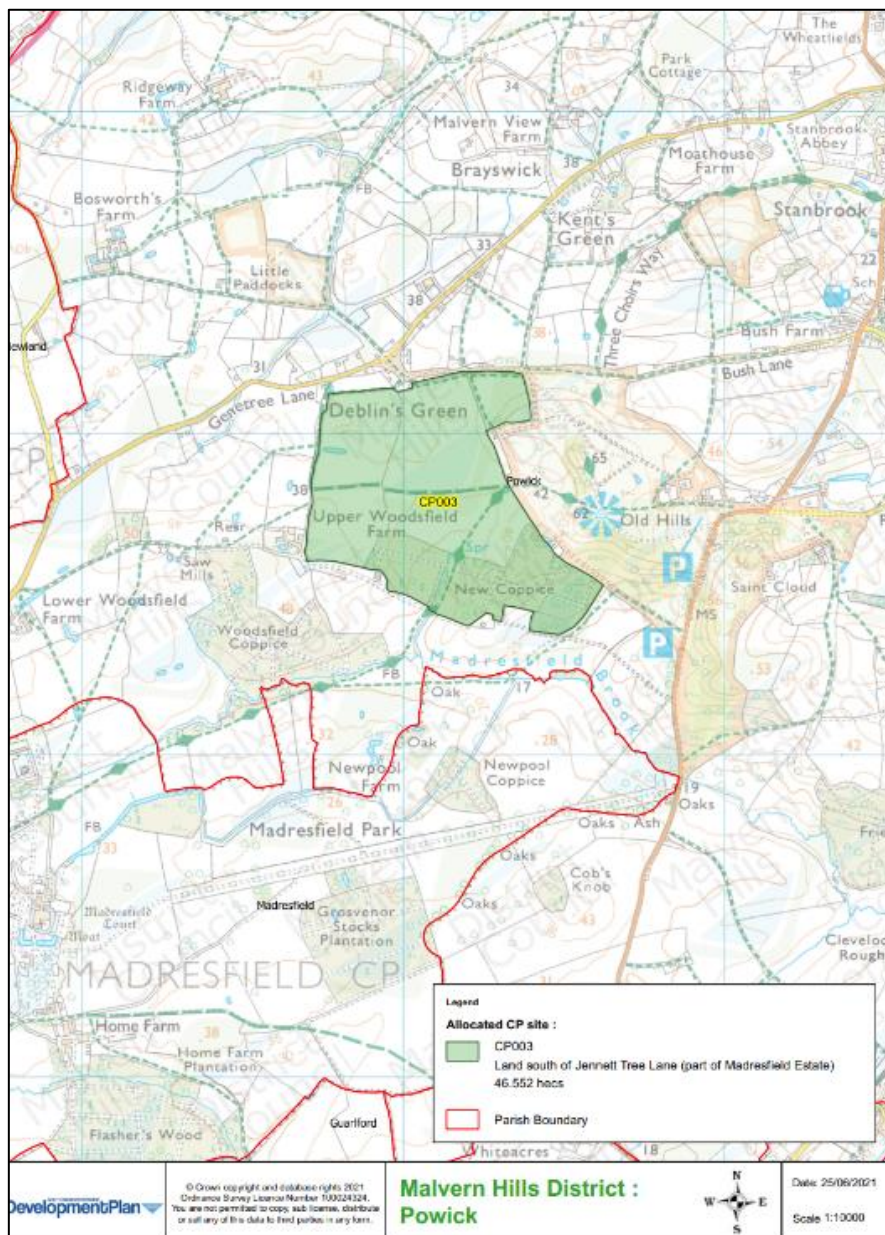


Figure 2: Jennet Tree Lane AIR (AIR02)

The second AIR (AIR02) is known as Jennet Tree Lane, a 36.3ha site near Deblin’s Green that is roughly 4km northeast of Malvern and around 6km southwest of Worcester. This site is owned by the Madresfield Estate. The Jennet Tree Lane site lies within relative proximity of the Malvern Hills (around 5km) and the site would provide a marked enhancement to local access provision. It is well placed strategically (between the Malvern Hills and most of the SWDPR allocations) to intercept visitors otherwise heading to the Malvern Hills. It also borders the Old Hills, an area of common land with open access, providing potential for connectivity between the greenspaces. The site description in policy SWDPR 07 states: *“Retention and enhancement of pastoral and arable landscape with woodland and veteran trees, with increased and enhanced public access routes within the site and to the adjacent Old Hills. Provision of small-scale car parking facilities.”*

Madresfield Estate wished to operate the AIR at a Country Park level as a business operation, as set out in the original Call for Sites, but have since raised concerns regarding the long-term liability of creating a country park/AIR on its land in relation to management and funding. After the submission of the SWDPR to the Secretary of State, the site was reduced in size and the revised boundary is shown in Figure 3.

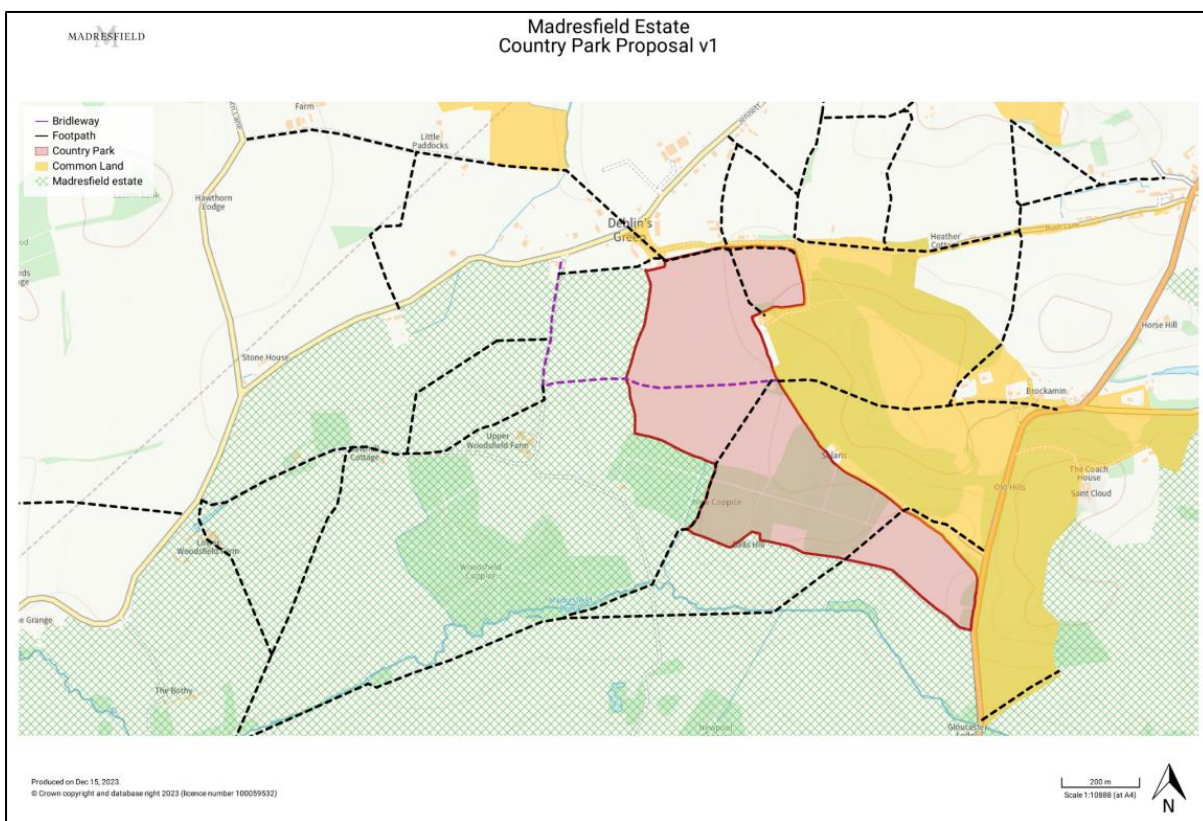


Figure 3: Jennet Tree Lane AIR (AIR02) Size Reduction

Following discussions between the SWCs and Madresfield Estate, the SWCs commissioned the additional ‘AIRs’ report (Footprint Ecology, June 2024) (EXAM17) to address concerns raised at Regulation 19, as principally raised by Madresfield Estate. However, following consideration of the report, in November 2024, the Estate formally confirmed that their concerns remained valid and that they no longer wished to pursue the allocation of the land as an AIR. Accordingly, the site is no longer available as a proposed AIR allocation in the SWDPR. However, an alternative site in Malvern Hills District was put forward by Madresfield Estate in November 2024, known as ‘Land at Cowleigh Road, Malvern’. This additional site proposal forms one of the option appraisals of this Topic Paper (see Option 3c in table 5 below).

Prior to the Jennet Tree Lane AIR being unavailable, the site was included in updated viability work as relates to the SWDP Review in 2024. The AIRs Report by Footprint Ecology (2024) (EXAM17) provided some indicative establishment and management costs for the AIR, which for the 20-year plan period (2021-2041) totalled £2,318,680 (£706,080 establishment and £1,612,600 management costs).

Status (December 2024): Is the site still available as a proposed AIR allocation in the SWDPR? **NO.**

2.7 Honeybourne (AIR03)

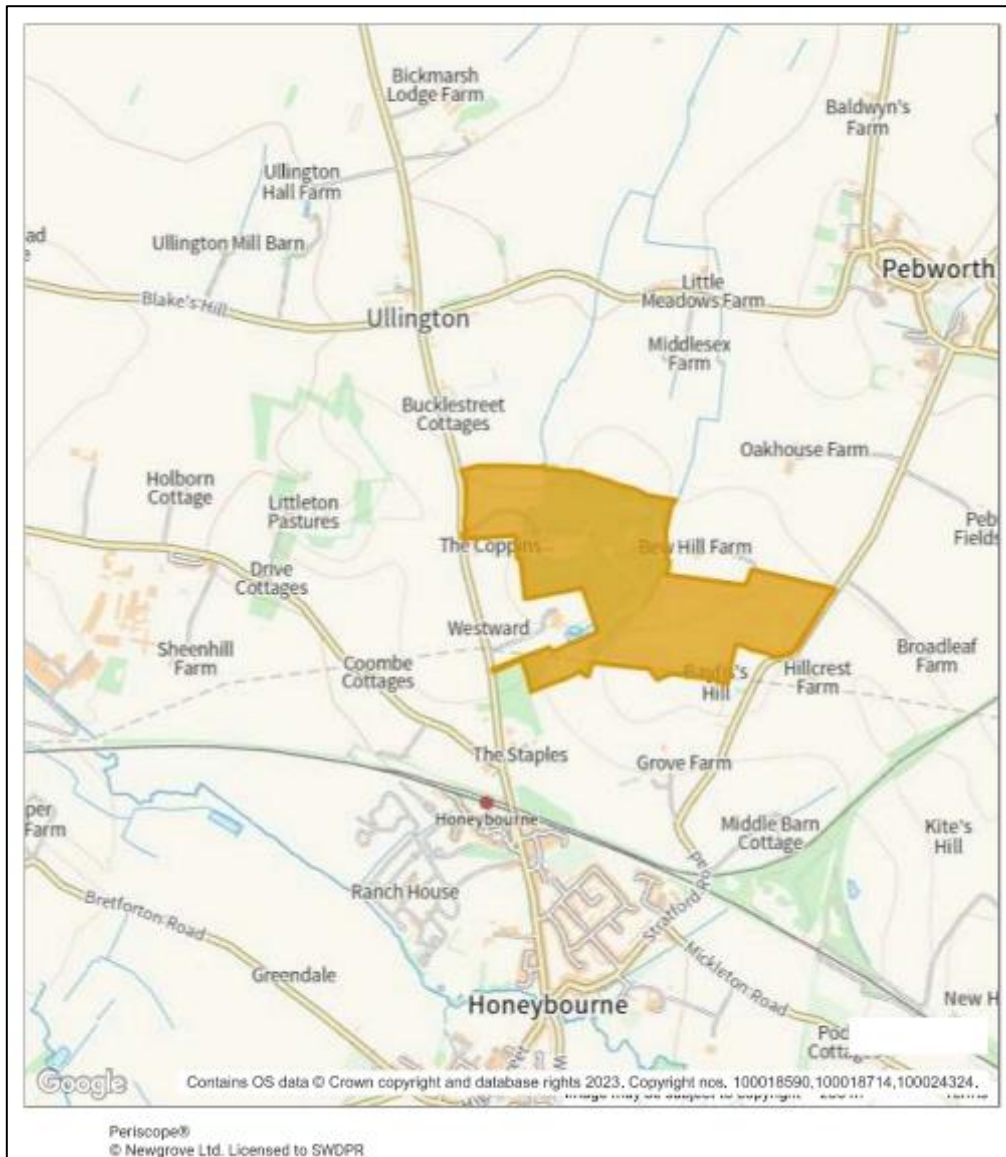


Figure 4: Honeybourne AIR (AIR03)

AIR03 ('Honeybourne') is located north-east of Blenheim Farm, Honeybourne, a 59.4ha site lying 8km to the east of Evesham. It is part of the Heart of England Forest project and is well connected to a wider Green Infrastructure network. The large size, nearby train station at Honeybourne, and the location in an area with otherwise limited access nonetheless means the site is likely to work well in providing for local access, particularly for residents in Evesham. The site description in policy SWDPR07 states: *“Creation of new*

woodland and associated habitats with new and enhanced access trails around the site. Provision of small-scale car parking facilities.”

The Honeybourne AIR is located 33km from the Malvern Hills SSSI, well outside the 25km zone of influence within which most visitors to the Malvern Hills originate. As such, its role in providing any mitigation with respect to the Malvern Hills is limited, but the site could still play a role in mitigating against the development proposed in the plan as a whole and achieving the other aims of the AIRs. As per the site updates for AIR01 and AIR02 above, of the sites proposed for allocations, AIR03 is now the sole remaining available AIR allocated in the SWDPR.

The Honeybourne AIR site was also included in updated viability work as relates to the SWDP Review in 2024. The AIRs Report by Footprint Ecology (2024) (EXAM17) provided some indicative establishment and management costs for the AIR, which for the 20-year plan period (2021-2041) totalled £3,454,783 (£688,140 establishment and £2,766,643 management costs).

Status (December 2024): Is the site still available as a proposed AIR allocation in the SWDPR? **YES.**

3. Performance of Policy

3.1 Current Position (December 2024)

Following the decisions from the landowners of AIR01 and AIR02 to rescind the availability of their sites for allocation in the SWDPR, only one site (AIR03) remains available for allocation in the SWDPR. Due to this change in circumstance, in order to provide a full analysis, the performance of the AIRs needs to be assessed in their pre-submission and post submission status. Accordingly, criterion H-K of SWDPR07 will be assessed against six spatial objectives for the AIRs as drawn from the wording of the Reasoned Justification of the policy (pages 45-48 of the SWDPR²). This is summarised in table 4 below.

Table 4: Situational Comparison between the submission of SWDPR for Examination in September 2023 and the current position (December 2024)		
Objective	<u>Original Allocation Status</u> (Submission September 2023)	<u>Current Allocation Status</u> (December 2024)
	3 AIRs: Hampton Lovett (AIR01), Madresfield (AIR02), and Honeybourne (AIR03)	1 AIR: Honeybourne (AIR03)
Form new, large strategic informal recreation sites	Yes. Three allocations across the plan area.	Limited. Only one location in a relatively remote area of the plan as relates to the areas of planned growth in the SWDPR.
Increase access to green spaces	Yes. Dispersed locations covered a range of areas lacking in access to green space, particularly Hampton Lovett in the north.	Limited. Areas near Honeybourne were identified as lacking access to green space.
Create a wider network of accessible greenspaces above and beyond any standard provision	Yes. The three allocations together would help to achieve this aim.	Limited. Connects to Heart of England Forest project.
Provide mitigation to address recreation impacts to the Malvern Hills (including the SSSI)	Yes. Together the three AIRs offered a wide variety of provision. The Madresfield allocation is especially well located for providing an	No. Honeybourne AIR sits outside of the 25km zone of influence where most visitors to the Malvern Hills originate from. As such, it would be

² Regulation 19/Regulation 22 version of the SWDPR

	alternative location for recreation.	unlikely to offer the required level of mitigation.
Take pressure off existing green infrastructure assets	Yes. Together the three AIRs offered a wide variety of provision. The Madresfield allocation is especially well located for providing an alternative location for recreation.	Limited. The AIR would offer some mitigation to assets in the southeast of the plan area, including Bredon Hill SAC.
Provide mitigation for recreational pressures related to the growth set out in the plan	Yes. Together the three AIRs offered significant opportunities to provide mitigation owing to their geographical locations and land coverage.	Limited. Only a small amount of the proposed allocations in the SWDPR are located within the vicinity of this AIR.

Based on the assessment in table 4 above, it is considered that AIR03 alone would have limited effectiveness in delivering against the stated Green Infrastructure objectives as part of the SWDPR. Alternative options relating to the AIRs are therefore required. These are set out in section four below.

3.2 Green Infrastructure provision in the SWDPR

Aside from the limitations of the one proposed AIR listed above, there are other forms of green infrastructure provision that need to be taken account of in the mitigation of the adverse impacts of the proposed developments on the Malvern Hills. As such The AIRs are only one element of the various components which make up the Green Infrastructure provision in the SWDP Review.

The strategic allocation sites are proposed to provide the following strategic green infrastructure provision³:

- **SWDPR 51 - Worcestershire Parkway** – 555 ha overall provision over the two phases with approximately 438 ha to be ‘accessible’ recreational spaces. The Community Park of 50.54 ha is included in this total.
- **SWDPR 52 - Throckmorton** – 363.5 ha overall provision over the two phases with approximately 230 ha planned to be ‘accessible’ recreational spaces.
- **SWDPR 53 - Rushwick** – 35.5 ha overall provision with 30.7 ha planned to be ‘accessible’ recreational spaces.
- **SWDPR 54 - Mitton** – 59.88 ha overall provision over the two phases with approximately 40 ha planned to be ‘accessible’ recreational spaces.

Further, the proposed urban extension reallocation sites set out in policy **SWDPR 60 (SWDP 45/1 – Worcester South and SWDP 45/2 – Worcester West)** set out policy provisions for up to 40% green

³ Some of the planned green infrastructure provision at SWDPR 51 Worcestershire Parkway and SWDPR 52 Throckmorton will likely be implemented post-2041.

infrastructure on each site. This would approximately equate to 98.84 hectares on SWDP 45/1 - Worcester South and 55.52 hectares on SWDP 45/2 - Worcester West.

In combination, the strategic allocations and urban extension reallocations could therefore provide up to 893.06 ha of green spaces that would form some level of provision for recreational purposes. The provision would offer a wide variety of uses ranging from formal parks and play areas to informal walking routes through semi-natural spaces. Appendix 3 provides a detailed breakdown of GI and recreational spaces to be provided on each of the strategic sites. For the purposes of this Topic Paper, accessible recreational spaces refers to areas of green infrastructure provision that can be used by residents or visitors for recreational purposes. Areas for ecological protection, SuDS features, or areas that are unlikely to have some form of recreational pathways or routes through have not been included in the figures above.

One of the key aims of providing large areas of accessible green spaces on the strategic allocations, particularly at Worcestershire Parkway and Throckmorton New Settlement, is to maximise self-containment within these settlements. It is envisioned that on a day-to-day basis most residents of these new settlements would utilise the onsite recreational provision rather than travelling outside of the settlement to outside destinations, for example to the Malvern Hills SSSI and other GI assets that face recreational pressures. It is also likely that the high levels of variety and provision of recreational space within these new settlements may act as a destination in their own right for visitors beyond the residents, also drawing people away from the Malvern Hills SSSI and other assets. Monitoring and visitor surveys of these spaces moving forward would be supported to understand if the provision at these allocations is effective at diverting visitors from pressured areas such as the Malvern Hills SSSI.

In terms of securing other GI provision, strategic policy SWDPR 07 – Green Infrastructure requires GI to be provided on new development sites under certain scenarios (the provision requirement varies between 20% or 40% depending on the site of the site). Further, other plan policies also set out requirements relating to Green Infrastructure or provide supporting functions, including: SWDPR 01 – Climate Change; SWDPR 10 Health and Wellbeing; SWDPR 26 Design; SWDPR 27 Biodiversity and Geodiversity; SWDPR 35 Sustainable Drainage Systems; SWDPR 36 - Water Resources; Efficiency and Treatment; SWDPR 45 Provision of Green Space and Outdoor Community Uses in New Development; and SWDPR 46 Playing Fields.

The SWDPR is supported by the Infrastructure Delivery Plan, which provides further information in relation to the role of Green Infrastructure in the SWDPR.

Amount of AIRs Provision needed in the SWDPR

In terms of how much land the AIRs could be providing through the SWDPR, the AIRs Report (2024) (EXAM17), outlines a rate of 8ha per 1,000 population, as based on 'SANGs' provision.

In relation to recreational pressures associated with the Malvern Hills SSSI, as per the site allocations identified in the SWDP Review within 25km of the Malvern Hills (including an element of windfall allowance), around 10,214 dwellings are anticipated to come forward over the plan period 2021- 2041. Assuming an occupancy rate of 2.4 people per dwelling (24,513 people), around 196ha of SANG could be required to

provide the appropriate level of mitigation through the SWDP Review as relates to providing targeted mitigation for the Malvern Hills SSSI through the 25km buffer ‘zone of influence’⁴.

However, if the whole SWDP Review plan requirement (2021-2041) was used a benchmark (26,360 dwellings (excludes discounting for commitments), so 63,264 people, circa 506ha of SANG would be required.

As indicated above (and in table 5 below), the indicative provision calculations based on a SANGs rate of 8ha per 1,000 population will vary significantly depending on the amount of growth and/or geographical zone factored into the calculation. In terms of the AIRs, as provision is not being provided as a result of impacts relating to a National Site Network, the AIRs are therefore not formally SANGs. Therefore, a ‘target’ based on SANGs provision is not necessarily one the SWCs are required to meet in the SWDP Review, rather it is a guiding figure in terms of what could be designated through the AIRs and/or wider strategic provision e.g. green infrastructure delivered through the strategic sites and urban extensions. Table 5 below sets out to provide an indication of the wide-ranging ‘targets’ the SWCs could refer to when considering strategic GI provision in the plan, how much GI could be provided through a combination of the AIRs, the strategic sites and the urban extensions, and how much surplus ‘provision’ is being provided in each scenario.

Table 5: Provision of Informal Recreation Space			
SWDPR (2021-2041) – Green Infrastructure Delivery Scenarios	Malvern Hills SSSI Mitigation Strategy: Anticipated delivery in 25km Zone of Influence (excludes commitments in ZOI up to 31/03/2021)	Plan-wide provision (base requirement figure as at 31/01/2021)	Plan-wide, subtracting deliverable allocations (3,975) and commitments (8,925) as at 31/03/2021
Number of dwellings	10,214	26,360	13,460
Number of people ⁵	24,513	63,264	32,304
‘Target’ provision requirement (hectares) ⁶	196.10	506.11	258.43
Current AIRs Provision (AIR03) December 2024 (hectares)	59.31	59.31	59.31
Strategic Sites and Urban Extension Reallocations Provision (hectares) ⁷	893.06	893.06	893.06

⁴ This distance represents the 75th percentile (i.e. the distance within which 75% of visitors originated, rounded to the nearest km), and is based on those travelling on a short visit, directly from home only. Source: [Recreation Impacts Report \(2021\) \(ENV3\)](#).

⁵ Number of dwellings multiplied by average household occupancy rate (2.4) – Source: 2021 Census.

⁶ Divide number of people by 1,000, then multiply by 8 (8ha per 1,000 population)

⁷ Some of the planned green infrastructure provision at SWDPR 51 Worcestershire Parkway and SWDPR 52 Throckmorton will likely be implemented post-2041.

Potential additional AIRs provision	100 hectares – assumes provision of two further AIRs sites at circa 50ha each	100 hectares – assumes provision of two further AIRs sites at circa 50ha each	100 hectares – assumes provision of two further AIRs sites at circa 50ha each
Total provision anticipated for the SWDPR (hectares)	1,052.37	1,052.37	1,052.37
Net Provision vs Requirement (+/-) (hectares)	+856.27	+546.26	+793.94

Regardless of the overall green infrastructure 'requirement' as based on SANGs provision standards, it has been demonstrated in table 5 above that the SWDPR is providing green infrastructure in excess of the SANGs 'targets' for a range of delivery scenarios.

4. Options Appraisal

The withdrawal of two AIRs (AIR01, AIR02) since the submission of the SWDPR to the Secretary of State for examination in September 2023, has resulted in further work regarding whether the remaining AIR (AIR03) can fully meet the objectives identified by the policy, operating in conjunction with the proposed Green Infrastructure provision within the SWDPR and the Malvern Hills Mitigation Strategy. Based on the assessment undertaken in **table 4** above, it is considered that as a lone site allocation, it would not meet the required objectives.

An Options Appraisal is therefore required to help determine how the policy can meet objectives and to consider alternative solutions or strategies that could come forward to meet the identified gaps in provision.

The following options have been identified in table 6 below:

Table 6: Alternative Options relating to the AIRs	
Option Reference	Description
Option 1a	Retain Honeybourne (AIR03) as the sole AIRs allocation.
Option 1b	Expand Honeybourne (AIR03) into a larger allocation by incorporating 'Ruled In' but not allocated site CFS006h.
Option 2	Remove the AIRs (Criteria H-K) from Policy SWDPR07.
Option 3a	Reassess the 'Ruled In' but not allocated 'Call for Sites' submissions.
Option 3b	Reassess the 'Ruled Out' sites from the 'Call for Sites' submissions.
Option 3c	Assess the newly proposed site 'Land at Cowleigh Road, Malvern' (CP0018), submitted in November 2024.
Option 4	Undertake a further round of consultation to identify alternative sites.
Option 5	Modify the AIRs criterion policy (currently in SWDPR07) to allow for greater flexibility of AIRs provision through the SWDPR.

Each option has been assessed below and summarised in table 14 to help determine which option(s) have the most potential to deliver the identified spatial objectives. A further consideration of feasibility/deliverability has been included to analyse the degree to which each option could be implemented or put forward as a Main Modification ahead of the Examination in Public for the SWDPR. This will inform the SWCs final preferred approach. The outcomes for each option when assessed against the objectives have been categorised as follows:

- No improvement or Benefit
- Limited
- Moderate
- Considerable
- Significant

4.1 Option 1a: Retain Honeybourne (AIR03) as the sole AIRs allocation

Table 7: Option 1a: Retain Honeybourne (AIR03) as the sole AIRs allocation	
Objective	Analysis
Form new, large strategic informal recreation sites	Limited. Only one location in a relatively remote area of the plan. The strategic allocations (e.g., Worcestershire Parkway and Throckmorton) also include recreational green space provision which would help achieve this objective.
Increase access to green spaces	Limited. Areas near Honeybourne were identified as lacking access to green space.
Create a wider network of accessible greenspaces above and beyond any standard provision	Limited. Connects to Heart of England Forest project.
Provide mitigation to address recreation impacts to the Malvern Hills (including the SSSI)	No improvement or benefit. Honeybourne is outside of the 25km zone of influence where most visitors to the Malvern Hills originate from. As such, it would be unlikely to offer the required level of mitigation.
Take pressure off existing green infrastructure assets	Limited. Would offer some mitigation to assets in the southeast of the plan area, including Bredon Hill SAC.
Provide mitigation for recreational pressures related to the growth set out in the plan	Limited. Only a small amount of the proposed allocations in the SWDPR are located within the vicinity of this AIR.
Feasibility and Deliverability	Moderate. The AIR has been consulted on and has an accompanying evidence base to support its allocation. Funding one AIR would be more deliverable under the proposed funding sources identified by the Footprint Ecology AIRs Update Report 2024 (EXAM17). However, it will be challenging for the remaining site AIR03 (CP006f) to deliver the objectives of green infrastructure provision in the plan strategy in isolation and effectively provide the suitable required mitigation. This is primarily due to its distant location in relation to the proposed site allocations and its likely inability to deflect visitors from identified recreational pressures such as the Malvern Hills.

4.2 Option 1b: Expand Honeybourne AIR (AIR03)

Honeybourne AIR03 was submitted as one of several parcels of land by the Heart of England Forest scheme under Call for Sites Reference CP006f. The other parcels nearby included CP0006f-j and (aside from CP006i which was Ruled Out on Access) were all considered to be good sites overall. The entirety of the submission was not deemed appropriate to allocate due to scale; CP006f was deemed most appropriate to allocate given its location and existing woodland on site and came forward to form AIR03.

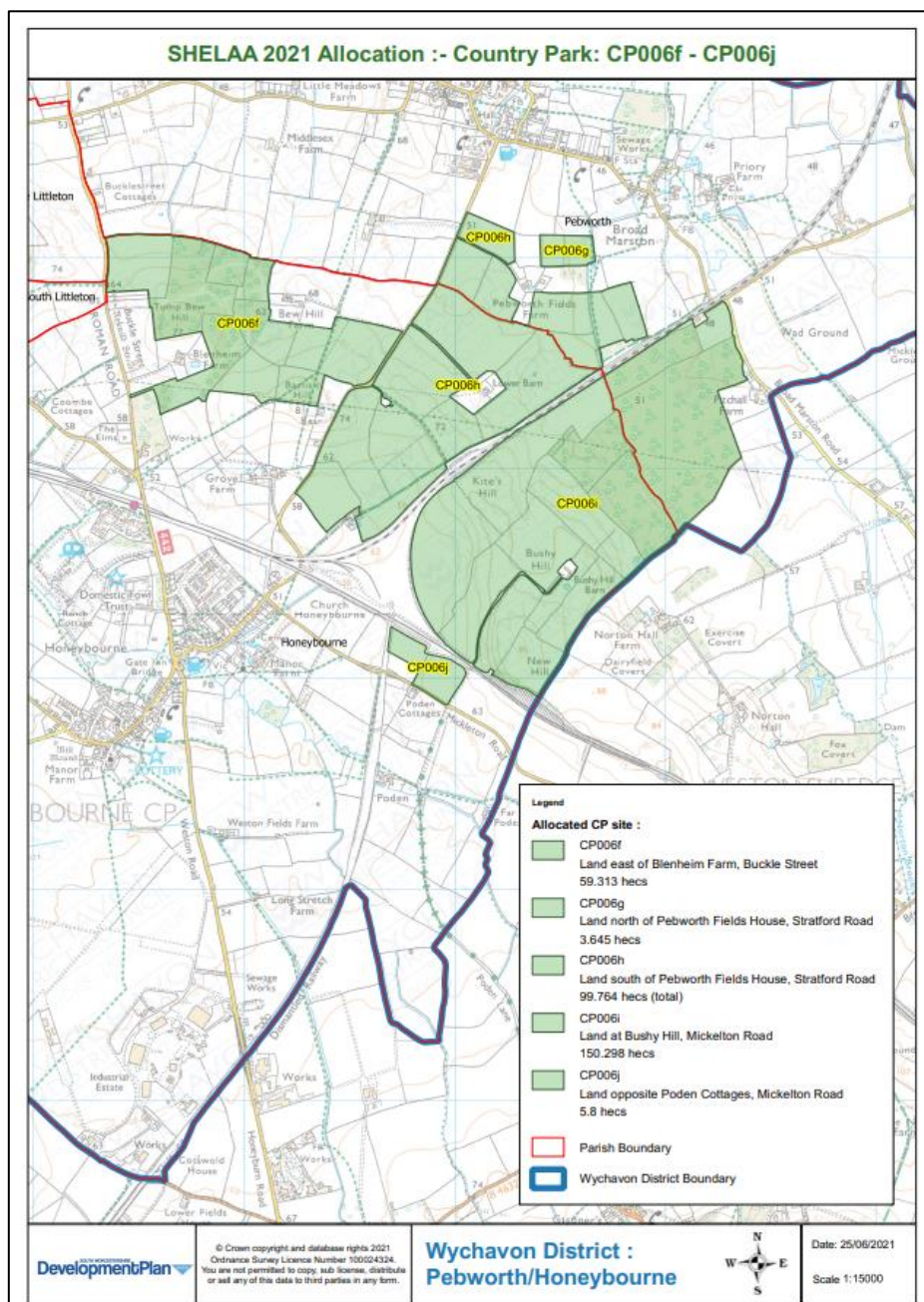


Figure 5: Map showing the Call for Sites Submissions for CP06f-j

It is acknowledged that AIR03 is in a relatively remote area of South Worcestershire and there is limited development proposed within the plan period located nearby. The original plan for the AIRs was to allocate dispersed sites offering relatively small levels of provision, however the withdrawal of AIR01 and AIR02 has made this approach undeliverable at present.

The potential extension to AIR03 (CP006h) is of a significant scale and is 99.7ha in size. Combined with AIR03 (CP006f) (59.3 ha), this would provide a total of 159 ha of green infrastructure within the plan period. Honeybourne is also in close proximity to a railway station, offering sustainable transport options for access in line with the SWDPR spatial strategy. Including CP006h in AIR03 would offer the opportunity to create a 'destination' AIR that would offer a wider variety of services and provisions, making it more appealing to visitors from a wider area.

Table 8: Option 1b: Extend AIR03 to include CP006h	
Objective	Analysis
Form new, large strategic informal recreation sites	Limited. This option would create only one large strategic informal recreation site. This location is in a relatively remote area of south Worcestershire in terms of where planned growth has been proposed. The strategic allocations at Worcestershire Parkway and Throckmorton do also include recreational green space provision which would help achieve this objective in conjunction with the extended AIR.
Increase access to green spaces	Limited/Moderate. Areas near Honeybourne were identified as lacking access to green space. Location near a railway station offers an opportunity for access to green space using public transport.
Create a wider network of accessible greenspaces above and beyond any standard provision	Limited/Moderate. Connects to Heart of England Forest project.
Provide mitigation to address recreation impacts to the Malvern Hills (including the SSSI)	Limited. Whilst Honeybourne is outside of the 25km zone of influence where most visitors to the Malvern Hills originate from, a large destination with a variety of provision may divert some visitors away from the SSSI, though this would likely be limited. Were this option to be taken forward, monitoring and visitor surveys would be required to measure the success of this objective.
Take pressure off existing green infrastructure assets	Limited/Moderate. The site could offer some mitigation to assets in the southeast of the plan area, including Bredon Hill SAC.
Provide mitigation for recreational pressures related to the growth set out in the plan	Limited. Only a small amount of the proposed allocations in the SWDPR are located within the vicinity of this AIR.

Feasibility and Deliverability	<p>Moderate. The potential extension was ‘Ruled In’ at the site assessment stage but not taken forward due to the allocation of AIR03 (CP006f). Funding one AIR would be more deliverable under the proposed funding sources identified by the Footprint Ecology AIRs Update Report 2024 (EXAM17). However, it will be challenging for the remaining site AIR03 (CP006f) to deliver the objectives of green infrastructure provision in the plan strategy in isolation and effectively provide the suitable required mitigation. This is primarily due to its distant location in relation to the proposed site allocations and its likely inability to deflect visitors from identified recreational pressures such as the Malvern Hills.</p>
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4.3 Option 2: Remove the AIRS (Criteria H-K) from Policy SWDPR07

Table 9: Option 2: Removal of AIRs from Policy SWDPR07	
Objective	Analysis
Form new, large strategic informal recreation sites	<p>Limited. Removal of the AIRs would limit new, large strategic recreation sites delivery to only those provided within the strategic allocations, for example Worcestershire Parkway and Throckmorton New Settlement.</p>
Increase access to green spaces	<p>Limited. Removal of the AIRs would leave large-scale strategic access to be provided at the strategic allocations within the SWDPR. This may not fully address gaps in green space provision in existing settlements or towns.</p>
Create a wider network of accessible greenspaces above and beyond any standard provision	<p>No improvement or benefit. The removal of the AIRs would result in the loss of strategic green space provision and limit further greenspace being established beyond standard provision obtained through policy requirements (e.g., SWDPR 07 Parts A to D).</p>
Provide mitigation to address recreation impacts to the Malvern Hills (including the SSSI)	<p>No improvement or benefit. The Malvern Hills Mitigation Strategy would offer a level of mitigation from recreational pressures and proposed development, but the AIRs would have also provided alternative destinations for visitors to use, particularly AIR02. Strategic site delivery would also include green spaces for recreational purposes to mitigate impact of their development.</p>
Take pressure off existing green infrastructure assets	<p>No improvement or benefit. The removal of the AIRs would result in the loss of mitigation measures against the pressures faced by existing Green Infrastructure assets.</p>

Provide mitigation for recreational pressures related to the growth set out in the plan	No improvement or benefit. Strategic site delivery will include green spaces to be used for recreational purposes to mitigate impact of their development. Only a small amount of the proposed site allocations in the SWDPR are located within the vicinity of the remaining AIR (AIR03) and its remote location relative to growth set out in the plan suggests it would offer limited mitigation opportunities.
Feasibility and Deliverability	Limited. Removal the AIRs from the policy could be proposed through a modification to the SWDPR to be considered at the Examination hearings. However, the removal of the AIRs completely (Criteria H-K) from Policy SWDPR07 would potentially leave a void in the Local Plan as far as strategic Green Infrastructure is concerned. The SWDPR would be reliant on other green infrastructure policy requirements (e.g., SWDPR07 parts A to D) and provision on the strategic allocations (e.g., Worcestershire Parkway) to justify meeting SWDPR objectives.

4.4 Option 3a: Reassess the ‘Ruled In’ but not allocated CFS submissions

Three sites in the Call for Sites submissions were assessed as being ‘ruled in’ but not allocated for selection. The three sites have been reassessed below against the relevant SWDPR Objectives (table 10) and have also been analysed as a site as a potential replacement AIR (table 11).

Table 10: Option 3a: Assessment of previously ‘Ruled In’ but not allocated AIRs sites against relevant SWDPR Objectives			
Objective	CP005 – Land Adjacent to Throckmorton (Wychavon) 150.1ha	CP007 – Land to the West of Leigh Sinton (Malvern Hills) 50.63ha	CP010 – Ashmores Farm and New Farm, Norton (Wychavon) 71.31ha
Form new, large strategic informal recreation sites	Considerable – the site would create a large area of recreational provision in close proximity to a proposed strategic allocation.	Considerable – the site would be located in Malvern Hills District, which would be geographically advantageous in terms of helping to address recreational pressures on the Malvern Hills SSSI.	Moderate - the site would create a large area of recreational provision on the outskirts of Evesham. However, the site is in close proximity to AIR03.
Increase access to green spaces	Moderate/ Considerable - the site is close to/is part of the Throckmorton strategic location,	Considerable - particularly as a potential location for providing alternative green space	Moderate – the site is in close proximity to AIR03.

	which has its own large scale GI proposals.	opportunities to take visitors away from the Malvern Hills.	
Create a wider network of accessible greenspaces above and beyond any standard provision	Considerable - The site would be large enough to achieve this.	Considerable - The site would be large enough to achieve this.	Considerable - The site would be large enough to achieve this.
Provide mitigation to address recreation impacts to the Malvern Hills (including the SSSI)	Limited - this site is located too far away to be considered effective.	Considerable - the site is located in Malvern Hills district and within reasonable proximity to the Malvern Hills.	Limited - this site is located too far away to be considered effective.
Take pressure off existing green infrastructure assets	Moderate - the site is close to/is part of the Throckmorton strategic location, which has its own large scale GI proposals so impact would likely be limited.	Considerable - the site is located in Malvern Hills district and within reasonable proximity to the Malvern Hills.	Moderate - the site would offer some mitigation to assets in the southeast of the plan area, including Bredon Hill SAC. However, the site is located is in close proximity to AIR03.
Provide mitigation for recreational pressures related to the growth set out in the plan	Moderate - the site is close to/is part of the Throckmorton strategic location, which has its own large scale GI proposals.	Considerable -this site could potentially provide mitigation for development pressures in Malvern Hills District.	Limited - Only a small amount of the proposed allocations in the SWDPR are located within the vicinity of this AIR.
Feasibility and Deliverability	Limited. Site is located too close to Throckmorton strategic location, which is providing its own green	Moderate - Applicant has put the site forward as an income generator, but this would likely involve a land sale. The site could have financial	Limited. Ecological constraints may impact on deliverability and the site is located in close proximity to AIR03.

	infrastructure through SWDPR 52.	challenges in relation to delivery.	
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Table 11: Analysis of the previously ruled in but not allocated sites as a potential replacement AIR.

Site	Reason for being ruled 'IN' but not originally allocated in (2020)	Analysis of site as a replacement allocation (2024)
CP005 – Land Adjacent to Throckmorton (Wychavon) Figure 6	Good site with no major constraints, although there are some access concerns relating to CP005c and CP005e. Given the location of site and its juxtaposition with the proposed Throckmorton New Settlement, it is more appropriate to consider it as part of the wider Throckmorton New Settlement Masterplanning. As such, the site is not proposed for allocation.	<p>Previous comments remain valid. However, the site is located too close to/is part of the Throckmorton strategic location, which has its own large scale GI proposals.</p> <p>Site suitable as an alternative allocation: No</p>
CP007 – Land to the West of Leigh Sinton (Malvern Hills) Figure 7	Good site for a Country Park overall, including being in a location close to the currently over capacity Malvern Hills and Commons, however due to concerns surrounding the potential impact on nearby Aileshurst Coppice SSSI, CP007 is not carried forward for allocation and CP001, CP003 and CP006f are preferred.	<p>The 'call for sites' submission form by the applicant states that: "...Once developed could be a considerable income generator, therefore we expect that this will be reflected in the acquisition price"; and: "This site is put forward on the basis of a delivery mechanism that secured an appropriate value for the land." This signifies a requirement for a revenue generating model which would result in a land sale (of an appropriate value) which would be required in order for the landowners to make the site available as an AIR.</p> <p>Concerns surrounding the potential impact on nearby Aileshurst Coppice SSSI remain valid, but impact on the SSSI could potentially be mitigated with suitable protection measures.</p> <p>If suitable funding and mitigation can be sourced and achieved, the site could be suitable as a potential location for an AIR.</p>

		Site suitable as an alternative allocation: Yes.
CP010 – Ashmores Farm and New Farm, Norton (Wychavon) Figure 8	Good site for a Country Park overall, including being in a location of reduced accessibility to land for recreation, however due to concerns surrounding the potential impact on nearby Windmill Hill SSSI and Nature Reserve, and some concerns relating to change in levels in some areas of the site, CP010 is not carried forward for allocation and CP001, CP003 and CP006f are preferred.	The site would be in a fairly isolated location as relates to the majority of the proposed development proposed in the SWDPR and would also be in close proximity to AIR03. Impacts on Windmill Hill SSSI and Nature Reserve remain valid. Site suitable as an alternative allocation: No.

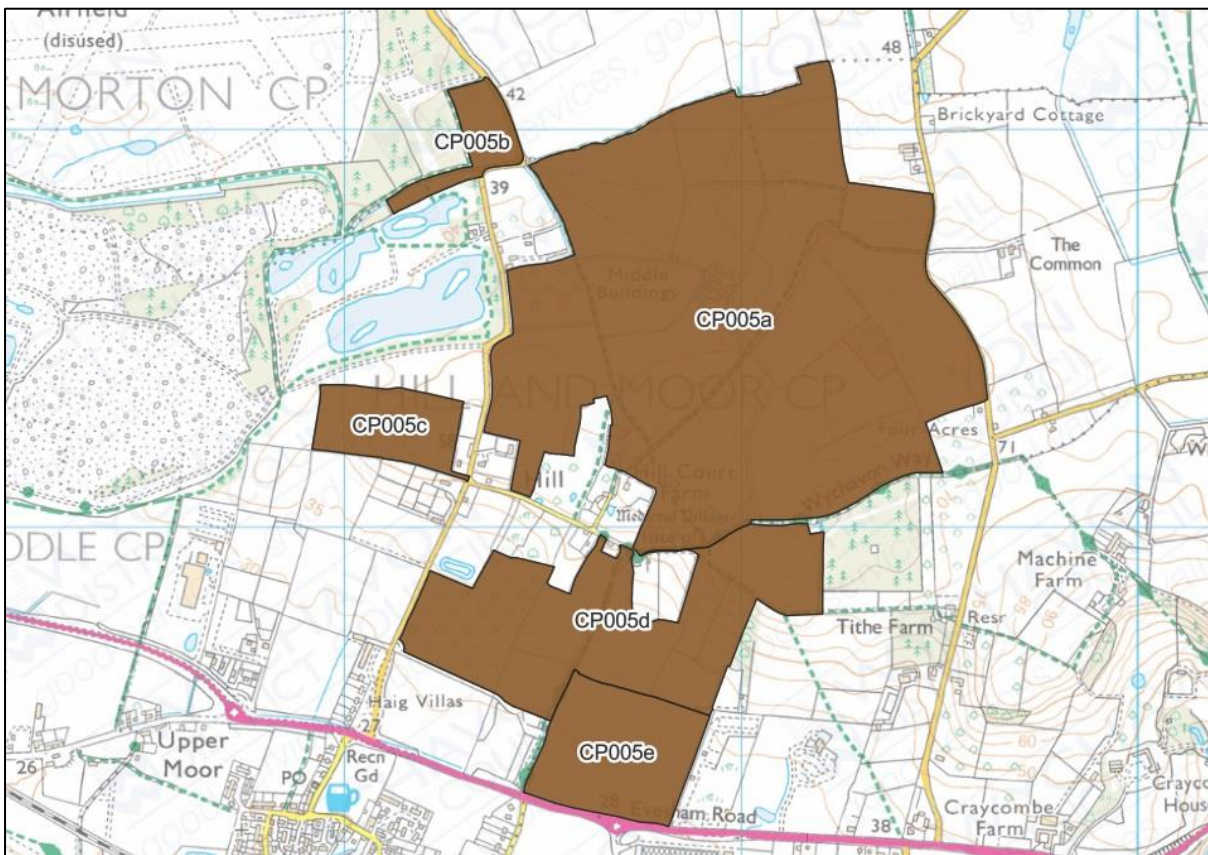


Figure 6: CP005 - Land Adjacent to Throckmorton

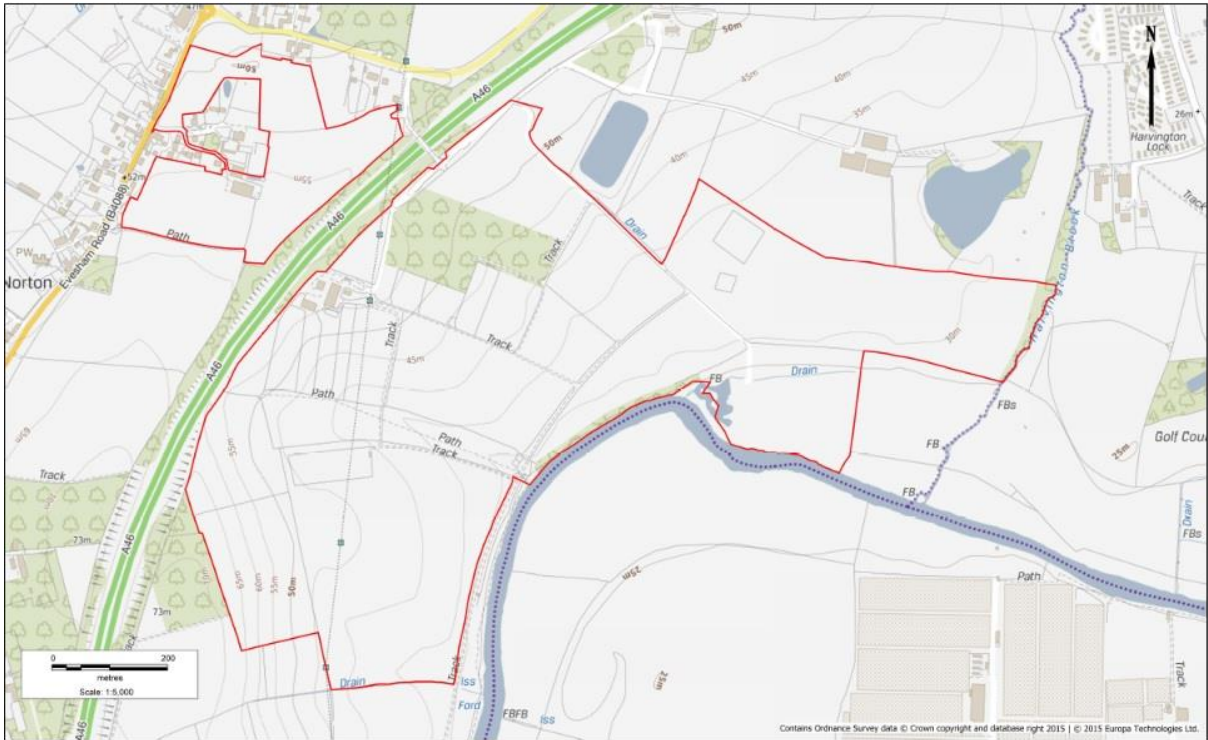


Figure 8: CP010 – Land at Ashmores Farm and New Farm Norton

Based on the assessment of the other site submissions from the ‘Call for Sites’ consultation previously ruled in but not allocated sites as a potential replacement AIR, the SWCs conclude that following reappraisal of the sites, CP007 – Land to the West of Leigh Sinton (Malvern Hills) is situated in an appropriate location and could provide a suitable site for an AIR. However, sites CP005 - Land Adjacent to Throckmorton and CP010 - Ashmores Farm and New Farm, Norton are not considered to be suitable locations for an AIR.

CP007 is approximately 50ha in size. If combined with AIR03 (59ha), approximately 109 ha of AIRs green space would be proposed through the SWDPR. The site will require more detailed assessment work in order to determine site deliverability . Further, in December 2024, following correspondence with the agent for CP007 – Land to the West of Leigh Sinton, it was confirmed that the site is still available for consideration as an AIR.

4.5 Option 3b: Reassess the ‘Ruled Out’ sites from the ‘Call for Sites’ submissions.

The sites in Table 12 below were previously ruled out during the 2020 assessment of the ‘Call for Sites’ submissions. The sites have been reassessed in 2024 to determine if any reappraisal is required.

Table 12: Option 3b - Reassessment of the ‘Ruled Out’ sites from the ‘Call for Sites’ submissions				
Site Reference	Ruled In / Out? (2020)	Officer Summary (2020)	Allocated as a Country Park in the SWDPR?	2024 Officer Reappraisal
CP002 LAND AT MANOR FARM, GRAFTON FLYFORD	Out	Ruled out due to location.	No	Out - Ruled out due to location (adjacent to Grafton Wood SSSI). Natural England raised concerns that a Country Park directly adjacent to the SSSI is likely to adversely impact on its notified features through increased recreational pressure and disturbance.
CP004 EVESHAM COUNTRY PARK	Out	Ruled out due to availability unknown.	No	Out – Availability unknown (speculative submission from local resident).
CP006a HEART OF ENGLAND FOREST (AB LENCH)	Out	Ruled out on access.	No	Out - Whilst a vehicular access could be provided from the adjacent public highway, the relatively narrow carriageways might not be suitable for high traffic flows. On its own, the site is under the size threshold of 50 ha.
CP006b HEART OF ENGLAND FOREST (SHERIFF'S LENCH)	Out	Ruled Out on access and potential impact on the adjacent Highclere SSSI.	No	Out - Whilst a vehicular access could be provided from the adjacent public highway, the relatively narrow carriageways might not be suitable for high traffic flows. Impact on the adjacent Highclere SSSI.
CP006c-e HEART OF ENGLAND FOREST (NORTH OF BROAD MARSTON)	Out	Ruled out on access.	No	Out - Whilst a vehicular access could be provided from the adjacent public highway, the relatively narrow carriageways might not be suitable for high traffic flows.

CP008 MIDDLE AND UPPER BATTENHALL FARM, WORCESTER	Out	Ruled out on deliverability grounds.	No	Out – Requires enabling housing development.
CP009 LAND ADJACENT STONEBRIDGE CROSS	Out	Ruled out due to size.	No	Out – Ruled out due to size.
CP011 LAND WEST OF CRUTCH LANE, DROITWICH SPA	Out	Availability unknown.	No	Out – Availability unknown (speculative submission from the Civic Society).
CP012 PARSON'S MEADOW, POWICK	Out	Ruled out due to Flood Risk.	No	Out – The site is almost entirely within Flood Zone 3.
CP013 MALVERN CHASE	Out	Not a Country Park (AIRs) proposal.	No	Out - Not a Country Park (AIRs) proposal.
CP014 MADRESFIELD, MALVERN	Out	Not a Country Park (AIRs) proposal.	No	Out - Not a Country Park (AIRs) proposal.
CP015 LAND TO THE NORTH OF MARTLEY ROAD	Out	Ruled out on deliverability grounds.	No	Out – Requires enabling housing development.
CP016 PARK FARM, EVESHAM	Out	Ruled out on deliverability grounds.	No	Out – Requires enabling housing development.
CP017 LAND ADJACENT TO PERSHORE BRIDGES	Out	Ruled out due to Flood Risk.	No	Out - The majority of site is within Flood Zone 3, with the remainder in Flood Zone 2.

Based on the 2024 reappraisals of the ruled-out sites in 2020, it is considered that none of the previously ruled out sites warrant further consideration as a potential AIRs allocation under option 3b. For the purposes of the options appraisal assessment in table 15, this option would likely result in a **'no improvement or benefit'** outcome against achieving GI objectives.

4.6 Option 3c: Assess newly proposed site 'Land at Cowleigh Road, Malvern' (CP0018).

Following the ruling out of land at Jennet Tree Lane, Deblins Green, Madresfield Estate proposed an additional site for consideration by the SWCs in November 2024. An officer assessment of this site has been undertaken in Table 13 below. The site is approximately 45 ha in size. As per the site assessments undertaken as part of the SWDP Review evidence base, relevant consultees were consulted on this additional site and asked to comment. The comments received are set out in summary form in table 14 below. The full consultee responses can be accessed via a link to a separate Excel report. The link to the report is provided at Appendix 4.

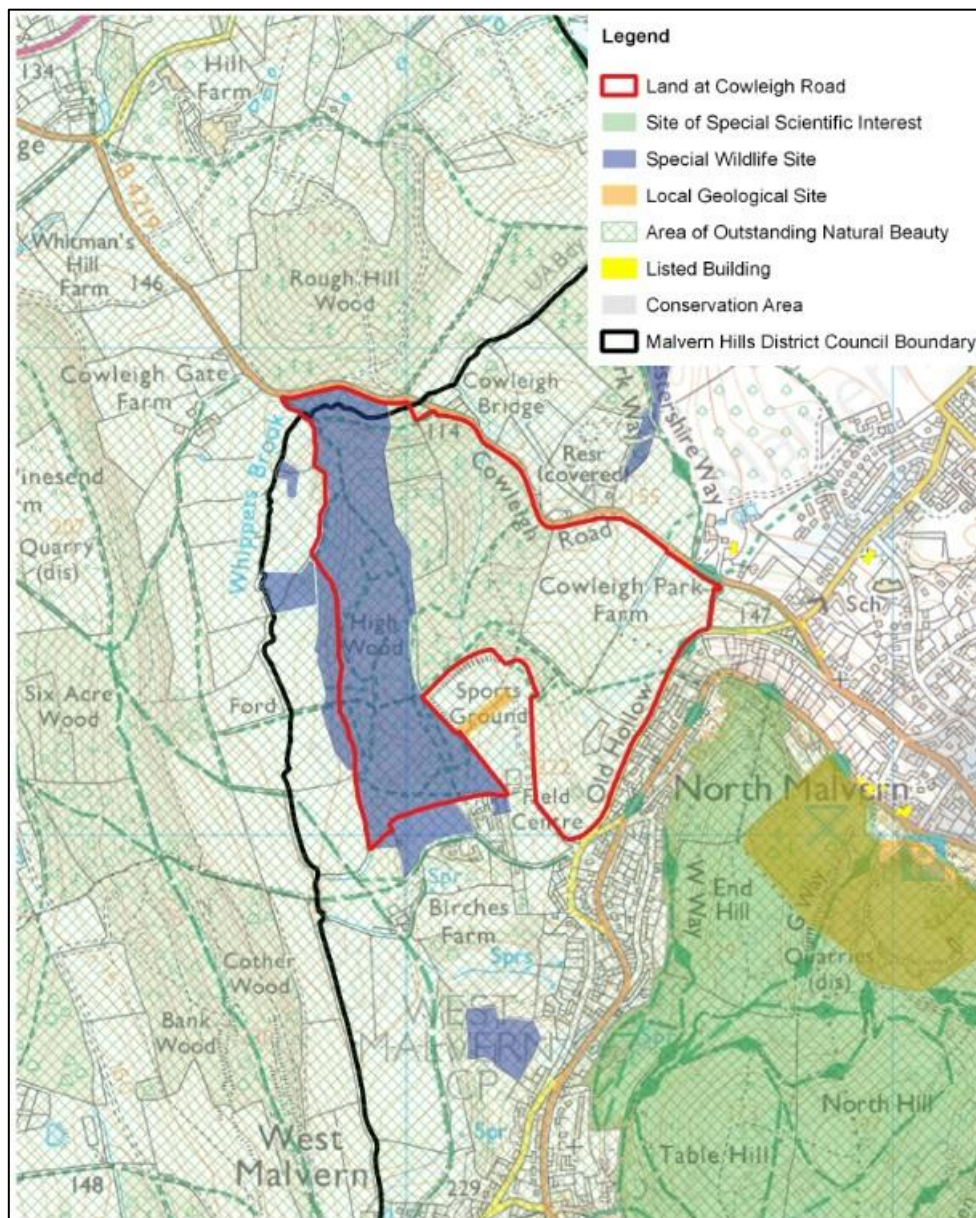


Figure 9: Land at Cowleigh Road, Malvern (CP0018)

Table 13: Option 3c: Assessment of newly proposed site ‘Land at Cowleigh Road, Malvern’ (CP0018).

Objective	Analysis
Form new, large strategic informal recreation sites	Moderate. CP0018 is approximately 45ha in size. If combined with AIR03 (59ha), approximately 104 ha of AIRs provision would be proposed through the SWDPR. The site is also located in Malvern Hills District and so is better placed for potentially taking pressure off the Malvern Hills. However, the site forms part of the Malvern Hills National landscape and sits at the foot of the hills, which could have an adverse effect on lowering visitor numbers on the hills by attracting visitors to them. More detailed evidence is needed to understand whether the proximity of this site to the SSSI would increase visitor activity on the hills or would divert visitors away from them. The site is currently used locally as an area of recreation, but by a low number of people. There are priority habitats within the site including ancient semi-natural woodland, plantation on ancient semi-natural woodland, relic wood pasture and parkland and acid grassland. Increased use could cause harm to the site if not properly managed.
Increase access to green spaces	Moderate. The site is currently used locally as an area of recreation, but by a low number of people. It is also close to a residential area of Malvern town and a proposed allocation that has recently been granted planning permission (SWDPR55) so could provide accessible green space for these residents. However, due to the biodiverse nature on the site increased use could cause harm to the site if not properly managed.
Create a wider network of accessible greenspaces above and beyond any standard provision	Moderate. CP0018 is approximately 45ha in size. If combined with AIR03 (59ha), approximately 104 ha of AIRs provision would be proposed through the SWDPR. The site forms part of the Malvern Hills National landscape and sits at the foot of the hills. There are PROWs running through the site that provide connections through to Herefordshire but it could be difficult to create connections into Malvern itself due to existing residential development and the SSSI itself.
Provide mitigation to address recreation impacts to the Malvern Hills (including the SSSI)	Limited/Moderate. The site forms part of the Malvern Hills National landscape and sits at the foot of the hills by attracting visitors to them.. More detailed evidence is needed to understand whether the proximity of this site to the SSSI would increase visitor activity on the hills or would divert visitors away from them. The site is currently used locally as an area of recreation, but by a low number of people.

<p>Take pressure off existing green infrastructure assets</p>	<p>Limited/Moderate. The site forms part of the Malvern Hills National landscape and sits at the foot of the hills. More detailed evidence is needed to understand whether the proximity of this site to the SSSI would increase visitor activity on the hills or would divert visitors away from them. The site is currently used locally as an area of recreation, but by a low number of people. Due to the biodiverse nature on the site, increased use could cause harm to the site if not properly managed.</p>
<p>Provide mitigation for recreational pressures related to the growth set out in the plan</p>	<p>Limited/Moderate. CP0018 is approximately 45ha in size. If combined with AIR03 (59ha), approximately 104 ha of green space would potentially be available. The site is also located in Malvern Hills District as so is better placed for potentially taking pressure off the Malvern Hills. However, the site forms part of the Malvern Hills National landscape and sits at the foot of the hills, which could have an adverse effect on lowering visitor numbers on the hills by attracting visitors to them. Given their proximity to the site, visitors could be drawn to the Malvern Hills as part of the recreational activities. More detailed evidence is needed to understand whether the proximity of this site to the SSSI would increase visitor activity on the hills or would divert visitors away from them. The site is currently used locally as an area of recreation, but by a low number of people. Due to the biodiverse nature on the site, increased use could cause harm to the site if not properly managed.</p>
<p>Feasibility and Deliverability</p>	<p>Limited/Moderate. Landowners may seek funding to facilitate delivery of the site. Commercial ventures may also be sought, e.g., a café but may not be suitable in this location. Malvern Town is within 1.5 miles of the current car park off Cowleigh Road, indicating a range of facilities including cafes are within close proximity. The roads surrounding the site are narrow and footpaths are limited. The only feasible access would be off Cowleigh Road. A small car park exists which could be expanded but would require encroachment into green space land. The site is also undulating in places, which may make it inaccessible to some visitors. Improvements to pathways and wayfinding would be essential.</p>

Table 14: Option 3c: Consultee comments for 'Land at Cowleigh Road, Malvern' (CP0018).

Consultee	Summary Response
<p>Worcestershire County Council Highways</p>	<p>Would safe access (vehicular and other to include current or potential cycle route) be achievable? “Yes, it should be possible to provide a vehicular access from the B4219 Cowleigh Road. (There is already the small existing Earl Beauchamp Fountain car park accessed from the B4219, which could be expanded?)</p> <p>Vehicle access via Old Hollow is not supported, as the carriageway is restricted. But might be more suitable as the principal cycle route to the site.”</p> <p>Other Comments: “Scale of development may require local widening of the B4219, to form an appropriate junction. This would need to be west of the existing car park.</p> <p>There are no bus stops in the vicinity of the existing car park.</p> <p>There is no continuous footway link to the existing car park, with the existing footway to the east terminating approximately 64m east of the existing car park. Old Hollow has no existing footway provision.”</p>
<p>Natural England</p>	<p>Quality of the site: The site offers an interesting mosaic of habitat with some good and some not so good. With appropriate management and assisted design via appropriately designed tracks/pathways it offers an attractive proposition to a visitor to use it regularly. There is currently a woodland countryside stewardship scheme attached to the site which would need investigating re. any potential conflict. Ongoing investment in the site via the AIR framework may help improve the quality of the site and counter any potential footfall. This would need to be designed and agreed appropriately by key partners such as the Wildlife Trust, NL and MHT.</p> <p>Habitats Sites: The site offers a lot of interest to a visitor that makes it attractive to travel to. Good mix of woodland type (mixed and broadleaf units) also marked on Ancient Woodland Inventories. Stream runs through it and may have protected species linked to it - needs checking. Veteran tree. Interesting intricate field system associated with Special Wildlife Site that include Hedgerow. Woodpasture in places. Considerations/sensitivity should be attributed to protect and enhance areas with notable sensitive flora such as bluebell etc. Full survey should be carried out to ensure the sites quality and suitability should be made before decisions made.</p> <p>Topography: Very steep topography that has non metalled footpaths. Wetness in places especially valley bottom which may limit seasonal</p>

	<p>access across full site thereby impacting and leading to increased access on other parts.</p> <p>Proximity to sensitive designated sites with public access: Virtually next door to SSSI Malvern Hills with public footpath links. This site at lower elevation requiring a very steep ascent to get to SSSI. Car Park facility may enable more footfall to choose this site as a launch site. As this site exists within impact risk zone of SSSI more consideration required here to ensure this is limited/eliminated.</p> <p>Obvious "Bad neighbour" issues: Not aware of any other than proximity to SSSI.</p> <p>Existing Heritage and Landscape features that could make the proposal more attractive to visitors: An attractive site with views, interesting natural features, woodland and open pasture supported by existing footpath framework.</p> <p>Other comments: This may provide opportunity for mountain-biking use that would deflect more mountain-biking from the hills. Steepness of terrain may be challenging, unattractive and non-inclusive to a proportion of the public so question over how popular site it would be to wider audience. There would need to be added incentive and routes that are easy for broader appeal. Cafe and Toilets and bigger carparking area would be beneficial here.</p> <p>The site is already well visited by locals in the area so would question how much more added value this provides in attracting others to the site. Is there evidence in place to demonstrate this? Is there the potential to link this land to other adjoining land to the west that would increase its size and help remove pressure on the existing features of interest e.g. Special Wildlife Site?</p> <p>We would prefer a site that did not have a Special Wildlife Site and Ancient Woodland as part of it which adds significant value and importance to the nature recovery network while adding a mosaic habitat to the local SSSI on its doorstep. However, we recognise that these features make it attractive to visitors and hence its active use thereon. We appreciate that the investment that comes with this site will enable it to potentially be enhanced alongside an appropriately agreed and monitored management plan. Consequently, we would expect that the intricate features of the site are enhanced and protected from any increases in visitor pressure.</p>
<p>Malvern Hills National Landscape</p>	<p>Quality of the site: As a natural/semi-natural environment, located within a designated landscape, along with exceptional views and public footpaths, perceptually the site has a high landscape quality.</p>

	<p>Ecologically the site is likely to be more variable in quality. Some sections would benefit from management, e.g. bracken control, although there are also extensive areas of bluebells immediately off Old Hollow,</p> <p>Habitat Types: Mixed and deciduous woodland including 'Ancient & semi-natural', Stream, Veteran trees, Hedgerows, Bracken stands, Wood pasture, Improved pasture.</p> <p>Topography: The site is located in the Principal Wooded Hills Landscape Character Type (LCT) as defined in the Malvern Hills AONB Landscape Strategy and Guidelines. The steeply sloping topography rising towards the adjoining ridge of the Malvern Hills makes the site highly representative of this LCT.</p> <p>Although the site is frequented by local residents and has numerous Public Rights of Way (PRoW), these paths tend to be very steep, some with significant drops. Wider accessibility opportunities are therefore limited. Many parts of the site also live very wet for most of the year.</p> <p>Informal bike tracks and jumps have been created in the wooded areas.</p> <p>Viewpoints: Views towards the site are numerous from the Malvern Hills National Landscape including those from the northern end of the hills, and public rights of way and the Worcestershire Way off Cowleigh Road. The site benefits from high value, panoramic views outwards across to the Hills and the east.</p> <p>Proximity to sensitive designated sites with public access: The site is located less than 200m from the Malvern Hills SSSI. Explanation notes for policy SWDPR 07 cite the Malvern Hills SSSI Recreation Mitigation Strategy produced by Footprint Ecology as part of the SWDPR evidence base. The report included the role that strategic planning has in ensuring the SSSI's adequate protection and enhancement. The inclusion of this site as a potential regionally designated AIR seems to be in conflict with the Mitigation Strategy's recommendation that off-site mitigation should draw people from the wider area to other parts of the SWDPR area. Given the site's proximity to the SSSI, its allocation may result in adverse effects through increased footfall and traffic to the northern part of the SSSI by attracting visitors from outside the local area.</p> <p>It is not apparent how the allocation of the site as an AIR would contribute to alleviating pressure on sensitive green spaces in the Malvern area by drawing people to alternative areas.</p>
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	<p>There could be a significant opportunity to re-direct some of the local footfall that would otherwise be on the Hills/SSSI, to nearby alternative green spaces such as the land off Cowleigh Road without attracting further footfall from the wider area.</p> <p>Obvious "Bad neighbour" issues: There was very limited evidence of Anti-social Behaviour (ASB) during site visit on 12/12/24. The site may experience more ASB with further development off Malvern Vale.</p> <p>Planned and well-designed mountain bike tracks and jumps have been created in some of the woodland and pasture/bracken areas. These however are preferential to the Hills themselves and subsequent damage to the SSSI. Opportunities to further mountain bike provision on the site would potentially be welcomed.</p> <p>Other Comments: The site is well served by PRoW and already well used by local residents. However, there are a number of constraints on the site which limits its effectiveness as a strategic allocation in the SWDPR.</p> <p>While there are several PRoW, the topography limits the scope to make the site more accessible to a wider range of users. There is also very limited parking near the site, and very limited capacity to expand this. While there is a bus stop in close proximity to the site off Cowleigh Bank, the majority of journeys are likely to be by car. The local road network is fairly poor, i.e. minor roads. Connectivity to the site across Cowleigh Road would also need to be addressed as this is currently not pedestrian or cycle friendly.</p> <p>As the site is located in a designated landscape, any new built form such as toilets and cafe may be difficult to integrate.</p> <p>It is not clear what benefit would be provided by the site's allocation as an AIR. There is a concern this may inadvertently result in increased traffic from the wider area to the Hills, rather than mitigating recreational pressure on the Hills and the SSSI.</p> <p>In summary, the site does not appear to lend itself well as an AIR/Country Park at a strategic level. However, it could offer an opportunity for mitigating some of the issues identified in the Malvern Hills SSSI Mitigation Strategy produced by Footprint Ecology by alleviating some of the recreational pressure on the Malvern Hills by local residents.</p>
<p>Conservation, Landscape and Heritage Officers (MHDC)</p>	<p>Quality of the site: Existing small parking area. (Parts of) site already heavily used. Extensive network of public footpaths. However, permitted access to some parts of the site limited. Topography of site</p>

	<p>would impact on accessibility. Parts of the site already heavily used by mountain bikes. Tracks opened up. Erosion being caused. Increased usage of site highly likely to lead to further degradation of valuable habitats. Western third of site designated as a local wildlife site.</p> <p>Habitats: Very biodiverse site already. More potential for doing damage rather than good by redesignation/improving access. Designated local wildlife sites - Whippets Brook and its tributaries (important for white clawed crayfish and are vulnerable to dog disturbance), High Wood.</p> <p>Priority habitats within the site include ancient semi-natural woodland, plantation on ancient semi-natural woodland, relic wood pasture and parkland and acid grassland. Large areas of native bluebells (already being trampled).</p> <p>Locally notable plant species recorded on site (broad leaved helleborine, bristle clubrush, thin-spiked wood-sedge, native bluebells), protected species using the site include common pipistrelle, soprano pipistrelle, lesser horseshoe, Myotis species (bats) badger, willow tit, small heath (butterfly).</p> <p>Viewpoints: Site clearly visible from long stretch of Old Hollow and tops of the Malverns. Site falls within area where "most exceptional corridors overlap" (see https://www.malvern-hills-nl.org.uk/wp-content/uploads/2022/05/L12.pdf).</p> <p>Increased size of car parking area/construction of buildings, opening up new paths, potentially harmful to important views. Potential (negative) visual impacts from perspective of users of Cowleigh Road.</p> <p>National Habitat Recovery Network: Development of the local nature recovery strategy is well under way. Malvern Hills National Landscape will almost certainly be a high priority for restoration and enhancement of core habitat connectivity corridors.</p> <p>Existing Heritage and Landscape features that could make the proposal more attractive to visitors: Elevated views of surrounding landscape, beautiful undulating landscape, topography/valleys, (seasonal) views of fields of bluebells and wooded slopes, far-reaching views across wider landscape. Woodland with many paths. Established yet not-necessarily official mountain bike trails.</p> <p>Other Comments: At least one major badger sett. Vulnerable to disturbance by dogs. Site close to Malvern Hills SSSI. Direct footpath links between the two. Increased footfall on proposed site could</p>
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	<p>potentially increase footfall to SSSI, rather than reduce it. Part of site falls within Natural England SSSI Impact Risk Zone.</p> <p>May serve to increase footfall to Malvern Hills SSSI due to its proximity and direct footpath access to the hills.</p>
<p>Worcestershire Wildlife Trust</p>	<p>Habitat Types: From limited desk analysis only. Ancient Semi-Natural Woodland / Plantation on Ancient Woodland site. Acid, neutral and possibly additional unimproved grasslands, scrub.</p> <p>Quality of the site: Unknown without further survey. Despite current use for public access the Local Wildlife Site (LWS) designation and Worcestershire Habitat Inventory suggest that large parts of the site are of high ecological value and would be part of the 'Areas that could become of particular importance for Biodiversity' (APIB) layer in the emerging Local Nature Recovery Strategy (LNRS). Immediate surroundings would therefore be a target for habitat restoration.</p> <p>Existing Heritage and Landscape features that could make the proposal more attractive to visitors: The site already offers some public access (both through PRow and apparently through wider access, the details of which are unknown to the Trust). The Ancient Semi-Natural Woodland (ASNW) and other natural features would be a considerable draw for visitors, as might the proximity to the Malvern Hills and the rolling landscape of the immediate area.</p> <p>Other Comments: The Trust would be very concerned about allocation of this site as an AIR given that a large section of it is LWS and ASNW containing sensitive ground flora and other species of interest. Protection and enhancement of this key feature would be difficult in a country park scenario and while there may be merit in allocating it to take pressure off the Malvern Hills SSSI, the likely adverse impacts on the woodland outweigh this benefit in our view. However, this may be ameliorated by current use for public access, which is referred to in the LWS citation. The details of this are unknown to us but would have implications for the balance of risks to biodiversity vs opportunities for public benefit that need to be fully considered in any allocation.</p>

Based on the assessment in table 13 and the consultee comments received in table 14, it is considered that the site submitted as 'Land at Cowleigh Road, Malvern has the potential to be considered as an AIR, but some constraints have been identified and the site will require more detailed assessment work in order to determine site deliverability.

4.7 Option 4: Undertake a further round of consultation to identify alternative sites

For option 4, with the exception of the additional site assessment undertaken through option 3c, the SWCs consider that the time and resources required to undertake this approach could result in a significant delay to the SWDPR timetable. The plan was submitted for examination to the Secretary of State in September 2023 for independent examination, and at the time of writing (December 2024) it would be impractical for suitable sites in appropriate locations to be submitted, assessed, consulted on, and proposed for allocation through a further call for sites consultation within an acceptable timeframe. Further, as per the revaluation of the sites under option 3a, it is considered that an alternative location for an AIR is available for consideration in the SWDPR (CP007). Option 4 is therefore not considered to be a fully viable option at the current time. For the purposes of the options appraisal assessment in table 15 below, this option would likely result in a **'no improvement or benefit/limited'** outcome against achieving GI objectives.

4.8 Option 5: Modify the AIRs criterion policy (currently in SWDPR07) to allow for greater flexibility of AIRs provision through the SWDPR.

In relation to the preceding option, if a further round of consultation was undertaken there would be no guarantees that suitable sites in appropriate locations would come forward as proposed allocations. Any improvements to access to green space, wider Green Infrastructure connectivity, mitigation to both the Malvern Hills and other Green Infrastructure assets, and the relieving of development pressures would remain uncertain until alternative locations could be secured.

As a result of this, there is the possibility to consider adding greater flexibility in relation to the policy wording currently set out in SWDP07 – Green Infrastructure to allow for further AIRs to come forward through the Development Management Process. Part of this approach may involve modifying policy wording relating to the AIRs (and the Malvern Hills SSSI Mitigation Strategy) to form new Development Management style policies to act as an enabler for future AIRs provision.

For the purposes of the options appraisal assessment in table 15, this option would likely result in a **'moderate/considerable'** outcome against achieving GI objectives.

5 Options Appraisals Summary

Following the consideration of the eight options set out in this topic paper, the appraisals have been summarised in table 15 below, as collated from the options appraisals within the report.

Table 15: Options Appraisals Summary								
Objectives	Option 1a - Retain Honeybourne (AIR03) as the sole AIRs allocation	Option 1b- Extend Honeybourne (AIR03) using CP006h	Option 2 - Remove the AIRS (Criteria H-K) from Policy SWDPR07	Option 3a - Reassess the 'Ruled In' but not allocated 'Call for Sites' submissions (CP005, CP007, CP010)	Option 3b - Reassess the 'Ruled Out' sites from the 'Call for Sites' submissions	Option 3c Assessment of newly proposed site 'Land at Cowleigh Road, Malvern' (CP0018)	Option 4 - Undertake a further round of consultation to identify new alternative site options	Option 5 - Modify the AIRs criterion Policy (currently in SWDPR07)
Form new, large strategic informal recreation sites	Limited	Limited	Limited	Considerable (CP005) Considerable (CP007) Moderate (CP010)	No improvement or benefit	Moderate	No improvement or benefit/ Limited	Moderate/ Considerable
Increase access to green spaces	Limited	Limited/ Moderate	Limited	Moderate/ Considerable (CP005) Considerable (CP007)	No improvement or benefit	Moderate	No improvement or benefit/ Limited	Moderate/ Considerable

				Moderate (CP010)				
Create a wider network of accessible greenspaces above and beyond any standard provision	Limited	Limited/ Moderate	No improvement or benefit	Considerable (CP005, CP007, CP010)	No improvement or benefit	Moderate	No improvement or benefit/ Limited	Moderate/ Considerable
Provide mitigation to address recreation impacts to the Malvern Hills (including the SSSI)	Limited	Limited	No improvement or benefit	Limited (CP005) Considerable (CP007) Limited (CP010)	No improvement or benefit	Limited/ Moderate	No improvement or benefit/ Limited	Moderate/ Considerable
Take pressure off existing green infrastructure assets	Limited	Limited/ moderate	No improvement or benefit	Moderate (CP005) Considerable (CP007) Moderate (CP010)	No improvement or benefit	Limited/ Moderate	No improvement or benefit/ Limited	Moderate/ Considerable
Provide mitigation for recreational pressures related to the growth set out in the plan	No improvement or benefit	Limited	No improvement or benefit	Moderate (CP005) Considerable (CP007) Limited (CP010)	No improvement or benefit	Limited/ Moderate	No improvement or benefit/ Limited	Moderate/ Considerable

Feasibility/ Deliverability	Moderate	Moderate	Limited	Limited (CP005) Moderate (CP007) Limited (CP010)	No improvement or benefit	Limited/ Moderate	No improvement or benefit/ Limited	Moderate/ Considerable
Overall Summary	<p>In isolation, AIR03 would not provide sufficient GI provision for the planned growth in the SWDPR, nor (due to its location) would it provide sufficient mitigation for recreational pressures such as the Malven Hills SSSI.</p>	<p>Despite being a larger site, it would not provide sufficient GI provision for planned growth in the SWDPR, nor (due to its location) would it provide sufficient mitigation for recreational pressures such as the Malven Hills SSSI.</p>	<p>The removal of the AIRs (criteria H-K) from Policy SWDPR07 would potentially leave a void in the Local Plan as far as strategic Green Infrastructure is concerned. The SWDPR would be reliant on other green infrastructure policy requirements to justify meeting SWDPR objectives.</p>	<p>Following reappraisal, CP007 could provide a potential option as a suitable location for an AIR. The site will require more detailed assessment work in order to determine site deliverability .</p> <p>Sites CP005 and CP010 are not considered to be suitable options for an AIR.</p>	<p>Based on the 2024 reappraisals of the ruled-out sites in 2020, none of the sites warrant further consideration as a potential AIRs allocation.</p>	<p>Following assessment, CP0018 could provide a potential option as a location for an AIR. The site will require more detailed assessment work in order to determine site deliverability .</p>	<p>Having submitted the plan for examination in September 2023, undertaking this option now (December 2024) could result in a significant delay to the SWDPR timetable. It would also be impractical to undertake this approach at the current time.</p>	<p>This option may help allow for greater flexibility in terms of AIRs delivery, for example through an alternative Development Management-style policy.</p>

6 Conclusion

6.1 Next Steps

Following the options appraisals in this report, as summarised in table 15, a decision must be taken on the most appropriate way forward in order to ensure that the objectives of the SWDPR are met.

It is considered that a combination of the options could be taken forward as part of the SWDP Review. This would be as follows:

- Consider CP007 – Land to the west of Leigh Sinton as a site allocation for an AIR (option 3a) subject to further assessment and consultation through the examination process.
- Consider CP0018 - Land at Cowleigh Road, Malvern as a site allocation for an AIR (option 3c) subject to further assessment and consultation through the examination process.

Consider policy updates to provide greater flexibility to bring forward suitable sites for the AIRs through the Development Management process (option 5). Further, whilst option 4 would not be feasible at the current time, it may be an option which could be pursued in the future, should a call for further sites need to be undertaken.

AIR03 (land at Honeybourne) would remain as a proposed allocation site in the SWDPR. The site has been viability tested as part of the SWDPR and remains deliverable.

In total, the three sites (AIR03, CP007 and CP0018) could potentially provide circa 154 hectares of AIRs provision. Additionally, as per table 5, up to 893.06 hectares of recreational green space is planned as part of the four new strategic sites and the two urban extension reallocations in the SWDPR.

This provision of recreational green spaces on the strategic sites, particularly at Worcestershire Parkway and Throckmorton New Settlement, will maximise self-containment within these settlements, allowing residents to utilise the onsite recreational provision instead of travelling outside of the settlement to destinations such as the Malvern Hills SSSI. It is also likely that the high levels of variety and provision of recreational space within these new settlements may act as a destination in their own right for visitors.

Overall, it is considered that this combination of site options relating to the AIRs will allow for the AIRs to progress in the policy/plan and provide scope for replacement AIRs to be brought forward through the plan-making process via policy updates (main modifications), for example through a development management-style enabling policy. Alongside the strategic green infrastructure provision on the new strategic sites and the urban extension reallocation sites, it is considered that this strategy could provide the most appropriate mechanism from which to achieve the Green Infrastructure objectives of the SWDPR.

In terms of next steps, further work relating to the AIRs (and the Malvern Hills Mitigation Strategy) will be progressed through a Statement of Common Ground with the relevant stakeholders.

Finally, subject to the outcome of the Examination in Public of the SWDPR, further evidence base updates may be required as relates to the proposed AIRs allocations.

Appendix 1: Site Allocation Criteria

ESSENTIAL CRITERIA	Landowner supportive of Country Park development?
	Site available within SWDPR Plan Period?
	Any significant Legal Constraints?
	Deliverable and Viable?
	At least 95% Greenfield?
	Land constraints which would limit building development (café / visitor centre etc.)?
	Flood Risk?
	Safe Access (vehicular and other to include current or potential cycle route)?
	Availability of Public Transport?
	Less than 10 miles from an urban area (Worcester or a Town)?
	Size
OTHER CONSIDERATIONS	Quality of the site?
	Habitats?
	Viewpoints?
	National Habitat Recovery Network?
	Existing Heritage and Landscape features that could make the proposal more attractive to visitors?
	Natural England Comments
OUTCOME	Ruled In / Out?
	Officer Summary
	Allocated as a Country Park in the SWDPR?

Appendix 2: Summary of Call for Sites Assessments

Table 16: Full site assessments - [SWDPR Country Park Recreational Green Space Site Assessments.xls \(swdevelopmentplan.org\)](#) originally undertaken in 2020.

Site Reference	Ruled In / Out?	Officer Summary (2020)	Allocated as a Country Park (AIR) in the SWDPR?
CP001 LOWER HALL FARM, HAMPTON LOVETT	In	Good site with no major constraints in a location near to current and planned growth. As such, site is proposed to be allocated alongside CP003 and CP006f.	Yes
CP002 LAND AT MANOR FARM, GRAFTON FLYFORD	Out	Ruled out due to location.	No
CP003 LAND SOUTH OF JENNETT TREE LANE	In	Good site with no major constraints in a location near to the currently over-capacity Malvern Hills. As such, site is proposed to be allocated alongside CP001 and CP006f.	Yes
CP004 EVESHAM COUNTRY PARK	Out	Ruled out due to availability unknown.	No
CP005 LAND ADJACENT TO THROCKMORTON	In	Good site with no major constraints, although there are some access concerns relating to CP005c and CP005e. Given the location of site and its juxtaposition with the proposed Throckmorton New Settlement, it is more appropriate to consider it as part of the wider Throckmorton New Settlement Masterplanning. As such, the site is not proposed for allocation.	No
CP006a HEART OF ENGLAND FOREST (AB LENCH)	Out	Ruled out on access.	No
CP006b HEART OF ENGLAND FOREST (SHERIFF'S LENCH)	Out	Ruled Out on access and potential impact on the adjacent Highclere SSSI.	No
CP006c-e HEART OF ENGLAND FOREST (NORTH OF BROAD MARSTON)	Out	Ruled out on access.	No
CP006f-j HEART OF ENGLAND FOREST (NORTH OF HONEYBOURNE)	CP006f-j - CP006f, CP006g, CP006h, CP006j and	CP006f-j (aside from CP006i which is also Ruled Out on Access) is a good site overall. Not deemed appropriate to allocate all land parcels due to scale; CP006f deemed most appropriate to allocate given location and existing woodland on site. CP006g,	Yes (CP006f only)

	CP006j In. CP006i Ruled Out on Access	CP006h and CP006j are all small parcels which are slightly detached from the main parcels CP006f and CP006h, with CP006h of a significant scale.	
CP007 LAND TO THE WEST OF LEIGH SINTON	In	Good site for a Country Park overall, including being in a location close to the currently over capacity Malvern Hills and Commons, however due to concerns surrounding the potential impact on nearby Aileshurst Coppice SSSI, CP007 is not carried forward for allocation and CP001, CP003 and CP006f are preferred.	No
CP008 MIDDLE AND UPPER BATTENHALL FARM, WORCESTER	Out	Ruled out on deliverability grounds.	No
CP009 LAND ADJACENT STONEBRIDGE CROSS	Out	Ruled out due to size.	No
CP010 ASHMORES FARM AND NEW FARM, NORTON	In	Good site for a Country Park overall, including being in a location of reduced accessibility to land for recreation, however due to concerns surrounding the potential impact on nearby Windmill Hill SSSI and Nature Reserve, and some concerns relating to change in levels in some areas of the site, CP010 is not carried forward for allocation and CP001, CP003 and CP006f are preferred.	No
CP011 LAND WEST OF CRUTCH LANE, DROITWICH SPA	Out	Availability unknown.	No
CP012 PARSON'S MEADOW, POWICK	Out	Ruled out due to Flood Risk.	No
CP013 MALVERN CHASE	Out	Not a Country Park (AIRs) proposal.	No
CP014 MADRESFIELD, MALVERN	Out	Not a Country Park (AIRs) proposal.	No
CP015 LAND TO THE NORTH OF MARTLEY ROAD	Out	Ruled out on deliverability grounds.	No
CP016 PARK FARM, EVESHAM	Out	Ruled out on deliverability grounds.	No
CP017 LAND ADJACENT TO PERSHORE BRIDGES	Out	Ruled out due to Flood Risk.	No

Appendix 3: GI Provision at the Strategic Sites

Typologies of GI to align with Masterplan	Amount in Hectares	Accessible recreational area included	Amount included in recreational provision calculation
Stoulton buffer (Existing GI asset)	151.4	Yes. Will include walking routes and connections to Stoulton through a landscaped buffer.	151.4
SSSI (Existing on-site asset)	8.3	Cooksholme Meadow. No access will be provided to protect the SSSI.	0
Train station SuDS	2.2	Existing on-site provision. Not recreational.	0
Natural Green Space	106 ha	New extensions of wildlife buffer (including motorway, railway buffers) and Town Centre Buffer. Not recreational though some active travel routes may cross some buffers.	0
Community Park	50.54	Formal park and recreation facilities. One large community park and multiple smaller parks and spaces provided throughout neighbourhoods.	50.54
Other Park and Recreation (including formal parks)	13.26		13.26
Allotments / community orchard	20.28	Provided throughout neighbourhoods.	20.28
Sports Hubs / pitches	30	Provided near main town centre and throughout neighbourhoods.	30
Play Space (Children)	1.17	Provided throughout neighbourhoods.	1.17
Play Space (Youth)	1.17	Provided throughout neighbourhoods.	1.17
Amenity Green Space	170.84	Provided throughout neighbourhoods.	170.84
Total GI Provision	555.19 ha	Total Recreational Provision	438.66 ha

Table 18: Proposed GI at Throckmorton			
Typology	GI Proposed in Concept Plan (Ha)	Detail	Amount included in recreational provision calculation
Biodiversity/ Natural GI	66.2	23.8ha Identified BAP Sites within airfield site	0
		21.0ha Existing features such as woodland, ponds	21.0
		21.4ha Reptile Translocation site	0
	22.2	22.2ha Biodiversity enhancement areas on landfill site post remediation	22.2
	56.5	56.5ha Extent of wildlife Buffer within the SGA - potential wet meadow enhancement	56.5
	32.9	32.9ha New Extensions to Wildlife Sites throughout scheme	0
Natural GI	46.7	37.3ha Throckmorton Village Buffer - area with no change to the landscape	37.3
		9.4ha Land adjacent to Hill Historic setting - pastoral land	9.4
Allotments / orchards	7.2	Allotments and orchards in neighbourhoods	7.2
Play spaces youth	0.6	Play spaces in neighbourhoods	06
Play spaces child	0.6		0.6
Park and Recreation	4.8	Pocket parks and larger Park	4.8
Playing pitches	12.2	Provided throughout	12.2
Amenity Green Space	105.3	60.49ha Throughout wider site	60.49
		44.8 ha Amenity and roadside landscaping within development parcels	0
Green corridors	8.3	Greening of 50% Runways (remainder for active travel)	0
Total	363.5	Total Recreational Provision	232.09

Table 19: GI Provision at Rushwick			
Typology	Hectares Concept Plan (Ha)	Detail	Amount included in recreational provision calculation
Allotments and Orchards	1.2	0.5ha on CFS1213b	0.5
		0.4ha on CFS1213c	0.4
		0.3 ha community orchard on CFS1213b	0.3
Amenity Green Space (sites > 0.15ha)	7.6	5.1ha Broadmore Village Green on CFS1213a	5.1
		2.2ha amenity on southern parcel on CFS1213b	2.2
		0.3ha amenity southern parcel on CFS1213b parallel to Upper Wick Lane	0.3
Tree lined active travel routes green corridor	3.3	1.4ha linking to station from flood plain to east of GI corridor on CFS1213b	0
		0.5ha corridor for active travel South of Christine Avenue between Park and Upper Wick Lane	0
		1.4ha corridor between station and western employment site on CFS1213a (to include pumping station)	0
Existing trees	0.7	0.7ha existing trees on CFS1213b	0
Tree planting buffer	0.7	0.7ha New tree buffer between Upper Wick	0
Parks and Recreation Grounds	1.6	1.6ha park on CFS1213b	1.6
	1.0	1.0ha existing recreation ground	1.0
Play Space (Children)	Within amenity/ parks	1 LEAP on CFS1213a	0
		1 LEAP on CFS1213b	0
		1 LEAP on Rushwick Village Green	0
		3 NEAPs on CFS1213a	0

Play Space (Youth)	Within amenity/ parks	3 NEAPs on CFS1213b	0
		01 NEAP on Rushwick Village Green	0
Natural Green Space	13.2	9.1ha GI Corridor on CFS1213a & CFS1213b	9.1
		4.1ha on CFS0582 (already got planning permission)	4.1
	1.4	1.4ha existing open space in southern parcel on CFS1213b	1.4
Playing Pitches	4.7	4.6ha sports pitches on CFS0398	4.6
		0.1ha tennis courts on Rushwick Village Green)	0.1
Attenuation pond	0.1	0.1ha Attenuation pond at Station on CFS1213a	0
Total Provision	35.5	Total Recreational Provision	30.7

Table 20: GI Provision at Mitton			
GI typologies	Total (ha)	Detail	Amount included in recreational provision calculation
Amenity Space -	5.15	Public open space (including some hedgerow margins)	5.15
Tree buffer planting areas	3.2		0
Equipped play space	0.2		0.2
Orchard and allotments	2.21		2.21
Carrant Valley Park	25.88	Land free from development and managed for ecological and recreation benefit: semi-natural accessible space	25.88
Carrant Brook Wildlife Corridor	2.54		0
Attenuation Basins	4.08		0
Highway landscaping at site entrances	0.08		0
Outdoor sport pitches	5.8		5.8
GI buffer preserving setting/	10.34	Delivering biodiversity net gain	0
Totals	59.88	Total Recreational Provision	39.24

Appendix 4: Consultee Comments for CP0018: Land at Cowleigh Road, Malvern (Option 3c)

Table 21: Consultee Comments	
Wychavon District Council and Malvern Hills District Council -Conservation, Ecology and Landscape Officers	
Quality of the site?	Existing small parking area. (Parts of) site already heavily used. Extensive network of public footpaths. However, permitted access to some parts of the site limited. Topography of site would impact on accessibility. Parts of the site already heavily used by mountain bikes. Tracks opened up. Erosion being caused. Increased usage of site highly likely to lead to further degradation of valuable habitats. Western third of site designated as a local wildlife site.
Habitats?	<p>Very biodiverse site already. More potential for doing damage rather than good by redesignation/improving access.</p> <p>Designated local wildlife sites - Whippets Brook and its tributaries (important for white clawed crayfish and are vulnerable to dog disturbance), High Wood.</p> <p>Priority habitats within the site include ancient semi-natural woodland, plantation on ancient semi-natural woodland, relic wood pasture and parkland and acid grassland. Large areas of native bluebells (already being trampled).</p> <p>Locally notable plant species recorded on site (broad leaved helleborine, bristle clubrush, thin-spiked wood-sedge, native bluebells), Protected species using the site include common pipistrelle, soprano pipistrelle, lesser horseshoe, Myotis species (bats) badger, willow tit, small heath (butterfly)</p>
Viewpoints?	<p>Site clearly visible from long stretch of Old Hollow and tops of Malverns.</p> <p>Site falls within area where "most exceptional corridors overlap" (see https://www.malvern-hills-nl.org.uk/wp-content/uploads/2022/05/L12.pdf).</p> <p>Increased size of car parking area/construction of buildings, opening up new paths, potentially harmful to important views.</p> <p>Potential (negative) visual impacts from perspective of users of Cowleigh Road.</p>
National Habitat Recovery Network?	Development of the local nature recovery strategy is well under way. Malvern Hills National Landscape will almost certainly be a high priority for restoration and enhancement of core habitat connectivity corridors.
Existing Heritage and Landscape features that could make the proposal more	<p>Elevated views of surrounding landscape, beautiful undulating landscape, topography/valleys, (seasonal) views of fields of bluebells and wooded slopes, far-reaching views across wider landscape.</p> <p>Woodland with many paths.</p>

attractive to visitors?	Established yet not-necessarily official mountain bike trails.
Additional things to consider	At least one major badger sett. Vulnerable to disturbance by dogs. Site close to Malvern Hills SSSI. Direct footpath links between the two. Increased footfall on proposed site could potentially increase footfall to SSSI, rather than reduce it. Part of site falls within Natural England SSSI Impact Risk Zone which states they want to be consulted where " <i>All planning applications (except householder applications) where the proposed development is outside or extends outside existing settlements/urban areas and will increase lighting levels or affect trees/woodland, waterbodies, rural buildings/structures (manmade or natural) or linear landscape features such as hedgerows, streams and rivers through direct loss, fragmentation or change of use.</i> "
Does this improve access for residents to 100ha plus sites?	May serve to increase footfall to Malvern Hills SSSI due to its proximity and direct footpath access to the hills.
Malvern Hills National Landscape Comments	
Location in relation to the "gaps" identified in GI Framework (revised Framework 3 draft)	The GI Framework states that the Malvern Hills are over capacity and "under considerable recreational pressure." The framework also describes how "there is a good spread of different sizes of accessible natural green space assets across the district and the presence of the Malvern Hills AONB along the western edge of the district provides good access to larger assets." Figure 10 indicates that the Malvern area is already one of the higher scoring parts of the county for access to land for recreation. The site is already well served by PRoWs and popular with local residents, including the creation of some informal mountain bike tracks. The designation of the site in the SWDPR as an AIR does not seem to fulfil the gaps identified in the GI Framework in terms of provision elsewhere in the SWDPR area and alleviating recreational pressure on the Malvern Hills. If Worcester Woods CP is also beyond capacity, then a more suitable location may be between Malvern and Worcester, which would also ensure the new 'destination' is not in the vicinity of Hills. It is also worth noting that the presence of the AONB designation in of itself does not necessarily bring additional public access to the larger assets, but the land ownership of the Malvern Hills Trust and public access provided.
Size	Meets minimum site area, although topography and grazing areas limit accessibility in places.
Habitat types	Mixed and deciduous woodland including 'Ancient & semi-natural'. Stream.

	<p>Veteran trees. Hedgerows. Bracken stands. Wood pasture. Improved pasture.</p>
Topography	<p>The site is located in the Principal Wooded Hills LCT as defined in the Malvern Hills AONB Landscape Strategy and Guidelines. The steeply sloping topography rising towards the adjoining ridge of the Malvern Hills makes the site highly representative of this LCT.</p> <p>Although the site is frequented by local residents and has numerous PROWS, these paths tend to be very steep, some with significant drops. Wider accessibility opportunities are therefore limited. Many parts of the site also live very wet for most of the year.</p> <p>Informal bike tracks and jumps have been created in the wooded areas.</p>
Proximity to sensitive designated sites with public access	<p>The site is located less than 200m from the Malvern Hills SSSI. Explanation notes for policy SWDPR 07 cite the Malvern Hills SSSI Recreation Mitigation Strategy produced by Footprint Ecology as part of the SWDPR evidence base. The report included the role that strategic planning has in ensuring the SSSI's adequate protection and enhancement. The inclusion of this site as a potential regionally designated AIR seems to be in conflict with the Mitigation Strategy's recommendation that off-site mitigation should draw people from the wider area to other parts of the SWDPR area. Given the site's proximity to the SSSI, its allocation may result in adverse effects through increased footfall and traffic to the northern part of the SSSI by attracting visitors from outside the local area.</p> <p>It is not apparent how the allocation of the site as an AIR would contribute to alleviating pressure on sensitive green spaces in the Malvern area by drawing people to alternative areas. One of the two AIRs being carried forward, Jennet Tree Lane, is located in the Malvern Hills District. This site would provide an alternative to the Hills as a green space location for those north-east of the town.</p> <p>There could be a significant opportunity to re-direct some of the local footfall that would otherwise be on the Hills/SSSI, to nearby alternative green spaces such as the land off Cowleigh Road without attracting further footfall from the wider area.</p>
Obvious "Bad neighbour" issues	<p>There was very limited evidence of ASB during site visit on 12/12/24. The site may experience more ASB with further development off Malvern Vale.</p> <p>Planned and well-designed mountain bike tracks and jumps have been created in some of the woodland and pasture/bracken areas. These however are preferential to the Hills themselves and subsequent damage to the SSSI. Opportunities to further mountain bike provision on the site would potentially be welcomed.</p>

<p>Quality of the site?</p>	<p>As a natural/semi-natural environment, located within a designated landscape, along with exceptional views and public footpaths, perceptually the site has a high landscape quality.</p> <p>Ecologically the site is likely to be more variable in quality. Some sections would benefit from management, e.g. bracken control, although there are also extensive areas of bluebells immediately off Old Hollow,</p>
<p>Viewpoints?</p>	<p>Views towards the site are numerous from the Malvern Hills National Landscape including those from the northern end of the hills, and public rights of way and the Worcestershire Way off Cowleigh Road. The site benefits from high value, panoramic views outwards across to the Hills and the east.</p>
<p>Existing Heritage and Landscape features that could make the proposal more attractive to visitors?</p>	<p>The Malvern Hills are already one of most visited sites in the county due to its existing heritage and landscape features.</p>
<p>Other Comments</p>	<p>The site is well served by PRoWS and already well used by local residents. However, there are a number of constraints on the site which limits its effectiveness as a strategic allocation in the SWDPR.</p> <p>While there are several PRoWS, the topography limits the scope to make the site more accessible to a wider range of users. There is also very limited parking near the site, and very limited capacity to expand this. While there is a bus stop in close proximity to the site off Cowleigh Bank, the majority of journeys are likely to be by car. The local road network is fairly poor, i.e. minor roads.. Connectivity to the site across Cowleigh Road would also need to be addressed as this is currently not pedestrian or cycle friendly.</p> <p>As the site is located in a designated landscape, any new built form such as toilets and cafe may be difficult to integrate.</p> <p>It is not clear what benefit would be provided by the site's allocation as an AIR. There is a concern this may inadvertently result in increased traffic from the wider area to the Hills, rather than mitigating recreational pressure on the Hills and the SSSI.</p> <p>In summary, the site does not appear to lend itself well as an AIR/Country Park at a strategic level. However, it could offer an opportunity for mitigating some of the issues identified in the Malvern Hills SSSI Mitigation Strategy produced by Footprint Ecology by alleviating some of the recreational pressure on the Malvern Hills by local residents.</p>

Natural England	
Location in relation to the "gaps" identified in GI Framework (revised Framework 3 draft)	Feels sensible to incorporate safe (away from roads) active travel routes, bus (with bike carrying potential) in and out of Malvern.
Size	As an individual site it represents a good size though not sure how much of the site can be accessed at all times of the year due to wetness underfoot and sensitivity of Special Wildlife Site - hence earlier comment under site area.
Habitat types	The site offers a lot of interest to a visitor that makes it attractive to travel to. Good mix of woodland type (mixed and broadleaf units) also marked on Ancient Woodland Inventories. Stream runs through it and may have protected species linked to it - needs checking. Veteran tree. Interesting intracate field system associated with Special Wildlife Site that include Hedgerow. Woodpasture in places. Considerations/sensitivity should be attributed to protect and enhance areas with notable sensitive flora such as bluebell etc.. Full survey should be carried out to ensure the sites quality and suitability should be made before decisions made.
Topography	Very steep topography that has non metalled footpaths. Wetness in places especially valley bottom which may limit seasonal access across full site thereby impacting and leading to increased access on other parts.
Proximity to sensitive designated sites with public access	Virtually next door to SSSI Malvern Hills with public footpath links. This site at lower elevation requiring a very steep ascent to get to SSSI. Car Park facility may enable more footfall to choose this site as a launch site. As this site exists within impact risk zone of SSSI more consideration required here to ensure this is limited/eliminated.
Obvious "Bad neighbour" issues	Not aware of any other than proximity to SSSI.
Quality of the Site	The site offers an interesting mosaic of habitat with some good and some not so good. With appropriate management and assisted design via appropriately designed tracks/pathways it offers an attractive proposition to a visitor to use it regularly. There is currently a woodland countryside stewardship scheme attached to the site which would need investigating re. any potential conflict. Ongoing investment in the site via the AIR framework may help improve the quality of the site and counter any potential footfall. This would need to be designed and agreed appropriately by key partners such as the Wildlife Trust, NL and MHT.
Other useful purposing	This may provide opportunity for MTB use that would deflect more MTb from the hills. Steepness of terrain may be challenging, unattractive and non-inclusive to a proportion of the public so question over how popular site it would be to wider audience. There would need to be added incentive and routes that are easy for

	broader appeal. Cafe and Toilets and bigger carparking area would be beneficial here.
Existing Heritage and Landscape features that could make the proposal more attractive to visitors?	An attractive site with views, interesting natural features, woodland and open pasture supported by existing footpath framework.
Other Comments	<p>We do not have capacity to fully assess and consider this site in the short turn-around of one week. In principle - we think this site is a good idea because of its location, size and interest which is also close to local development. This site on its own represents a significant land holding toward meeting part of the recommendation within the Footprint Ecology report.</p> <p>Though we would prefer a site that did not have a Special Wildlife Site and Ancient Woodland as part of it which adds significant value and importance to the nature recovery network while adding a mosaic habitat to the local SSSI on its doorstep. However, we recognise that these features make it attractive to visitors and hence its active use thereon. We appreciate that the investment that comes with this site will enable it to potentially be enhanced alongside an appropriately agreed and monitored management plan. Consequently, we would expect that the intricate features of the site are enhanced and protected from any increases in visitor pressure.</p> <p>However, in the meantime we heavily caveat this with a need for you to question and consider the views of the National Landscape, the Malvern Hills Trust with regards to its suitability and proximity to the Malvern Hills SSSI. You will also need to consider the views of the Wildlife Trust as linked to the Local Wildlife Site upon which this site is partly based. You will also need to consider if you have enough evidence that says people only go to the Malvern Hills purely for the views. If so, you will need to ensure this site offers visitors with the potential for views as provided by the Malvern Hill tops. There is currently a woodland countryside stewardship scheme attached to the site which would need investigating re. any potential conflict. We understand that the site is already well visited by locals in the area so would question how much more added value this provides in attracting others to the site. Is there evidence in place to demonstrate this. Is there the potential to link this land to other adjoining land to the west that would increase its size and help remove pressure on the existing features of interest eg. Special Wildlife Site. We would recommend that a full survey be carried out to ensure the sites quality and suitability should be made before decisions made. We understand that the area is already being used by local individuals as an unofficial MTB site with lots of planned and executed routes. This site potentially represents an opportunity to enhance the spec of the site for MTB but would require close engagement with local MTB groups/individuals to make this 'a go to site' locally and thus help take more MTB off the hills. Further assessments into the evidence and impact of MTB would be recommended in order to understand this more.</p>

	To be certain of not damaging the Malvern Hills SSSI you will need to make sure that the AIRs you seek are supported by a commitment to a wider joined up strategic package of mitigation that is in partnership with other LPA's within the zone of influence. We appreciate that we do not know what that looks like in the round as yet until we hear from other Local Planning Authorities. We will support you with this at the preliminary Feb 6th meeting alongside these other LPAs. A wider mitigation strategy may include: GI proposals alongside workable exclusion zone policies, a bike SANG, comprehensive parking strategies, resting the beacons, SAMM etc. etc.
Worcestershire County Council Highways	
Would safe access (vehicular and other to include current or potential cycle route) be achievable?	YES, it should be possible to provide a vehicular access from the B4219 Cowleigh Road. (There is already the small existing Earl Beauchamp Fountain car park accessed from the B4219, which could be expanded?) Vehicle access via Old Hollow is not supported, as the carriageway is restricted. But might be more suitable as the principal cycle route to the site.
Comments	Scale of development may require local widening of the B4219, to form an appropriate junction. This would need to be west of the existing car park. There are no bus stops in the vicinity of the existing car park. There is no continuous footway link to the existing car park, with the existing footway to the east terminating approximately 64m east of the existing car park. Old Hollow has no existing footway provision.
Worcestershire Wildlife Trust	
Location in relation to the "gaps" identified in GI Framework (revised Framework 3 draft)	GI strategy places this site in a 'Good' GI area, where the priority is to protect and enhance existing assets and support socio-economic enhancement.
Size	45 hectares
Habitat types	From limited desk analysis only. Ancient Semi-Natural Woodland / Plantation on Ancient Woodland site. Acid, neutral and possibly additional unimproved grasslands, scrub
Topography	Variable
Proximity to sensitive designated sites with public access	Close to Malvern Hills and Commons

Obvious "Bad neighbour" issues	Unknown
Quality of the site?	Unknown without further survey. Despite current use for public access the LWS designation and WHI suggest that large parts of the site are of high ecological value and would be part of the APIB layer in the emerging LNRS. Immediate surroundings would therefore be a target for habitat restoration
Viewpoints?	Unknown
Existing Heritage and Landscape features that could make the proposal more attractive to visitors?	The site already offers some public access (both through PROW and apparently through wider access, the details of which are unknown to the Trust). The ASNW and other natural features would be a considerable draw for visitors, as might the proximity to the Malvern Hills and the rolling landscape of the immediate area.
Other Comments	The Trust would be very concerned about allocation of this site as an AIR given that a large section of it is LWS and ASNW containing sensitive ground flora and other species of interest. Protection and enhancement of this key feature would be difficult in a country park scenario and while there may be merit in allocating it to take pressure off the Malvern Hills SSSI, the likely adverse impacts on the woodland outweigh this benefit in our view. However, this may be ameliorated by current use for public access, which is referred to in the LWS citation. The details of this are unknown to us but would have implications for the balance of risks to biodiversity vs opportunities for public benefit that need to be fully considered in any allocation.