

The South Worcestershire Development Plan (SWDP) was adopted and published on 25 February 2016 and is an integral part of the Development Plan for the administrative areas of Malvern Hills District, Worcester City and Wychavon District. Planning decisions by these Local Planning Authorities and the Government's Planning Inspectorate must be taken in accordance with the Development Plan unless material considerations indicate otherwise.

[http://www.swdevelopmentplan.org/?page\\_id=12262](http://www.swdevelopmentplan.org/?page_id=12262)

Arguments to put forward:

- 1) SWDP is the valid framework that balances the differing policies for development in Worcester city, Malvern Hills and Wychavon district. Economic, Infrastructure and Ecological / Environmental requirements are balanced and addressed within the SWDP. The SWDP cannot be a "jobs-led development plan" as described by Adrian Becker, Chief Planning Officer, in his comment on 20<sup>th</sup> October 2017. Nor can it be an environment-led development plan. It provides a balance of all policies.
- 2) The land is allocated in SWDP 43/23 as 5 hectares of land for B1 business use.<sup>1</sup>
  - a) The proposal is for something significantly different (includes B8 not just B1) and is therefore in conflict with the SWDP's policy 43.
  - b) The proposal impinges upon the "Significant Gap" which is set out in the SWDP's "Proposals Map"
- 3) We support the details as set out in the two letters submitted by the Warndon Parish Council of 19<sup>th</sup> June and 21<sup>st</sup> October 2017.
- 4) This is a speculative application. As a consequence, we cannot know the projected traffic flows, hours of operation, noise, light, vibration and air pollution. Therefore we cannot assess the impact of this proposed development.
- 5) SWDP Policy 3 already contains sufficient allocated employment land within the Worcester area for sustainable economic growth. Therefore we do not have a "shortfall of land supply for economic purposes" that would outweigh the conflict existing between this proposal and the other policies in the SWDP (Significant Gap, green space, environmental protection etc).
- 6) The importance of the "Significant Gap" mentioned previously is evident from the protections continuously afforded to it by previous Local Plans which are incorporated within SWDP43.

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<sup>1</sup> This is defined as offices (other than those that fall within A2), research and development of products and processes, light industry appropriate in a residential area.

[https://www.planningportal.co.uk/info/200130/common\\_projects/9/change\\_of\\_use](https://www.planningportal.co.uk/info/200130/common_projects/9/change_of_use)

7) The Highways Authority Response dated 14<sup>th</sup> June proposes a £1.225m Section 106 contribution from the developer for “capacity improvements”, but these are not detailed and the likely impact of these “improvements” upon the adjacent areas, or their effectiveness at mitigating the impact of additional traffic, is unclear.

8) The SWDP went through extensive consultation and consideration during the adoption process. Before the SWDP was finally approved, it was reviewed by an Inspector from the Planning Inspectorate who was appointed by the Secretary State for Communities and Local Government. In his report, the Inspector put forward many changes to the SWDP, but made particular comment on the risk of not maintaining sufficient gaps between developments and the M5:

*"The harmful effects of not doing so are illustrated by the existing development a few miles away to the south of M5 junction 5 at Droitwich. Development there appears to back onto the motorway itself, allowing no space to enable passers-by to appreciate that it actually forms the edge of a distinct settlement. A similar situation here, at what will become the edge of the Worcester urban area, would be highly detrimental to the setting of the city."*<sup>2</sup>

9) We cannot “cherry-pick” elements from the SWDP to allow new developments to deviate significantly from its stipulations. If we do so, we alter the balance of the SWDP, rendering it redundant and removing the strategic framework that it provides for sustainable and balanced development of the South Worcestershire District. Doing this would constitute a wilful waste of years of work and over £1.3m paid by local residents as part of their council tax bills.

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2 page 41 (para 206) of [http://www.swdevelopmentplan.org/wp-content/uploads/2016/02/SWDP\\_Inspectors\\_Report\\_Feb2016.pdf](http://www.swdevelopmentplan.org/wp-content/uploads/2016/02/SWDP_Inspectors_Report_Feb2016.pdf)