

**Statement of Common Ground between the South
Worcestershire Councils (Malvern Hills District Council,
Wychavon District Council and Worcester City Council)
(SWCs)**

and

Worcestershire County Council (WCC)

and

**‘The Trustees of the 2002 Settlement’ and ‘The Trustees
of the Berkeley Settlement’ (The Spetchley Estate)**

**Policy SWDPR 61: Worcester City Allocations - Land at
Newtown Road, Worcester (SWDP 43/15, CFS0703,
WCEMREAL01)**

Date: 18th April 2024



1. Introduction and Purpose

1.1. This Statement of Common Ground (SoCG) has been produced to support the South Worcestershire Development Plan Review (SWDPR), which has been jointly prepared by the South Worcestershire Councils - Malvern Hills District Council, Wychavon District Council and Worcester City Council (SWCs). It sets out how the SWCs have engaged with Worcestershire County Council (WCC) and 'The Trustees of the 2002 Settlement' and 'The Trustees of the Berkeley Settlement' (The Spetchley Estate) in relation to Land at Newtown Road, Worcester (SWDP 43/15, CFS0703, WCEMREAL01).

2. Scope

2.1. Planning Practice Guidance (PPG)¹ provides details on the scope of a SoCG, those relevant to the Land at Newtown Road are detailed below.

- a short description and map of the administrative areas covered by the statement;
- the key strategic matters being addressed by the statement;
- the plan-making authorities responsible for joint working detailed in the statement, and list of any additional signatories;
- governance arrangements for the cooperation process;
- distribution of needs in the area as agreed through the plan-making process, or the process for agreeing the distribution of need (including unmet need) across the area;
- a record of where agreements have (or have not) been reached on key strategic matters, including the process for reaching agreements on these; and
- any additional strategic matters to be addressed by the statement which have not already been addressed.

2.2 The PPG also recognises that the *'level of cooperation detailed in the statement is expected to be proportionate to the matters being addressed. The statement is expected to be concise and is not intended to document every occasion that strategic policy-making authorities meet, consult with each other, or for example, contact prescribed bodies under the duty to cooperate. The statement is a means of detailing key information, providing clear signposting or links to available evidence on authorities' websites.'*²

¹ Paragraph: 011 Reference ID: 61-011-20190315

² Paragraph: 011 Reference ID: 61-011-20190315

3. Relevant Parties and Site Background

Relevant Parties

- 3.1. The relevant parties to this SoCG are Malvern Hills District Council, Wychavon District Council and Worcester City Council (SWCs), Worcestershire County Council (WCC) and the landowners of the site are 'The Trustees of the 2002 Settlement' and 'The Trustees of the Berkeley Settlement' (The Spetchley Estate). The administrative areas of Malvern Hills District Council, Wychavon District Council and Worcester City Council are located in Worcestershire County. The site of focus in this SoCG (Land at Newtown Road, Worcester) is located within Worcester City Council's boundary.
- 3.2. It is important that effective duty to cooperate discussions are undertaken between relevant parties regarding strategic planning matters during the South Worcestershire Development Plan Review.

The Site

- 3.3. The extent of the Estate's ownership at the Land at Newtown Road is set out at Figure 1 below. The site comprises a pair of largely undeveloped fields in the east of Worcester, enclosed by Newtown Road and the A4440. The site accommodates the Perry Manor Care Home and the 'Blue Car Park', which provides overflow parking for staff of the nearby Worcestershire Royal Hospital.
- 3.4. The Care Home lies outside of the Estate's ownership, but the Blue Car Park, access road and landscape bunds are within its ownership.



Figure 1: Extent of Spetchley Estate ownership

Planning Policy Context – Adopted Position

- 3.5. For planning policy purposes, the site is situated within the defined development boundary for Worcester, set out in the adopted South Worcestershire Development Plan (SWDP), adopted in 2016.
- 3.6. The majority of the site also forms part of a wider allocation for mixed-use development under Policy SWDP43/15, Worcester Woods Business Park, Newtown Road. Figure 2 below displays the extent of the site and the site boundary, as relates to Policy SWDP 43/15. Policy SWDP 43/15 permits a range of uses, comprising “*B1, B2 employment, car / motorbike showroom, hospital expansion*”. The extent of the allocation is set out at Figure 2 below.

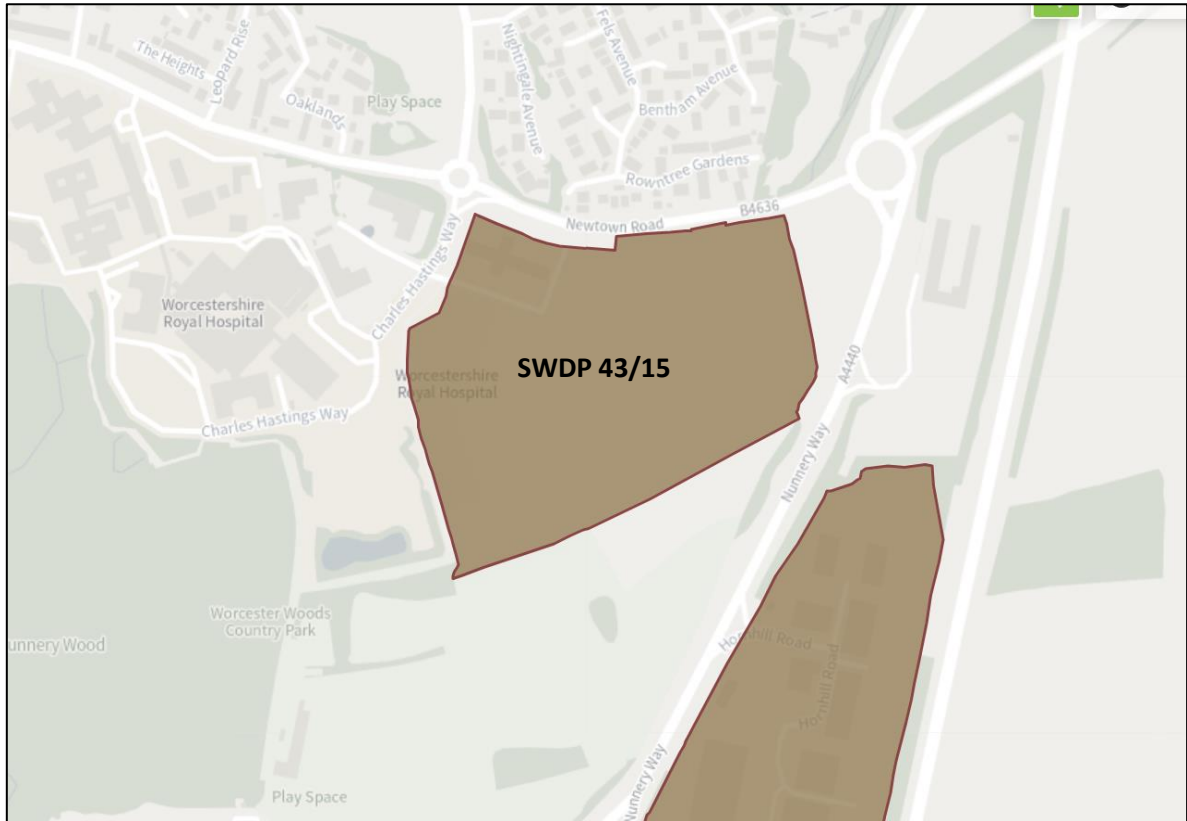


Figure 2: Policy SWDP 43/15 Allocation

3.7. Prior to the SWDP, the site was the subject of an employment allocation in the City of Worcester Local Plan 1996-2011, adopted in 2004. During that period since 2004 the office market in Worcester has been weak and focussed on the City Centre environment. As a consequence, the landowner has engaged in dialogue with various organisations (both from the local community and private enterprises) to explore the development potential of the site. There has been an extensive level of interest from organisations in the community for example through: (i) the provision of the care facility; and (ii) the provision of the Blue Car Park for the hospital and more recently the temporary expansion of the hospital car park as a result of the Covid-19 pandemic. The hospital's requirement for further additional parking long term has been under discussion/negotiation for several years.

Planning Policy Context – Emerging Position

3.8. Draft Policy SWDPR61 (Worcester City Allocations) allocates the entirety of the site's remaining undeveloped area for educational uses, to comprise a new secondary school, extending to approximately 9.16ha. The extent of the allocation is illustrated at Figure 3 below, and excludes the Perry Manor Care Home and the Blue Car Park. The background to this allocation is set out at Section 6 of this SoCG.

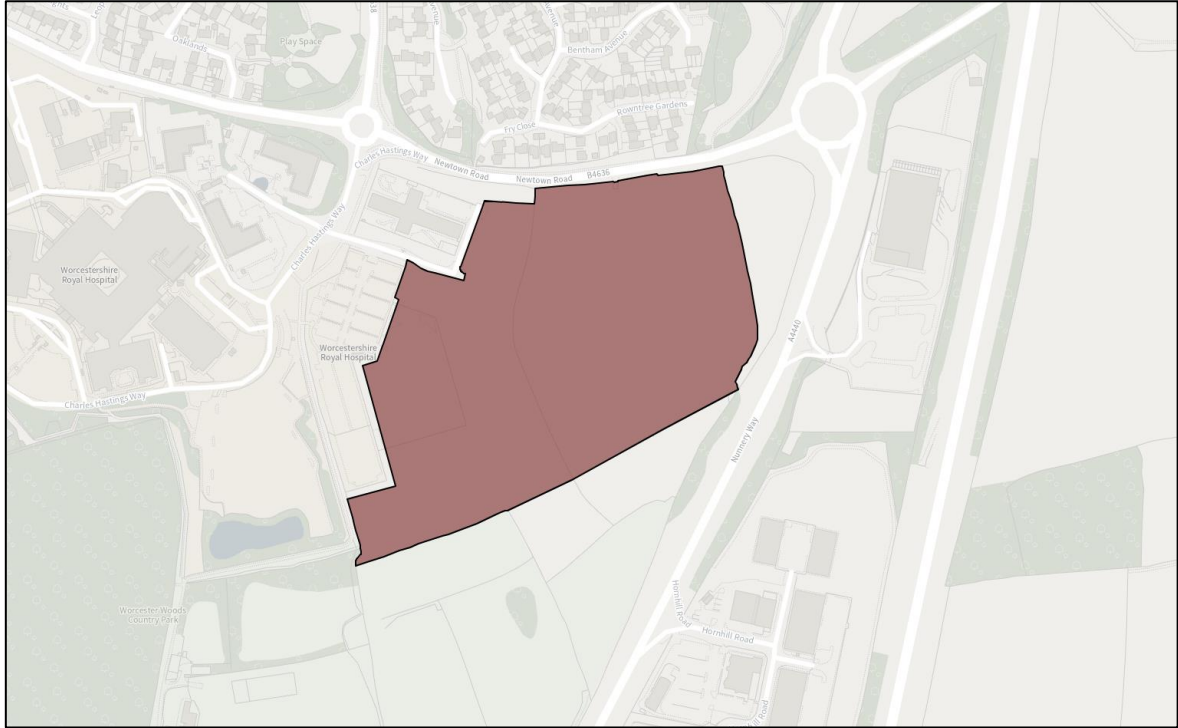


Figure 3: Draft Policy SWDP 61 Allocation (WCEMREAL01)

3.9. The SWDPR was submitted to the Secretary of State for independent examination in September 2023.

4. Duty to Cooperate

South Worcestershire Development Plan Review

- 4.1. The Development Plan for the SWCs currently comprises the South Worcestershire Development Plan (SWDP, adopted 2016), the Worcestershire Minerals Local Plan (2022) and the Worcestershire Waste Core Strategy (2012), together with made Neighbourhood Plans. The SWDP was prepared jointly by the three SWCs working together under plan making arrangements. On completion of the SWDP Review process, the SWDP will be replaced by the 'South Worcestershire Development Plan Review, 2021-2041' (SWDPR).
- 4.2. The SWDPR includes strategic and detailed policies, together with site allocations for the Plan period 2021 to 2041. The SWDPR was submitted to the Secretary of State for independent examination in September 2023.
- 4.3. There has been ongoing and active engagement between the SWCs, WCC and The Spetchley Estate throughout the SWDPR process and discussions have occurred at appropriate times during the SWDPR process.

- 4.4. As part of the development of various Development Plan Documents (DPDs) the SWCs have undertaken consultations on the following:

South Worcestershire Development Plan Review DPD

Consultation Stage	Consultation End Date
SWDPR Issues and Options Regulation 18 (I)	17 December 2018
SWDPR Preferred Options Regulation 18 (II)	16 December 2019
SWDPR Further Regulation 18 (III) Sustainability Appraisal Consultation	19 April 2021
SWDPR Publication (Regulation 19)	23 December 2022
Evidence Base³	Consultation End Date
Village Facilities and Rural Transport Proposed Methodology	2 July 2018
Call for Sites and Proposed SHELAA Methodology	2 July 2018
Sustainability Appraisal Scoping Report	3 July 2018
Development Boundaries Review Proposed Methodology	8 October 2018
Renewable and Low Carbon Energy Call for Sites	16 December 2019
Country Park Call for Sites	24 July 2020

Traveller and Travelling Showpeople Site Allocations DPD

Consultation Stage	Consultation End Date
Preferred Options	9 May 2016
Revised Preferred Options (I)	18 April 2018
Revised Preferred Options (II)	5 July 2021
Publication	13 December 2022

- 4.5. Duty to cooperate discussions will continue with WCC and The Spetchley Estate at appropriate times as the SWDPR progresses.

5. Context

Regulation 18 (Preferred Options) Consultation (Consultee ID: 1172494)

- 5.1 The SWCs undertook a Regulation 18 (Preferred Options) consultation in November and December 2019.

³ A full suite of evidence base documents has been produced and consulted on during each plan making consultation stage.

5.2 In their response to the Regulation 18 consultation (Appendix 1), WCC stated the following regarding school capacities and provision for the plan, as relates to Worcester City specifically:

5.3 **Worcester City:** *“There are 471 dwellings reallocated as part of this plan in Worcester City, along with new allocations for 828 dwellings. Much of the allocations are spread across the city and therefore local schools will be able to accommodate much of this proposed new housing.*

5.4 *However, proposed developments in the Dines Green Primary catchment area, as well as the 495 dwellings proposed as part of a mixed-use development at Navigation Road, will require contributions to provide additional accommodation to support new places in local schools.”*

5.5 **Middle and Secondary:** *“In response to the level of proposed housing as part of this plan, WCC will seek to increase middle and secondary school accommodation in all remaining planning areas not yet expanded to support the SWDP, the exception being Tenbury Wells which has sufficient existing accommodation to support the proposed level of housing within its catchment area. It will also be necessary to further invest in already expanded schools to meet the proposed level of housing across South Worcestershire, utilising developer contributions. However, many schools are reaching capacity in terms of expansions.*

5.6 *Therefore, we are also likely to require a new secondary school within South Worcestershire to meet the needs of families up to 2041. As part of this plan we will need to consider where land for a new secondary school can be acquired in or around Central and East Worcester City whether on an allocated site or nearby. This school will be required to support new housing across the districts as well as demographic increases and therefore will be required early in the plan. WCC will discuss the detailed timing for the new school in Worcester as the plan develops towards the submission consultation.”*

5.7 Following the consultation, WCC contacted the SWCs in January 2021 (having commenced work on the search for a new secondary school in 2019) requesting assistance with finding a suitable location for a new secondary school in Worcester City.

5.8 In dialogue with WCC, a shortlist of sites in Worcester were put forward and considered, but none were considered suitable, with the exception of land at Newtown Road, Worcester (SWDP 43/15, WCEMREAL01, CFS0703). Accordingly, the land at Newtown Road was put forward as a possible site, subject to engagement and agreement with The Spetchley Estate, as landowner.

5.9 Worcestershire County Council has subsequently liaised with the Spetchley Estate on this matter, in dialogue with the SWCs.

6. Key Strategic Matters

6.1. The following matters and issues have been identified in dialogue and in consultation between the SWCs, WCC and The Spetchley Estate.

'The Trustees of the 2002 Settlement' and 'The Trustees of the Berkeley Settlement' (The Spetchley Estate)

Regulation 19 – Publication (2022) (Consultee ID: 1231789)

6.2. In their representations to the Regulation 19 SWDPR public consultation (Publication, 2022) (Appendix 2), The Spetchley Estate raised objections to the following policies of the SWDP Review:

SWDPR 61: Worcester City Allocations - Land at Newtown Road, Worcester (SWDP 43/15, WCEMREAL01, CFS0703)

6.3. In their representations, The Spetchley Estate raised concerns that the proposed use of the site had changed from employment use in the Regulation 18 consultation to a new secondary school in the Regulation 19 consultation and that the change of use for the site was not properly communicated to them prior to the publication of the Regulation 19 consultation of the SWDPR.

6.4. The Spetchley Estate confirmed that it had been approached by WCC in relation to a new secondary school on part of the site (mainly east of the hedgerow). But there was no formal agreement for WCC to acquire the land.

6.5. Pending such an agreement, The Spetchley Estate's position is that it will seek to continue the allocation of the entire Newtown Road site for employment use.

Post Regulation 19

6.6. Following the Regulation 19 consultation, meetings between all parties were held on 19th May 2023 and 19th September 2023 to discuss the site. As a result of these meetings, an alternative land use approach has been put forward which incorporates both a new secondary school and land for employment use on the site. An indicative Allocation Plan is set out under Appendix 3. The indicative Allocation Plan proposes 5.5 hectares (13.6 acres) for employment use and 7.2 hectares (17.8 acres) for the new secondary school.

6.7. The employment allocation includes the hospital's Blue Car park to enable the comprehensive delivery of the site when the hospital lease expires. The Estate reserves the right to develop the remainder of the western field prior to the expiry of the Blue Car Park lease (subject to gaining planning permission).

6.8. Subject to The Spetchley Estate reaching an agreement to sell part of the site to WCC as a secondary school (subject to planning), all parties consider the indicative Allocation Plan to be the most suitable approach concerning land use allocations on the site as part of the SWDPR.

6.9. With respect to the remaining land to the west of this site, and having regard to minimising impact on surrounding uses, particularly the school and existing care home, it is proposed for the employment uses to be small scale industrial and logistics uses with ancillary offices/high technology uses to service Worcester and environs. It is envisaged that the allocation could deliver approximately 16,250 sq. m (175,000 sq. ft) of employment space on 5.5 hectares (13.6 acres).

Worcestershire County Council

Regulation 19 – Publication (2022) (Consultee ID: 1172494)

6.10. SWDPR 61: Worcester City Allocations - Land at Newtown Road, Worcester (SWDP 43/15, WCEMREAL01, CFS0703)

During the Regulation 19 consultation stage (Publication, 2022), WCC's response regarding education was focused on the Infrastructure Delivery Plan (IDP) rather than the SWDPR itself. In their response WCC did not directly refer to the provision of a new secondary school in Worcester City in their representations (Appendix 4) as table 8.1 of the IDP (page 102) already outlines a requirement for a new secondary school in relation to SWDPR 61: Worcester City Allocations.

6.11. As per paragraph 6.4 above, The Spetchley Estate has been approached by WCC in relation to a new secondary school on part of the site. Both parties are optimistic that the parties will reach an agreement to sell part of the site to WCC for use as a secondary school, subject to planning.

Post Regulation 19

6.12. Following the Regulation 19 consultation, meetings between all parties were held on 19th May 2023 and 19th September 2023 to discuss the site. WCC continued to express their support for a new secondary school at the Newtown Road site, but recognised that such a school would not need the entirety of the site, and it was The Spetchley Estate's preference to maintain an employment allocation on the western field.

SWCs Response:

6.13. The SWCs are supportive of the indicative Allocation Plan set out at Appendix 3 and the approach to provide both employment land and a new secondary school on land at Newtown Road, Worcester (SWDP 43/15, WCEMREAL01, CFS0703), subject to agreement by all parties.

Any issues relating to this matter can be considered further during the SWDP Review examination, should the Inspector deem it relevant to do so.

Concluding Remarks

6.14. It is considered that consultation and engagement with WCC and The Spetchley Estate has been progressed in a positive and progressive manner. Whilst this SoCG identifies outstanding areas where there remain some issues to be resolved between

the Parties, it is considered that any outstanding issues can be discussed through the Examination into the SWDPR, should the Inspector deem it relevant to do so.

7. Matters of Agreement

7.1 The matters of agreement between the SWCs, WCC and The Spetchley Estate are as follows:

7.2 The South Worcestershire Councils (Malvern Hills District Council, Wychavon District Council and Worcester City Council) have engaged with WCC and The Spetchley Estate and consulted them at the appropriate stages.

7.3 The extent of land subject of this SoCG relates to the site illustrated at Figure 1 of this document. The total site area is 12.7ha.

7.4 All parties are supportive of the indicative Allocation Plan set out at Appendix 3 and the approach to provide both employment land and a new secondary school on land at Newtown Road, Worcester (SWDP 43/15, WCEMREAL01, CFS0703), subject to The Spetchley Estate reaching an agreement to sell part of the site to WCC for use as a secondary school (subject to planning).

7.5 The parties will continue to work positively together on any issues of relevance relating to Land at Newtown Road, Worcester (SWDP 43/15, CFS0703, WCEMREAL01).

8 Matters of Disagreement

8.1 There are no matters of disagreement and/or matters to be resolved between the SWCs, WCC and The Spetchley Estate.

8.2 Any outstanding issues raised relating to land at Newtown Road, Worcester (SWDP 43/15, CFS0703, WCEMREAL01) can be considered further during the SWDP Review examination if the Inspector deems it relevant to do so.

9 Conclusions

9.1 The parties agree that:

- i) The South Worcestershire Councils (Malvern Hills District Council, Wychavon District Council and Worcester City Council) have engaged with WCC and The Spetchley Estate and consulted them at the appropriate stages.
- ii) All parties agree that the extent of land subject of this agreement relates to the land at Figure 1.



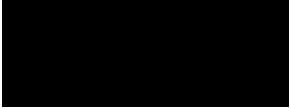
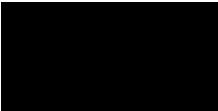
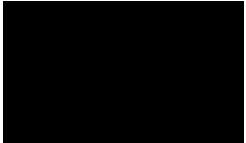
- iii) All parties are supportive of the indicative Allocation Plan set out at Appendix 3 and the approach to provide both employment land and a new secondary school on land at Newtown Road, Worcester (SWDP 43/15, WCEMREAL01, CFS0703), subject to The Spetchley Estate reaching an agreement to sell the eastern half of the site to WCC for use as a secondary school (subject to planning).
- iv) All parties will continue to work positively together on any issues of relevance relating to Land at Newtown Road, Worcester (SWDP 43/15, CFS0703, WCEMREAL01).

9.2 The parties are not in agreement and/or there are matters to be resolved on the following:

- i) Any outstanding issues raised relating to land at Newtown Road, Worcester (SWDP 43/15, WCEMREAL01, CFS0703) can be considered further during the SWDP Review examination if the Inspector deems it relevant to do so.

10 Signatories

10.1 This SoCG has been agreed and signed by the following:

<u>South Worcestershire Councils</u>	<u>Worcestershire County Council</u>	<u>Savills acting on behalf of The Spetchley Estate</u>
<p style="text-align: center;">Malvern Hills District Council and Wychavon District Council</p> <p>Name: Ian Macleod</p> <p>Position: Director of Planning & Infrastructure</p> <p>Date agreed: 18/04/2024</p> <p>Signature: </p>	<p>Name: Emily Barker</p> <p>Position: Head of Planning and Transport Planning</p> <p>Date agreed: 19/03/2024</p> <p>Signature: </p>	<p style="text-align: center;">Savills</p> <p>Name: Geraint Jones</p> <p>Position: Director</p> <p>Date agreed: 25/03/2024</p> <p>Signature: </p> <p>And,</p>
<p style="text-align: center;">Worcester City Council</p> <p>Name: Duncan Rudge</p> <p>Position: Head of Planning</p> <p>Date agreed: 08/04/2024</p> <p>Signature: </p>		<p style="text-align: center;">The Spetchley Estate</p> <p>Name: Henry Berkeley</p> <p>Position: Owner</p> <p>Date agreed: 25/03/2024</p> <p>Signature: </p>

Appendices

Appendix 1 (page 14) – Regulation 18 representations submitted by Worcestershire County Council.

Appendix 2 (page 72) – Regulation 19 representations submitted by Savills acting on behalf of ‘The Trustees of the 2002 Settlement’ (The Spetchley Estate).

Appendix 3 (page 102) – Indicative Allocation Plan of Land at Newtown Road, Worcester (SWDP 43/15, WCEMREAL01, CFS0703) produced by Savills, in agreement with all parties following discussions held on 19th May 2023 and 19th September 2023.

Appendix 4 (page 103) – Regulation 19 representations submitted by Worcestershire County Council.



16th December 2019

Fred Davies
 Planning Policy Manager
 Wychavon & Malvern District Councils
 Civic Centre
 Queen Elizabeth Drive
 Pershore

Dear Fred,

South Worcestershire Development Plan Review – Preferred Options Public Consultation

Worcestershire County Council (WCC) welcomes the opportunity to comment on the above consultation from the combined South Worcestershire Councils (SWCs) of Malvern Hills District Council (MHDC), Worcester City Council and Wychavon District Council (WDC).

Introduction

We are pleased to be able to respond to the above consultation and have undertaken extensive internal consultation to develop the combined response presented here which includes officer only comments from:

- Broadband and Mobile Telecoms
- Children's First on behalf of WCC for Education
- Green Infrastructure and Biodiversity
- Landscape and Visual Impact
- Minerals
- Place Partnership on behalf of WCC for Land Interests (separate document)
- Public Health
- Strategic Planning Team
- Sustainability
- Transport

We look forward to continuing to work together on the next stages of the South Worcestershire Development Plan Review (SWDPr). The response below is combined from all the services above and is written in the same order as the plan to help SWC in analysing the information. Comments on the infrastructure study and the viability appraisal are included at the end of the document.

Emily Barker
 Head of Planning and
 Regulation

County Hall
 Spetchley Road
 Worcester
 WR5 2NP

Introduction

The SWDP review should make clearer the relationship with other parts of the Development Plan. It sets out a section about its relationship with Neighbourhood Plans at paragraphs 2.7-2.8, but currently makes no reference in its introductory paragraphs to minerals and waste matters. We suggest the inclusion of the following text “minerals and waste infrastructure are an important part of South Worcestershire’s economy and are essential to support the growth of sustainable communities. These forms of development are county matters (Worcestershire County Council is the Mineral and Waste Planning Authority) and are subject to the policies set out in the Worcestershire Waste Core Strategy and Minerals Local Plan which, like the SWDP, form part of the Development Plan.”

Vision and Objectives

Vision

3.2 Suggested amendment from “improvement to walking and cycling” to “significant upgrade in walking and cycling infrastructure”. This illustrates improvement to walking and cycling is a behaviour change ambition which evidence shows is predominantly achievable through creating safer walking and cycling environments.

3.5 Suggested amendment from “range of housing types and tenures that help to meet the needs of young families.....etc ,” to “range of housing types and tenures that help to meet the needs of all, including young families.....etc ,”.

3.6 Suggest this paragraph needs an extra sentence to state that investment in a range of facilities and infrastructure has resulted in healthy behaviour change and excellent access to health promoting opportunities for residents and visitors. This is because we feel the plan should support healthier behaviour change by design and as such this should be referenced in the “Vision” recognising that just creating access does not mean it will be used, the design of the GI needs to be such that the easy access, attractive, sociable and timely design principles are applied.

Objectives

3.7 (2) Suggest adding community interest Companies and voluntary sector organisations to the list in this paragraph.

3.7 (6) Suggest adding the word “healthy “after “inclusive / sustainable”

3.7 (14) Suggested minor rewording by adding the word “measurable” after “delivering” and by adding “air quality” after “water quality,”.

3.7 (15) Suggested rewording by changing “plan for and promote healthy developments” to “plan for and design health promoting”.

3.7 (16) Suggested rewording by changing “To ensure that new development supports the delivery of healthcare provision and accessibility.” for “To ensure that new development supports the delivery of, and access to healthcare provision.”

Spatial context

Biodiversity Delivery Areas are areas where the Worcestershire Biodiversity Partnership and Local Nature Partnership believe the Worcestershire Biodiversity Action Plan can best be delivered in the short term; closer reference to BDAs as they are found within the SWDP area would be beneficial.

Employment Housing and Retail Requirements

Spatial Development Strategy and Settlement Hierarchy

Note: minor typographic error in Policy SWDPR2. B.

...and therefore appropriate, if they are for land that lies within a defined development boundary

Transport

We support the proposed policies and RJ. Request an addition, at 7.21, of biodiversity in the list of possible risks associated with environmental impacts of transport infrastructure. While appreciating this is not a comprehensive list, the fragmentation of the natural environment by highway and associated highway infrastructure (particularly street lighting) is a significant and growing issue which has been neither consistently or robustly considered through many historic development schemes. Recognition and Inclusion of biodiversity may help promote early consideration of appropriate design features in order to avoid and mitigate for unavoidable fragmentation effects in future development.

We welcome the location of the Strategic sites in close proximity to new or existing rail stations as these will significantly help with the sustainable credentials of the sites and increase residents travel choices which will be vital to transport planning moving forward. As part of this SWDP review there is a need to review and refresh the Worcester Transport Strategy to identify realistic alternative travel choices that deliver infrastructure and services to deliver modal shift away that will create essential capacity in the transport network to support growth. This refresh needs to consider tried and tested interventions. The following previously proposed measures should undergo thorough modelling to provide an evidenced based and deliverable Worcester Transport Strategy that is compliant with national planning policy:

- City Centre Transport Strategy
- Parking Strategy – The current lack of coordinated management of parking in the City will accelerate gridlock unless tackled. If managed correctly this can be delivered in a manner which has no detrimental impact on essential car parking income. This will require a comprehensive approach which includes on and off-street parking capacity in the City Centre, Residents Parking Zones and Park and Ride, ideally linked to current and proposed rail stations. The key aim of this should be to push commuter and long and medium stay visitor parking demand at the periphery of the city and transferring it onto a Park and Ride system, with short stay parking only retained in the City Centre to enhance access to services and encourage frequent turnover.
- Bus Priority Development Plan including identification of a suitable bus/rail/taxi/CT interchange arrangements in the City Centre, Hospital, University and County Hall, and through the use of advancing technology deliver systemic bus priority on a number of key corridors, linked to Park and Ride sites. Physical bus priority should not be necessary on most corridors if the parking strategy is suitably calibrated.
- Local Cycling and Walking Investment Plan
- The application of alternative strategies and policies to reduce travel demand, or to redistribute this demand.

Several of the smaller allocations are not located within areas that we consider to be sustainable from a transport perspective. We have highlighted these in our comments below. We suggest the suitability of sites should be scored using the Transport for New Homes checklist to define sustainable development.

Traffic Modelling

Initial traffic modelling has been undertaken which identifies significant impact on the South Worcestershire transport network if unmitigated. Further detailed modelling work will be required to identify the essential transport infrastructure requirements necessary to support these allocations and mitigate the significant impact these developments will have on the local network. This work will be undertaken between now and the pre-submission version.

7.1 Suggested amendment by changing “minimise pollution, congestion and maintain an effective highway” to “minimise pollution, congestion, improve health and maintain an effective highway”. This is designed to reinforce the health benefits effective transport infrastructure can have.

7.23 – There is no reference to urban locations? Are you adopting the parking standards within our adopted Streetscape Design Guide (SDG) for Urban Areas? When are they going to contact us about developing locally specific parking standards for rural areas.

SWDPR 3

Suggested amendments by changing, “Worcestershire Parkway Station - Parking Capacity and Platform Enhancements; iii. Pershore Railway Station Car Park; iv. Rushwick Railway Station and Car Park;” to:

“Worcestershire Parkway Station – Cycle and Car Parking Capacity and Platform Enhancements; iii. Pershore Railway Station Car Park and Cycle Parking; iv. Rushwick Railway Station and Car Park and Cycle Parking;”

7.7 Suggested minor amendment by changing, “congestion, accessibility and environmental quality.” to “congestion, accessibility, environmental and air quality.” Emphasises the need to consider air quality.

7.9 Suggested minor amendment by changing, “will have an even great impact on the area’s future” to “will have an even greater impact on the area’s future”.

Electric vehicle charging

While we support the increased provision for walking and cycling (including the provision for cycle storage), the provision for electric vehicle charging infrastructure could be made stronger in line with national policy to move towards a removal of new solely petrol and diesel vehicles from sale from 2040. The building regulations consultation indicates a move to increase standards by requiring the provision of cabling for EV charging. The Streetscape Design Guide strongly encourages the installation of electric vehicle chargepoints but doesn’t require them for domestic properties in the same way as the local development plan could. The guide doesn’t provide a specific requirement for the proportion of residential properties that should have electric vehicle charging points. Currently the charging requirement for commercial developments is set too high at 22kW when 7kW would be sufficient for staff parking for a day.

The Office of Low Emissions Vehicles (OLEV) now estimates that the cost of a wall mounted chargepoint is as low as £200-£500 which indicates the additional cost per property will be minimal. The consultation documents indicate an additional cost per parking space of £976 which is much lower than the cost to retrofit a chargepoint at a later date.

Green Infrastructure SWDPR4

Introduction

It is important to note that GI betterment is sought through all development. Suggested wording of the policy to be retained as is for in submission plan:

8.1

This policy seeks to provide multi-functional Green Infrastructure (GI) to support sustainable development throughout the plan area. It also seeks to protect **and enhance** existing GI that serves local communities in terms of their health and wellbeing.

8.2

We have no evidence to support the proposition that the percentage is an onerous burden on developers. Conversely, GI is shown to promote house prices and we are not aware of any appeals raised or won over the previous plan period based on SWDP5 GI percentage. We therefore maintain strong support for the percentages of GI proposed, concur that greater guidance would help inform the specificity and function of GI provision, and that landscape-and-catchment scale consideration of GI (with reference to 8.3) is entirely appropriate.

We support proposed wording with minor modifications proposed for consideration;

- A. Housing, employment and retail proposals (including mixed use schemes) are required to contribute towards the provision, maintenance, improvement and connectivity of **multi-functional** Green Infrastructure (GI) ⁽⁸⁾ as follows (subject to financial viability) ⁽⁹⁾
- B.i. The precise form and function(s) of GI will depend on the wider strategic green network, site characteristics, the local context and the Worcestershire GI Strategy's priorities. Developers should **agree** their proposals for GI with the local planning authority before submitting a planning application.

8.5

There are many advantages to be gained from securing a critical mass of GI in a locality – creating a wide range of benefits that **contribute in meeting the** individual site priorities **as listed at Environmental Character Area level within the** Worcestershire Green Infrastructure Partnership (2012) Worcestershire Green Infrastructure Strategy.

8.9

We strongly support this wording and would add that there is an additional benefit through accreditation of GI features using benchmarks such as Building with Nature as this recognizes the value of and promotes positive management of GI features beyond the scope of the planning processes so as to ensure GI features continue to perform for residents and communities sustainably into the future. While we understand that DEFRA continues to develop a national GI Standard we do not yet know the predicted publication date of this document and so the wording here (SWDPR4.E 'or other equivalent') remains appropriate.

Public health support the routine integration of green roofs and living walls as a long term public health benefit.

8.13

Further analysis and guidance will be produced by the GI Partnership as resources permit, in the interim I suggest a minor rewording here so that there is an expectation that development within those urban locales will be led by GI Concept Plans or Statements to be prepared by developers.

8.15

Does the green network require further explanation or spatial representation, or is this term well understood by the target audiences? For example, how does Worcester's Green Network (https://www.swdevelopmentplan.org/?page_id=3922) integrate with Wychavon's and Malvern Hill's Green Networks to form a plan wide Green Network as this doesn't appear to be spatially illustrated within the Interactive Policies Map.

While recognising that the plan should not be prescriptive on the content of future GI Concept Plans, it's unclear how developer's will recognize what matters a GI Concept Plan should include. Development of a template, technical guidance note, or SDP would be advisable in order to provide developer confidence and promote consistency.

In line with the multi-functional contributions which GI components can make we would encourage SWDPR4 to promote an expectation for inclusion of street trees and wildflower verges within the streetscene. Street trees help improve poor air quality, which can be exacerbated in urban areas particularly when vehicular activity is increased as a result of development; street trees provide shade which helps combat heat-island issues in built up areas (particularly with effects of climate change over the plan period and recognizing the climate emergency declared by SWDP authorities) and street trees help sequester carbon and reduce surface water flooding hotspots through point-source interception and attenuation within root networks. There are multiple design solutions enabling street tree planting in otherwise confined streetscenes, our recommendation is that the SWDPR promotes a "net gain of urban and semi-urban tree canopies" within the context of its strategic urban extension allocations. This can be achieved by creating comprehensive proposals for the inclusion of street trees within strategic allocations and should be analysed through GI Concept Plans which should be required to include consideration of street tree quanta and species selection. Tools such as the Worcester Woodland Guidelines, Landscape Character Assessment and iTree can assist in ensuring street tree selection mirrors the local landscape and species assemblages.

While street trees and wildflower verges are also promoted through Worcestershire County Council's Streetscape Design Guide, it should be noted that design features both within and outside of the adoptable highway boundaries can, if designed appropriately, contribute towards a development's GI apportionment. For example, vegetated surface water conveyance swales when co-located within an Active Travel Corridor will both protect foot/cyclepaths from flooding events (attenuating and purifying surface water discharges), provide landscape and biodiversity benefits and can constitute a natural capital asset.

However, design decisions require an understanding of GI multi-functionality or delivery can be undermined, for example street services may be co-located inside Active Travel Corridors and subsequently prevent deployment of street-trees. The Reasoned Justification text offers an opportunity to raise these issues at an early stage of development planning so that subsequent GI designs can evaluate and deliver meaningful GI benefits.

Natural capital refers to the stock of natural resources, such as water, air, soil and biodiversity, from which people can or do benefit. The protection and betterment of natural capital stocks is enshrined in the Government's 25-year Environmental Plan¹. The use of Natural Capital auditing can ensure decision-making affecting natural stock and services/benefits is mainstreamed into core budgeting and accounting, not an after-thought or outside core decision-making. The use natural capital accounting alongside an assessment of biodiversity net gain is considered important as biodiversity metrics alone do not necessarily involve any great gain or replacement of ecosystem services otherwise lost to development. With regards the strategic allocation sites proposed through the SWDPR, attention is drawn to the guidance provided by the Chartered Institute of Ecology and Environmental Management (<https://cieem.net/wp-content/uploads/2019/07/CIEEM-Natural-Capital-Briefing-for-Policy-Makers-July2019.pdf>) which suggests that:

“Aligned with public authorities’ existing duty to conserve biodiversity, and to help Local Planning Authorities meet their duties to consider effects on natural capital under Paragraphs 170b and 171 of the National Planning Policy Framework, Local Planning Authorities should require an assessment of natural capital/ecosystem services impact (both positive and negative) for major developments, policies, plans or programmes, such as those which require Environmental Impact Assessment (EIA) or Strategic Environmental Assessment (SEA)”.

8.16

Suggested addition to this RJ paragraph could be, “Green infrastructure sites such as country parks, picnic places, nature reserves and play areas should be managed to Green Flag standards. The Green Flag Award is an internationally recognised accreditation scheme that recognises well managed parks and greenspaces for being welcoming, health, safe and secure, clean and well maintained, managed well for biodiversity, landscape and heritage and encouraging community involvement.”

The reasoned justification supporting policy SWDPR 4 (Green Infrastructure) would benefit from highlighting to developers that when identifying the GI context, it will be relevant to take account of other existing and planned development, and that this may include the approved working and restoration schemes and aftercare of mineral sites and the GI priorities for mineral sites allocated in the Mineral Site Allocations DPD.

¹ <https://www.gov.uk/government/publications/25-year-environment-plan>

The scale and nature of mineral operation and the policy framework in the MLP mean that there is potential to create or enhance GI assets over the timescales of the SWDP, in some cases this might include the creation of sub-regional scale assets. In some cases, mineral development may be in an operational phase when housing or employment land applications are being considered, however the degree of certainty relating to an approved restoration scheme means that the greatest potential benefits can be gained from viewing these sites as part of a holistic GI network.

Historic Environment

SWDPR 5 and SWDPR 28

The wording of the new policies SWDPR 5 and SWDPR 28 is similar to that in the previous policies (SDWP6 and SDWP24), which has been found to work well and be legally sound. A few minor changes were needed, and have been made, following the 2018 update to NPPF. The historic environment policies sit well within the context of the inter-related themes in other policies, such as Green Infrastructure, Landscape and Tourism.

SWDPR 5 and SWDPR 28 could be stronger on defining the treatment of non-designated heritage assets and understanding their significance and setting. Paragraph 9.4 identifies that *“A number of representations made the point that more emphasis should be given to the importance of the setting of heritage assets, especially when considering applications for new development. This response tended to relate to multiple site-specific representations and that SWDP 6 criteria should be applied to allocating sites in the SWDPR. Finally, it was felt that stronger reference should be made to non-designated heritage assets and specifically to ancient and veteran trees.”* This needs to be addressed further and the wording on non-designated assets, and their setting, strengthened.

Infrastructure SWDP6

Education

This review proposes the delivery of 13,957 dwellings on top of the 28,400 proposed in the current plan. New housing inevitably leads to an increase in the 0-19-year-old population, with a consequential demand for additional school places for all types of education from early year's provision for children aged 2-4 to post-16 and specialist provision for children with special needs and disabilities.

This chapter considers the ability of the education infrastructure across the South Worcestershire District Councils to support housing allocations as proposed as part of the South Worcestershire Development Plan Review Consultation 2019 (SWDPr). Worcestershire Children First (WCF), acting on behalf of Worcestershire County Council

(WCC), has set out its response below regarding the impact of the proposals on education infrastructure, and where additional infrastructure is required to accommodate the proposed level of housing.

WCC as the Local Authority (LA) responsible for education has a statutory duty under the Education Act 1996 to ensure that there is a sufficiency of school places for all children of statutory school age living in Worcestershire and whose parents/carers wish for them to attend publicly-funded schools. In addition the 2006 Childcare Act outlined the responsibility of LAs in England to ensure families with children aged 3 and 4 are able to access 570 hours of funded childcare per year, over no fewer than 38 weeks of the year until the child reaches compulsory school age. In 2013, this was extended to eligible families from the term following the child's second birthday. From September 2017, the free early education entitlement was doubled for eligible families with children aged 3 and 4 to equal a total of 1,140 hours per year, over a minimum of 38 weeks of the year, known as '30 hours' entitlement.

The proposed site allocations as part of this review have been analysed against existing school infrastructure to ensure families can access school places and support all children to have the best start in life. The assessment has been undertaken in line with Government Policy and the Worcestershire Education Planning Obligations Policy, updated in 2019².

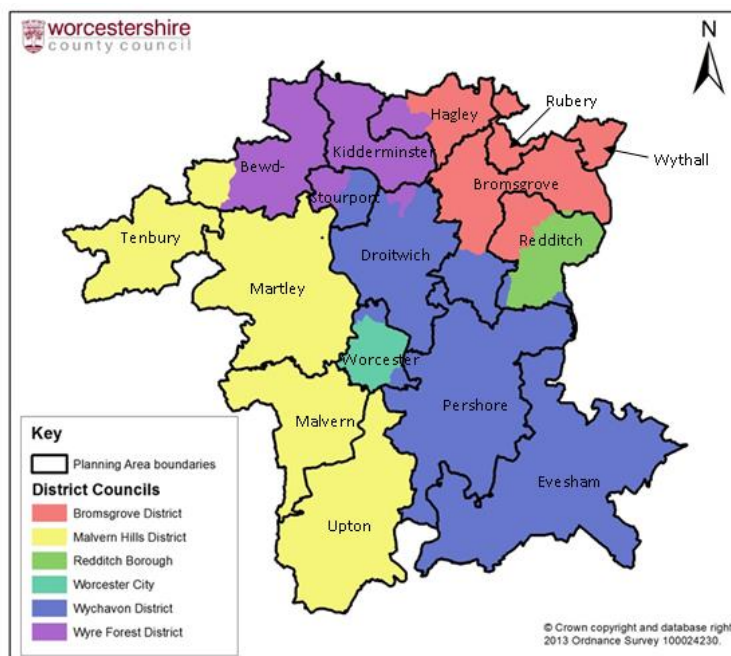
Education in South Worcestershire

The provision of education in South Worcestershire is arranged in both two-tier and three-tier Education Planning Areas (EPAs) shown in Figure 1 below. Schools in Malvern Hills and Worcester City operate on two-tier provision, with most schools in Wychavon operating a three-tier dynamic, transferring to middle school at years 4 (Droitwich and Pershore) or 5 (Evesham) and transferring to high school in years 8 (Pershore) or 9 (Droitwich and Evesham).

² Available at:

http://www.worcestershire.gov.uk/info/20015/planning_policy_and_strategy/142/school_planning_obligations

Figure 1: Education Planning Areas as they relate to District Council Areas



The majority of primary and first schools in South Worcestershire are small rural schools, many of which have less than 30 places per year group. In contrast, primary and first schools within urban areas operate to higher numbers. Rural housing allocations can be crucial for small village schools to bolster numbers and support their sustainability, however, in areas which have already experienced new housing in recent years, schools may be at capacity and unable to expand further due to land and building constraints. This is particularly the case for some category 1 and 2 villages which are served by a single school. There are 9 middle schools and 14 secondary and high Schools in South Worcestershire. Over the last 5 years WCC has invested over £20million in the expansion of 6 secondary and high schools in 4 strategic areas in response to growth through, financed through WCC budgets and section106 contributions.

Infrastructure impact of proposed housing allocations

WCF expects, where possible, to mitigate some of the planned growth by utilising spare education infrastructure capacity, however this is not always possible and where existing schools are unable to support the proposed level of housing in the area, additional infrastructure will be required, where this is the case it is outlined below and summarised in table 1-3. Extensions and alterations to schools have a shorter lead in time and a lower cost compared to a new school. Overall therefore, extensions and alterations provide better value for public funding. However, where extensions or alterations are not possible or appropriate,

there may be a need to build a new school, particularly on large housing sites to provide on-site provision.

The school landscape has changed significantly following alterations in national education policy. Academies³ and free schools⁴ receive public funding but are independent of the LA. As at 1st November 2019, there were 61 academies, 2 free schools and 73 maintained schools in South Worcestershire. Under current legislation there is a national presumption that any new school will be a free school. This does not preclude the need for developer contributions and the Department for Education (DFE) issued guidance in April 2019 to help local authorities secure appropriate developer contributions for education.

These changes to school organisation have changed the role of the LA from being a direct provider of school places to one of commissioner. Additional school places to support population growth from all sources, including housing development, must be negotiated with new and existing providers to ensure there is a sufficiency of overall provision. WCF will always seek to provide additional accommodation within local schools, however this is not always possible and any change to schools is subject to consultation and approval from a number of bodies which can include the Academy Trust, Diocese, the Education and Skills Funding Agency (ESFA) and the Regional Schools Commissioner (RSC). LAs do not have power to compel academies or free schools to provide additional places.

The education infrastructure requirements outlined below have been developed based on the expected number of dwellings proposed on site allocations that form the SWDPr. Any changes to housing numbers will result in a change in the advice and recommendations outlined below.

The proposed strategic growth areas of Parkway and Throckmorton have been considered separately.

First and Primary Schools

Rural impact

Rural housing allocations can be beneficial to small village schools to bolster numbers and support their sustainability, therefore the majority of the rural allocations proposed in this plan will support and maintain pupil numbers in a number of schools, however many schools are at capacity and additional infrastructure will be required.

³ Academies are state-funded schools that are run by a governing body and are independent of the local council.

⁴ Free schools are state funded schools that can be run by charities, universities, independent schools, community groups, teachers, parents, businesses and are independent of the local council.

The rural impact has been considered as of the time of writing in November 2019. This will be subject to change as the plan develops as primary and first school forecasts only look forward for four years. This rural section considers areas where proposed allocations will cause WCF will need to consider an expansion or new setting. All other minimal impact sites are included in tables 1 and 2 below.

Wychbold

This plan proposes an additional 39 dwellings within Wychbold. This village is served by a single first school, Wychbold First and Nursery School, which is currently at capacity with existing local pressure for places. There are no alternative schools within 2 miles walking distance of the site proposed. Despite the relatively low numbers proposed here, any additional housing within this area will exaggerate issues for the school. Therefore, as part of this plan, WCC would require land to be allocated either adjacent to the existing school site and contributions to allow the school to expand to 1 form of entry⁵ (FE), or sufficient land for a new first school in the area to allow the school to expand to support additional housing.

Broadway

The relatively large numbers of new and reallocated dwellings proposed within Broadway will put additional pressure on the two existing schools in this area above which they can currently support. The area is currently served by Broadway First School and St Mary's Catholic Primary Broadway. New housing of the scale proposed will require additional accommodation to be created through the expansion at one of these schools. Both schools will be offered this opportunity at the appropriate time. Developer contributions from the allocations in this area towards this expansion will be required.

Offenham

There is a total of 98 dwellings to be reallocated and newly proposed as part of this review within Offenham. The area is served by a single school, Offenham C.E. First School which is currently full or almost full in all year groups. Therefore, additional accommodation will be required at the school to support any additional housing and developer contributions will be required to support this.

Mitton

The allocation of 1000 dwellings at Mitton is within the education planning area of Evesham which operates a three-tier education structure. However, the proposal is to function as an urban expansion of Tewkesbury, which is operating a two-tier education structure. Tewkesbury High is located less than 1.5 miles from the development and is situated

⁵ Form of entry refers to the number of full classes (30 pupils) that can be admitted per year group.

outside the Worcestershire boundary. This compares to the Middle and High schools in Worcestershire serving this area located 9 miles and 14 miles from the proposal respectively. A development of 1000 dwelling in this location will require the provision of a new primary school up to year 6 to allow children to feed into Tewkesbury High. We will therefore require a land allocation and contributions towards the creation of a new 2FE primary school to serve this development, as well as contributions towards the expansion of Tewkesbury High.

Powick

There are 84 dwellings proposed as part of this plan within the catchment area of Powick CE Primary. The school currently has a Published Admission Number (PAN) of 28 and is full or almost full in all year groups. Over the time of this plan we will seek to provide additional accommodation at the school to support them to take class sizes of 30 in response to new housing in the area.

Rushwick

Rushwick CE Primary School has recently been expanded from 20 to 30 places per year group and as such can support a low level of additional housing within the area as proposed for site SWDPREALLOCATED69. The strategic allocation of 1000 dwellings will require the provision of a new 2FE primary school on the development site. The delivery of a second school for this area would create choice for families and ensure children can access a local school through to 2041. In addition, the existing school site cannot expand further and a 4FE primary school is not appropriate in this location and is a difficult size to manage

Great Witley and Broadheath

The proposed allocations within Great Witley and Broadheath will put pressure on the two schools currently serving these areas – Great Witley C.E. Primary and Broadheath C.E. Primary. Both schools are currently functioning at capacity and cannot support any further housing in the area, therefore it will be necessary to provide additional school capacity to support the allocated housing proposed.

Upton-upon-Severn and Welland

Both Upton-upon-Severn CE Primary and Welland Primary schools in the Upton education planning area are currently at capacity and WCC is currently undergoing investment at Welland Primary to support additional accommodation and support existing growth in the area. Any additional housing will have a major impact on these schools and further accommodation paid for via contributions will be required. However, due to site constraints it may not be possible to do so in local schools and families wishing to move onto the currently proposed level of additional housing as part of this review may be required to access provision in alternative schools.

Urban allocations

Droitwich

There are 46 dwellings reallocated as part of this plan in Droitwich town, along with a new allocation for 730 dwellings, including the major allocations of 600 dwellings to the South East of the town and 112 in the North of the town. Both major allocations are within the catchment area of St Peter's Droitwich C.E. Academy which is currently full or almost full in all year groups. This will represent a major impact on demand for places at the school which already operates to 90 pupils per year group. Therefore, as part of this plan we would require a land allocation appropriate for a 2FE primary school on the proposed development at Union Lane as well as proportional financial contributions towards the creation of a new school. Information on requirements for new schools are outlined in Table 6

Evesham

The allocation of 213 dwellings in addition to the 366 reallocated for Evesham urban area will require additional accommodation to support housing. Due to the varied location of these allocations this will be managed through expansion of existing schools rather than the creation of a new school for the town. Contributions on a cost per pupil place will be required.

Pershore

There are 52 dwellings reallocated as part of this plan in Pershore town, along with new allocations for 714 dwellings, the majority of which are located to the south of the town. This represents a major impact on existing schools and therefore as part of this plan we would require contributions and a land allocation appropriate for a 2FE First School on one of the proposed sites to the south of the town.

Malvern

Much of the reallocation of 1276 dwellings as part of this plan has been mitigated for through planned and completed school expansions in and around the town of Malvern, which will also support the new allocations in the North of the town. In response to new proposal dwellings to the South and East of the town, additional accommodation and contributions will be required to expand existing schools once it is clear when these dwellings will be built.

Tenbury

Tenbury is served by a single primary school, Tenbury C.E. Primary Academy which is currently full in several year groups. As the area is served by a single school, the ability to adapt to further demand is limited and new housing will put pressure on places at the

school. We would therefore seek contributions to expand a local school places in response to new housing by 2041.

Worcester City

There are 471 dwellings reallocated as part of this plan in Worcester City, along with new allocations for 828 dwellings. Much of the allocations are spread across the city and therefore local schools will be able to accommodate much of this proposed new housing. However, proposed developments in the Dines Green Primary catchment area, as well as the 495 dwellings proposed as part of a mixed-use development at Navigation Road, will require contributions to provide additional accommodation to support new places in local schools.

Middle and Secondary

In response to the level of proposed housing as part of this plan, WCC will seek to increase middle and secondary school accommodation in all remaining planning areas not yet expanded to support the SWDP, the exception being Tenbury Wells which has sufficient existing accommodation to support the proposed level of housing within its catchment area. It will also be necessary to further invest in already expanded schools to meet the proposed level of housing across South Worcestershire, utilising developer contributions. However, many schools are reaching capacity in terms of expansions.

Therefore, we are also likely to require a new secondary school within South Worcestershire to meet the needs of families up to 2041. As part of this plan we will need to consider where land for a new secondary school can be acquired in or around Central and East Worcester City whether on an allocated site or nearby. This school will be required to support new housing across the districts as well as demographic increases and therefore will be required early in the plan. WCC will discuss the detailed timing for the new school in Worcester as the plan develops towards the submission consultation.

Infrastructure requirements to meet proposed housing allocations

Table 1: Malvern Hills infrastructure requirements to meet housing allocations

Location	EPA	Sites (Excludes sole employment sites)	Total Dwellings	Primary and Nursery School requirements	Secondary School requirements
Bayton	Bewdley	SWDPREALLOCA TED65	Reallocated: 5 New: 0 Total: 5	None	None
Clows Top	Bewdley	SWDPREALLOCA TED67	Reallocated: 17 New: 0 Total: 17		
Callow End	Malvern	SWDPREALLOCA TED66	Reallocated: 15 New: 0	None	None

			Total: 15		
Leigh Sinton	Malvern	SWDPNEW104	Reallocated: 0 New: 52 Total: 52	None	None
Powick inc Colletts Green	Malvern	SWDPREALLOCA TED68 SWDPNEW101 SWDPNEW102	Reallocated: 49 New: 35 Total: 84	Existing school expansion	Existing school expansions
Rushwick	Malvern	SWDPREALLOCA TED69	Reallocated: 96 New: 0 Total: 96	None	
Rushwick SGA	Malvern	Strategic Allocation	Reallocated: 0 New: 1000 Total: 1000	New 2FE Primary School	
Malvern Town allocations	Malvern	SWDPREALLOCA TED46 SWDPREALLOCA TED47 SWDPREALLOCA TED48 SWDPREALLOCA TED49 SWDPREALLOCA TED50 SWDPREALLOCA TED51 SWDPREALLOCA TED70 SWDPREALLOCA TED71 SWDPNEW89 SWDPNEW90 SWDPNEW91 SWDPNEW92	Reallocated: 1276 New: 778 Total: 2054	Existing school expansions	
Abberley Common	Martley	SWDPREALLOCA TED56 SWDPREALLOCA TED57 SWDPREALLOCA TED58 SWDPNEW100	Reallocated: 46 New: 18 Total: 64	None	None
Clifton-upon- Teme	Martley	SWDPREALLOCA TED59 SWDPNEW94	Reallocated: 30 New: 36 Total: 66	None	
Great Witley	Martley	SWDPNEW95	Reallocated: 0 New: 44 Total: 44	Existing school expansion	
Hallow	Martley	SWDPREALLOCA TED60 SWDPNEW96	Reallocated: 30 New: 49 Total: 79	None	

Lower Broadheath	Martley	SWDPREALLOCA TED62 SWDPREALLOCA TED63 SWDPNEW97	Reallocated: 48 New: 12 Total: 60	Existing school expansion	New 7FE Secondary school in Worcester South East
Martley	Martley	SWDPNEW98	Reallocated: 0 New: 71 Total: 71	None	
Hanley Swan	Upton	SWDPREALLOCA TED61	Reallocated: 16 New: 0 Total: 16	None	
Upton upon Severn	Upton	SWDPREALLOCA TED55 SWDPNEW103	Reallocated: 70 New: 50 Total: 120	Existing school expansion	
Welland	Upton	SWDPREALLOCA TED64 SWDPNEW99	Reallocated: 14 New: 36 Total: 50		
Tenbury Wells	Tenbury	SWDPREALLOCA TED52 SWDPREALLOCA TED53 SWDPREALLOCA TED54 SWDPNEW93	Reallocated: 119 New: 61 Total: 180	Existing school expansion	

Table 2: Wychavon infrastructure requirements to meet housing allocations

Location	EPA	Sites (Excludes sole employment sites)	Total Dwellings	First and Nursery School requirements	Middle and High School requirement
Ombersley	Droitwich	SWDPREALLOCA TE34 SWDPREALLOCA TE35 SWDPNEW37	Reallocated: 55 New: 28 Total: 83	None	Existing Middle and High school expansions
Tibberton	Droitwich	SWDPNEW56 SWDPNEW57	Reallocated: 0 New: 44 Total: 44	None	
Wychbold	Droitwich	SWDPNEW41 SWDPNEW42	Reallocated: 0 New: 29 Total: 29	Existing school expansion	
Droitwich Town allocation	Droitwich	SWDPREALLOCA TE22 SWDPREALLOCA TE23 SWDPREALLOCA TE24 SWDPREALLOCA TE25 SWDPREALLOCA TE26 SWDPNEW11 SWDPNEW12 SWDPNEW13 SWDPNEW14	Reallocated: 126 New: 730 Total: 856	New 2FE First School	

Ashton Under Hill	Evesham	SWDPREALLOCA TE36 SWDPREALLOCA TE37	Reallocated: 20 New: 0 Total: 20	None	Existing Middle and High school expansions
Broadway	Evesham	SWDPREALLOCA TE32 SWDPNEW27	Reallocated: 100 New: 62 Total: 162	Existing school expansion	
Crothorne	Evesham	SWDPNEW47 SWDPNEW48	Reallocated: 0 New: 36 Total: 36	None	
Eckington	Evesham	SWDPREALLOCA TE38	Reallocated: 25 New: 0 Total: 25	None	
Conderton	Evesham	SWDPREALLOCA TE42	Reallocated: 6 New: 0 Total: 6	None	
Kemerton	Evesham	SWDPREALLOCA TE43	Reallocated: 9 New: 0 Total: 9	None	
Overbury	Evesham	SWDPREALLOCA TE39	Reallocated: 8 New: 0 Total: 8	None	
Sedgeberrow	Evesham	SWDPREALLOCA TE40 SWDPNEW62	Reallocated: 20 New: 29 Total: 49	None	
Badsey	Evesham	SWDPNEW25 SWDPNEW26	Reallocated: 0 New: 59 Total: 59	None	
Bretforton	Evesham	SWDPNEW43 SWDPNEW44	Reallocated: 0 New: 45 Total: 45	None	
Cleeve Prior	Evesham	SWDPNEW46	Reallocated: 0 New: 5 Total: 5	None	
South Littleton	Evesham	SWDPNEW55	Reallocated: 0 New: 11 Total: 11	None	
North and Middle Littleton	Evesham	SWDPNEW59 SWDPNEW60	Reallocated: 0 New: 34 Total: 34	None	
Offenham	Evesham	SWDPREALLOCA TE33 SWDPNEW34 SWDPNEW35 SWDPNEW36	Reallocated: 19 New: 79 Total: 98	Existing school expansions	
Church Lench	Evesham	SWDPNEW45	Reallocated: 0 New: 19 Total: 19	None	
Evesham Town allocations	Evesham	SWDPREALLOCA TE27 SWDPREALLOCA TE28 SWDPREALLOCA TE29	Reallocated: 365 New: 213 Total: 578	Existing School expansions	

		SWDPREALLOCA TE30 SWDPREALLOCA TE31 SWDPNEW15 SWDPNEW16 SWDPNEW17 SWDPNEW18 SWDPNEW19			
Adjoining Tewksebury (Mitton)	Tewkesbu ry	SWDPNEWEDGE 3	Reallocated: 0 New: 1000 Total: 1000	New 2FE Primary school	Existing School Expansion
Defford	Pershore	SWDPNEW50 SWDPNEW51	Reallocated: 0 New: 16 Total: 16	None	Existing High School Expansion
Drakes Broughton	Pershore	SWDPNEW28	Reallocated:0 New: 12 Total: 12	None	
Norton Juxta Kempsey	Pershore	SWDPNEW61	Reallocated:0 New: 10 Total: 10	None	
Crowle and Crowle Green	Pershore	SWDPNEW49	Reallocated:0 New: 40 Total: 40	None	
Flyford Flavell	Pershore	SWDPNEW58	Reallocated: 0 New: 12 Total: 12	None	
Hill and Moor	Pershore	SWDPNEW53	Reallocated: 0 New: 32 Total: 32	None	
Himbleton	Pershore	SWDPNEW52	Reallocated: 0 New: 10 Total: 10	None	
Inkberrow	Pershore	SWDPNEW32 SWDPNEW33	Reallocated: 0 New: 80 Total: 80	None	
Pinvin	Pershore	SWDPNEW54	Reallocated: 0 New: 23 Total: 23	None	
Upton Snodsbury	Pershore	SWDPREALLOCA TE41 SWDPNEW38 SWDPNEW39 SWDPNEW40	Reallocated: 16 New: 56 Total: 72	None	
Pershore Town allocations	Pershore	SWDPREALLOCA TE19 SWDPREALLOCA TE20 SWDPREALLOCA TE21 SWDPNEW20 SWDPNEW21 SWDPNEW22 SWDPNEW23 SWDPNEW24	Reallocated: 52 New: 662 Total: 714	New 2FE First School	

		SWDPNEW115			
Hartlebury	Stourport	SWDPNEW30 SWDPNEW31	Reallocated: 0 New: 59 Total: 59	None	N/A

Table 3: Worcester infrastructure requirements to meet housing allocations

Location	EPA	Sites (Excludes sole employment sites)	Total Dwellings	Primary and Nursery School requirements	Secondary School requirements
Fernhill Heath	Worcester	SWDPNEW15	Reallocated: 0 New: 40 Total: 40	None	New 7FE Secondary School in Worcester South East
Adjoining Worcester City (North)	Worcester	SWDPNEWEDGE1 SWDPNEWEDGE2	Reallocated: 0 New: 101 Total: 101		
Worcester City allocations	Worcester	SWDPPREALLOCATE 1 SWDPPREALLOCATE 2 SWDPPREALLOCATE 3 SWDPPREALLOCATE 4 SWDPPREALLOCATE 5 SWDPPREALLOCATE 6 SWDPPREALLOCATE 7 SWDPPREALLOCATE 8 SWDPPREALLOCATE 9 SWDPPREALLOCATE 10 SWDPPREALLOCATE 11 SWDPPREALLOCATE 12 SWDPPREALLOCATE 13 SWDPPREALLOCATE 14 SWDPPREALLOCATE 15 SWDP 43/aa* SWDP NEW 1 SWDP NEW 2 SWDP NEW 3 SWDP NEW 4 SWDP NEW 5 SWDP NEW 6 SWDP NEW 7	Reallocated: 571 New: 828 Total: 1,399	Existing school expansions	

		SWDP NEW 8 SWDP NEW 9			
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Education requirements on Strategic Growth Areas

Due to the location of the Strategic Growth Areas of Throckmorton and Parkway, it will not be possible to expand existing schools to meet the needs and families and demand will need to be met entirely within new provision.

New schools are an important community component of Garden Villages, and in April 2019, the Department for Education published the guidance note “Education provision in Garden Communities”⁶ to address queries frequently raised by local planning authorities and their delivery partners involved in delivering the Garden Villages and Garden Towns as part of the government’s Garden Communities programme. This guidance has been considered to support the below requirements for education on Strategic Growth Areas.

In large scale housing developments, we see very early engagement from young families looking to move onto the development and requiring childcare and school places. National and Worcestershire evidence shows that the demand for places in new settlements will be high, and we would therefore expect the early delivery of new schools particularly given the new settlement status of these locations which do not have any other provision in the vicinity. We will discuss this matter with the developer, but it is expected a primary school to be delivered alongside occupation of the first dwellings. The DfE states that “Early provision is usually critical in providing core social infrastructure to help a new community thrive, improve social integration and support the creation of sustainable travel patterns and a healthy environment. There is also strong evidence that early provision of key infrastructure such as a new primary school will impact positively on scheme viability and generate faster sales rates and higher values; developers therefore often welcome it. This in turn can significantly speed up the delivery of new housing.”

It is recommended that schools to be delivered as a result of new housing are set up under the Free School presumption route⁷ as per the guidance 2019, which is led by the LA identifying the needs for a new school and requesting academy proposals. The minimum duration for a presumption school from the time of the announcement that the school is going ahead to completion is 14 months, therefore early engagement will be crucial to ensure schools are delivered at the appropriate time. This time also does not include land acquisition, build time etc.

⁶https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/793682/Education_provision_in_garden_communities.pdf

⁷https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/844346/Free_school_presumption_051119.pdf

Early Years

Evidence clearly shows new build developments attract a higher percentage of families than the general housing stock, particularly those with young children. Across new build developments in Worcestershire, we see an average of 28 0-3-year olds (pre-school age) children per 100 dwellings living on new housing developments.

Sufficient nursery provision to support 2-4-year olds is required on all new build developments to support the Government agenda to support families back to work and allow the best start for young children. Nurseries will be provided on all new build primary schools and space within community hubs and commercial areas are required to support private providers to offer a full range of childcare provision including facilities for children 0-1.

Other types of childcare such as breakfast clubs, afterschool clubs and holiday clubs are also necessary to support parents returning to work. Within existing localities these facilities are offered by both schools and private providers and we will be aiming to ensure that the infrastructure is provided to allow private operators and schools to offer this facility to parents.

Primary and Secondary Schools

The average number of primary age children seeking a mainstream school place on new developments is 35 per 100 dwellings (5 per year group). This figure is slightly lower for secondary age children where a higher percentage will access independent provision, at 20 children per 100 dwellings (4 per year group). This is evidenced by previous new build sites but is subject to variation. In addition, WCC will therefore aim to maintain a 5% surplus in any given area to ensure we are able to meet needs of new families.

As far as possible, new schools on developments should be provided early on to ensure families moving onto the site in the early stages are able to access school places. This is particularly important for Garden Villages which should be self-sufficient and are unlikely to be connected to alternative schools within suitable walking distance.

New schools must be underwritten by the LA to safeguard their sustainability in the initial years of the school. The requirement for early delivery of schools due to the nature of these developments will therefore put strain on the LA and a phased opening of early schools will be considered.

Schools should be located within residential areas and spread across the site to appropriately suit families across the allocation. Schools should be co-located with

community centres and easily accessed via suitable walking and cycle routes in order to support sustainable transport solutions to and from schools. Appropriate parking should be provided as per school building standards Building Bulletin103⁸.

Post-16 Provision

Across Worcestershire, 50% of 16-year olds choose to remain at school to access sixth-form provision, and therefore all secondary schools to be built on strategic growth areas will need to be built with sufficient capacity to support sixth form demand.

Remaining 16-18-year olds access further education in further education colleges or through apprenticeships. It is strongly encouraged that the development creates links with local colleges to provide a range of apprenticeships for young people during construction of the development, and within the commercial facilities on site. Consideration should also be given to offer early engagement with further education providers to offer post-16 and adult learning opportunities within local centres, and around railway links which provides a unique opportunity for links to existing further education providers in Evesham, Worcester city and beyond.

Special Educational Needs and Disability Places

At present, 3% of all pupils in reception to year 11 in Worcestershire have an Education and Health Care Plan (EHCP) to support them to access education with special needs or disabilities. Therefore, all new schools will be built to appropriate accessibility standards and sufficient facilities will be provided to support a range of needs across the site. We will seek to provide a range of specialist provision within mainstream schools for those children who would benefit from integrating within mainstream schools, and where required, new special schools will be delivered to support children who require a specialist school environment.

Education infrastructure requirements for Parkway SGA

This plan has proposed the allocation of 5000 dwellings as part of the Strategic Growth Area of Parkway up to 2041, which intention to create a further 5000 dwellings beyond 2041 as part of the creation of a new Garden Village. The following schools and education establishments will be required for 5000 dwellings at this location:

- Sufficient provision for day nursery places commensurate with the size of the development proposed, 3-4 large school nurseries (52 full time equivalent places), 6 pre-schools, and 20 childminders. This is based on the current childcare structure

⁸https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/324056/BB103_Area_Guidelines_for_Mainstream_Schools_CORRECTED_25_06_14.pdf

available to parents in Worcestershire at present. Delivery of this will be subject to discussion and other education infrastructure. A similar childcare market will be required for the second 5000 dwelling phase of the development.

- 4 primary schools: 1 X 3 form of entry primary school (capacity of 630) plus 3 X 2 form of entry primary schools (capacity of 420 each. The delivery of the site requirements through 4 primary school is preferable as this would allow for greater variation in delivery, greater parental choice, shorter walking distances and flexibility to expand an existing school if required to respond to flexible internal need, however this will be subject to the intended delivery of dwellings on the site. The same number of places will be required for the second 5000 dwelling phase of the development.
- 1 secondary school with sixth form with final capacity for 7 forms of entry (210 pupils per year group). The same provision will be required for the second 5000 dwelling phase of the development.
- Special school provision will be built onto mainstream schools and for those pupils requiring a special school environment, a new special school will be delivered on phase two of this development beyond 2041.

Table 4: Types and size of school(s) required at Parkway

	Phase 1 (5000 Dwellings)	Phase 2 (Further 5000 Dwellings)
Primary	Either: 1 X 3FE + 3 X 2FE primary schools with nursery provision. Accessible and with SEND provision on site OR: 3X3FE primary schools with nursery provision. Accessible and with SEND provision on site	Either: 1 X 3FE + 3 X 2FE primary schools with nursery provision. Accessible and with SEND provision on site OR: 3X3FE primary schools with nursery provision. Accessible and with SEND provision on site
Secondary	1 X 7FE secondary school with sixth form provision through phased build with SEND provision on site	1 X 7FE secondary school with sixth form provision through phased build with SEND provision on site
SEND		1 X special school

Education infrastructure for Throckmorton SGA

A new settlement at Throckmorton has been considered as part of this proposal for 2000 dwellings to be delivered up to 2041, with a further 4000 dwellings intended beyond the plan period. The intention of this settlement is to be relatively self-contained. An aspect that will be crucial for families on the site seeking school places as there are currently no

existing schools within 2 miles of the proposal. The following schools and education establishments will be required for 2000 dwellings at this location:

- 3 average sized day nurseries, 2 school nurseries, 2 pre-schools, and 8 childminders, based on the current childcare structure available to parents in Worcestershire at present.
- 1 X 2FE primary school plus 1 X all-through school to provide 2FE at Primary level and 4FE at Secondary level to support a total of 105 primary places and 85 secondary school places per year group required for the first 2000 dwellings
- An all-through school rather than a secondary or high school has been proposed as the secondary pupil yield for 2,000 dwellings will not be sufficient to sustain a standalone secondary/high school. Yet secondary provision on this site will need to be delivered relatively early on in order to ensure families can access places without having to use the external road infrastructure. All-through schools are able to provide sustainable secondary education on a smaller scale and support the needs of families moving onto the initial proposal for 2000 dwellings.
- A small secondary school will then be required as part of the further 4000 dwellings proposed, in addition, a further 2 X 2FE primary schools and 1 X 3FE primary schools will be required past 2041 with post-16 and nursery provision also required.

Table 5: Types and size of school(s) required at Throckmorton

	Phase 1	Phase 2
Primary	1X 2FE Primary School with nursery provision	2 X 2FE + 1 X 3FE primary schools with nursery provision.
Secondary	1X 2FE/4FE All through School with nursery provision Both schools to be fully accessible with SEND provision on site	1 X 6FE secondary school with sixth form

Cost and delivery of education provision across the plan

In accordance with SWDPR 6 planning obligations will be required to fund education infrastructure projects that are directly related to the specific development. This is in line with the Worcestershire Education Policy 2019, where developments will be expected to fund education infrastructure when required as a result of new housing. Where new schools are required, land and construction costs will be required to support the delivery of the school. Contributions sought to deliver new schools will be based on a proportionate cost based on the anticipated pupil yield of the development. Where a school expansion is required, a calculation based on cost per pupil place based on the number of dwellings on site is required. In many instances the actual cost of implementing the required infrastructure changes will be greater than those outlined below as new schools and

expansions will be undertaken to support class sizes of 30 where possible. Moreover, the below cost per pupil place is based on an average, and some school expansion projects and new schools will represent a far greater cost to account for site specific needs.

Where new schools are required, land suitable to support the school will need to be safeguarded on allocated sites. Any land allocated for a school must be appropriate and fit for purpose. Issues which will need to be assessed include: ground conditions; topography; contamination; flood risks and the proximity of incompatible land uses. Land should be transferred fully serviced and fit for use at nil cost with appropriate access for construction.

We will aim to work with stakeholders in developing concept plans, masterplans and design codes, all of which are a useful means of establishing and communicating aspirations on design quality to ensure design cohesion. WCF are open to developers who wish to deliver new schools themselves, and will require close oversight to meet the design and build requirements of new Worcestershire schools

The DfE has recently launched a pilot initiative to support developers in delivering schools early on in the development by providing capital loans to help overcome barriers such as cash flow⁹ as referenced in the existing SWDPr 10.13.

New schools and school expansions will need to take into account expected pupil yield requiring specialist facilities. This has been taken into account in the contribution estimates outlined in Tables 7- 11.

Table 6: Land and cost of delivering new infrastructure as at 1st April 2019

	Recommended site size	Estimated cost*
2FE Primary and Nursery	2.02ha	£8,291,760
2FE First School and Nursery	1.27ha	£5,668,990 - £7,277,480
3FE Primary and Nursery	2.9ha	£10,862,781
7FE Secondary with sixth form	9.37ha	£34,271,664
2FE/4FE All through school	6.9ha	£25,291,500
SEND (120 place high need)	2.07ha	Subject to feasibility
Cost per mainstream pupil place for first and primary expansions		£17,008
Cost per mainstream pupil place for middle school expansions (Dependent on age range)		£17,008-£23,302
Cost per mainstream pupil place for secondary / high expansions:		£23,302
SEND places will be calculated at 4 times the cost of a place appropriate for the phase of education as per government guidance		

⁹ <https://www.gov.uk/government/publications/developer-loans-for-schools-apply-for-a-loan/developer-loans-for-schools-pilot-information-web-version>

Table 7: Malvern Hills infrastructure contribution requirements

			Total	Primary and early years contribution required	Secondary contribution sought	Total
Bayton	Bewdley	SWDPREALLOCATE65	5	£-	£-	£-
Clows Top	Bewdley	SWDPREALLOCATE67	17	£-	£-	£-
Callow End	Malvern	SWDPREALLOCATE66	15	£-	£93,208	£93,208
Leigh Sinton	Malvern	SWDPNEW104	52	£-	£302,926	£302,926
Powick inc Colletts Green	Malvern	SWDPREALLOCATE68	49	£408,192	£279,624	£687,816
		SWDPNEW101	20	£170,080	£116,510	£286,590
		SWDPNEW102	15	£136,064	£93,208	£229,272
Rushwick	Malvern	SWDPREALLOCATE69	96	£-	£629,154	£629,154
Rushwick SGA	Malvern	Strategic Allocation	1000	£6,909,800	£6,081,822	£ 12,991,622
Malvern Town allocations	Malvern	SWDPREALLOCATE46	59	£-	£326,228	£326,228
		SWDPREALLOCATE47	15	£-	£93,208	£93,208
		SWDPREALLOCATE48	20	£-	£116,510	£116,510
		SWDPREALLOCATE49	21	£-	£139,812	£139,812
		SWDPREALLOCATE50	33	£-	£186,416	£186,416
		SWDPREALLOCATE51	28	£238,112	£163,114	£401,226
		SWDPREALLOCATE70	300	Already being provided for	Already being provided for	£-
		SWDPREALLOCATE71	800	Already being provided for	Already being provided for	£-
		SWDPNEW89	180	£1,530,720	£1,071,892	£2,602,612
		SWDPNEW90	400	£-	£2,470,012	£2,470,012
SWDPNEW91	18	£153,072	£116,510	£269,582		
SWDPNEW92	180	£1,530,720	£1,071,892	£2,602,612		
Abberley Common	Martley	SWDPREALLOCATE56	6	£-	£-	£-
		SWDPREALLOCATE57	15	£-	£-	£-
		SWDPREALLOCATE58	25	£-	£-	£-
		SWDPNEW100	18	£-	£-	£-
Clifton-upon-Teme	Martley	SWDPREALLOCATE59	30	£-	£-	£-
		SWDPNEW94	36	£-	£-	£-
Great Witley	Martley	SWDPNEW95	44	£357,168	£-	£357,168
Hallow	Martley	SWDPREALLOCATE60	30	£-	£-	£-

		SWDPNEW96	49	£-	£-	£-
Lower Broadheath	Martley	SWDPREALLOCATE62	6	£-	£-	£-
		SWDPREALLOCATE63	42	£340,160	£-	£340,160
		SWDPNEW97	12	£119,056	£-	£119,056
Martley	Martley	SWDPNEW98	71	£-	£-	£-
Hanley Swan	Upton	SWDPREALLOCATE61	16	£-	£ 93,208	£ 93,208
Upton upon Severn	Upton	SWDPREALLOCATE55	70	£612,288	£489,342	£1,101,630
		SWDPNEW103	50	£ 459,216	£279,624	£738,840
Welland	Upton	SWDPREALLOCATE64	14	£119,056	£93,208	£212,264
		SWDPNEW99	36	£ 289,136	£209,718	£498,854
Tenbury Wells	Tenbury	SWDPREALLOCATE52	40	£323,152	£-	£323,152
		SWDPREALLOCATE53	44	£357,168	£-	£357,168
		SWDPREALLOCATE54	35	£289,136	£-	£289,136
		SWDPNEW93	61	£544,256		£544,256.00
Total Malvern Hills				£14,886,552	£14,517,146	£29,403,698

Table 8: Wychavon infrastructure contribution requirements

			Total	Primary and early years contribution sought	Middle catchment	Secondary contribution sought	Total
Ombersley	Droitwich	SWDPREALLOCATE34	30	£-	£120,930	£116,510	£ 237,440
		SWDPREALLOCATE35	25	£-	£ 97,628	£ 93,208	£ 190,836
		SWDPNEW37	28	£-	£120,930	£116,510	£ 237,440
Tibberton	Droitwich	SWDPNEW56	18	£-	£ 80,620	£ 69,906	£ 150,526
		SWDPNEW57	26	£-	£120,930	£116,510	£ 237,440
Wychbold	Droitwich	SWDPNEW41	24	£ 153,072	£ 97,628	£ 93,208	£ 343,908
		SWDPNEW42	5	£-	£-	£ -	£ -
Droitwich Town allocation	Droitwich	SWDPREALLOCATE22	10	£ 85,040	£ 40,310	£ 46,604	£ 171,954
		SWDPREALLOCATE23	6	£-	£-	£ -	£ -
		SWDPREALLOCATE24	20	£-	£ 80,620	£ 93,208	£ 173,828
		SWDPREALLOCATE25	10	£-	£ 40,310	£ 46,604	£ 86,914
		SWDPREALLOCATE26	80	£561,264	£ 299,178	£302,926	£ 1,163,368
		SWDPNEW11	9	£-	£-	£ -	£ -
		SWDPNEW12	112	£ 765,360	£ 396,806	£512,644	£ 1,674,810
		SWDPNEW13	9	£-	£-	£ -	£ -
	Evesham	SWDPREALLOCATE36	6	£-	£-	£ -	£ -

Ashton Under Hill		SWDPREALLOCATE37	14	£-	£ 63,612	£ 69,906	£ 133,518
Broadway	Evesham	SWDPREALLOCATE32	100	£ 765,360	£ 271,456	£372,832	£ 1,409,648
		SWDPNEW27	62	£ 510,240	£ 184,542	£233,020	£ 927,802
Crothorne	Evesham	SWDPNEW47	23	£-	£ 80,620	£ 93,208	£ 173,828
		SWDPNEW48	13	£-	£ 63,612	£ 69,906	£ 133,518
Eckington	Evesham	SWDPREALLOCATE38	25	£-	£ 80,620	£ 93,208	£ 173,828
Conderton	Evesham	SWDPREALLOCATE42	6	£-	£-	£ -	£ -
Kemerton	Evesham	SWDPREALLOCATE43	9	£-	£-	£ -	£ -
Overbury	Evesham	SWDPREALLOCATE39	8	£-	£-	£ -	£ -
Sedgeberrow	Evesham	SWDPREALLOCATE40	20	£-	£ 63,612	£ 93,208	£ 156,820
		SWDPNEW62	29	£-	£103,922	£116,510	£ 220,432
Badsey	Evesham	SWDPNEW25	32	£-	£-	£ -	£ -
		SWDPNEW26	27	£-	£-	£ -	£ -
Bretforton	Evesham	SWDPNEW43	8	£-	£-	£ -	£ -
		SWDPNEW44	37	£-	£-	£ -	£ -
Cleeve Prior	Evesham	SWDPNEW46	5	£-	£-	£ -	£ -
South Littleton	Evesham	SWDPNEW55	11	£-	£-	£ -	£ -
North and Middle Littleton	Evesham	SWDPNEW59	17	£-	£-	£ -	£ -
		SWDPNEW60	17	£-	£-	£ -	£ -
Offenham	Evesham	SWDPREALLOCATE33	19	£ 153,072	£-	£ -	£ 153,072
		SWDPNEW34	10	£ 85,040	£-	£ -	£ 85,040
		SWDPNEW35	32	£ 238,112	£-	£ -	£ 238,112
		SWDPNEW36	37	£ 289,136	£-	£ -	£ 289,136
Church Lench	Evesham	SWDPNEW45	19	£-	£ 63,612	£ 93,208	£ 156,820
Evesham Town allocations	Evesham	SWDPREALLOCATE27	100	£ 765,360	£-	£ -	£ 765,360
		SWDPREALLOCATE28	36	£ 255,120	£-	£ -	£ 255,120
		SWDPREALLOCATE29	15	£ 119,056	£-	£ -	£ 119,056
		SWDPREALLOCATE30	14	£ 119,056	£-	£ -	£ 119,056
		SWDPREALLOCATE31	200	£ 1,513,712	£ 542,912	£838,872	£ 2,895,496
		SWDPNEW15	61	£ 493,232	£-	£ -	£ 493,232
		SWDPNEW16	7	£-	£-	£ -	£ -
		SWDPNEW17	50	£ 357,168	£-	£ -	£ 357,168
		SWDPNEW18	25	£187,088	£ 80,620	£ 93,208	£ 360,916
SWDPNEW19	70	£ 561,264	£ 207,844	£256,322	£1,025,430		
Adjoining Tewkesbury (Milton)	Evesham	SWDPNEWEDGE3	1000	£6,909,800	£ 2,973,428	£ 4,101,152	£13,984,380
Defford	Pershore	SWDPNEW50	8	£-	£-	£ -	£ -

		SWDPNEW51	8	£-	£-	£ -	£ -
Drakes Broughton	Pershore	SWDPNEW28	12	£-	£-	£ 69,906	£ 69,906
Norton Juxta Kempsey	Pershore	SWDPNEW61	10	£-	£-	£ 46,604	£ 46,604
Crowle and Crowle Green	Pershore	SWDPNEW49	40	£-	£-	£186,416	£ 186,416
Flyford Flavell	Pershore	SWDPNEW58	12	£-	£-	£ 69,906	£ 69,906
Hill and Moor	Pershore	SWDPNEW53	32	£-	£-	£163,114	£ 163,114
Himbleton	Pershore	SWDPNEW52	10	£-	£-	£ 46,604	£ 46,604
Inkberrow	Pershore	SWDPNEW32	23	£-	£-	£116,510	£ 116,510
		SWDPNEW33	57	£-	£-	£279,624	£ 279,624
Pinvin	Pershore	SWDPNEW54	23	£-	£-	£116,510	£ 116,510
Upton Snodsbury	Pershore	SWDPREALLOCATE41	16	£-	£-	£ 93,208	£ 93,208
		SWDPNEW38	14	£-	£-	£ 69,906	£ 69,906
		SWDPNEW39	24	£-	£-	£116,510	£ 116,510
		SWDPNEW40	18	£-	£-	£ 93,208	£ 93,208
Pershore Town allocations	Pershore	SWDPREALLOCATE19	20	£136,064	£-	£ 93,208	£ 229,272
		SWDPREALLOCATE20	13	£102,048	£-	£ 69,906	£ 171,954
		SWDPREALLOCATE21	19	£136,064	£-	£ 93,208	£ 229,272
		SWDPNEW20	72	£510,240	£-	£326,228	£ 836,468
		SWDPNEW21	28	£187,088	£-	£139,812	£ 326,900
		SWDPNEW22	75	£544,256	£-	£349,530	£ 893,786
		SWDPNEW23	19	£136,064	£-	£ 93,208	£ 229,272
		SWDPNEW24	18	£119,056	£-	£ 93,208	£ 212,264
Hartlebury	Stourport	SWDPNEW30	52	£-	£-	0	£ -
		SWDPNEW31	7	£-	£-	0	£ -
Total Wychavon				£23,628,664	£ 8,604,240	£15,658,944	£47,891,848

Table 9: Worcester and adjacent infrastructure contribution requirements

			Total	Primary and early years contribution sought	Secondary contribution sought	Total
Fernhill Heath	Worcester	SWDPNEW29	40	£-	£233,020	£ 233,020
Adjoining Worcester City (North)	Worcester	SWDPNEWEDGE1	74	£-	£512,644	£ 512,644
		SWDPNEWEDGE2	27	£-	£163,114	£ 163,114
	Worcester	SWDPPREALLOCATE 1	40	£-	£233,020	£ 233,020

Worcester City allocations	SWDPPREALLOCATE 2	52	£-	£302,926	£ 302,926
	SWDPPREALLOCATE 3	33	£-	£186,416	£ 186,416
	SWDPPREALLOCATE 4	12	£-	£ 69,906	£ 69,906
	SWDPPREALLOCATE 5	45	£-	£256,322	£ 256,322
	SWDPPREALLOCATE 6	15	£-	£ 93,208	£ 93,208
	SWDPPREALLOCATE 7	15	£-	£ 93,208	£ 93,208
	SWDPPREALLOCATE 8	10	£-	£ 69,906	£ 69,906
	SWDPPREALLOCATE 9	13	£ 119,056	£ 93,208	£ 212,264
	SWDPPREALLOCATE 10	30	£-	£186,416	£ 186,416
	SWDPPREALLOCATE 11	12	£-	£ 69,906	£ 69,906
	SWDPPREALLOCATE 12	10	£-	£ 69,906	£ 69,906
	SWDPPREALLOCATE 13	25	£-	£139,812	£ 139,812
	SWDPPREALLOCATE 14	21	£-	£139,812	£ 139,812
	SWDPPREALLOCATE 15	18	£-	£116,510	£ 116,510
	SWDP 43/aa*	100	£-	£652,456	£ 652,456
	SWDP NEW 1	6	£-	£ -	£-
	SWDP NEW 2	5	£-	£ -	£-
	SWDP NEW 3	105	£ 884,416	£675,758	£ 1,560,174
	SWDP NEW 4	39	£-	£233,020	£ 233,020
	SWDP NEW 5	60	£-	£326,228	£ 326,228
SWDP NEW 6	60	£-	£326,228	£ 326,228	
SWDP NEW 7	43	£-	£256,322	£256,322	
SWDP NEW 8	15	£-	£ 93,208	£ 93,208	
SWDP NEW 9	495	£ 4,149,952	£ 3,075,864	£ 7,225,816	
Total			£5,153,424	£ 8,668,344	£ 13,821,768

Table 10: Strategic Growth sites estimated infrastructure costs

	Total	Primary and early years costs	Secondary/all-through contribution costs	Total
Parkway	5000	£35,738,061	£34,271,664	£70,009,725
Throckmorton	2000	£8,291,760	£25,291,449	£33,583,259
Total		£44,029,821	£59,563,113	£103,592,934

Table 11: Total education costs of plan to 2041

	Total	Primary and early years costs	Secondary/Middle/ All-through contribution costs	Total
Malvern Hills	4,073	£14,886,552	£14,517,146	£29,403,698
Worcester City	1,420	£ 5,153,424	£ 8,668,344	£13,821,768
Wychavon	4,256	£23,628,664	£24,263,184	£47,891,848
SGA	7,000	£44,029,821	£59,563,113	£103,592,934
		£87,698,461	£107,011,787	£194,710,248

Health and Wellbeing

SWDPR7

Support SWDPR7, suggested rewording:

B.vii: **multifunctional** Green Infrastructure

Support RJ 11.16 and 11.17 and fully agree that GI features such as hedgerows, street trees, green roofs and green walls have been shown to address both water quality and air quality issues as often associated with traffic emissions. Believe this supports need to highlight early and positive engagement for multi-functional GI design as per earlier street scene comments provided under SWDPR4.

Suggested minor amendment by changing “iii. including appropriately sized and equipped play areas:” to “iii. including appropriately located, sized and equipped play areas;”

Change made due to some play areas being located near busy junctions in the past thus increasing children’s exposure to air pollution and increasing the safety risk.

SWDPR 7 (Bii) – WCC support the policy “Dementia Friendly Design” but will need to explore exactly what this means for highways and planning in the future.

Suggested amendment by changing,

“v. A permeable environment that promotes active travel, such as walking and cycling, linking to local centres, schools and community facilities, to help reduce car dependency, and to facilitate community interaction;”

to:

“v. A permeable environment that prioritises and designs active travel routes for e.g. walking and cycling, that link to local centres, schools and community facilities on continuous routes, to help reduce car dependency, and to facilitate community interaction;”

More robust requirement to create safer routes which are a known barrier to active travel choices.

11.11 Suggested amendment to delete the words “despite the increased associated costs of longer life expectancies.” The aim is to improve health therefore mitigating costs through increasing longer healthy life expectancy for all, so people live a greater proportion of their lives in good health and so reduce health inequalities.

11.16 Suggested addition to the paragraph after the first sentence the proper positioning of areas for play and recreation can reduce exposure to air pollution and should be a material consideration when designing community facilities (schools, nurseries, care homes etc).

This recognises the need to consider outdoor spaces and their location to air pollution sources (roads, buildings etc)

Evidence: <https://www.nice.org.uk/guidance/ng70/chapter/Recommendations#planning>

11.17 Suggested rewording from:

“Any new and improved health services and facilities should be in locations where they can be easily accessed using public transport, walking and cycling.”

To:

“Any new and improved health services and facilities should be in locations where they can be easily and safely accessed using public transport and active transport e.g. walking, cycling and mobility devices.

Economic Growth

Providing the Right Land and Buildings for Jobs

The Waste Core Strategy's safeguarding policy, WCS 16, concerns 'New development proposed on or near to existing waste management facilities' and states that, subject to various tests, *“Existing waste management facilities will be safeguarded from non-waste-related uses”*. It is important that any new housing (or other land uses which would introduce sensitive receptors) within or adjacent to waste management sites will not compromise the ability of those sites to operate. This is in line with paragraph 182 of the NPPF, which states that *“Where the operation of an existing business or community facility*

could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed". We are encouraged to see that this issue is addressed in SWDPR8 however a cross-reference to the WCS 16 and WCS web tool would improve clarity.

Many waste management operations are located on employment land, either as *sui generis* or B2/B8 uses. These industry sectors formed part of the employment land assessment in the EDNA. However, it would appear that Policy SWDPR 8 as currently drafted would not support *sui generis* employment on strategic employment sites or in other locations where premises are over 500m³ and paragraph 12.23 states that "Strategic employment sites where the change of use of premises from B1, B2 and B8 to other uses will be resisted". Many waste operations are high-tech facilities which play an important role in the circular economy and would be in keeping with other employment land uses. We request that changes are made in the policy and reasoned justification to clarify that a change of use from B2/B8 to a *sui generis* waste use would not be resisted where this operation would otherwise be compatible with the employment land allocation. We would welcome the opportunity to cooperate with you further in relation to this matter to ensure that delivery of the WCS is not compromised, and we would hope to reach agreement with you on this strategic matter prior to submission of the SWDP review for examination.

12.34 Suggested minor amendment from:

"alternatives to car use such as public transport are readily available."

To:

"alternatives to car use such as public transport and cycling are readily available."

SWDPR10

Suggested amendment from

"iii Access by all travel modes and particularly bus, cycle and walking is convenient and safe, taking into account any improvements provided or secured by the development."

To

"iii Access by all travel modes and particularly bus, cycle and walking is convenient, easy, attractive and safe, taking into account any improvements provided or secured by the development."

Evidence suggests the more attractive and easy the active travel is to use the more frequently it will be used especially for the older generation.

Smaller Scale Retail Facilities

Suggested amendment to section iv from

“iv. The creation of new, or extensions to existing garden centres of farm shops in the open countryside will only be permitted if the proposed development is ancillary to, and on the site of, an existing horticultural business or existing farming operation.”

To:

“iv. The creation of new, or extensions to existing garden centres of farm shops in the open countryside will only be permitted if the proposed development is ancillary to, and on the site of, an existing horticultural business or existing farming operation and includes secure accessible cycle parking close to the entrance door of the farm shop or garden centre.”

Housing

Introduction of term net environmental gain here for what appears to be the first time within the plan document. It's unclear why the term is introduced here rather than, for example, measurable biodiversity net gain. Does this risk inconsistencies between policies or is there a specific rationale for the broader terminology? Would Natural Capital (with existing measures and freely available auditing toolkits) be more appropriate?

We support wording of SWDPR12.E.v. however where significant receptors occur adjacent to and would be adversely impacted by an allocated site, it is strongly recommended that policy wording provides sufficient flexibility to require a reduction in overall density where redistribution of density fails to prevent an unacceptable adverse environmental impact.

It should be noted that development of isolated homes in the countryside or significant extensions to curtilage in these areas have the potential to sterilise large areas of mineral resource around them, therefore Paragraph 13.116 and Policy SWDPR 24 would benefit from reference to the need to consider Mineral Consultation Areas as set out in the adopted Minerals Local Plan. This should also be added to footnote 90 attached to policy SWDPR 48.

13.4

This paragraph would benefit from closer cross-referencing to the benefits of well-planned multi-functional green infrastructure in delivering protection and enhancement of natural and historic environment. Thinking beyond the 'edges' of development: GI-led development proposals can help encourage developments to preserve sensitive local

receptors and ensure proposals enhance the wider area. The direction set in this paragraph is particularly helpful given that not inconsiderable damage to local environmental receptors is caused through cumulative and indirect impacts post-construction, such as trampling and enrichment from increased recreational footfall and unwanted light pollution. These effects may be felt most strongly at development edges and buffers and we therefore commend the plan for acknowledging and addressing this.

SWDPR 11

SWDPR 11 (c) – Employment use needs to be small and not attract trips from outside the local community or should be ancillary to dwelling

C

vi.

Suggested amendment sentence to read, “All units have to full fibre to the premises broadband infrastructure or equivalent gigabit capable infrastructure.”

vii.

Suggested amendment end of sentence to read, “i.e. meeting rooms, communication room and basic office services.”

Market housing needs

SWDPR 12 (E) – This will need to align with the parking policy within WCC adopted Streetscape Design Guide.

Residential space and access standards

SWDPR16 and SWDPR22

Rural exception sites

Although clearly to be read ‘in the round’; noting the concerns raised previously regarding development outside a settlement’s Development Boundaries (as recognised in section 6.10), for developments coming forward under policy SWDPR18 it would be beneficial to provide a list within the RJ of other key SWDPR policies for cross-compliance and conformity.

Replacement dwellings in open countryside

13.108

We recommend that compliance with SWDPR26 is also included within this section as “measurable net gain for biodiversity” can be secured through proportional and often minor gains in rural replacement dwellings. Cumulatively, across the plan area and plan period these will contribute significantly towards the plan’s objectives of delivering net gain for biodiversity.

Reuse of rural buildings

The wording of SWDPR23 appears to be in non-compliance with NPPF with regards adherence with the mitigation hierarchy for protected habitats and species. We strongly recommend further consideration of wording at A.v directing that any adverse impact on local biodiversity is 'significantly mitigated'. Where significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts) adequately mitigated or, as a last resort, compensated for, then planning permission should be refused (NPPF 175.a.). Additionally, planning policies and decisions should contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity (NPPF 170.d.).

Suggested rewording:

SWDPR23.A.v. There will be no adverse effect on the historical **and natural** environment, the character of the landscape and its setting, and that **any** measurable net gains for **impact on** local biodiversity, including protected habitats and species, **must can** be demonstrated; **significantly mitigated;**

SWDPR 23 (A) – There may not be genuine transport choices available in some of these areas and therefore we may not be able to support.

Extensions to residential curtilage

As with earlier comments, NPPF encourages plans and policies to secure measurable net gain for biodiversity (170.d. and 174.b.) and in this regard the requirement in SWDPR24 for 'no detrimental impact on existing ecology' appears to fall short of delivering measurable net gain. Suggested rewording:

- iv. There is no detrimental impact on existing heritage, ~~ecology~~, and landscape features **and measurable net gain for biodiversity is demonstrated**

14 Environmental enhancement and protection

Design.

Many of these design matters are also addressed within good design principles for green infrastructure and it is suggested that the wording is introduced for consistency and cohesion between SWDPR4 and SWDPR25 to ensure that the benefits from emerging GI standards and existing GI benchmark can be applied here too. For example, encouraging introduction of street trees will contribute in provision of shade, connectivity and soft-landscaping if selection and aftercare complies with existing standards set out in the Streetscape Design Guide and Tree and Design Action Groups Species Selection for Green Infrastructure.

SWDPR 25 includes:

“viii. Appropriate Facilities

Development should incorporate parking facilities, storage for bicycles and make accommodation for waste collection facilities. Satisfactory access and provision for the parking and manoeuvring of vehicles, including waste collection vehicles should be provided.”

We consider that the current SWDP waste policy to be more effective and more consistent with WCS17 and National Policy as it promotes and enables the treatment of waste at the highest level of the waste management hierarchy: “Proposals for new development should incorporate adequate facilities into the design to allow occupiers to separate and store waste for recycling and recovery unless existing provision is adequate.” We suggest that this could usefully be reinstated in part viii, and strengthened in paragraph 14.19, but would welcome further discussion on the changes proposed to ensure there is no conflict with or unnecessary repetition of the Waste Core Strategy.

The current SWDP (page 172) states that “To sustain economic growth without increasing the use of land-won aggregates, it is vital that the contribution of secondary and recycled materials used in construction projects is increased. On site recycling and reuse of construction materials will therefore be encouraged, having regard to the environmental implications of any proposed operations and their overall acceptability. The use of substitute or secondary and recycled materials in development will also be encouraged.” We would encourage the retention of this paragraph to support part vii of policy SWDPR 25 and suggest that it is an appropriate consideration in relation to the design of development.

Biodiversity and geodiversity

Lighting

As an overall comment many of the developments proposed within the SWDP could potentially locate buildings and street lighting near light intolerant wildlife we would recommend adherence with adherence with NPPG guidance (<https://www.gov.uk/guidance/light-pollution>) on light pollution should be required as a minimum, with GI masterplans directed to prepare lighting strategies capable of demonstrating consideration of ecological receptors from the outset. Closer cross-reference to SWDPR26.D.iv and section 14.34 would be helpful in this regard.

It is widely acknowledged that the climate and biodiversity emergencies are inextricably entwined, the commitments for net biodiversity gain through SWDPR26 will contribute

towards the climate change emergency response which the South Worcester Planning Authorities have adopted and are fully supported.

Some minor modification of wording is suggested for consideration:

14.31

~~There is an expectation that the~~ Opportunities exists ~~and there is an expectation that to~~ build biodiversity net gain ~~will be built into any~~ development.

This aligns more closely with SWDPR26.A.

14.33

Development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists (NPPF 175.c.) in this regard policy SWDPR26.D.ii appears sound while RJ 14.33 doesn't appear to expand on or further clarify the text; it is suggested that further detail on what a 'suitable compensation strategy' might entail (for example referencing the Woodland Trust's 'Ancient Trees and Development') and establishing what level of 'wholly exceptional' reasons should be provided, for example NPPF footnote indicates a Nationally Significant Infrastructure Project.

General comments

We support this policy and believe it is in compliance with NPPF, sound and deliverable. However, how the Planning Authorities intend to measure net gain, particularly for development schemes where application of a biodiversity metric poses difficulties, is not yet clear. Similarly, it remains unclear what % of biodiversity gain would be considered 'sufficient', and in what form.

Aligned with targets established by Lichfield District Council and the emerging Tunbridge Wells Borough Council, we recommend that a minimum of 20% biodiversity net gain is established unless a different threshold is mandated by national legislation or assessments revealed this was unviable.

For national parity we commend use of the DEFRA biodiversity metric 2.0 or its successor but acknowledge there is considerable scope for both localised modifications to the metric (including connectivity indices based on local ecological networks) and which may also reflect more closely the biodiversity priorities established by Worcestershire's Local Nature Partnership. Furthermore, clear direction will be required to secure biodiversity net gain cumulatively from otherwise small-scale 'low biodiversity impact' schemes where application of a biodiversity metric might otherwise be inappropriate. Regardless of mechanisms selected by SWDPR LPAs to realise biodiversity net gain we would urge that, in line with SWDPR4, private gardens should not be included within a development's biodiversity net gain calculation, and that the plan is clear on this criteria from the outset. In order to demonstrate that the planning authorities have delivered measurable biodiversity net gain, we also suggest that the quanta of change (positive or negative) is

included within SWDPR57 Monitoring Framework. We will look forward to further detail emerging through technical guidance and/or SPD.

There is some conflation of mitigation and compensation measures in the text which we suggest is clarified in revised wording below. For further consideration: we suggest that, aligned to the trajectory set in this policy and in support of the mitigation hierarchy and precautionary principles, delivery of enhancement measures including net gain for biodiversity is secured 'on-site' principally, and only offsite where it has been satisfactorily demonstrated that on site provision of net gain is unachievable. We suggest the following rewording of SWDPR26:

D.vi. In the first instance compensatory provision **and net gain** should be through on-site ~~mitigation~~ **measures**, the details of which need to be agreed with the LPA. Off-site mitigation, **compensation and net gain measures** will only be acceptable as a last resort and where on-site ~~mitigation~~ **measures are** is shown not to be possible. Where, having followed the mitigation hierarchy, there is an unavoidable requirement for off-site biodiversity compensation to offset harm, applicants will be expected to demonstrate that this will be brought forward in a timely manner at a scale and proximity to the proposed development in keeping with the harm caused.

We support the directions provided at section 14.34 to promote permeability for terrestrial wildlife through developments. We support the requirement for statement of conformity, habitat monitoring, and management agreements as set out at section 14.35.

Waste

We welcome the inclusion of secure storage for waste disposal. This could go further to include provision for composting where possible.

The Cotswold and Malvern Hills AONB

14.41

Note duplication of text

We support policy SWDPR27 and commend SWDPR27.B with cross-reference to SWDPR35 (and section 15.107) in recognising that flora and fauna are an intrinsic part of the AONB's natural beauty. Light intolerant wildlife is increasingly under pressure from fragmentation of the natural environment through proliferation of home and street lighting and so we request that further consideration is made within the RJ to ensure development within the AONB (and broader plan area) considers lighting alongside landscape impacts from the outset.

Electronic communications

15.1

Update term ultra-fast broadband to “gigabit capable broadband” This is the term the government is now using.

SWDPR30

A, suggested amendment to last sentence to read, “wider applications, whilst allowing for a minimum of two gigabit capable infrastructure providers.”

B, suggested amendment to first sentence to read “will be expected to consult with at least two mobile network operators to explore”

15.6

In the first sentence suggest adding after the word broadband in bracket “(both wired and wireless)”.

15.9

In the first sentence to be clearer when exceptional circumstances will be considered suggested amendment to the sentence to read, “outside urban areas and category 1 and 2 villages an equivalent...”

Suggested amendment to last sentence to read, “broadband services reach gigabit capable speeds and are...”

15.11

Suggested amendment to last bullet point to read “for more than one infrastructure provider.”

Renewable and low carbon energy

We support the proposal to aim for 20% renewable energy generation from developments. The provision of renewable energy generation on site will not only support carbon reduction plans but also reduce the demand on the grid. Further provision for relieving pressure of the grid could be made by the inclusion of the provision for battery storage to ensure that the solar energy generated during the day can be used at peak times.

It may be beneficial to define what will be considered low carbon sources of energy and whether these negate the need for renewable energy generation from the site as an either-or option is offered in the policy. These options may be low carbon, but they may not be low cost options.

We welcome the proposal for decentralised energy to be examined. Evidence that a true examination has taken place should be requested from applicants

Point 15.38 points towards the use of biomass domestic heating. This should be used with caution as it is recorded that biomass has adverse impacts on air quality. DEFRA reports that particulates and nitrogen oxide are emitted from the burning of biomass¹⁰ and can negatively impact air quality even though biomass is considered to be low carbon. The Energy Saving Trust¹¹ estimates financial savings can be made when compared with an old G rate oil boiler but not when compared to a new A rated oil boiler. While the carbon emissions would be lower it is not possible to say that measures such as biomass will benefit fuel poor households. This doesn't take account of Renewable Heat Incentive (RHI) payments. RHI payments can be assigned to the installer to 'offset' the original install cost. It is not guaranteed that a householder would see these financial benefits.

The EnviRecover energy from waste facility at Hartlebury is Combined Heat and Power-ready. This should be highlighted as an existing potential heat source in 15.52, particularly given the employment land allocations in close proximity.

Management of flood risk

Support Policy SWDPR32. Some technical detail currently in policy may in practicality be better located within RJ text, however this is a minor presentation matter for the SWDP team to consider.

Sustainable drainage systems

Fully support SWDPR33 noting that, as per SWDPR32, some technical detail may be better located in RJ rather than policy.

Physical constraints on development

In line with comments made as per 14.41, suggested rewording for SWDPR 35:

- C. Development proposals must be designed to avoid any unacceptably adverse impact **on residents** from the agents of nuisance, which are considered to be noise, light, odour and effluvia.

Alternatively, insert 'residents **and environmental receptors**'

15.109

We support the requirement for lighting assessments but note that sensitive environment receptors may occur within a development boundary in addition to neighbouring land.

¹⁰ https://uk-air.defra.gov.uk/assets/documents/reports/cat11/1708081027_170807_AQEG_Biomass_report.pdf

¹¹ <https://www.energysavingtrust.org.uk/renewable-energy/heat/biomass>

Additionally, and in line with the mitigation hierarchy, avoidance of lighting impacts should be sought in the first instance and prior to mitigating or, as a last resort, compensating for lighting impacts.

Air quality

No comments

Land stability and contaminated land

SWDPR37

Suggested amendment to consider adjacent land in addition to the land itself to ensure all health risks are considered. Change from:

“Planning proposals for development on land which is or may be contaminated by a previous or current land use or activity must include an appropriate level of survey and proposed mitigation or treatment measures to prevent adverse impacts to current or existing users”

To:

“Planning proposals for development on or adjacent to land which is or may be contaminated by a previous or current land use or activity must include an appropriate level of survey, independent assessment and proposed mitigation or treatment measures to prevent adverse health and safety impacts to current or existing users”

15.123 Reasoned Justification

“Landfill sites” should be added to the list of sites which should be considered for past contamination.

Minerals

We welcome the inclusion of SWDPR 38: Minerals. However, policy MLP 31 requires an assessment of the how much resource would be sterilised, the potential economic value as well as how opportunities for extraction of mineral resource would be optimised, and policy MLP 32 requires an assessment of the potential impact of the proposed development on the continued operation of mineral sites or supporting infrastructure. We would welcome the opportunity to cooperate with you on this policy to ensure that it is better aligned to MLP 31 and MLP 32 as set out in the Worcestershire Minerals Local Plan Publication version.

We also suggest that paragraph 15.131 should also refer to the need to safeguard mineral sites and supporting infrastructure from sterilisation, to accord with paragraph 204 (e) of the NPPF, and policy MLP 32 in the Publication Version of the Minerals Local Plan. This might also be appropriate to consider the impact on mineral resources through the SA process.

The web links to the Minerals Local Plan in footnotes 76 and 78 should be replaced with <http://www.worcestershire.gov.uk/minerals>.

Site Allocations: Mineral safeguarding

There is a cross-over between minerals safeguarding considerations as identified in the Worcestershire Minerals Local Plan Publication Version and proposed site allocations at:

- Worcester City: CFS0345sc, CFS1020, CFS0439, CFS0252, CFS0519, CFS1019sc, CFS0689
- Evesham: CFS099, CFS0355, CFS0690, CFS0632, CFS0308
- Pershore: CFS0641, CFS0808, CFS0807, CFS0350ec
- Cropthorne: CFS0360, CFS0568a
- Defford: CFS0560, CFS0948
- Great Witley: CFS0911sc
- Hallow: CFS0343sc
- Hartlebury Trading Estate: CFS0061a, CFS0061b, CFS0061f
- Hill and Moor: CFS0769
- Kempsey: CFS1019sc
- Lower Broadheath: CFS0045
- Norton and Lenchwick: CFS0099
- Offenham: CFS0623, CFS0690
- Pinvin: CFS0605
- Strensham: CFS0880

- Worcestershire Parkway New Settlement Area
- Throckmorton Airfield New Settlement
- Rushwick Expanded Settlement
- Land at Mitton

As previously highlighted in our response to the Issues and Options consultation, it is crucial that the SWDPR site selection methodology takes full account of mineral safeguarding to ensure that sites are deliverable and to avoid soundness objections. The MLP Publication version makes it clear that sites allocated in adopted Local Plans will only be considered exempt from mineral safeguarding requirements where “i) Safeguarding requirements have been ruled out during plan preparation and this is clearly stated as part of the site

allocation or ii) a mineral site or supporting infrastructure has been permitted within 250m of land which has already been allocated in an adopted Local Plan”.

By addressing these issues early in the consideration of potential site options, it will be possible to establish whether a site should be excluded on mineral safeguarding grounds or the extent of any mitigation which will be required to enable the site to be allocated. This will ensure that sufficient safeguards are in place to prevent the sterilisation of mineral resources and to prevent significant adverse effects on the proposed new land use, which could jeopardise the continued operation of an existing business. It will also enable the implications of any prior extraction or other mitigation to be taken into account in considering site viability and timescales for delivery. The Mineral Safeguarding Areas and Mineral Consultation Areas proposed for mineral resources in the Publication Version and the location of extant mineral sites and supporting infrastructure can be viewed on the interactive minerals map at <http://gis.worcestershire.gov.uk/Website/MineralsLocalPlan/>.

Once site allocations are selected, it should be clearly stated in the information and policies relating to each site whether any mineral safeguarding actions are required, so that expectations are clear and unambiguous and so that any site-level investigations required will inform the design of the development at outline planning stage.

Given the quantum of development and timescales involved in the delivery of the following sites it is expected that there will be significant potential to optimise opportunities for extraction of mineral resource in line with policy MLP 31:

- Worcestershire Parkway New Settlement Area
- Throckmorton Airfield New Settlement
- Rushwick Expanded Settlement
- Land at Mitton

We would welcome the opportunity to cooperate with you further in relation to site allocations and mineral safeguarding requirements and would hope to reach agreement with you on this strategic matter prior to submission of the SWDP review for examination. We will explore this as part of the ongoing commitment to duty to co-operate and statements of common ground between our respective authority.

Visitor accommodation

SWDPR 40

Suggested additions as follows from:

“A. Planning permission for new(82)visitor accommodation(83) within Development Boundaries will be permitted where:

- i. It is of an appropriate type and scale for the location or building; and
- ii. There is no adverse impact on neighbouring amenity.”

To:

A. Planning permission for new(82)visitor accommodation(83) within Development Boundaries will

be permitted where:

- i. It is of an appropriate type and scale for the location or building; and
- ii. There is no adverse impact on neighbouring amenity.
- iii There are easy, safe and attractive active travel routes to the site
- iv There is safe and secure overnight cycle parking

This could have the effect of promoting green tourism and support active travel by employees in addition to guests.

Static and touring caravans, chalets and camping sites

As per comments under 14.41 and SWDPR35, proliferation of lighting and associated cumulative adverse effects on environmental receptors within peri-urban and open countryside will have a significant adverse impact on light intolerant wildlife. Inclusion of lighting as an ‘obtrusive’ factor within RJ 16.24 would be helpful.

SWDPR 41

Suggestion to add the following:

“vii The site provides safe and secure overnight cycle storage.”

Built community facilities

SWDPR 42

Suggested amendment from,

“D. Community facilities comprise specific buildings (and associated land) for a range of uses including:”

To:

“D. Community facilities comprise specific buildings (and associated land plus active travel routes to local developments/settlements) for a range of uses including:”

To ensure that active travel is an easy and attractive option for accessing community buildings, these being within walking and cycling distances of communities, thus reducing

air pollution, mitigating against climate change and associated weather extremes including flooding and increasing health through day to day physical activity.

Green space

Support SWDPR43 but it should be noted that a nationally recognised technical assessment of need for surplus green space and selection of alternative/replacement green space may not take into consideration the use of green infrastructure (retained as green space) which is used to deploy ecological mitigation strategies including soft and hard landscaping. This may then cause a requirement for offsetting of legally secured biodiversity mitigation, likely compromising its effectiveness and value as these features would have had opportunity to become colonised or mature. This should be identified as a significant constraint for any future removal of that green space designation. Failure to secure biodiversity mitigation/compensation and net gain provision in this way would undermine the SA's assessment of a neutral or positive net gain.

Provision of green space and outdoor community uses in new development

We support the requirement for access to natural green space and the multiple benefits this provides.

SWDPR 44

Suggested amendment from,

“In addition to Table 4 the precise amount, and form of these uses will be informed by local evidence, e.g. neighbourhood plans, parish and town plans, village design statements.”

To:

“In addition to Table 4 the precise amount, and form of these uses will be informed by local evidence, e.g. neighbourhood plans, JSNA including physical activity and obesity prevalence, parish and town plans, village design statements.”

This change is designed to ensure that health data is used to inform green spaces decision making.

Waterfronts SWDPR 45

Support RJ 16.60 There are significant opportunities for GI enhancement due to waterfront development's connectivity to natural linear infrastructure, but we would like to see further direction outlining what the key constraints and opportunities are likely to be. For example, waterways are frequently used by light intolerant wildlife.

Marina and moorings

Subject to previous comments on FLL, no specific comments.

SWDPR 46

Minor amendment to B from,

“B. Proposals for new commercial moorings and wharfs for vessels engaged in transporting cargo or providing services for tourists and day visitors will be permitted provided that they meet criteria A i, ii, v and vii above.”

To:

“B. Proposals for new commercial moorings and wharfs for vessels engaged in transporting cargo or providing services for tourists and day visitors will be permitted provided that they meet criteria A i, ii, iv, v and vii above.”

This ensures access by walking and cycling.

Site Allocations: Waste safeguarding

The allocation of sites in the SWDPR should safeguard waste management facilities, in accordance with adopted Waste Core Strategy policy WCS16. It is crucial that the SWDPR site selection methodology takes full account of waste site safeguarding to ensure that sites are deliverable and to avoid soundness objections. By addressing these issues early in the consideration of potential site options, it will be possible to establish whether a site should be excluded on waste safeguarding grounds or the extent of any mitigation which will be required to enable the site to be allocated. This will ensure that allocated sites will not prevent, hinder or unreasonably restrict the operation of existing waste management facilities, and will prevent significant adverse effects on the proposed new land use, which could jeopardise the continued operation of an existing business, as previously highlighted in our response to the Issues and Options consultation. Once site allocations are selected, it should be clearly stated in the information and policies relating to each site whether any waste safeguarding actions are required, so that expectations are clear and unambiguous and so that any site-level investigations required will inform the design of the development at outline planning application stage.

There is a cross-over between safeguarding waste facilities and the following proposed site allocations:

- Worcester City: CFS0308
- Evesham: CFS0308

- Malvern: CFS1097a, CFS1097b
 - Hartlebury Trading Estate: CFS0061a, CFS0061b, CFS0061f
 - Honeybourne: CFS095
 - Middle Littleton: CFS0028, CFS0055
-
- Worcestershire Parkway New Settlement Area
 - Throckmorton Airfield New Settlement

We would welcome the opportunity to discuss the safeguarding issues at these sites to ensure that they are fully taken into account and would hope to reach agreement with you on this strategic matter prior to submission of the SWDP review for examination.

Strategic allocations

Greater design principle details should be included within in SWDPR49.

Acknowledging that a cohesive and over-arching site-wide GI masterplan would provide both strategic and site-level guidance for GI delivery, in line with other strategic allocation development policies (e.g. SWDPR45/1), SWDPR49 should summarise the key drivers to be resolved through subsequent GI Concept Plans. For example: retention and protection of key ecological receptors including irreplaceable habitats. Maintenance and improvement of catchment quality and flows. A high threshold of measurable biodiversity net gain (we would recommend 20%) in first principle to be integrated within the site's GI network. Integration of ecological enhancements throughout the built realm, to ecotown standards.

Similarly, greater direction within SWDPR50 to the specificity and function of GI and threshold of biodiversity net gain to be required. It should be noted that the land allocated is likely to support populations of protected species, and that on-site GI may prove insufficient (due to need for multi-functionality) to support translocated populations of wildlife such as reptiles. The planning authorities are therefore strongly advised to consider, at a very early stage of strategic planning, the preparation of contingencies to include translocation receptor sites in order to facilitate these large-scale developments.

SWDPR49 Worcester Parkway

Suggested minor amendment from,

“ii. Dedicated cycle way provision, avoiding M5 Junction 7.”

To:

“ii. Dedicated cycle ways provision, avoiding M5 Junction 7.”

A development of this size is likely to require more than one cycleway.

Further suggested modifications include:

Av/Ciii. Education: one secondary school and four primary schools with nursery and sixth form provision

Civ. Community facilities: to include childcare facilities

The area allocated for development here is likely to have been settled from prehistoric times onwards. The western boundary of the proposed development area lies just 300m to the east of the Scheduled Monument Crookbarrow Hill (a monument of possible prehistoric origin) and metal detecting finds suggest potentially high status prehistoric settlement within the development area. Roman remains are known around Crookbarrow Hill, and the entire development area shows evidence for medieval settlement, from relic field systems at a landscape-scale to individual sites and earthworks. SWDPR 49 should make reference to the historic environment within the policy wording and state clearly the need to fully understand the impacts, including the setting of designated and undesignated heritage assets, and mitigation required.

Transport

Initial transport modelling has been undertaken to identify the potential impact this strategic allocation will have on the transport network. This modelling has highlighted significant impact across the local and wider network as a result of this allocation. Further detailed modelling will be required to test additional wide-reaching mitigation measures needed to complement those already identified within the policy to ensure the development does not have an unacceptable impact on the network.

Careful master planning will need to be undertaken to ensure appropriate infrastructure and facilities are provided within the site to provide realistic travel choice by alternative modes in addition to the car. This will be in the form of direct active travel corridors, direct bus routes through the site ensuring minimal travel distance from all areas of the site to bus facilities and the inclusion of a Park and Ride facility. Consideration of a comprehensive Car Parking review on the wider network may also be necessary.

The impact on M5 Junctions 6 and 7 will need to be carefully assessed and managed through detailed discussions with Highways England.

SWDPR 50: Land at Throckmorton Airfield, SWDPR 51: Rushwick Expanded Settlement and SWDPR 52: Directions for Growth Outside the City Administrative Boundary: Existing Urban Extensions to be Reallocated

Development of all these strategic sites will have impacts on the historic environment. The evidence base for the Development Plan Documents must include an assessment of this impact, both in terms of built heritage and below-ground archaeology. Throckmorton in particular is likely to have archaeology of high, potentially national, significance. The impacts on each strategic allocation need to be better understood at the earliest opportunity in order to inform development design and assess potential risks.

Please note land matters on these two sites is included within the Place Partnership response.

SWDPR50 Throckmorton

We would like to see a detailed health assessment of the impact of the adjacent landfill site on the health of the population of this proposed site prior to this allocation being included in the publication consultation.

17.3 Suggested amendment from,

“500 space car park at Pershore Railway Station.”

To:

“500 space car park and appropriate bicycle parking at Pershore Railway Station.”

Further suggested modifications include:

Aiii. Local centre to include childcare

Aiv. Education: All-through school and one primary school with nursery and sixth form provision (secondary school and 2-3 primary schools beyond 2041)

As with SWDPR 49 above, initial transport modelling has been undertaken to identify the impact of this site on the local and wider transport network. This initial work has highlighted significant impacts on the immediate network including within Pershore and Evesham. Further detailed modelling will need to be undertaken with wide reaching mitigation measures identified, to ensure the development does not have an unacceptable impact on the network. This will then feed into the Development Plan Document.

As stated within the Preferred Options Consultation document, access to the site will be via a new link directly off the A44 and this will need to be fully provided before any development can come forward. The further detailed modelling will identify other critical infrastructure that may be required before the development comes forward.

SWDPR51 Rushwick

Suggested amendment from,

“a new railway station and 500 space car park would be secured.”

To:

“a new railway station, 500 space car park and appropriate bicycle parking would be secured.

The Policy refers to a new rail station and 500 space car park, this key infrastructure must be delivered before any development takes place in order to mitigate any impact from the site on the transport network. Early discussions with the rail industry are vital to facilitate this key piece of infrastructure. The provision of active travel corridors linking Rushwick with Worcester and Malvern are important to providing transport choice along with park and ride facilities.

Further suggested modifications include:

Aiii. New 2FE Primary School with nursery. Rushwick Primary School (1FE) to remain on existing site.

Table 26 and Table 27 – sum of dwellings recorded is incorrect

SWDPR52

GI Concept Plans have been prepared for Worcester West Urban Extension and Worcester Technology Park. These partnership documents have been drafted in collaboration with and adopted by the SWDP authorities and as such it would be prudent for the policies to closely reference these and direct development to be delivered in compliance with the design principles and objectives established within them. Clearer description of the form and function of GI (including green space and buffers) should be provided within the direction of policy, together with a clear percentage of required biodiversity net gain to be achieved.

Specific allocations

Limited comments are provided here from ecology due to capacity constraints rather than absence of environmental constraints. However, with reference to NPPF Section 15, we would encourage the SWDPR evidence base demonstrates more clearly how the ecological value of land has been considered in the allocation processes, so that it is clearly illustrated how land of least/lower ecological value has been allocated in preference to sites where

development would otherwise cause unacceptable damage to biodiversity, natural capital, ecological networks and ecosystem services.

SWDPR 53 – 55 the district housing allocations

A significant number of the proposed sites will impact the historic environment. It is important that a full assessment of the known and potential impacts on the historic environment is carried out for each one at an early stage in the development process.

Worcester City Allocations

SWDP NEW 9 Land at Navigation Road Diglis. Unclear why less than 40% GI has been stipulated, particularly given the site's proximity and likely interactions with the adjacent Local Wildlife Site. While GI might be configured in a manner to buffer this, the likely indirect and cumulative impacts upon sensitive habitats would not appear to support a proposition for reduced GI allocation here. Note: presence of scarce BAP priority species of light intolerant bats recorded here. A requirement to ensure development is led by an appropriate lighting strategy from the outset should be articulated within the plan policy and/or RJ. This allocation includes an area designated as Local Wildlife Site which we strongly advise should be clipped from the site's boundaries and appropriately buffered.

The footnote stating 30% GI should be explained as a minimum to outline the reasons in this sites case.

SWDP43/15 Worcester Woods Business Park. Within the city's "green network" and its proximity to Hornhill Meadows nature reserve makes any sizeable quanta of development difficult to achieve without adverse impacts. Known to support populations of protected species and will require detailed and up-to-date ecological survey work (likely to include mitigation strategies) to bring forward.

As previously stated, a review of the Worcester Transport Strategy is required to provide genuine alternative travel choices and deliver modal shift as an alternative to the car to create the capacity within the transport network to support these allocations.

Wychavon Allocations

SWDP NEW 85. Eatons Farm, Church Lane. Proliferation of large scale employment land from the periphery of Worcester City beyond the historic hard boundary of the M5 and beyond Pershore Lane in to open rural countryside is not supported and should be resisted.

SWDP NEW 115. Land north of Defford Road. Taken individually there may be capacity to introduce new housing allocations at Conningsby Drive and off-Holloway, however the significant increase in footfall with associated direct recreational impact and indirect damage to Tyddesley Wood Local Wildlife Site, Tiddesley Wood SSSI and Stocken and

Tiddesley Wood Orchards Local Wildlife Sites would be avoidable with alternative allocations to CFS0350sc. The value of the land proposed for development as a functional buffer and ecological corridor around the designated site (following Lawton's principles as enshrined in the Government's 25 year Environment Plan, NPPF para's 174.a,175.a and 175.c.and SWDP5.F) is evident on reviewing the Worcestershire Habitat Inventory (http://www.worcestershire.gov.uk/info/20302/worcestershire_habitat_inventory) and we advise that CFS0350sc is deleted.

SWDP50/7 Land off Abbey Road. Recommend significant GI apportionment as direct and indirect impact environmental buffer will be required to the adjacent River corridor and designated wildlife site. Portions of the site are located in floodzone 2; we recommend a GI-led development strategy which retains these areas as public open space and functional floodplain is secured. Careful consideration of sensitive lighting and SuDS strategies should inform a GI Concept Plan for development and should be an early and explicit requirement of development here.

SWDP NEW 90, Lane of Cales Farm, abuts two sensitive Local Wildlife Sites: Mill Coppice and Whippets Brook. Even with a high apportionment of on-site GI buffering these designated sites the direct and indirect impacts are avoidable through lowering the quanta of development to a more deliverable figure here. Note that Whippets brook supports one of the last remaining populations of white clawed crayfish in the county and should not receive SuDS outfall unless betterment of flows and water quality is demonstrated.

SWDPR 54 (Table 13) – These will place significant demand onto Waterside junction which will result in a severe impact. A significant junction improvement will be necessary to accommodate growth, and this will require the acquisition of additional land outside of the existing highway boundary.

SWDPR 54 (Table 14) – Initial modelling work identifies significant congestion within Pershore as a result of these allocations. As previously stated, further detailed modelling work will be required to identify the transport infrastructure requirements necessary to support these allocations. This work will be undertaken between now and the pre-submission version.

SWDPR 54 (Table 15) – Some of the allocations contained with table 15 are not located within sustainable communities from a highways perspective so we would find it difficult to support these without significant interventions. They are –

SWDP NEW 38
SWDP NEW 39
SWDP NEW 40

SWDPR 54 (Table 16) – There are very few amenities within this location and insufficient transport choice to make the development sustainable. Occupiers will therefore be solely

reliant on travel by private car which is not sustainable. We cannot support this allocation from a highway perspective.

SWDPR 54 (Table 17) – There are very few amenities within this location and insufficient transport choice to make the development sustainable. Occupiers will therefore be solely reliant on travel by private car which is not sustainable. We cannot support this allocation from a highway perspective.

SWDPR 55 (Table 24) – These will place significant demand onto Newlands Roundabout which will result in a severe impact. A comprehensive junction redesign will be necessary to accommodate this level of growth and this will require the acquisition of additional land outside of the existing highway boundary.

SWDPR 55 (Table 27) - There are very few amenities within this location and insufficient transport choice to make the development sustainable. Occupiers will therefore be solely reliant on travel by private car which is not sustainable. We cannot support this allocation from a highway perspective.

SWDPR 55 (Table 31) – Blackmore Park (no genuine transport choices), Mayfield Road (no vehicle access to site), Holly Green (unsustainable)

South Worcestershire Infrastructure Study Update (2019)

Following the publication of the SWDPr consultation, further analysis has been possible to assess the appropriateness of infrastructure solutions to meet the needs of new development. More detailed solutions are contained in this document and some solutions require amendment within the IDP:

Summary of Requirements:

- Malvern: Primary need will be met by the expansion of existing schools and not by the provision of a new school as suggested in the IDP.
- Mitton: A new 2FE Primary school and Nursery will be required for this site.

Appendix A5: Education Project Schedule

- Reference to number of places is included in form or entry expansion and is not in addition to. Detail should be amended to remove the word 'and' in reference to new places and include number of new places in brackets for clarity.
- 2 FE rather than 3FE will now be delivered at Worcester City Secondaries for 2021 to a cost of £5.115m.

- Rather than the further delivery of 3FE at Worcester City Secondaries in 2023 and 4FE beyond 2023 we will be looking for solutions for the delivery of a new secondary school.
- Droitwich will require an addition 2FE to all phases in response to new housing
- A *minimum* of 0.5FE will be required in Evesham.
- No longer seeking to expand any Pershore Rural Schools due to limited proposed developments in this area
- We will now be intending to expand: Powick C.E. Primary; Great Witley Primary; Offenham C.E Primary; a school in Broadway
- We will also require further provision at Wychbold and a new school at Mitton.
- Further expansions will be required as per the detail above, specific details of appropriate solutions are not yet known. This detail will be developed along with the development of the plan.

General correction:

Education planning obligations are applicable to developments of 10 dwellings or greater, not to developments of 'greater than 10 dwellings' as currently described on page 56.

Correction of cost per pupil place to £17,008 for primary and early years and £23,302 for Secondary and Sixth form.

The method by which places for children with specialist educational needs or disabilities will be delivered is described incorrectly. 3% of all places claimed will be capable of supporting children with specialist needs and will not be considered as a requirement above the mainstream requirement as suggested within the IDP. The pupil yield represents the expected yield for all pupils, 97% of those places will be funded as mainstream and 3% funded for children with specialist needs. Whether those places are delivered within mainstream schools or at specialist provision will be site dependent.

Correction required in:

- Table 24 on page 57 to correct cost per pupil place
- Table 26 on page 58 to correct cost per pupil place and amend for inclusion of SEND contributions
- Building Cost Multiplier information on pages 58 and 59
- Demand for SEND Provision information on page 59
- Cost of infrastructure in Table 27 must be corrected as per the information presented within this response

SWDP Financial Viability Assessment Report

General Observations

The viability document has tested £20k per unit on strategic sites. WCC suggest this figure would be insufficient to deliver the infrastructure required on the strategic sites. Education alone for Parkway would require £14k per dwelling. The next assessment will require the figure tested to be based on actual need in order to demonstrate deliverability.

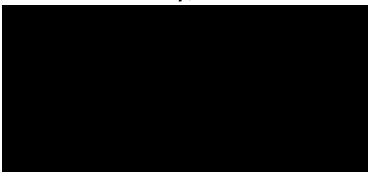
The table at 5.35 mixes up Rushwick and Parkway which then makes the remainder of the report incorrect. Making Rushwick 7500 units and with it in the lower value zone skews the results of the viability. This could make a significant difference to the results and the report should be updated and re published to reflect this. It should have the effect of improving viability. This is due to the higher unit number moving to the higher value area and lower unit number moving to the lower value area.

The viability also appears to show there is scope for a CIL review with an increase of the residential charging rate for Malvern and Wychavon alongside the introduction of a charge in the Worcester City area. With affordability proposing the strategic sites could afford £180 per square metre this suggests there is scope to increase the £40 per square metre on remaining sites. There is also potential for a charge having a North West / South East split to ensure values are accurately reflected.

Conclusion

WCC are committed to working with South Worcestershire Councils to develop the review of the SWDP. If any of the matters within this response raise a question please contact Mike Martin-White [REDACTED] in the first instance who will help put you in touch with the appropriate officer.

Yours sincerely,

A large black rectangular redaction box covering the signature area.

Emily Barker
Head of Planning and Regulation

The Spetchley Estate

South Worcestershire Development Plan Review: Worcester Woods Business Park, Newtown Road

Public Consultation (Regulation 19)

Representations prepared by Savills on behalf of
'The Trustees of the 2002 Settlement' (The
Spetchley Estate)

Introduction

1. These representations have been prepared by Savills on behalf of the ‘Trustees of the 2002 Settlement’, who control the part of the Spetchley Estate (hereafter referred to as ‘The Spetchley Estate’) to which these representations relate, in response to the consultation on the South Worcestershire Development Plan Review (SWDPR).
2. The Estate controls approximately 1,800 ha of land to the east of Worcester, including land within new settlement at Worcestershire Parkway (Policy SWDP49), and land south of Newtown Road (referenced in the adopted SWDP as Worcester Woods Business Park (Policy Ref. SWDP43/15)).
3. These representations focus on The Spetchley Estate’s land interests in respect of the land at Newtown Road (Worcester Woods Business Park (Adopted Policy Ref. SWDP43/15)) (‘the site’). The Spetchley Estate is not supportive of the emerging allocation for the development of the site for education uses.
4. The site is allocated for employment use within the adopted Local Plan, and the justification for that allocation still holds today. The Spetchley Estate, as landowner, therefore seeks the allocation of this site for an employment site as a business park.
5. Enclosed as part of these representations are a site red line plan, Employment Concept Masterplan and Vision Statement prepared by Pad. Together these documents set out The Spetchley Estate’s vision for the site, demonstrating how employment uses could be accommodated, while considering the ecological and biodiversity constraints of the site.
6. We also note that despite enjoying close working relationships with officers at South Worcestershire, The Spetchley Estate was not made aware of the proposed change to the existing site allocation until the SWDPR was published for consultation in November 2022.
7. It is hoped that these representations are of assistance to the three Councils in preparing the next stages of the SWDPR.

National Planning Policy

8. Achieving sustainable development is an economic objective, which seeks to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation, and improved productivity.
9. As part of the National Planning Policy Framework's (NPPF's) presumption in favour of sustainable development, paragraph 11 establishes that '*all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects.*'

Policy SWDPR 61: Worcester City Allocations (SWDP Reg 19 Ref: WCEMREAL01).

10. The land to the south of Newtown Road has been the subject of extensive analysis in support of the various planning applications promoted at the site (refs. P05Q0141 and P10Q0276). In these planning applications the principle of development for B-class employment uses and a comprehensive redevelopment of the site has also been previously explored.
11. The wider site comprises approximately 12ha in total. A care home, hospital staff car parking and helideck have been developed in the western part, with the remainder being undeveloped agricultural land. The undeveloped part of the site extends to approximately 9.16ha. It is bounded by Newtown Road to the north, Worcestershire Royal Hospital and Kings Court Business Park to the west, the A4440 to the east and agricultural land to the south.
12. The site benefits from an existing allocation in the South Worcestershire Development Plan for a range of uses including B1/B2 employment uses, care home, car/ motorbike showroom, hospital expansion (Policy Ref. SWDP43/15 (CFS0703)). The Spetchley Estate understood from officers at South Worcestershire Council that this allocation would be carried through to the SWDPR and was supportive of this.
13. Policy SWDPR61 allocates the entirety of the site's remaining undeveloped area for educational uses, namely a new secondary school, also noting at footnote 210 that the site area (9.16ha) should include flood mitigation measures, green infrastructure, and landscaping (SWDP Reg 19 Ref: WCEMREAL01). There is no explanation of the rationale for this change within the Reasoned Justification for Policy SWDPR61, however, it is understood that this change has occurred following discussions between Worcestershire County Council and SWDPR Officers regarding the former's aspirations for the site to provide a new secondary school. This proposed change to the existing allocation has been made with no consultation between the Local Planning Authority's Policy team and The Spetchley Estate; indeed, The Spetchley Estate was unaware of the new draft allocation prior to the publication of the SWDPR for consultation in November 2022.

14. The Spetchley Estate has been approached by Worcestershire County Council. It is likely the parties will reach an agreement to sell part of the site to WCC as a secondary school subject to planning. Consideration is being given towards achieving a suitable highways access. Pending such an agreement, Spetchley Estate will seek to continue the allocation of that part of the site for employment, and also the remainder of the site which is not intended to be a secondary school. In the absence of any unconditional agreement for the site to be brought forward for educational use, it is the Estate's wish that the site be allocated for employment use. It cannot endorse the allocation of the entire site for educational uses, particularly when there is identified need for employment and other land uses within the area.
15. The Evidence base prepared for the SWDPR includes an Economic Development Needs Assessment Part 1 (September 2018) and an Economic Needs Assessment Final Addendum Report (July 2019), both prepared by BE Group. This identifies that there is demand for office and industrial sites throughout South Worcestershire and good occupancy levels within employment sites. Stakeholder consultation indicated that there is a general lack of suitable employment land and premises and a perceived lack of choice within the market. The Addendum Report noted that there is a deficit of employment land within South Worcestershire of 160.4ha over the forecast period to 2041. It is considered that there is likely to be higher demand for small and mid-size units and recommends that the majority of employment uses should be located either in, or at the fringes of, existing settlements. It also places emphasis on the deliverability of allocated sites, noting that *'it is important that sites that are allocated for employment have the realistic potential to be developed, either by a single occupier or through a willing developer that would bring premises to the market.'*
16. While the Addendum Report identifies a deficit of 12.7ha of employment land within Worcester City, with much larger deficits within Malvern Hills (-25.4ha) and Wychavon (-122.3ha), it notes that this is reflective of historic strong growth in Wychavon, itself a function of the supply of available and suitable employment land in this area and the constrained supply within Worcester City. The Addendum Report states that *'analysis undertaken as part of the EDNA revealed that there is demand for employment land and premises in... Worcester, but that this demand cannot be met due to supply constraints. Therefore, while it may be tempting to continue to provide the vast bulk of further employment land over the forecast period in Wychavon as there are more potential sites in this district, there needs to be consideration of the suppressed demand needs of ... Worcester when identifying further supply.'*
17. The Addendum Report includes an analysis of potential employment sites within South Worcestershire at Table 9, including the site (land at Worcestershire Woods Business Park (Ref. CFS0703)). It concludes that the ongoing allocation of this site for employment uses should be supported. The emerging allocation for educational uses therefore runs contrary to the recommendation put forward within the evidence base. Similarly, the identification of only 12.96ha of employment land within the wider Worcester City area is also not reflective of the recommendations set out within the EDNA; a greater supply of employment land should be identified within Worcester City in order to redress the balance of supply within the study area.

18. An Employment Development Needs Assessment (EDNA) (BE Group, March 2022) also forms part of the evidence base and indicates that there is approximately 9.96ha of allocated employment land and strategic sites within Worcester City, with a total 290.7ha within the wider South Worcestershire area. In addition to allocations within the SWDP Review the South Worcestershire Councils have, collectively, a net 71.75ha of employment land commitments, however, there is a deficit of 3.09ha of allocated land in Worcester City. The combination of the proposed employment land site allocations and the net employment land monitoring commitments provide a potential supply of 362.45ha of employment land, against a forecast demand of 350.5ha over the plan period 2021-2041: this results in a small surplus of 11.95ha. Given the current uncertainties in the market, any changes in circumstance could easily lead to a reduction in the potential supply and a resulting loss of any surplus. It is also notable that, in spite of this small surplus across the wider district, a significant deficit of 47.38ha remains in Worcester City itself. The EDNA also identifies a range of markets that will need to be catered for, comprising: smaller industrial operators (200-1,000sqm); mid-sized industrial operators (2,000-3,000sqm); larger industrial and warehouse operators; corporate offices; and smaller offices for SMEs.
19. The EDNA includes a brief assessment of the site's development potential (Ref. CFS0703), as follows: *'majority of the site is vacant and grassed. Some sloping but developable for B-class uses. Potential for business park or research park with links to Hospital, though is of sufficient scale for a broader range of employment uses. However, the land is recorded as '0 ha' for employment uses as there is a high probability that the site will now be used for a new secondary school. Summary: Developable for employment e.g. office/ research park. However, there is a high probability that the site will now be used for a new secondary school.'* The EDNA confirms that the site is highly suitable for a range of employment uses and does not provide any further reasoning as to why it would be used for a new secondary school.
20. The site is considered to be suitable for a range of employment uses to meet the range of markets identified in the EDNA due to its sustainable location and good links to the strategic road network. Of the employment allocations that have been assessed within the EDNA, it is identified as the 5th most suitable site, out of 43 assessed sites. It achieves a very high market led score (42 out of a potential 50) which reflects its inherent strengths in terms of its location, prominence, environmental setting, and sequential testing. This high market led score justifies its current allocation for employment uses.
21. Its continued allocation for a range of employment uses would help to meet identified demand for employment floorspace within Worcester City and is consistent with the key tenets of sustainable development as set out within the NPPF. It also has good deliverability potential, as has been demonstrated by the planning history of the wider 12ha site, the western part of which has been developed to provide a care home, hospital staff car parking and helideck. The principle of the site being deliverable remains (i.e. there has been no material change of circumstance following the previous grants of planning permission, (LPA Refs. P05Q0141, P10Q0276, P05Q0141, P07Q0618 and P10Q0276).

22. Paragraph 82 of the NPPF states that planning policies 'should help create the conditions in which businesses can invest, expand and adapt' and that 'significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.' In accordance with this, the continued allocation of the land at Newtown Road for employment uses provides certainty to investors and potential occupants who may wish to locate to the area.
23. The emerging allocation indicates that the north eastern corner of the site should be left undeveloped in order to provide a strategic gap. We consider that this is not necessary, given that the site is clearly defined by the existing road network which itself fulfils the role of a strategic gap. As above, we also note that footnote 210 requires the site to include flood mitigation measures, although does not provide any further context, and we would query this, given the site's location in Flood Zone 1.
24. As an alternative approach, the Spetchley Estate would also be supportive of the removal of the existing allocation, therefore leaving the site unallocated.

Summary

25. The Spetchley Estate is not supportive of the allocation of the land at Worcester Woods Business Park (SWDP Reg 19 Ref: WCEMREAL01) for education uses. It cannot endorse the allocation of the entire site for educational uses, particularly when there is identified need for employment and other land uses within the area.
26. The Spetchley Estate would support the continued allocation of the site for mixed use employment. To this end, we enclose an Employment Concept Masterplan and Vision Statement setting out The Spetchley Estate's vision for the site, demonstrating how employment uses could be accommodated, while considering the ecological and biodiversity constraints of the site.
27. The site's reallocation confirms a continuing commitment from the joint authorities relating to its development. Its designation would also generate certainty for investors, developers and/or occupiers who wish to develop the site: creating conditions where businesses can invest, expand and adapt – in accordance with paragraph 82 of the National Planning Policy Framework.
28. Going forward, the Spetchley Estate looks forward to evolving the employment proposals with the South Worcestershire Councils.

**South Worcestershire Development Plan Review
Publication Consultation
(Regulation 19)**

Response Form

Please return by **23:59 on Tuesday 13 December 2022 to:**

South Worcestershire Development Plan Team
Civic Centre
Queen Elizabeth Drive
Pershore
WR10 1PT

or email contact@swdevelopmentplan.org

Ref:

(For official use only)

How we will use your details

The personal information you provide on this form will be held and processed in accordance with the requirements of the Data Protection Act 1998 and the General Data Protection Regulation 2018. Please note that your name and comments may be made publicly available when displaying and reporting the outcome of this consultation and cannot be treated as confidential. Any other details, including signatures, private telephone numbers and email addresses will not be published on the council's website, but the original representations with personal details redacted will be available in full for inspection on request. Your details will be retained in order for us to validate your comments. We will use these details to continue to notify you of the progress on planning policy documents within south Worcestershire. If you no longer wish to receive notifications, you can email us or write to us to be removed from the consultation list, however this will impact upon your right to be notified of progress with the document you are commenting on.

This form has two parts –

Part A – Personal Details: only needs to be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.



Part A

1. Personal
Details*

2. Agent's Details (if
applicable)

**If an agent is appointed, please complete only the Title, Name and Organisation (if applicable)*

boxes below but complete the full contact details of the agent in 2.

<i>Title</i>	C/O Agent	Mr
<i>First Name</i>	C/O Agent	Geraint
<i>Last Name</i>	C/O Agent	Jones
<i>Job Title</i> <i>(where relevant)</i>	C/O Agent	Director (Planning)
<i>Organisation</i> <i>(where relevant)</i>	-	Savills
<i>Address Line 1</i>	-	Embassy House
<i>Line 2</i>	-	Queens Avenue
<i>Line 3</i>	-	Bristol
<i>Line 4</i>	-	
<i>Post Code</i>	-	BS8 1SB
<i>Telephone Number</i>	-	
<i>Email Address</i> <i>(where relevant)</i>	-	

Part B – Please use a separate sheet for each representation

Name or Organisation:

Savills representing the Spetchley Estate

3. To which part of the SWDP Review Publication Consultation (Regulation 19) Plan does this representation relate?

Please tick as appropriate

<i>Paragraph</i>	<input checked="" type="checkbox"/>	<i>Policy</i>	<input checked="" type="checkbox"/>	<i>Policies Map</i>	<input checked="" type="checkbox"/>
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4. Do you consider the Local Plan is:

4.(1) Legally compliant	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>

Please tick as appropriate

5. Please give details in the box below of why you consider the SWDP Review Publication Consultation (Regulation 19) Plan is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the SWDP Review Publication Consultation (Regulation 19) Plan please set this out below.

Please refer to the attached reps

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the SWDP Review Publication Consultation (Regulation 19) Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). Please say why each modification will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please refer to the attached reps

(Continue on a separate sheet /expand box if necessary)

Please note: In your representation(s) you should provide succinctly all the evidence and supporting information necessary to support your representation(s) and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

7. Please provide any representations on the **Publication Draft Sustainability Appraisal** and/or **Publication Draft Habitat Regulations Assessment**.

Please refer to the attached reps

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues the Inspector identifies for Examination.

8. If your representation is seeking a modification to the Plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

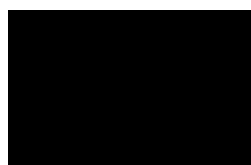
9. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Please refer to the attached reps

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in the hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

10. Signature:

Geraint Jones

A solid black rectangular box used to redact the signature of Geraint Jones.

Date:

21st
December
2022

Guidance Note to Accompany Representation Form

1.1. The SWDP Review Publication Consultation (Regulation 19) Plan has been published by the South Worcestershire Councils of Malvern Hills District, Worcester City and Wychavon District Councils in order for representations to be made on it before it is submitted to the Planning Inspectorate for Examination. The *Planning and Compulsory Purchase Act 2004*, as amended, [PCPA] states that the purpose of the Examination is to consider whether a plan complies with the relevant legal requirements, including the duty to co-operate, and assess if it is sound. The Inspector will consider all representations on the Plan that are made within the period set by the Local Planning Authorities (LPA).

1.2. To ensure an effective and fair examination, it is important that the Inspector and all other participants in the Examination process are able to know who has made representations on the Plan. The LPAs will therefore ensure that the names and addresses of those making representations can be made available and taken into account by the Inspector.

1.3. Where groups or individuals share a common view on the Plan, it would be very helpful if they would make a single representation which represents that view, rather than a large number of separate representations repeating the same points. In such cases the group should indicate how many people it is representing and how the representation has been authorised.

1.4. Please consider carefully how you would like your representation to be dealt with at the examination: whether you are content to rely on your written representation, or whether you wish to take part in hearing session(s). Only representors who are seeking a change to the plan have a right to be heard at the hearing session(s), if they so request. In considering this, please note that written and oral representations carry the same weight and will be given equal consideration in the examination process.

LAND AT NEWTOWN ROAD, WORCESTER

VISION STATEMENT



On behalf of The Spetchley Estate

DECEMBER 2022

VISION

Situated on the edge of Worcester, the Land at Newtown Road is located in a readily accessible and sustainable location for the provision of high quality, modern employment floorspace, with the ability to serve the residents of Worcester and South Worcestershire.

The proposals make effective use of land on a vacant land parcel and respond to the lack of suitable employment land and premises across Worcester City and the wider South Worcestershire sub-region.

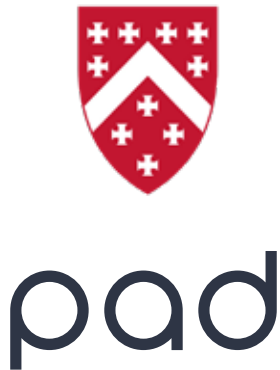
To promote active travel, the Newtown Road development will be accessed via a range of transport modes, including the existing pedestrian and cycle network in the area, as well as local bus services.



PREFACE

This Vision Statement has been prepared by Pad Design and Savills (Planning), on behalf of the Spetchley Estate.

The document sets out the potential for an employment development located approximately 3.5 kilometres (km) from Worcester Centre. The document focuses on the opportunities and constraints of the site, together with an initial design concept.



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Issue record			
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Author	CL/PG	CL	CL
Checked	PG	MD	PG
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WORCESTERSHIRE ROYAL HOSPITAL

PERRY MANOR CARE HOME



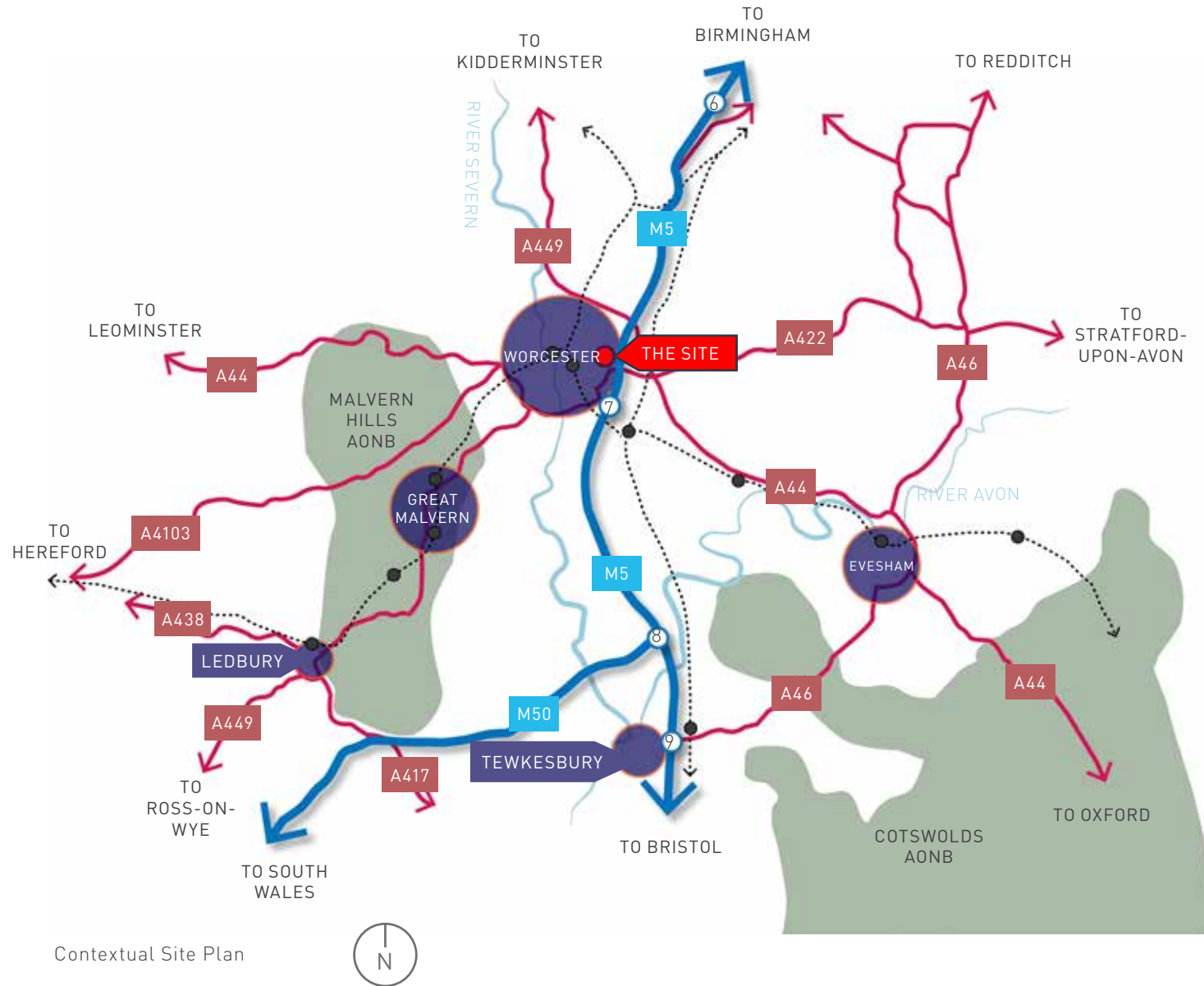
View from the site with the Perry Manor Care Home (right) and Worcester Royal Hospital, situated off Charles Hastings Way.

SITE LOCATION

The site is located immediately to the west of the A4440 Nunnery Way and to the south of Newtown Road. The site lies approximately 3km east of Worcester City Centre and 4km west of the strategic road network (M5). The site is located within 7 minute drive from Junctions 6 and 7 of the M5, ensuring that the site benefits from excellent accessibility to both the local and strategic highway networks.

Worcester is easily accessible by rail and road to/ from regionally significant locations including the West Midlands and Bristol.

Worcester benefits from a diverse range of assets that collectively produce a vibrant city with a proud history. Over the 10 year period to 2021, Census data shows that the population of the Worcester City administrative area increased by 5.2% to 103,900 people. Census data shows that the population of South Worcestershire totals 315,800 people, which means that the site has a healthy local and sub-regional employment base.



Contextual Site Plan

CONTEXT

ECONOMIC CONTEXT

The Worcestershire Local Enterprise Partnership's (LEP's) Plan for Growth 2020-2040 outlines an ambitious vision for the county that will create a connected, creative and dynamic economy for all.

The plan seeks to deliver 11,500 more jobs with an additional £1.3 billion uplift in GVA by 2030, increasing to 18,500 jobs and a £2.5 billion GVA uplift by 2040.

As part of delivering its Plan for Growth, the LEP has committed to increase the stock of high quality and sustainable business premises in the county to support inward investment and growth of indigenous businesses, as well as increasing the number of scale-up and growth businesses in the county.

PLANNING CONTEXT

The National Planning Policy Framework's (NPPF's) presumption in favour of sustainable development, paragraph 11 establishes that 'all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects.

The NPPF adds that "Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development" (paragraph 81).



M5 is situated east of the site



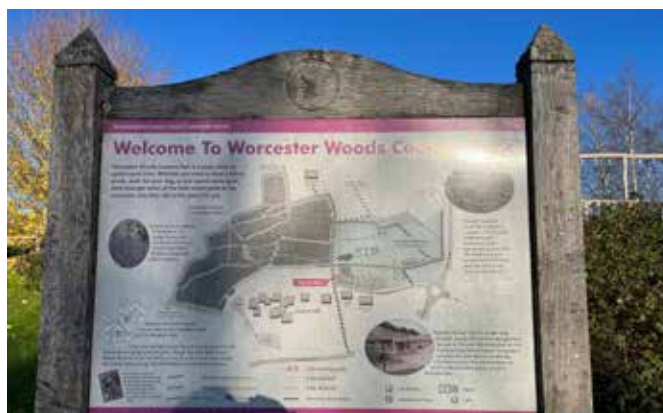
Residential area north of the site



Worcester town centre lies within 3.5km from the site



Ronkswood Hill Meadows Local Nature Reserve



Worcester Woods Country Park board



Aconbury Orchard is a nearby park and garden

The site is allocated for employment use within the adopted South Worcestershire Development Plan (SWDP, published 2016), as set out in Policy SWDP 43/15 (Worcester Woods Business Park, Newtown Road). The justification for that allocation still holds today.

The Spetchley Estate, as the landowner therefore seeks the allocation of the site for an employment site as a Business Park.

In support of the emerging South Worcestershire Development Plan Review (SWDPR), the Worcestershire Economic Development Needs Assessment Update (EDNA, March 2022) identifies that whilst there is a modest surplus of 11.95ha over the forecast period, there is a deficit of 3.09ha of allocated employment land in Worcester City. Notwithstanding this, in order to meet the LEP's economic aspirations, more land will be needed to facilitate an increased GVA and job growth across South Worcestershire.

The EDNA identifies that of the 43 employment sites assessed, the Land at Newtown Road is one of the most suitable locations for employment growth (ranked 5th). The site achieves a very high market led score reflects its inherent strengths in terms of its location, prominence, environmental setting, and sequential testing, therefore justifying its current allocation for employment uses.

The EDNA's assessment of the site identifies that it is 'developable for employment', with potential to deliver office and/or research and development uses.

The EDNA identifies that several types of premises would need to be accommodated for, including:

- Smaller industrial units
- Mid-sized industrial units
- Larger industrial and warehouse units
- Corporate offices
- Small offices



Bluebell Farm pub at employment area east of the site



Petrol station at employment area east of the site



Worcestershire Royal Hospital buildings to west



Worcestershire Woods Country Park playground



The Country Park and Hospital lie close to the site

SURROUNDING AREA

The surrounding area comprises a variety of residential, commercial, and civic uses located on the eastern edge of the city.

Worcestershire Royal Hospital (WRH) lies west of the site with its main access in and out from Charles Hastings Way. The Trust employs nearly 6,000 people and provides a range of services to a population of 580,000 people in Worcestershire.

Perry Manor Care Home is located within the site on the north-west boundary with the WRH Blue Car Park located along the west boundary within the site.

To enhance the well-being and amenities of employees, the Worcester Woods Country Park is located south west of the site and includes a range of facilities including The Orchard café and park trails. The park is well connected to the site, providing pedestrian and cycle connectivity.

The residential suburbs of Lyppard Bourne and Lyppard Hanford are located beyond Newtown Road to the north. Despite the site's edge of city location, the wider vicinity includes several residential suburbs, including Redhill and Ronkswood.



Worcestershire Royal Hospital on west boundary



Existing car park on west boundary



Worcester Woods Country Park facilities easily accessible from the site



Worcestershire County Council lies within 1km of the site



Perry Manor Care Home lies on west boundary of the site

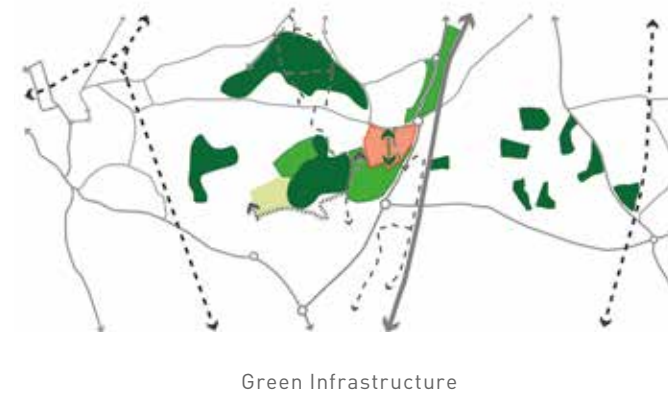
EXISTING SETTLEMENT

Residents enjoy a high standard of living, featuring good health and education in an attractive, safe and secure, low-crime environment. Investment in retail and office space has enabled Worcester to compete successfully with the larger centres within and beyond the West Midlands.



GREEN INFRASTRUCTURE

The landscape is of a very high quality and is a defining feature of south Worcestershire. There is a wide range of types of open space, including: playing fields, recreation grounds, allotments, cemeteries, parks, and amenity green space.



EMPLOYMENT

The planned growth in housing and employment, supported by the work of the Worcestershire Local Enterprise Partnership, has created a robust, competitive local economy. This in turn has retained and stimulated significant inward investment and generated numerous job opportunities.



SITE OVERVIEW

The site extends to approximately 14ha, and comprises two fields bisected by a hedgerow running north to south. The site is currently vacant and consists of a pair of pasture fields with the Perry Manor Care Home and the WRH Blue Car Park located in the north-west and west of the site. A Public Right of Way is located in the eastern field and runs parallel with the hedgerow.

The site's main access/egress is from Newtown Road to the north of the site, although this is agricultural in nature. An existing vehicular access is available from Charles Hastings Way to the north-west.

The site is fairly flat, with gentle undulation and levels dropping away to the north-east. The site is predominantly bordered by mature vegetation, which provides a good level of screening from the north, east and the south.



1. Trees along the north-south hedge



2. Trees along the southern boundary



3. Ditch along the northern boundary and care home



4. Tree along Public Right of Way



5. Site panoramic view east of the hedge taken from south with the A440 road located on the right and Perry Manor Care Home located on the left

CONSTRAINTS AND OPPORTUNITIES



CONCEPT MASTERPLAN



- 1 Existing hospital car park with heliport to south
- 2 Low planting green buffer around heliport
- 3 Primary vehicular access from Newton Road
- 4 Vehicular loop connecting with Charles Hastings Way
- 5 Diverted Public Right of Way
- 6 Pedestrian access to Worcester Woodlands Country Park
- 7 Amenity space with new tree planting, retained shrub and attenuation pond
- 8 Green corridor along retained hedgerow with new north-south pedestrian route
- 9 Employment buildings fronting Newton Road and Nunnery Way will be visible from the highway
- 10 Well landscaped parking areas
- 11 Parking areas to back of buildings to provide buffer to heliport

DEVELOPMENT PRINCIPLES

EMPLOYMENT

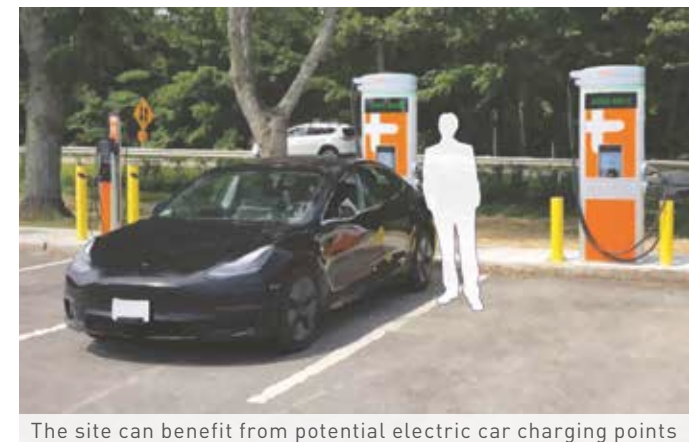
Provision of employment floorspace to meet local and sub-regional needs. Delivery of a high-quality environment, with modern buildings, in keeping with the site context.

ENERGY

Reducing energy demand from new development and incorporating energy efficiency measures in accordance with relevant Building Regulations, alongside the promotion of sustainable construction techniques.

ACCESS

Redevelopment of the area provides the opportunity to enhance pedestrian/cycle links into the city. Reducing the need to commute out to other destinations should reduce the generation of additional traffic flows across key junctions particularly on the A4440 road.



CONCLUSION

This Vision Statement sets out a clear approach that will guide future employment development on the Land at Newtown Road, Worcester, on behalf of The Spetchley Estate.

The proposals will deliver a high quality economic development to address an identified deficit of employment land in the Worcester City administrative area. The proposals also contribute towards the targets set by the Worcestershire LEP's 'Plan for Growth' which is committed to job growth and an uplift in GVA.

The proposals also seek to incorporate green building principles, by reducing energy demand incorporating energy efficiency measures in accordance with Building Regulations. The scheme will contribute towards providing excellent accessibility to/from the site through various modes of transport, including safe and attractive pedestrian and cycle paths. The site is located between two motorway junctions and has access to a healthy employment base.

The Development Principles aim to:

- Focus on improving economic prosperity and delivering new jobs;
- Retain key employers and maximise high value employment opportunities; and
- Encourage active travel by integrating new and existing pedestrian and cycle networks.





EMPLOYMENT BUILDING

BICYCLE SHED

CAR PARK

Concept visualisation with employment areas



pad

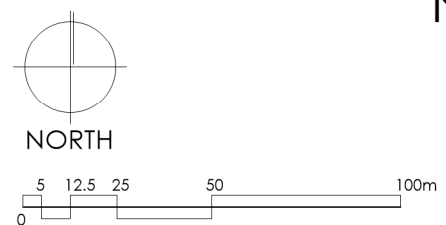


Key:

	Site Boundary		Strategic Landscape
	Existing Care Home		Existing Vegetation
	Employment		Proposed trees
	Existing Infrastructure		Primary Vehicular Route
	Proposed Infrastructure		Diverted Public Right of Way
	Attenuation Pond		Cycle Pedestrian Route (others)
	Existing Water Body		

- Notes:**
- Existing hospital car park with heliport to south
 - Low planting green buffer around heliport
 - Primary vehicular access from Newton Road
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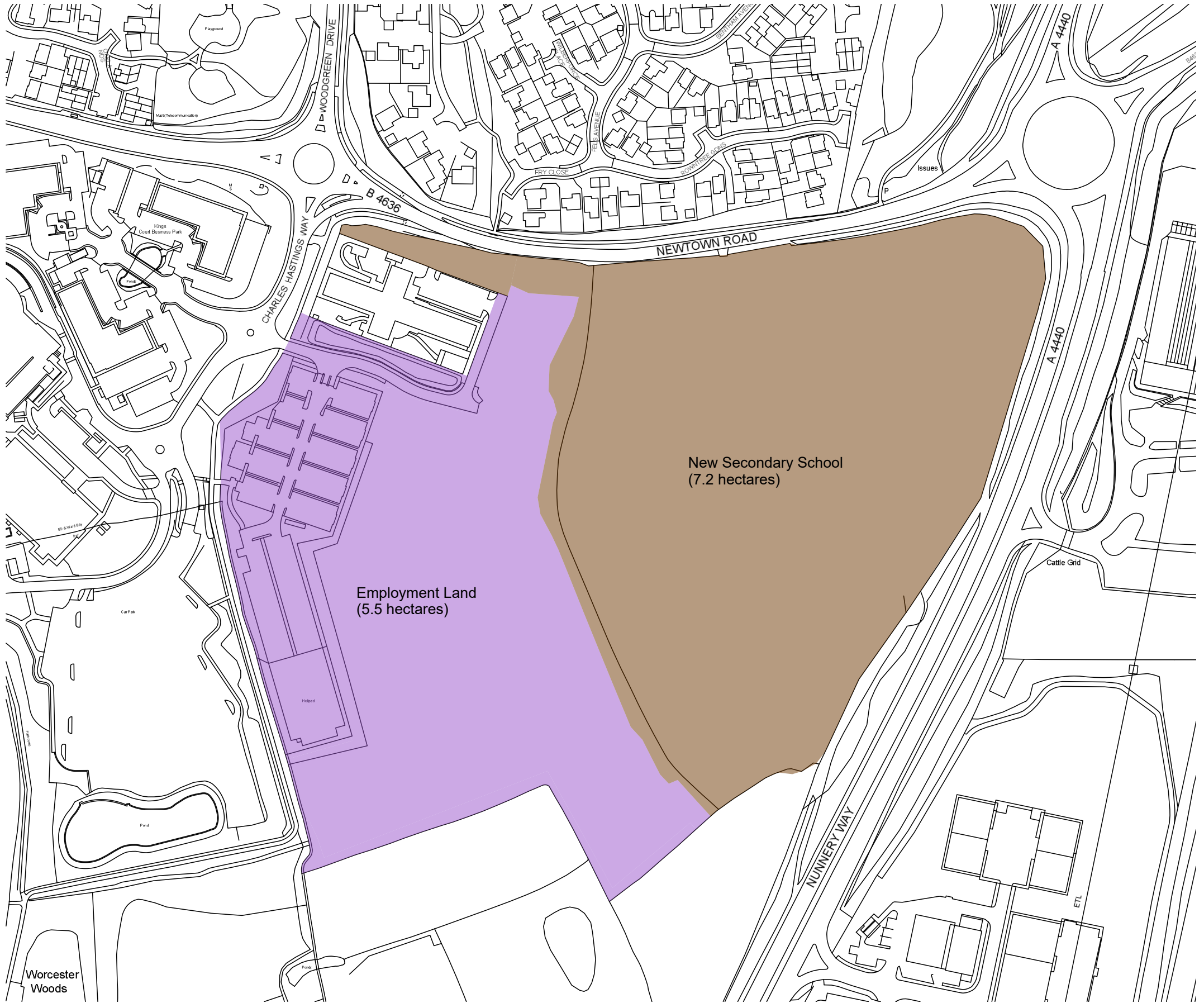
NEWTON ROAD, WORCESTER ILLUSTRATIVE MASTERPLAN



Amendments _____ By Chk'd _____ Date _____

WORK IN PROGRESS

Job No/Drawing No 22560/3010A	Job Title Newton Road, Worcester	
Scale Date Drawn Chk'd 1:2000 12/22 PG MD	Drawing Title Illustrative Masterplan	
All Dimensions to be checked on site OS Licence No: pad Design Ltd - The Tobacco Factory - Raleigh Road - Bristol BS3 1TF - Tel. 0117 9530059 - www.pad-design.com		

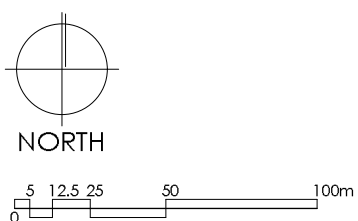


NEWTOWN ROAD, WORCESTER DRAFT POLICY LAND ALLOCATION PLAN

D Amended in line with comments received on 11.12.23
Amendments

PG 11/12/2023
By Chk'd Date

DRAFT FOR COMMENT



Job No/Drawing No 22560/7000D	Job Title Newtown Road, Worcester	
Scale Date Drawn Chk'd 1:2500 09/23 AS MD	Drawing Title Draft Policy Land Allocation Plan	
All Dimensions to be checked on site OS Licence No: 100022432		
pad Design Ltd - The Tobacco Factory - Raleigh Road - Bristol BS3 1TF - Tel. 0117 9530059 - www.pad-design.com		



South Worcestershire Development Plan Team

Civic Centre

Queen Elizabeth Drive

Pershore

WR10 1PT

19th December 2022

Dear South Worcestershire

SWDP Review Publication Public Consultation (Regulation 19)

Worcestershire County Council (WCC) welcomes the opportunity to comment on the above consultation.

Consultation has taken place with the County Council throughout its development and the County Council believe the plan to be fully compliant with legal requirements and have the following comments to make with regards to soundness. For ease of reading this response has been broken down into subject headings.

Worcestershire County Council consider it necessary to participate in hearing sessions for the Examination in Public of the SWPDR, to provide further clarification and detail on the points below or any other matters as required.

Minerals and Waste Policy Response

SWDPR Minerals and Waste Safeguarding policy

WCC welcomes the inclusion of policy SWDPR 39: Minerals and Waste Safeguarding. However, as set out in previous Duty to Co-operate discussions, we have concerns about the exact wording of part B of the policy. It is important

Emily Barker
Head of Planning
and Transport
Planning

County Hall
Spetchley Road
Worcester
WR5 2NP

that policy SWDPR 39 uses accurate terminology for relevant mineral allocations. As set out in the Planning Practice guidance, there are three tiers of mineral allocation: “areas of search”; “preferred areas”; and “specific sites”. As per the definitions in the Minerals Local Plan, all three of these are “mineral allocations”. Areas of search are extensive, as can be seen on the interactive minerals mapping tool available at <https://gis.worcestershire.gov.uk/Website/MineralsLocalPlan/> by clicking on ‘Policies Map’ and then ‘Allocated Sites’.

Part B of policy SWDPR 39 states that:

“All non-exempt development proposals (as defined in the Worcestershire Minerals Local Plan) within or partially within 250m of an extant mineral site, **an allocated mineral site** or supporting minerals infrastructure site (including SWDPR site allocations listed in Table 2 of Annex G) will be required to assess the potential impact on the site in accordance with the policies in the Worcestershire Minerals Local Plan.” (Our emphasis.)

We have previously requested that the policy should specify the safeguarding of “allocated specific sites and preferred areas” rather than “an allocated mineral site”. We believe this to be a matter of soundness because it would not be justified or effective, and it would not be consistent with Minerals Local Plan policy MLP 42 (Safeguarding Mineral Sites and Supporting Infrastructure) which provides for specific sites and preferred areas to be safeguarded, and NOT all areas of search allocations.

It would be inappropriate and disproportionate for part B of the SWDPR 39 policy to extend to areas of search. WCC considers that the current wording of policy SWDPR 39 - which uses different wording to the adopted Minerals Local Plan policy - could have significant implications for applicants and for SWC development management officers and decision-makers. The following change to the wording of Part B of policy SWDPR 39 is required to ensure that “allocated mineral site” is not misunderstood:

All non-exempt development proposals (as defined in the Worcestershire Minerals Local Plan) within or partially within 250m of an extant mineral site, an allocated specific site or preferred area ~~mineral site~~ or supporting minerals infrastructure site (including SWDPR site allocations listed in Table 2 of Annex G) will be required to assess the potential impact on the site in accordance with the policies in the Worcestershire Minerals Local Plan.

WCC believes that there is an issue with soundness with regards to policy SWDPR 39 and have suggested modification to the wording above to address this issue.

Potential impacts on mineral and waste safeguarding arising from SWDPR site allocations

WCC has assessed the potential for the proposed site allocations in the SWDPR to affect mineral resources, mineral sites, mineral supporting infrastructure and/or waste management sites. These assessments have informed extensive Duty to Co-operate (DtC) discussions between officers from WCC and SWCs to identify which of the proposed SWDPR allocations need to undertake minerals and/or waste safeguarding. The requirements for safeguarding are set out in SWDPR Annex G “Minerals and Waste Safeguarding”. WCC and SWCs are in agreement that further amendments are needed to the tables in Annex G of the current SWDPR Regulation 19 consultation to ensure that safeguarding requirements for all relevant SWDPR allocations are accurately recorded. WCC is confident that this mechanism will ensure that minerals and waste safeguarding is applied proportionately. We look forward to continued liaison with SWCs to further refine Annex G prior to the SWDPR being submitted for examination. The changes necessary to Annex G will be set out in the Statement of Common Ground being developed between WCC and the SWCs.

Subject to the limited changes to Annex G discussed above, the SWDPR identifies housing and employment allocations that will need to address one or more types of safeguarding as part of any planning application. WCC has also assessed the other types of allocation in the SWDPR and is satisfied that no issues regarding minerals or waste safeguarding arise in relation to the reallocations from the existing SWDP or from the proposed country parks. WCC does, however, welcome further discussion with the SWCs regarding the proposed renewable and low-carbon energy allocations, as several of these proposed allocations do raise minerals and/or waste safeguarding concerns. These concerns are considered further below.

SWDPR proposed solar farm allocations

WCC has identified that some of the sites proposed for allocation for ground-mounted solar photovoltaic farms under policy SWDPR 59: Renewable and Low Carbon Energy Site Allocations are within Mineral Consultation Areas and/or are adjacent to safeguarded mineral and waste sites. Some of these proposed solar allocations are also adjacent to sites that have been promoted for mineral development in WCC’s Mineral Site Allocations DPD.

Whether or not solar farm development is compatible with mineral development, or is acceptable within Mineral Consultation Areas, will depend on the specific circumstances in each case. WCC considers that, although potential conflicts between solar farms and mineral sites/mineral resources may be less apparent than conflicts between (for example) housing and mineral sites/mineral resources, this does not mean that conflicts would not arise. When considering

interactions between solar farms operating alongside mineral developments, it is clear that solar farms are likely to be less susceptible to some types of impacts from mineral development than other, more sensitive receptors. Any noise or visual impacts from a mineral site, for example, would be unlikely to significantly affect a solar farm, although this may still need to be considered at application stage. Other types of impacts, such as dust and vibration, have more potential to impact the operation of a solar farm and would need to be investigated in more detail.

Solar developments tend to require only minimal and shallow excavations; the underlying mineral resources would be largely undisturbed and therefore would theoretically remain available for extraction in the longer term. However, whilst we recognise that some solar developments are “temporary”, and we note that proposed policy SWDPR 59 states that solar farms would be a temporary use of land for a maximum of 25 years, we consider that the allocation of the land for renewable/low-carbon energy is likely to imply or lead to a permanent change of land use. In addition, even if a solar development is deemed to be “temporary”, it would prevent mineral extraction during its lifetime, and development of a solar farm in a wider area of currently unconstrained mineral resources could constrain future mineral working beyond the solar site boundary through the need to avoid impacts on the solar farm. We therefore consider that, where potential interactions have been identified between solar farm allocations and mineral resources, sites or infrastructure, there is a need for an assessment of the likely impact of the proposed solar allocations on safeguarded minerals resources and safeguarded mineral and waste sites.

Cumulative impacts may also need to be considered, such as the impact of vehicle movements from the solar farm (particularly during construction and decommissioning) and the mineral development on the local road network.

Solar farm applications within Minerals Consultation Areas (MCAs)

RLCE018 ‘Land off Alcester Road, Harvington’ falls wholly within a sand and gravel MCA. Although the resource in the immediate vicinity of the proposed site is relatively narrow, there is currently little existing development that would act to sterilise the resource. The solar farm allocation would materially increase the risk to minerals safeguarding within and beyond the site boundary. **Proposed allocation RLCE018 should be added to Table 1 of Annex G “SWDPR Site Allocations within Mineral Consultation Areas which will be required to address mineral safeguarding (see Policy SWDP 38 and Worcestershire Minerals Local Plan)”.**

RLCE038c ‘Land at Crophorne’ falls wholly within a sand and gravel MCA. Existing properties to north, south and north-east mean that the development would not materially extend the current area of sterilisation. Prior extraction is

unlikely to be necessary for a solar development. **No further action regarding safeguarded mineral resources is required for RLCE038c.**

The majority of RLCE060sc 'Land to rear of Wadborough Road, Norton' falls within a sand and gravel MCA. The mineral resource within 250m of the proposed allocation is relatively narrow and is already partially sterilised by existing development. **No further action regarding safeguarded mineral resources is required for RLCE060sc.**

RLCE033b 'Ryall House Farm, Ryall' falls wholly within a sand and gravel MCA. Whilst the resources within the proposed allocation boundary may have already been worked, resources extend in all directions from the proposed allocation. The solar farm development could potentially constrain the ability of minerals to be extracted in the surrounding area. An MRA should be required to inform allocation. **Proposed allocation RLCE033b should be added to Table 1 of Annex G "SWDPR Site Allocations within Mineral Consultation Areas which will be required to address mineral safeguarding (see Policy SWDP 38 and Worcestershire Minerals Local Plan)".**

Solar farm applications within/within 250m of existing mineral sites or existing minerals supporting infrastructure

The only proposed solar farm allocation that falls within 250m of safeguarded mineral sites/infrastructure is RLCE033b 'Ryall House Farm, Ryall'. The majority of RLCE033b falls within the red-line boundaries of the 'Ryall House Farm' and 'Saxons Lode' sand and gravel sites. The 'Ryall House Farm' site is currently operational, and the 'Saxons Lode' site is undergoing restoration and will remain a safeguarded site until restoration and aftercare are complete.

RLCE033b is also within around 70m of the 'Ryall' concrete plant and within around 110m of 'Ryall House Farm Quarry' wharfage. Both of these sites are safeguarded under Minerals Local Plan policy MLP 42: Safeguarding Mineral Sites and Supporting Infrastructure.

In accordance with the "agent of change" principle in paragraph 187 of the National Planning Policy Framework, where the continued operation of the mineral sites or supporting minerals infrastructure could have a significant adverse effect on proposed development in the vicinity of the mineral/infrastructure site(s), the applicant of the new development would need to provide suitable mitigation before the development has been completed.

Proposed allocation RLCE033b should be added to Table 1 of Annex G "SWDPR Site Allocations within 250m of a mineral site or supporting mineral infrastructure site which will be required to address mineral

safeguarding (see Policy SWDP 38 and Worcestershire Minerals Local Plan)”.

Solar farm applications within/within 250m of promoted mineral sites

WCC is preparing a Mineral Site Allocations DPD to allocate specific sites and preferred areas for mineral development. Sites promoted by industry/landowners are being evaluated by WCC. Because the SWDPR will almost certainly be adopted before the DPD, it is highly unlikely that the promoted mineral sites will be safeguarded under national or local policy at the time the solar farm sites are allocated¹. As such, WCC does not object to any of the solar farm allocations on the grounds of potential conflicts with promoted minerals sites.

Notwithstanding the fact that mineral site safeguarding would not formally apply in these circumstances, WCC considers it good practice to discuss these two sets of allocations under the Duty to Co-operate. This will help to identify where any interactions between the two sets of allocations could potentially arise and, if necessary, options to avoid conflict could be considered.

Two of the proposed solar farm allocations could potentially require further discussion between WCC and SWDP officers:

- RLCE018 'Land off Alcester Road, Harvington' is immediately adjacent to the promoted mineral site 'Harvington, Green Street Farm'.
- RLCE033b 'Ryall House Farm, Ryall' is immediately adjacent to the promoted mineral site 'North East of Uckinghall'.

WCC has no objection to the allocation of the above two proposed SWDPR sites on the basis of their relationship to promoted Mineral Site Allocation DPD sites, but would welcome ongoing discussion under the Duty to Co-operate regarding the relationship between both sets of allocations.

Solar farm applications within 250m of safeguarded waste sites

Existing waste management facilities are protected from development that could compromise their operations under policy WCS 16 'New development proposed on or near to existing waste management facilities' of the adopted Waste Core Strategy Local Plan. The types of development likely to pose the greatest risk to waste management sites are developments susceptible to amenity impacts. Whilst WCC considers that the likelihood of solar farms to be affected in such a way is low, the impacts cannot be completely ruled out at this stage. More

¹ Once the Mineral Site Allocations DPD is adopted, any planning applications for development that have not been expressly exempt at the allocation stage will need to take account of minerals safeguarding policy where relevant.

information on the nature of the solar farm would be needed to allow for an assessment to be made at planning application stage.

RLCE033b 'Ryall House Farm, Ryall' is partly within the boundary of the 'Saxons Lode' landfill site, with the majority of the proposed allocation falling within 250m of the safeguarded waste site.

Proposed allocation RLCE033b should be added to Table 3 of Annex G "SWDPR Site Allocations within 250m of an existing waste management facility which will be required to address waste safeguarding".

Highways Response

WCC is the Local Highway Authority for Worcestershire and is responsible for operating and maintaining the County's local road network, both in respect of its current activities and needs as well as its long-term operation and integrity. We are interested in the potential traffic and transport impacts of development site proposals and/or policies coming forward through the Local Plan process and need to ensure these are fully assessed and understood through the plan-making stage. It is imperative to identify any sustainable transport strategies and transport network infrastructure improvements needed to sustainably deliver aspirations at this early stage, as set out in Government policy.

Relevant Plan-Making Policy – Transport

Our responses to Local Plan consultations are guided by relevant policy and guidance, including the National Planning Policy Framework (2021) (NPPF).

NPPF sets out that plans should be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and statutory consultees (para 16).

Strategic policy-making authorities should collaborate to identify the relevant strategic matters which they need to address in their plans. They should also engage with their local communities and relevant bodies including county councils (para 25).

Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary (para 26).

In order to demonstrate effective and on-going joint working, strategic policymaking authorities should prepare and maintain one or more statements of

common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these (para 27).

Transport issues should be considered from the earliest stages of plan-making and development proposals so that the potential impact of development on transport networks can be addressed. (para 104).

The planning system should actively manage patterns of growth such that significant development is focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. (para 105).

Planning policies should be prepared with the active involvement of highways authorities and other transport infrastructure providers so that strategies and investments for supporting sustainable transport and development patterns are aligned. (para 106).

Planning policies and decisions should support development that makes efficient use of land, taking into account the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use. (para 124).

In terms of identifying the necessity of transport infrastructure, NPPF confirms that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. (para 111).

Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (including transport). Such policies should not undermine the deliverability of the plan. (para 34).

In summary, as a minimum, in order for the transport evidence base to satisfy the requirements of NPPF, it is necessary to establish:-

- The transport impacts of the development allocations;
- The improvements necessary (across all modes) to ensure that the impacts are not severe or unacceptable;
- Any land required for the delivery of the necessary improvements;
- The cost of the necessary improvements; and
- Any other deliverability constraints.

More information on this can be found in the Planning Practice Guidance which supports the NPPF 2021.

SWDPR Highways and Transport Evidence Base

Previously prepared transport modelling reports and impact assessments for the emerging strategic development locations have been made available, as part of the Regulation 19 Publication Evidence. The modelling reports were based on a number of transport models, particularly the Worcester Transport Model (WTM), which were used to consider the initial allocation proposals. However, the preferred spatial strategy and masterplanning of each strategic allocation has evolved since modelling reports and transport assessments were undertaken and further modelling for the transport evidence base is proposed.

We are working collaboratively with the District Councils and National Highways to further develop the transport evidence base for the South Worcestershire Development Plan Review (SWDPR), which will now be progressed using WCC's new Countywide Transport Model (CTM). The CTM is able to test the impact of the development strategy proposed across the whole South Worcestershire Plan area in one model. This will further capture the interactions between the emerging allocations as well as their individual impacts on the highway and transport network.

We continue to work positively and proactively with the District Councils and National Highways to further progress the necessary transport evidence base with the aim that an updated transport assessment of the preferred spatial strategy will be reported in the New Year.

Strategic Vision and Objectives

The current SWDP, adopted in 2016, sets out the land use planning strategy across the South Worcestershire Plan area up until 2030. The Plan Review will extend this horizon year to 2041.

The Draft Plan sets out an overarching spatial vision for 2041, which includes ensuring residents and businesses enjoy better accessibility within and beyond South Worcestershire through the implementation of "major improvements to the highway network, in particular completion of the improvements to the M5 junctions and the A4440 at Worcester, as well as the dualling of the North Cotswold railway line through Worcestershire Parkway, improvements to Pershore rail station and delivery of the rail halt at Rushwick". The Vision also outlines that the Plan will be supported by "a series of smaller but no less vital infrastructure improvements... including improvements to local roads, junctions, public transport provision,

significant upgrades to walking and cycling networks, drainage and water infrastructure". The Vision is underpinned by 20 strategic objectives, which includes two transport specific objectives -

- 14: To allocate most development in locations where there is good access to local services and where transport choice is maximised, and
- 20: All new development to contribute to the provision of accessible community infrastructure that increases the number of pedestrian and cycle movements in public places, and which enhances the connectivity between new and existing developments.

WCC welcomes the vision and underpinning strategic objectives. We share many of the same goals as the District Councils, including the desire for housing to be located at sites which are sustainable in transport terms and the development of a transport strategy which identifies the infrastructure and interventions necessary to deliver sustainable economic growth. However, we note that the strategic objectives do not currently refer to the need for the realisation of growth to be enabled by the phased delivery of transport interventions and it may be the case that the objectives could be strengthened by the inclusion of an aim to ensure that development and infrastructure needs are met in a timely and coordinated manner.

Strategic Policies

WCC has considered the draft strategic policies relevant to its role as the local highway authority for the Plan area and we would make the following comments.

SWDPR 06: Transport provides the strategic transport policy for the Plan. WCC considers that the title of Policy SWDPR 06 may benefit from further expansion, to 'Travel (or Movement) and Transport' to make it more inclusive and comprehensive.

Policy SWDPR 06 requirement M outlines that in cases where new transport infrastructure is necessary in order to make a development proposal acceptable in planning terms, financial contributions will be secured through a Community Infrastructure Levy (CIL) and/or a Section 106 legal agreement. Whilst WCC is broadly supportive of this policy requirement, clarification is requested as to how the delivery of development will be managed such that if there is a delay in securing sufficient contributions for necessary infrastructure (e.g. strategic

schemes), the appropriate phase of development for which that infrastructure is needed will not be brought into use until it is operational. WCC also considers that the wording of policy requirement M should be revised to better align with NPPF 2021 and reflect the use of other mechanisms to secure and deliver necessary transport infrastructure improvements, including planning conditions and Section 278 (Highways Act 1980) agreements.

WCC notes SWDPR 09 policy requirement F and recommends further clarification as to how it is intended to manage the delivery of development in instances where there is a delay between collecting sufficient CIL receipts to meet the full costs of implementing strategic infrastructure schemes necessary to mitigate the impact of a development or the appropriate phase of development for which that infrastructure is needed. WCC also notes that the “cumulative impacts of infrastructure” should be revised to be the “cumulative impacts of development”.

Economic Growth

Employment development often contributes significantly to peak hour traffic demand. It is noted that there can be challenges to accommodating high levels of trip demand, which may only exist for limited periods of the day, on principal county routes, such as the A4440 and the Major Road Network, including the A44. The attraction to businesses of locating to highly accessible locations is recognised, and we are aware that many businesses would like to be located close to principal county routes and locally-strategic connections. Indeed, for some businesses, close proximity to principal county routes and the Strategic Road Network is essential. Thus, consideration of the location of employment sites is as important to WCC as the location of housing sites.

When considering the location and associated supporting infrastructure for new employment areas, opportunities to provide new connections and improvements to the existing sustainable modes network (i.e. pedestrian, cycle and bus networks) for journeys to and from work should be prioritised and it must be demonstrated that safe and suitable access can be provided for all users, including heavy goods vehicles.

Policy SWDPR 11: Providing the Right Land and Buildings for Jobs provides that the Strategic Employment Sites to be brought forward through the Plan are:-

1. Warndon Business Parks.
2. Blackpole East and West and Cosgrove Close.
3. Worcester Six Business Park.

4. Malvern Hills Science Park and QinetiQ.
5. Enigma Business Park and Spring Lane.
6. Tenbury Business Park.
7. Vale Park.
8. Hartlebury Trading Estate.
9. Stonebridge Cross.
10. North Pershore / Keytec.
11. Berry Hill.
12. Hampton Lovett.
13. Stockwood Business Park

Policy SWDPR 02 outlines that 71.75 hectares of employment land was committed across the Plan area as of March 2021 and 75 hectares of the remaining 290.70 hectares to be allocated by the SWDPR is provided at 'strategic locations'. It remains unclear as to whether 'strategic locations' comprises the 13 Strategic Employment Sites listed above, or the strategic allocations outlined in section 8 of the Draft Plan and clarification would be helpful.

As set out at section 8: Allocations, WCC notes that 50 hectares of employment land is proposed to be allocated at Worcestershire Parkway, 60 hectares is to be allocated at Throckmorton Airfield, 5 hectares is to be provided at Rushwick and 10 hectares is to be provided at North-East Malvern. Paragraph 10.4 of the Draft Plan suggests that there is evidence to support a 70-hectare (gross) sub-regional employment site at Worcester Six (south) (Worcester Six north currently occupies 27 hectares) providing opportunities for existing manufacturing companies in the area to consolidate and expand by relocating to this site.

Policy SWDPR 13: Non-Allocated Employment Sites outlines the evidence required to be provided to support proposed employment development not allocated by the Plan. WCC notes that should development be permitted which has not been allocated and therefore tested within the transport evidence base and assessment supporting the Local Plan, it may be the case that highway and transport infrastructure improvements identified within the Infrastructure Delivery Plan (IDP) need to be brought forward earlier than planned and/or further improvement would be necessary, over and above that identified, in order to safely accommodate new development allocated in the SWDPR.

Allocations

The SWDPR proposes three Strategic Growth Areas (SGAs)/new settlements to help meet the identified housing and employment needs (SWDPR 02) to 2041. The SGAs are located at Worcestershire Parkway, Throckmorton Airfield and Rushwick.

Worcestershire Parkway

SWDPR 51: Worcestershire Parkway provides the policy requirements for a new strategic development at Worcestershire Parkway. The overarching vision for the SGA is to deliver a carbon neutral garden settlement of approximately 10,000 dwellings and 50 hectares of employment land in a phased manner, with 5,000 dwellings and all of the employment land being brought forward in this Plan period (2021-2041). The housing and employment land development is proposed to be supported by on-site retail, education and community services and facilities.

A new development road is also proposed to connect the A44 to the east of the site, to the B4084 at the site's western extent during the Plan period.

WCC notes the inclusion of policy requirement E, which suggests that the new settlement must be self-sufficient regarding transport, utilities, education, health, community and other infrastructure, where necessary allowing for the expansion and improvement of nearby facilities. WCC considers that, in order to promote and maximise self-containment within the settlement, understanding the phasing of land uses and how it is intended for the development to be managed within the first phase of delivery up to 2041, will be critical.

The intended phasing of the first 5000 homes to be brought forward in this Plan period, alongside employment land, other on-site land uses and the delivery of on-site transport infrastructure will need to be included in the transport assessment, with any necessary development phasing requirements and wider transport infrastructure improvements signposted in policy SWDPR 51 and included within an updated IDP.

SWDPR 51 policy requirement G(vii) sets out that a Movement Strategy, which prioritises walking, cycling and access to public transport, has informed the design of the new settlement. WCC has been engaged in the development of the Movement Strategy for the SGA and continues to work with the District Councils, National Highways and relevant stakeholders to inform the wider masterplan. We

note that policy requirement G(vii) lists critical transport infrastructure to support the successful delivery of the SGA, which is also referred to in the IDP. It is suggested that the list currently provided is not exhaustive and that a traffic monitor and manage strategy will be required to support the SGA, to be implemented throughout the subsequent development management process.

WCC welcomes the inclusion of policy requirement I, which seeks to secure that the realisation of new dwellings across the SGA is matched by the delivery of necessary and critical infrastructure, including the delivery of the new development access road connecting the B4084 with the Railway Station and the A44. WCC notes that policy requirement I suggests that “proposals which would deliver unsustainable, disconnected and isolated development will be refused”.

This requirement may benefit from revised wording which more positively provides the criteria for planning permission to be granted, such as new development will only be permitted where appropriate opportunities to promote sustainable and active transport modes can be, or have been, taken up.

Policy requirement G(xii) outlines that development proposals at Worcestershire Parkway will be expected to provide contributions to new infrastructure in accordance with SWDPR 9, referring to the IDP, including education, transport, retail, sporting and recreational facilities, emergency and healthcare services. However, policy requirement J suggests that necessary infrastructure, including transport infrastructure, must be provided in accordance with the latest IDP schedule unless it can be demonstrated that: -

- i. Relevant infrastructure capacity is readily available to service the quantum of development proposed;
- ii. The relevant infrastructure will be provided in advance of the proposed development; or
- iii. Alternative provision can be secured and agreed with the relevant provider and the Local Planning Authority to meet the relevant requirement

WCC requests clarification as to how strategic policy SWDPR 06: Transport (requirement M), SWDPR 09: Infrastructure, SWDPR 64: Implementation and Monitoring, and SWDPR 51: Worcestershire Parkway (requirements G(xii) and J) are intended to work together. The policies appear to be inconsistent in part, whereby some requirements place S106 obligations or CIL requirements on

new development proposals for cumulative infrastructure necessitated by the Plan, whereas other policy requirements appear to suggest that obligations or CIL contributions will not be required towards identified strategic infrastructure schemes if individual development proposals can demonstrate they can be accommodated within the existing available network capacity. **It should also be confirmed whether the CIL calculation for strategic transport schemes has taken account development that would not have to contribute based on the tests set out within policy requirement J.**

WCC also requests clarification as to how any delay in receiving sufficient contributions or CIL receipts to implement necessary infrastructure has been taken into account within the IDP.

Throckmorton Airfield

SWDPR 52: Land at Throckmorton New Settlement provides the policy requirements for a new strategic development at Throckmorton Airfield. The overarching vision for the SGA is to deliver a carbon neutral sustainable settlement of approximately 5000 dwellings and 60 hectares of employment land in a phased manner, with 2,000 dwellings and 20 hectares of employment land being brought forward in this Plan period (2021-2041). The housing and employment land development is proposed to be supported by on-site retail, education and community services and facilities. It is anticipated that the first 2000 would not commence until 2030, when critical movement and educational infrastructure will have been provided.

WCC notes the inclusion of policy requirement C, which suggests that the new settlement must be self-sufficient regarding transport, utilities, education, health, community and other infrastructure, where necessary allowing for the expansion and improvement of nearby facilities. WCC considers that in order to promote and maximise self-containment within the settlement, understanding the phasing of land uses and how it is intended for the development to be managed within the first phase of delivery up to 2041, will be critical.

The intended phasing of the first 2000 homes to be brought forward in this Plan period, alongside employment land, other on-site land uses and the delivery of on-site transport infrastructure will need to be included in the transport assessment, with any necessary development phasing requirements and wider transport infrastructure improvements signposted in policy SWDPR 51 and included within an updated IDP.

Policy requirement D lists critical transport infrastructure to support the successful delivery of the SGA, which is also referred to in the IDP. This includes a new access road linking the centre of the SGA to the A44, active travel and shuttle bus connections to Pershore Railway Station and an additional 500-space car park at Pershore Railway Station. WCC accepts that the proposed car park could attract car-based travel to the Railway Station, and this will need to be included within the updated transport assessment and evidence base.

WCC notes the absence of a policy requirement regarding a transport monitor and manage strategy or approach for Throckmorton Airfield and requests clarification in this regard. Policy requirement F requires that “the number and phasing of dwellings to be permitted, and the timing of housing delivery will be directly linked to the delivery of critical and necessary infrastructure. This will be agreed and conditioned through the planning application process, in consultation with the Local Planning Authority. Proposals which would deliver unsustainable, disconnected and isolated development will be refused”. WCC welcomes this signposting to a development management strategy for the Throckmorton Airfield which seeks to ensure that the realisation of new homes is met by the timely delivery of necessary infrastructure. **However, and as for Worcestershire Parkway, this requirement may benefit from revised wording which more positively provides the criteria for planning permission to be granted, such as new development will only be permitted where appropriate opportunities to promote sustainable and active transport modes can be, or have been, taken up.**

Policy requirement D(xii) outlines that development proposals at Throckmorton Airfield will be expected to provide contributions to new infrastructure in accordance with SWDPR 9, referring to the IDP, including education, transport, sporting and recreational facilities, emergency and healthcare services. However, policy requirement G suggests that necessary infrastructure, including transport infrastructure, must be provided in accordance with the latest IDP schedule unless it can be demonstrated that:-

- i. Relevant infrastructure capacity is readily available to service the quantum of development proposed;
- ii. The relevant infrastructure will be provided in advance of the proposed development; or

- iii. Alternative provision can be secured and agreed with the relevant provider and the Local Planning Authority to meet the relevant requirement.

WCC requests clarification as to how strategic policy SWDPR 06: Transport (requirement M), SWDPR 09: Infrastructure, SWDPR 64: Implementation and Monitoring, and SWDPR 52: Throckmorton (requirements D(xii) and G) are intended to work together.

Rushwick Expanded Settlement

SWDPR 53: Rushwick Expanded Settlement provides the policy requirements for an expansion of the existing settlement at Rushwick. Land at Rushwick will be developed to deliver approximately 1000 new dwellings within the Plan period and 5 hectares of employment land.

Policy requirement D(vii) lists critical transport infrastructure identified to support the successful delivery of the SGA, which is also referred to in the IDP. This includes an active travel bridge across the railway to serve the railway station, junction improvements on the A4103 and new and improved active travel routes including links between the development and Worcester City. **WCC considers that the proposed Railway Station car park would attract off-site car-based travel to the Railway Station, and this will need to be included within the updated transport assessment and evidence base.**

Policy requirement D(xii) and F outline that development proposals at the Rushwick SGA will be expected to provide contributions to new infrastructure in accordance with SWDPR 9, referring to the IDP, including education, transport, sporting and recreational facilities, emergency and healthcare services. Policy requirement F requires that “the number and phasing of dwellings to be permitted, and the timing of housing delivery will be linked to the planned infrastructure delivery. This will be agreed and conditioned through the planning application process, in consultation with the Local Planning Authority. It is also noted that S106 funding may be required over an extended time period, and this is likely to exceed 10 years.

Site Allocations – Transport Assessment and Evidence

We have set out above the requirement for the SWDPR to be underpinned by a robust transport evidence base which assesses the cumulative impact of the Plan

on the surrounding highway and transport network and identifies, in collaboration with the Highway Authorities, any necessary infrastructure and interventions to ensure that the transport needs of the Plan are met, without resulting in a severe congestion or unacceptable highway safety impact. In addition, the spatial strategy and respective strategic allocations should be genuinely vision-led, maximising opportunities for sustainable and active travel choices from the outset of development.

WCC continues to work with the District Councils and National Highways to progress the transport evidence base supporting the SWDPR and anticipates that further and more comprehensive transport assessment work, utilising the CTM, will be reported in the New Year. It is intended that this work clearly distinguishes between the quantum of development to be brought forward through the SWDPR Plan period up to 2041, and the wider 'vision' for further development of Worcestershire Parkway and Throckmorton Airfield beyond the Plan period.

The requirement for site specific infrastructure and interventions necessary to successfully deliver the sustainable development of each SGA should be clearly identified and/or signposted within the relevant site allocation policy and included with an updated IDP.

Local Highway and Transport Considerations

During our ongoing engagement with the District Councils and National Highways, we have discussed the current performance of the highway and transport network across South Worcestershire which will need to be considered in the evidence base supporting SWDPR. Several links and junctions, particularly those around Worcester and Evesham, are already constrained at peak times, resulting in adverse congestion and safety impacts. In accordance with the NPPF 2021 and emerging strategic transport policy SWDPR 06: Transport, WCC would take the view that any new development which results in a severe congestion or unacceptable highway safety impacts would be required to bring forward necessary transport infrastructure/interventions to mitigate those impacts to an acceptable level.

The transport evidence base will need to consider the impact of the proposed allocations, including residual allocations still to be brought forward, on the highway network across the South Worcestershire Plan area and identify any required improvements over and above those already planned and committed.

Any necessary infrastructure improvements should be included within an updated IDP/transport strategy and clearly signposted in Plan policy.

As outlined above, WCC continues to work collaboratively with the District Councils and National Highways to progress the transport evidence base required to support the new Local Plan and identify the necessary infrastructure and interventions required to successfully deliver sustainable growth. As we work to progress the transport evidence base and subsequent transport strategy for the SWDPR, we will also consider how the delivery of development across the Plan area will be managed such that necessary infrastructure is in place in a timely manner to ensure severe and unacceptable safety impacts do not occur on the highway network.

Implementation and Monitoring

WCC recognises that the successful delivery and implementation of the SWDPR will depend on a range of organisations and stakeholders within and beyond the South Worcestershire Plan area. The inclusion of Plan monitoring and review criteria at policy SWDPR 64: Implementation and Monitoring is welcome, and we note that one of the scenarios which would require a Plan review would be the failure of strategic policies SWDPR 01 to 10, when assessed against the Plan objectives, which includes SWDPR 06: Transport.

SWDPR 64 policy requirements A and B appear to be similar to policy requirements contained with strategic policy SWDPR 09: Infrastructure. Within both policies, it is required that CIL will be used to address the cumulative impacts of infrastructure in an area. WCC notes that SWDPR 64 directly repeats this requirement at both A and B. As requested in respect of strategic policy SWDPR 09, WCC requests clarification as to how it is intended to manage the delivery of development in instances where there is a delay between collecting sufficient CIL receipts to meet the full costs of implementing strategic infrastructure schemes necessary to mitigate the impact of a development or the appropriate phase of development for which that infrastructure is needed. WCC also notes that the “cumulative impacts of infrastructure” should be revised to be the “cumulative impacts of development”.

As highlighted within the allocations policies, WCC requests clarification as to how strategic policy SWDPR 06: Transport (requirement M), SWDPR 09: Infrastructure, SWDPR 64: Implementation and Monitoring, and allocations policies (transport infrastructure and contribution requirements) are intended to

work together. The policies appear to be inconsistent in part, whereby some requirements place S106 obligations or CIL requirements on new development proposals for cumulative infrastructure necessitated by the Plan, whereas other policy requirements appear to suggest that obligations or CIL contributions will not be required towards identified strategic infrastructure schemes if individual development proposals can demonstrate they can be accommodated within the existing available network capacity.

WCC supports the proposed schedule for monitoring the delivery and implementation of the Plan, which will take place on an annual basis. WCC would welcome the opportunity to be engaged with the District Councils South Worcestershire Authorities Infrastructure Monitoring Report.

In addition, WCC will have a significant interest in the annual Infrastructure Funding Statement, particularly with regards to understanding the anticipated level of funding from CIL receipts and developer contributions towards delivering strategic highway and transport schemes identified within the IDP.

Highways conclusion

To date, WCC has worked collaboratively with the District Councils to inform the strategic transport and allocations policies set out within the Draft Plan and is supportive of the underpinning principle that development should be promoted in locations that are, or can be made sustainable, facilitating the uptake of sustainable transport modes.

The early transport evidence and assessment, contained within Publication Evidence, provides an indication of those areas of the highway network that are likely to be a key concern, where strategic site allocations along the principal county highway network could significantly increase demand at constrained junctions and links, particularly during network peak periods. Work is continuing with the District Councils and National Highways to identify those locations where severe and unacceptable highway safety impacts may occur as a result of planned new development and to identify the necessary sustainable transport and highway interventions required to support the successful and sustainable delivery of the Plan.

We anticipate that further and more comprehensive transport assessment work will be reported in the New Year and subsequently be used to inform updates to the IDP supporting the Plan.

We look forward to continuing to work in cooperation with the District Councils and National Highways as the Plan is progressed to its final stages.

Ecology

Comments on policy SWDPR07

WCC Environmental Policy team support the wording as proposed in the Strategic Green Infrastructure policy SWDPR07.

Legislative changes arising around Biodiversity Net Gain and the Environment Act (2021) now mean that wording within Reasoned Justification of policy SWDPR07 will benefit from a minor refinement so as to demonstrate closer alignment with new statutory requirements. **Suggested wording:**

- 7.5 Development of both greenfield and brownfield sites will be expected to retain, protect and enhance the integrity of the GI network and its connectivity. Key GI features such as Sustainable Drainage (SuDS), green roofs, green walls, tree planting (particularly in urban settings) and measurable biodiversity net gain will be delivered wherever possible and integrated into the wider GI network. **Biodiversity net gain will be secured in all instances where mandated by the Environment Act 2021.** The delivery of GI should be benchmarked against recognised approaches. Building with Nature is the SWC preferred example of such a standard, which can provide accreditation based on a specific framework of principles that assesses the quality, functionality and long-term management of GI, as well as the additional value that a scheme may bring to the economy, sense of place or health and wellbeing.

Similarly, paragraph 7.12 of the Reasoned Justification should be updated to reflect the establishment of Conservation Covenants through Part 7 of the Environment Act as a new mechanism capable of securing long term management of land including that intended for contribution towards Green Infrastructure provision.

- 7.12 The policy also requires that effective management arrangements are put in place and it is accepted that a range of mechanisms can be employed to deliver this requirement, whether it is through a management company, a community led scheme, **Conservation Covenant** or the adoption of the GI by another organisation. Whichever approach is used, it should allow effective engagement of residents and others contributing to the management (directly or

financially) over the effectiveness of the management regime and costs and dispute resolutions.

Comments on Policy SWDPR27

Schedule 14 of the Environment Act requires the effective maintenance of Biodiversity Net Gain secured through planning consent for a period of “at least 30 years”. Schedule 7A of the Environment Act is clear that the post-development biodiversity value of onsite habitats will, by virtue of planning condition, planning obligation or conservation covenant, be maintained for a period of “at least 30 years after the development is completed”. **It would therefore appear prudent to modify Policy SWDPR27 to capture this expectation for maintenance of relevant biodiversity features, as follows:**

K. Development must secure the effective management and monitoring of relevant biodiversity features, both on and off-site **for a period of at least 30 years.**

Section 102 of the Environment Act amends Section 40 of the Natural Environment and Rural Communities Act (2006) ‘biodiversity duty’ to as to require public authorities to consider both the conservation and enhancement of biodiversity. **Paragraph 2.1 should therefore be amended to reflect this strengthened biodiversity duty, as follows:**

2.1 Conserving and enhancing the natural environment is one of the NPPFs core planning principles and Section 15 sets out how planning policy should achieve this. The Natural Environment and Rural Communities (NERC) Act (2006) **as strengthened by the Environment Act** requires public bodies to have regard to the purpose of conserving **and enhancing** biodiversity. The Environment Act (2021) sets out the government’s agenda for environmental reform and is considered key to delivering commitments made in the 25 Year Environmental Plan and achieving Net Zero Carbon Emissions by 2050(87).

Similarly, Paragraph 2.4 of the Reasoned Justification appears outdated due to recent legislative changes, especially within its first sentence; following implementation of Schedule 7A of the Environment Act, biodiversity net gain will no longer be an ‘expectation’ and, during the lifetime of the SWDPR, will be a statutory and quantifiable requirement. **It would therefore be prudent to separate treatment of habitats (which will be managed towards achieving measurable Biodiversity Net Gain in compliance with Schedule 7A of the Environment Act) from those measures intended to benefit notable/protected fauna, such as integrated bird and/or bat boxes, invertebrate boxes and hedgehog highways in new developments.** These should not be treated as interchangeable requirements. **Additionally, to align**

with the explicit and quantifiable Biodiversity Net Gain target of >+10%, an expectation for measurable provision of measures which benefit wild fauna should also be articulated within the SWDPR, to help secure wildlife benefits proportional to the scale and nature of the development. We would welcome further technical detail through a future SPD or technical guidance document such as setting out expectations for boxes/features per residence or scale of development.

Rationale: *“Relatively small features can often achieve important benefits for wildlife, such as incorporating ‘swift bricks’ and bat boxes in developments and providing safe routes for hedgehogs between different areas of habitat.”* PPG Paragraph: 023 Reference ID: 8-023-20190721

Suggested wording:

2.4 The Environment Act (2021) places a statutory requirement for development to provide at least +10% Biodiversity Net Gain, ~~There is an expectation that biodiversity net gain will be built into development and a range of opportunities to achieve this exist.~~ **In addition to habitat gains, there is also an expectation that the built environment will achieve benefits for wild fauna through simple measures such as** ~~This could, for example, be as simple as through the provision of a~~ **integrated** bird boxes or bat roosting features ~~integrated into a new householder extension,~~ **and** new planting to support pollinators and/or to improve habitat connectivity. ~~It could also be achieved through a specifically designed~~ **Site-wide biodiversity mitigation and enhancement schemes should seek to** restoring existing and creating new habitats, **whilst** integrating sustainable drainage systems and building on ecological networks and assets in the area. Local Nature Recovery Strategies (LNRS), in delivering a Nature Recovery Network, will put spatial planning for nature on a statutory footing and will support important existing habitats and provide opportunities to create or restore others. LNRS can be used to help inform the most appropriate biodiversity net gain measures, where they apply. More detailed guidance will be provided through additional technical information and / or through an SPD.

Paragraph 2.4 continues to describe spatial aspirations for biodiversity. In the context of the preceding text, this has particular relevance in the scenario of ‘biodiversity offsetting’. However, the detail of spatially targeting natures’ recovery is then abrogated either to a forthcoming Local Nature Recovery Strategy, additional technical information and/or through an SPD. Consequently, the second part of Paragraph 2.4 doesn’t add significantly to the value of prior text, and as such it could be separated into a subsequent new paragraph. Here, the SWDPR could helpfully steer developers to the Worcestershire Habitat

Inventory which, alongside site-specific ecology surveys, will assist in determining the pre-development biodiversity net gain 'baseline' values. In the current absence of technical detail predicted to be forthcoming in a future Local Nature Recovery Strategy, this signposting to WHI will help inform developers and stakeholders where important existing habitats and opportunity areas for nature's recovery are thought to be. Additionally, with reference to Schedule 7A Part 6(a) 'pre-development biodiversity value', use of WHI habitat datasets will help inform land-use at point of the 'relevant date' (30th January 2020) and this will send a strong signal that, aligned with the Environment Act provisions, intentional degradation of biodiversity value prior to a planning submission will not be tolerated.

Rationale: "The existing biodiversity value of a development site will need to be assessed at the point that planning permission is applied for. It may also be relevant to consider whether any deliberate harm to this biodiversity value has taken place in the recent past, and if so whether there are grounds for this to be discounted in assessing the underlying value of the site (and so whether a proposal would achieve a genuine gain)". NPPF Paragraph: 026 Reference ID: 8-026-20190721

Paragraph 2.9 of the Reasoned Justification appears to interchange terms lighting scheme and lighting strategy and in the absence of a glossary term this could lead to misunderstanding or misinterpretation as to the technical detail expected. Whilst we are entirely supportive of this paragraph, and the requirement for major schemes to include a lighting strategy to identify, protect and enhance functional dark corridors, we also note that the scale of a proposed development isn't always directly proportional to the significance of its ecological impact. This is also true for impact of Artificial Light at Night and its impacts on light-intolerant wildlife, where superficially modest lighting proposals on features such as watercourses, woodlands and sites of designated value to nature conservation can cause significant ecological impacts.

While detailed guidance in a future technical informative or SPD is welcomed, it would be helpful to establish an expectation that sensitive ecological corridors (as identified in the Worcestershire Habitat Inventory) will be carefully considered, protected and enhanced through provision of an outline Lighting Strategy to describe design principles and mitigation measures to be deployed, or, a more detailed Lighting Scheme, which can provide appropriate technical detail such as light modelling. **Suggested wording:**

2.9 Outline Lighting Strategies or more detailed ~~Details of~~ lighting schemes and boundary treatment shall be submitted with planning applications to demonstrate how dark corridors and permeability to wildlife will be achieved, as and where appropriate. **Careful consideration of ecological corridors and of sensitive features for wildlife such as designated sites of nature**

conservation value, woodlands, wetlands and watercourses (for example, as identified in the Worcestershire Habitat Inventory) should inform Lighting Strategies so as to avoid or minimise adverse environmental impacts of artificial light at night. ~~Lighting strategies on GI masterplans for larger schemes should also be considered.~~ Submitted strategies and information shall follow currently recognised professional guidance(93). More detailed guidance will be provided through additional technical information and/or through an SPD

Paragraph 2.9 should help clarify expectations as to how developers will achieve permeability for wildlife within development schemes. We recommend use of 'hedgehog highways' as these will promote terrestrial connectivity both for small mammals, reptiles and amphibians. **The following new sentences, which could be appended to paragraph 2.9, will provide suitable detail to help clarify expectations for the creation and maintenance of measures protecting and promoting permeability for terrestrial wildlife:**

The garden boundaries of new housing developments should be appropriately designed to ensure there is ecological permeability for wildlife species such as hedgehogs, nesting birds, roosting bats, invertebrates etc. This is to ensure the protection and enhancement of existing wildlife corridors and the provision of new connections across the site.

SWDPR makes excellent consideration of the direct and indirect effects of light pollution on wildlife, and we fully support advocating for the identification and protection of dark corridors and measures to protect and promote permeability and connectivity for wildlife. However, other important indirect effects on wildlife which could arise through effects of noise, dust, vibration, odour have not been considered in the context of SWDPR27. We note that Policy SWDPR31 controls unacceptable adverse impacts arising from these agents only upon residents, human health and amenity, and as such will not address effects of these pollutants on ecological receptors. Given these pollutants can cause direct and significant adverse impact as well as playing a role in undermining the cohesion and exacerbating severance effects on ecological corridors, it would be prudent to explicitly encapsulate these effects within the Reasoned Justification of SWDPR27.

With regards policy SWDPR52: we note and welcome the underpinning ecological evidence bases which support Throckmorton's Concept Plan and proposed Green Infrastructure provision. While we welcome and are supportive of the proposed developmental configuration so as to retain lowland meadow priority habitats, as has been identified in the Preliminary Ecological Appraisal and Ecological Constraints and Opportunities Plan, we also wish to re-iterate that the proposed close co-location of development next to botanically important

and sensitive grasslands will present risk of future conflicts of use which could, if unmitigated, undermine the ability to maintain, restore and improve the grassland's biological value if public access and recreational pressures are unmanaged. Managing conflicts between people and place is clearly not an insurmountable obstacle for the proposed allocation but should be recognised as a key matter requiring careful consideration and resolution through the allocation policy and future detailed design measures. We therefore recommend inclusion of an explicit expectation that the development ensures planned management of adverse anthropogenic effects on priority habitats present. This could be secured either within Reasoned Justification (for example, providing this detail within paragraph 2.13) or, more preferably, within policy SWDPR52.D.x.2 so as to specify: **“Protection and enhancement of existing areas of biodiversity including priority grassland habitats from adverse anthropogenic pressures and the key county reptile site; and”**

We support policy SWDPR59 but, recognising the aforementioned strengthened biodiversity duty and requirement for public bodies to have regard to the purpose of conserving and enhancing biodiversity, policy SWDPR59 should recognise Government's guidance 'Planning Practice Guidance for renewable and Low Carbon Energy' (DCLG, 2013) which directs planning authorities to consider *“encouraging the effective use of previously developed land, and if a proposal does involve greenfield land, that it allows for continued agricultural use and/or encourages biodiversity improvements around arrays”*. In this respect, solar photovoltaic development presents considerable scope to secure Biodiversity Net Gains, and should be encouraged to delivery specific and locally appropriate habitats, as currently outlined in Worcestershire's Biodiversity Action plan and as may be detailed in a future Worcestershire Local Nature Recovery Strategy.

While we commend SWDPR59 in recognising the potential for solar power developments to cause ecological impact including severance effects, and we commend the policy for requiring appropriate ecological studies to inform decision making in this respect, we feel the Reasoned Justification falls short in failing to discuss opportunities for ecological betterment. **We recommend that an additional paragraph is inserted between paragraphs 9.27 and 9.28 which commends creation and positive management of grasslands under photovoltaic arrays for their botanical diversity and value for pollinators.**

Comments on SWDPR Glossary

We encourage inclusion within the document's Glossary of a definition of terms blue, green and dark corridors, lighting strategy and lighting scheme, hedgehog highways and Conservation Covenants.

We note that the definition of NERC (as referenced in Paragraph 5.3 and elsewhere) appears to incorrectly specify the British Research Council rather than the Natural Environment and Rural Communities Act (2006) (as amended).

Reference to Special Wildlife Sites (SWS) are now outdated and should now refer to Local Wildlife Sites (LWS). The plan appears to use these terms interchangeably and requires update to reflect the more modern LWS naming convention.

The South Worcestershire Councils should be minded that the Earth Heritage Trust (EHT), in consultation with the Worcestershire's Local Sites Partnership, has recently designated several new Local Geological Sites which subsequently should be verified as included within the SWDPR interactive policies map. The EHT and Worcestershire Biological Record Centre will be able to provide up to date shapefiles for the recently designated sites.

Archaeology Response

Historic Environment

Overall the plan is positive in terms of the Historic Environment. The Historic Environment specific policies (**SWDPR 08: Historic Environment** and **SWDPR 29: Management of the Historic Environment**) are robust and sit well within the context of the inter-related themes in other policies, such as green infrastructure, landscape, reuse of rural buildings and tourism.

SWDPR 52: Land at Throckmorton New Settlement

We have concerns about the Throckmorton development in relation to archaeology. We appreciate that the archaeology of the site cannot be fully understood at the plan stage however, the *SMAA Developments Limited Throckmorton New Settlement Strategic Allocation Throckmorton Heritage Site Appraisal* records a number of medium and high-risk areas within the proposed development and states that further work must be done to understand the costs, viability and appropriateness of developing those areas. High risk areas include land adjacent to the Wyre Piddle bypass ear-marked for residential development and employment land.

There are also concerns around the setting of the historic village of Throckmorton and the scheduled monument: *Moated site and medieval settlement remains at Throckmorton* (national ref: 1016938). The plan has largely mitigated this risk through the allocation of open space adjacent to the village, but development is still within the proximity, and there is a risk of further below-ground archaeological remains associated with the designated medieval settlement.

There is a high-risk that archaeology of national significance will be identified within the plan area. The full nature and extent of such archaeology has not been defined. National Planning Policy Framework (200: footnote 68) makes clear that substantial harm or loss of undesignated remains deemed to be of equivalent status to a scheduled monument shall be wholly exceptional. There

is also a risk that archaeology may be deemed of less than national significance, but still of a complexity and density that results in mitigation through excavation being prohibitively expensive.

Further archaeological evaluation may show that nationally significant and/or highly complex archaeology is not present or confined to small areas. However, we maintain there is a risk that:

- The significance of the archaeology has the potential to directly impact the deliverability of the current concept plan for Throckmorton new settlement, requiring substantial changes to be made to layout/design;
- Further, the impact of more detailed archaeological evaluation may be that the proposed number of houses is not deliverable, which will impact on the viability of the allocation by making it unviable in current form and infrastructure aspirations.

Landscape Response

General Landscape observations:

We believe from a Landscape perspective that the plan has been positively prepared and can progress to deliver sustainable development at a strategic scale. The SWDP Team has undertaken a programme of comprehensive consultation with local authority and wider stakeholders on environmental matters, including matters of landscape assessment, green infrastructure and concept planning.

From a Landscape perspective, the Plan has assembled a substantial and comprehensive environmental evidence base, again, developed through regular stakeholder consultation. The strategy is sound from a landscape perspective. It's strategic impact must, of course, accept the overriding principle that a new settlement will introduce wholesale change to the baseline landscape character. The iterative approach to concept planning has however led to a Plan supported by a comprehensive evidence base.

We believe the Plan is deliverable over the stated period and has considered and addressed strategic matters from a landscape perspective. In addition we believe the Plan and its suite of environmental policies are compliant with national policies relating to landscape.

Worcestershire Parkway SLVA

Wychavon District Council, led in the development of a specification for a Strategic Landscape and Visual Assessment and a strategic framework, and then coordinated with the landscape consultants appointed to carry out landscape assessments on behalf of the individual landowners within the

allocation. The resultant SLVA has been presented as a strategic landscape evidence base to assist in the overall understanding of matters of landscape and visual impact and opportunities for mitigation. The SLVA will also function as strategic landscape assessment framework within which more detailed and focused LVIAs can be nested. Worcestershire County Council was included in the project steering group and was afforded opportunities to provide input and scrutiny at all stages of the SLVA development, review and draft consultation. We therefore consider this evidence base contributes effectively towards the soundness of the Plan from a Landscape perspective.

Throckmorton SLVA

Unlike the Worcestershire Parkway SLVA, the Throckmorton document has been prepared as a single study for the allocation. Worcestershire County Council was not consulted on the specification or draft report, the approach employed follows the assessment methodology recommended in the Guidelines for Landscape and Visual Impact Assessment (Third Edition 2013). The assessment has delivered an evidence base appropriate to the aims of the Plan and can be read in conjunction with the Throckmorton Concept Plan. We appreciate this consultation is focused on soundness and legal compliance and should not include a detailed critique of technical assessment, however, we do have one concern that is a matter relating to the Concept Plan: Development in the southern part of Parcel 1, eastern part of Parcel 5 and Northern part of Parcel 6 will harm the setting of the existing settlement of Throckmorton. The Throckmorton Concept Plan has largely avoided this risk through the allocation of open space provision, with the exception of Parcel 5 where the plan shows both an area of residential development and a school immediately adjacent to western bounds of the existing settlement of Throckmorton.

Education response

Please note the response from Education referrers to the Infrastructure Delivery Plan rather than the SWDPR itself.

Paragraph 8.5 the final sentence should read ***transferring to middle school at years four (Droitwich and Pershore) or five (Evesham) and transferring to high school in years Seven (Persnore), eight (Droitwich and Persnore) or nine (Evesham). The Persnore pyramid of schools currently operates both two and three tier systems.***

Table 8.1 under Rushwick SGA insert **Existing School Expansions/new Secondary school in Worcester City** under Secondary School Requirements column

Urban Expansion Development Sites

The text below was inserted as paragraph 8.21 but we would suggest a new paragraph above Funding at 8.33 and renumber.

The allocation of 1,000 dwellings at Mitton is within the education planning area of Evesham which operates a three-tier education structure. However, the proposal is to function as an urban expansion of Tewkesbury, which is operating a two-tier education structure. Tewkesbury High school is located less than 1.5 miles from the development and is situated outside the Worcestershire boundary. This compares to the middle and high schools in Worcestershire serving this area located nine miles and 14 miles from the proposal respectively. A development of 1,000 dwellings in this location will require the provision of a new two form entry primary school and nursery to deliver education for pupils up to year six to allow children to feed into Tewkesbury High school. We will therefore require a land allocation and contributions towards the creation of a new two form entry primary school and nursery to serve this allocation.

Insert into Table 8.2

Location	EPA	Sites (Excludes sole employment sites)	Total Dwellings	First and Nursery School requirements	Middle and High School requirement
Parkway	Pershore	New settlement	10,000	7 x 2 FE primary schools, 1 x 3 FE primary school to include nursery provision	2 x 7 FE secondary school, 1 x 120 special school
Throckmorton	Pershore	New Settlement	5,000	Phase 1: 1 x 2FE primary school and nursery, 1 x all-through school, Phase 2: 2 x 2 FE primary	Phase 1: 1 x all through school to be converted to secondary later on in the

				schools & nursery, 1 x 3FE primary school and nursery.	development stage under phase 2. 1 x post 16 provision (unknown) 1 x SEND provision Phase 2: 1 x SEND provision
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The allocation of 10,000 dwellings at the Parkway new settlement site is within the education planning area of Pershore. The proposal to establish Parkway as a new settlement will require education provision to be provided early on in the development to ensure a sufficiency of places. The proposal to deliver 5,000 dwelling under phase 1 will require 3 x 2 FE primary schools with nurseries, 1 x 3 FE primary school and nursery, 1 x 7 FE secondary school, post-16 provision and SEND provision. A further proposal for 10,000 dwellings under phase 2 will require 4 x 2 FE primary schools with nurseries, 1 x 7 FE secondary, post-16 provision and 1 x 120 place SEND school. There will be a transitional phase as the development is built out to ensure operational effectiveness of education provision as pupil numbers increase.

Further details are included in the separate IDP for parkway, (please see separate comments on the IDP).

The allocation of 1,000 dwellings at the Rushwick Expanded Settlement site is within the education planning area of Malvern. The proposal to expand Rushwick as a Strategic Growth Area will require additional education provision. The proposal to deliver 1,000 dwelling will require 1 x 2 FE primary school and nursery.

Further details are included in Chapter 16 Strategic Sites – Rushwick Expanded Settlement

The allocation of 5,000 dwellings at the Throckmorton new settlement site is within the education planning area of Pershore. The proposal to establish Throckmorton as a self-sustained settlement will require education provision to be provided early on in the development to ensure a sufficiency of places, in a similar approach to Parkway. The proposal to deliver 2,000 dwelling under phase 1 will require 1 x 2FE primary school and nursery and 1 x all-through

school Early years, primary and secondary). A further proposal for 3,000 dwellings under phase 2 will require 1 x 3 FE primary school and nursery and the conversion of the all-through school to a secondary school, post-16 and SEND provision. There will be a transitional phase as the development is built out to ensure operational effectiveness of education provision as pupil numbers increase.

Further details are included in Chapter 15 Strategic Sites – Mitton Strategic Allocation

Paragraph 8.26. Evesham should be amended as follows: The allocation of 606 dwellings for the Evesham urban area will require additional accommodation to support housing. Due to the varied location of these allocations this will be managed through expansion of existing schools rather than the creation of a new school for the town. Contributions will therefore be required to support additional accommodation to support the level of housing proposed. The change is to reflect the number of dwellings coming forward in this area.

The following amendments needs to be made to Table 8.2: Wychavon infrastructure requirements to meet housing allocations, total dwellings figure for Tibberton needs to be amended to 45. Evesham Town allocations, total dwelling figure needs to be amended to 606. The changes are to reflect the number of dwellings coming forward in these areas. For the following row “Adjoining Tewkesbury (Mitton)” the column for “Middle and High School requirement” currently reads “Existing school allocation” This needs to be updated to “**none**”. Due to the location the requirement for secondary school places will be delivered across border in Gloucestershire.

Table 8.6: Wychavon infrastructure contribution requirements as at 1 April 2021 and the following area “Adjoining Tewkesbury (Mitton)” and the Secondary contribution required (£) has been removed. Due to the location the requirement for secondary school places will be delivered across border in Gloucestershire. In addition, the total figure for Adjoining Tewkesbury (Mitton) needs to be **amended to £6,503,667** this is to reflect the omission of the secondary school costs previously included for Mitton and now reflects the costs associated with the provision of a two form entry primary school and nursery only.

The total figure 8.6 for Secondary contribution required (£) needs to be amended to read as follows, **£ 8,437,494** and the total figure for this table to be amended to read **£ 35,238,326** due to the reduction and the omission of the secondary school costs previously included for Mitton.

Table 8.6 please insert the following footnote in respect of the costs associated with the two site at Hadzor. **Any increase in the specified number of 300 dwellings on sites CFS0483a + CFS0483b will impact the cost of the**

provision of school places and is likely to necessitate a requirement for a 2 x FE first school and nursery.

The expansion at Tewkesbury High needs to be removed from Table 8.9: Wychavon infrastructure requirements to meet housing allocations as at 1 April 2021. These costs are outside the remit of Worcestershire County Council SEND provision figures in Table 8.9 for both Estimated cost as at April 2020 and S106 receipts from related housing development, needs to be amended to **£2,605,016**. This is related to the reduction in SEND costs and reflects the current requirements.

The figure for total Estimated cost as at April 2020 in Table 8.9, needs to be amended to **£48,082,239**. This is related to the reduction in SEND costs and reflects the current requirements. The figure for total S106 receipts from related housing development, needs to be amended to **£34,371,350**. This is to reflect current requirements and changes made during the Reg 19 consultation

Table 8.11: Total planned infrastructure costs as at 1 April 2021 and the figure for Total planned infrastructure costs needs to be amended to read **£120,654,259**. The figure in the Expected S106 receipts from planned housing, from table 8.11 also needs to be amended to **£55,053,767**. This is to reflect current requirements and changes made during the Reg 19 consultation.

It is also important to note that the education costs as set out above and in the SWDPr and supporting Infrastructure Evidence base are 2021 costs. They do not include any allowance for risk including inflation. Therefore these costs will rise during the lifetime of the plan, which will need to be reflected in viability testing and subsequently in any planning applications.

We look forward to working with you on the final stages of the plan development and towards eventual adoption.

Kind regards



Emily Barker

Infrastructure Delivery Plan – Strategic Growth Area: Parkway

Introduction

This chapter considers the ability of existing schools and education providers to support the Strategic Growth Area (SGA) at Parkway as proposed as part of the South Worcestershire Development Plan Review Consultation 2019 (SWDPr). Worcestershire Children First (WCF), acting on behalf of Worcestershire County Council (WCC), has set out its response below regarding the impact of the proposal on education infrastructure, where additional infrastructure is required to accommodate the proposed level of housing, and strategy to deliver this infrastructure to ensure sustainable education provision at all stages of the development.

New general market housing inevitably leads to an increase in the 0-19-year-old population, with a consequential demand for additional school places for all phases of education from early year's provision for children aged 2-4 to post-16 and specialist provision for children with special needs and disabilities.

WCC as the Local Authority (LA) responsible for education has a statutory duty under the Education Act 1996 to ensure that there is a sufficiency of school places for all children of statutory school age living in Worcestershire and whose parents/carers wish for them to attend publicly-funded schools. In addition, the 2006 Childcare Act¹ outlined the responsibility of LAs in England to ensure families with children aged 3 and 4 and certain eligible families of 2 year olds are able to access an entitlement of funded childcare per year².

The assessment and strategy have been undertaken in line with Government policy, DfE guidance on Securing Developer Contributions for Education³, and the Worcestershire Education Planning Obligations Policy⁴, and Education Provision in Garden Communities⁵.

Education Context of the SGA at Parkway

The strategic allocation of Parkway is proposed within the Education Planning Area (EPA) of Pershore, where a mix of two-tier and two-tier pyramids operate. Due to the location and proposed size of the SGA at Parkway it will not be possible to rely on existing schools to meet the needs of families. No capacity exists within schools within a 2-mile straight line distance and there are currently no safe walking routes to access these spaces.

¹ <https://www.legislation.gov.uk/ukpga/2006/21>

² https://www.worcestershire.gov.uk/info/20510/free_childcare

³

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/909908/Developer_Contributions_Guidance_update_Nov2019.pdf

⁴ https://www.worcestershire.gov.uk/info/20015/planning_policy_and_strategy/142/school_planning_obligations

⁵ https://dera.ioe.ac.uk/33233/1/Education_provision_in_garden_communities.pdf

Infrastructure impact of proposed housing allocations

Evidence shows new build developments attract a higher percentage of families than the general housing stock, particularly those with young children. Across new build developments in Worcestershire, we see an average of twenty-eight 0-4 year olds (pre-school age) children per 100 dwellings living on new housing developments. WCC has a statutory duty to provide sufficient funded nursery places for eligible 2-4 year olds and therefore sufficient nursery provision for this age range should be delivered via adequate infrastructure planning.

The average number of primary age children seeking a mainstream school place on new developments is 35 per 100 dwellings (5 per year group). This figure is slightly lower for secondary age children where a higher percentage will access independent provision, at 20 children per 100 dwellings (4 per year group). This is evidenced by previous new build sites but is subject to variation.

At present, 5,000 dwellings have been proposed for the SGA of Parkway in phase 1, with a second phase for 5,000 dwellings planned beyond this plan period. The intention of this settlement is to be highly self-contained. As currently proposed, the following infrastructure for education purposes is required:

A development of 5,000 dwellings will yield the requirement for 550 funded 2-4 year old early education places, 9 Forms of Entry (FE) of primary school provision, and 7FE of secondary school provision.

Table 1: Anticipated number of places required to meet state-funded education requirements on the SGA of Parkway

Table 1: Anticipated number of mainstream places required to meet state-funded education requirements on the SGA of Parkway			
	5,000 dwellings	5,000 dwellings	Total 10,000 dwellings
Full Time Equivalent Early Education Places	550	550	1100
Primary-age school places	1698	1698	3395
Secondary-age	970	970	1940
Post-16 (sixth form/apprenticeships/college etc.)	388	388	776
Special education needs school places (R-Y13)	89	89	177

The proposed education strategy to ensure a sufficiency of education places for Parkway are provided below.

Education Strategy for SGA of Parkway

Located within communities accessed via active travel routes⁶

School provision should be located within residential areas for all the proposed dwellings in the allocation. As far as possible primary schools and early years provision should be co-located with community centres and must be easily accessed via suitable walking and cycle routes in order to support sustainable transport solutions to and from schools. Moreover, this supports an optimal use of space as schools can provide important community facilities outside of school hours. Appropriate parking should be provided for staff members as per school building standards Building Bulletin103.

Schools delivered to serve housing must be delivered at an appropriately time linked to the build out of the development to ensure all dwellings can access school provision from occupation.

Schools must be well located to ensure all dwellings are within the statutory walking distance⁷ of education provision:

- Schools must be located within a two-mile safe walking route that offer education for children who are eight years or younger or;
- Schools must be located within a three-mile safe walking route that offer education for children who are nine years or older

Appropriately sized to ensure sustainability and viability

Phase one

The provision of 5,000 dwellings currently proposed for phase 1 of the Parkway development would yield the requirement for nine forms of entry at primary level and seven forms of entry at secondary level.

The minimum size that schools should be delivered to are outlined below, as per the April 2019, guidance on "Education provision in Garden Communities".

- Primary schools: The DfE recommend a minimum of two forms of entry (2FE) due to financial viability.
- Secondary schools: 4FE is the minimum acceptable for Education and Skills Funding Agency (ESFA) for a secondary school, due to viability (breadth of curriculum means need to employ a number of specialist teachers).
- All-through schools: Generally, 4FE minimum for the secondary school element, while the primary school element could be 2FE. The minimum acceptable size will ultimately depend on the viability of the school. Where a requirement has been identified for both primary and secondary schools, there may be cost efficiency, space saving and educational benefits in providing an all-through school.

Sufficient nursery provision to provide funded places for 2-4 year olds is required on all new build developments to support the Government agenda to support families back to work and

⁶ Active travel means making journeys by walking or cycling. These are usually short journeys, like walking to the shops, walking the kids to school, cycling to work, or cycling to the station to catch a commuter train.

⁷

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/575323/Home_to_school_travel_and_transport_guidance.pdf

allow the best start for young children, and therefore should be delivered via S106 contributions and adequate infrastructure planning. In addition, sufficient childcare provision for 0-2 year olds should be available to support families to return to work as far as possible and desirable.

A nursery will be provided at the new primary schools; however, this will not provide sufficient places alone to support the level of childcare required across Parkway for all ages. Therefore, it is advisable that consideration is given within community spaces to support private providers to deliver additional places, particularly for the age range 0-2, as well as childcare for children 0-1. Other types of childcare such as Out of School care and Holiday Schemes⁸ are also necessary to support parents returning to work but can be delivered within existing facilities such as community halls, schools and nurseries. Therefore, infrastructure does not need to be specifically delivered for this requirement, though consideration should be given to this demand.

Therefore, the minimum education infrastructure to deliver on phase 1 of the Parkway SGA for 5,000 dwellings to ensure sufficiency are:

- Three two-form entry Primary School with 52 place Nursery plus one three-form entry Primary school with 72 place Nursery
- One seven-form entry Secondary School
- Sufficiency space for post-16 College
- Sufficient space identified in local communities to support eight private nurseries
- Provision on mainstream schools to support specialist education provision

	Required	To be delivered by funded infrastructure	Space safeguarded to support other provision	Variation	Surplus Percentage
Early Education Places	550	228	338	+16	3%
Primary School Places	1698	1890		+192	10%
Secondary School	970	1050		+80	8%
Post-16	388	TBD			

This provision will provide a sufficient level of places in line with statutory class sizes and school organisation practice for 5,000 dwellings and create a level of surplus to support in effective place planning. The level of surplus created from this provision for phase one is higher than generally recommended long term and therefore can support the delivery of new dwellings early in the build out of phase two. It is also important that phase two is well integrated and delivered soon after the completion of phase one.

Phase two

Phase two is currently proposed for the delivery of an additional 5,000 dwellings, totally 10,000 dwellings for the SGA of Throckmorton. The following education infrastructure may

⁸ Further information can be found at: https://www.worcestershire.gov.uk/info/20529/types_of_childcare.

be required to support the full SGA of 10,000 dwellings, however this will need to be reviewed as part of the full phase two proposals:

- Seven two-form entry Primary School with 52 place Nursery plus one three-form entry Primary school with 72 place Nursery
- Two seven-form entry Secondary School
- One 120 Special School
- Sufficient space identified in local communities to support 16 private nurseries (dependent on size)
- Sufficient space identified for Post-16 College

Table 4: Education infrastructure delivery for phase 1 and phase 2: 10,000 dwellings

	Required	To be delivered by funded infrastructure	Space safeguarded to support other provision	Variation	Surplus Percentage
Early Education Places	1100	436	728	+64	5%
Primary School Places	3395	3570		+175	5%
Secondary School Places	1940	2100		+160	7.6%
Post-16 places	776	TBD			
Special Places	177	185		+9	5%

This level of surplus is appropriate and in line with recommendations for an established community.

WCF will constantly monitor the number of places available within the first phase schools of the SGA to ensure sufficiency of places is maintained. This may result in the timing, size, or need of subsequent schools changing. As these developments will have long build out times it should be possible to do this as the build out continues. In order to achieve this the sharing of completions and any updated trajectories is helpful to aid this process

Early Delivery of New Schools

New education provision should be provided early on to ensure families moving onto the site in the early stages are able to access school places. This is particularly important for garden towns which should be self-sufficient and are unlikely to be connected to alternative schools within suitable walking distance. It is the intention to deliver the SGA of Parkway in distinct neighbourhoods, therefore school provision should be delivered within the town centre or close proximity to the initial phases of development and then considered in relation to each neighbourhood.

The size of each school to be delivered will be dependent on the size of each neighbourhood it is to serve. The below table shows the maximum number of dwellings each size of school can support.

Table 2: Maximum number of dwellings that can be supported by school provision

School type	Maximum number of dwellings to serve
Two form entry Primary with Nursery	1200
Three form entry Primary with Nursery	1800
Four-form entry Secondary	3,000
Seven-form entry Secondary	5,250

Each new school should ensure coverage of its entire neighbourhood within the statutory walking distance. The first new primary school, secondary school and post-16 sites will need to be provided at the start of the development as no alternative school places exist. These sites will need to be accessible from all parts of the development being delivered early on via safe walking routes and by car. Later school sites will depend on the phasing plan and will be discussed at a later date.

Options in the delivery, build, and management of the first secondary school and standalone post-16 provision to ensure sustainability will be considered, options may include: the delivery of primary provision on the secondary school site, particularly until the number of dwellings can support a standalone secondary school (around occupation of 3,000 dwellings across the SGA); use of temporary accommodation; or other options to be considered at the point of feasibility for the exact site of the proposed secondary school.

Provision to meet a variety of needs

At present, 3% of all pupils in Reception to Year 11 in Worcestershire have an Education and Health Care Plan (EHCP) to enable children and young people with special needs or disabilities to access appropriate education. All new schools will be built to appropriate accessibility standards with sufficient facilities to support a range of needs across the site. We will seek to provide a range of specialist provision within mainstream schools for those children who would benefit from integrating within mainstream schools and deliver additional places within existing special schools. The provision of special education places to meet the needs of children and young people with SEND is managed across Worcestershire, and therefore, the requirement for additional places on the SGA of Parkway cannot be considered in isolation.

We would anticipate that 89 children aged Reception-Year 11 living on phase one of SGA will have an EHCP requiring specialist provision rising to 177 following phase 2 delivery. Provision within the planned mainstream schools and across the continuum of provision in South Worcestershire will be delivered to offer provision for pupils for whom specialist support

in a mainstream setting is right, alongside the provision of a new special school to serve this SGA early in phase two.

The new special school should be located close to main road links to ensure good highways connectivity so that pupils can travel by road where required due to their needs.

Providing Post 16 Choices

Post-16 provision will be required on site, which is recommended to be delivered by a standalone external provider. From a place making perspective this allows it to be more suitably located and connect with other existing providers outside of the proposed site to increase choice for young people.

The SGA of Parkway is well located to support young people aged 16-18 year olds who choose to access further education in colleges and other post-16 providers. It is strongly encouraged that the SGA creates transport links with local colleges and works with local colleges to provide a range of apprenticeships for young people during construction of the development and within the commercial facilities on site.

It is also recommended that space be safeguarded within the local centre and close to these links for a post-16 hub, to create a thriving environment on site for post-16 education, and to encourage young people to travel to the town centre from elsewhere in Worcestershire on public transport.

Cost of education provision

In accordance with SWDPR 6 planning obligations will be required to fund education infrastructure projects that are directly related to the specific development. This is in line with the Worcestershire Education Planning Obligations Policy 2019⁹, where developments will be expected to fund education infrastructure when required as a result of new housing. Full land and financial cost of delivering new schools as a direct result of this SGA will required to be provided at nil cost to the Local Authority. Worcestershire County Council will consider payment in kind by the direct provision of buildings by the developer. In this instance the specification and design of any provision must be agreed with the Local Authority.

The cost of delivering new schools will depend on a number of dependents including site specific factors such as topography and location. The below costs represent an estimated cost based on assumptions of a flat greenfield site with no additional cost requirements for site clearance, re-profiling etc. Once a site is proposed for a new school, a full feasibility will be undertaken to determine the actual cost of delivering such a provision for new housing which will determine the financial and land contributions required.

The DfE has recently launched a pilot initiative to support developers in delivering schools early on in the development by providing capital loans to help overcome barriers such as cash flow¹⁰.

All land allocated for a school must be appropriate and fit for purpose. Issues which will need to be assessed include ground conditions; topography; contamination; flood risks and the

⁹ https://www.worcestershire.gov.uk/info/20015/planning_policy_and_strategy/142/school_planning_obligations

¹⁰ <https://www.gov.uk/government/publications/developer-loans-for-schools-apply-for-a-loan/developer-loans-for-schools-pilot-information-web-version>

proximity of incompatible land uses. Land should be transferred fully serviced and any issue or constraints identified mitigated for at zero cost with appropriate access for construction to allow the infrastructure to be delivered and ensure places can be provided at the required level and the right time. This can be established by supplying WCF with an appropriate build out trajectory for the site.

We will aim to work with stakeholders in developing concept plans, masterplans and design codes for schools, all of which are a useful means of establishing and communicating aspirations on design quality to ensure design cohesion.

Phase one elements:	Land requirements		Estimated cost as at Q1 2021	
	Per School	Total	Per School	Total
Three two-form entry Primary School and Nursery	2.04ha	6.12ha	£9,876,000	£29,628,000
One three-form entry Primary School and Nursery	2.94ha	2.94ha	£13,399,000	£13,399,000
One seven form entry Secondary	8ha	8ha	£26,500,000	£26,500,000
Post-16 provision	2ha	2ha	£9,686,000	£9,686,000
SEND provision	Not applicable		£7,423,000	£7,423,000
Total phase one (5,000 dwellings):		19.06ha		£86,636,000
Additional Phase two elements:				
Four two-form entry Primary School and Nursery	2.04ha	8.16ha	£9,876,000	£39,504,000
Seven form entry Secondary	8ha	8ha	£26,500,000	£26,500,000
Special School (120 place)		2.07ha	£7,423,000	£7,423,000
Post-16 provision	2ha	2ha	£9,686,000	£9,686,000
Total phase two (5,000 dwellings)		20.23ha		£83,113,000

Commented [LL1]: Based on cost per pupil place for 388 pupils

Shortfalls in contributions will be sought through a combination of local government finances and by applying for basic need funding.