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Sustainability Appraisal of the SWDP – Regulation 18 (III) SA Report

Stoulton Parish Council and Drakes Broughton and Wadborough with Pirton Parish Council OBJECTIONS

Introduction

We have now been through the Sustainability Assessment Regulation 18 (iii) Report and we submit below our comments and objections to that report. As a Parish Council we have always supported some form of residential development on the land surrounding the Worcestershire Parkway station but only to a maximum of 2,500 homes, to form a village in size and in keeping with the surrounding area limiting the impact on the surrounding communities as much as possible and limiting the adverse impact on the existing road network. We made this very clear right at the very beginning following the community meeting in 2019.

Drakes Broughton and Wadborough with Pirton Parish Council share our views and support the points and objections made within this response to this Consultation.

Our concerns with the report are that it is flawed, wrongly scored and incorrect in a number of ways and should thus be re-examined;

Covid Impact and the over reliance of the railway in promoting Parkway

This Sustainability Appraisal (SA) has been produced either prior to or during Covid lock down times. In the entire 404 page document there is not one single reference to Covid and the impact that is likely to have on the way we lead our lives in the future, therefore the sites selected may very well no longer be the best sites to progress.

The long-term ramifications of Covid are huge and the world is already beginning to plan for these changes and yet the SA completely ignores this world changing event and assumes the economy, employment and public transport requirements remain unchanged, it totally ignores the fact that office working from home is now the new norm and it assumes that town centres continue to be the same 'pull' as they were pre covid.

The reality is now very different and the need to be close to a railway station to access the city centre is far less desirable than pre-Covid times. Read any newspaper or property journal and you will find comment on office space being downsized across the whole UK supported by both employees and the employers who can reduce their operational overheads. Technology allowing working at home is now the new norm with virtually all

office-based companies now utilising this new technology, whereas pre-Covid it was very rare.

In Worcester, offices are now predominantly out of town and therefore not accessible by train anyway. Commuting to Birmingham by train and elsewhere is now vastly reduced therefore demand to go into a town/city centre is now correspondingly reduced.

This reduction in town/city centre office jobs coupled with the well reported adverse impact on the UK high street with the rise of internet shopping, further reduces the need, requirement and demand to go by train into the city centre. There is already a train service from Pershore and Evesham into Worcester and it is never busy why therefore are people from this new development going to be using the service when others currently do not?

The use of the new station, which has been open for a year, is miniscule with never more than a handful of cars in the huge car park which is presumably in part down to Covid. What cannot be determined is whether and to what degree there will be any uptake in rail use, and yet this railway station is the single most important factor in the siting of this proposed development. The Plan puts an undue emphasis on rail transport which is utterly unrealistic and ignores any changes in post Covid work and leisure travel patterns.

The S.A. assumes a pre-Covid world will materialise post Covid which is naïve and results in a fundamentally flawed S.A.

S.A. Objective Scoring

The scoring and narrative that promotes Parkway as being the best opportunity is inconsistent, unsound, subjective and biased, it promotes Parkway whist pretending to be scientific analysis. The scores are not weighted in any way, so a high highway score has equal weight to a high biodiversity score even though the report confirms there is really no real difference in the biodiversity issues between any site. The true reality is that some objectives are far more impacting than others, but the S.A. scoring system wrongly does not take this into consideration. This scoring technique utilised produces the wrong preferred options, the report therefore needs to be rewritten to take into account these ambiguities and wrongful assumptions which has produced an unweighted and false score designed to promote Parkway ahead of other sites.

Site Assessment

All sites have been separately and independently assessed of each other and scored against a pre-selected criteria. The S.A fails to measure the impact one proposed development may have on another proposed development. For example, locating Parkway and Throckmorton in such close proximity to each other will result in households utilising the same road network, the same local services etc which has not been taken into consideration when scoring each development against set criteria. Pretending each new development, when in close proximity of another major proposal, will not impact on each other is both negligent and incorrect.

Parkway, Throckmorton, Kempsey, Rushwick and Lower Broad Green will all access the national motorway system via J 7 which is conveniently nearby and to a lesser extent is J6 of the M5. These 5 proposed sites amount to 9,000 new dwellings which is the vast majority of the high scoring sites which the S.A. recommends be developed.

In addition, there are 5,600 new homes proposed and currently under construction on the Southern Bypass of Worcester, in all totalling around 32,000 new people all trying to access the M5 in the main at J7. This junction is already very busy serving Malvern, south Worcester, Pershore and areas west of the Severn. This increased population amounts to a town bigger than either Evesham or Droitwich all now trying to access the motorway network, in the main via J7. By 2041 that population increases to around 43,000 new people.

This Worcester orientated, (predominantly J7 approach) will put undue pressure on one point of the highway network and this S.A. takes no consideration of this impact and indeed actively steers the majority of developments into this one area. The S.A. has failed to consider other sites within the SWDP area, for example around Evesham, Malvern, Tenbury etc all which would ease the congestion in this one area.

Of all the proposed developments only Hanley Castle, Strensham, Mitton and Hinton on the Green use alternative road networks avoiding J6 and J7 of the M5. Yet of these 4 locations 3 are prioritised in the bottom 4 of all sites. The S.A.is incorrect in the way it has scored highway issues and fails to consider any cumulative impacts due to the proximity of other proposed sites on the existing current environment.

The S.A. fails to consider how other less prioritised sites could be made more sustainable for example by reducing the size of Hinton on the Green to say 2,500 homes instead of the 5,000 proposed, which in this report has deemed unsustainable. This reduction has not been considered and building away from Worcester would relieve the pressure on M5 and surrounding areas.

<u>Impact Magnitude</u>
The impact on the surrounding villages will be catastrophic. For example;

- SWDP planners are stating that the B4084 leading from Pershore to Worcester via J7 will be virtually cut off so as to prevent existing traffic passing through the new town preventing the existing local population getting to work in Worcester, accessing the motorway, supermarkets, schools etc and instead rerouting them on smaller and more circuitous roads, causing delays, congestion and longer journey times thus increasing pollution. The degree of the impact has not been factored into the S.A. and results in a wrong score when analysing one site against another.

- SWDP planners are proposing a solar farm between Stoulton and Windmill Hill. Looking west from Windmill Hill towards the church will be one huge reflecting solar array destroying all views and amenity. Again, this major factor has not been factored into the S.A. and the score does not reflect yet another impact on the ‘receptor’.

Either the S.A. can only be determined once the SWDP planners have delivered more structure to the layout of the proposed town or alternatively SWDP planners abide by the assumptions of the S.A. Currently SWDP planners are pushing on with the proposals and ignoring the S.A. assumptions making the S.A. worthless which has resulted in a wrong scoring system.

Garden Community

The report raises the ‘rare opportunity to deliver the Garden Communities principles compliant development’.

We support a proper garden community but one based on the reality of normal car ownership.

All independent and pro housing research of Garden Towns indicates that these new towns, despite their classification, become car-based commuter estates just like any other new town. Furthermore, the research shows that in new developments close to fast roads residents merely drive out of the town for all facilities creating dead, soulless towns where the working population drives out in the morning and returns in the evening.

The only thing anyone can say with any amount of certainty is that, in the future, all cars will be powered by alternative non fossil fuel means and in all probability with the social movement currently enjoyed by the vast majority of the population, then every household will on average have at least 2 electric/hydrogen etc cars, and if they have older children, they too will have a car.

Pretending otherwise and that people will in the main use the train has not been evidenced anywhere outside of London. Putting 12,000 people at Parkway in the middle of rural Worcestershire and then saying there will be few cars because this is a garden community town indicates complete arrogance and a lack of knowledge, as it will leave the new garden town as well as the surrounding areas in traffic chaos for evermore.

Agricultural Land Classification

All the land within the Parkway proposal is within either Grade 2 (very good) or Grade 3 (good to moderate). Collectively these grades are within the ‘Best and Most Versatile Land’ classification.

Food security is a national and international sustainability issue, as a result of population growth and the impact of climate change already happening or inevitable. A mitigation for the UK is to reduce dependency on imported produce and grow more and not less of its primary food sources. In addition, the reduction of food production locally and internationally increases the distance food travels and therefore impacts carbon emissions and climate change.

Health and Wellbeing

The SA states that ‘in order to facilitate healthy and active lifestyles for existing and new residents it is expected that the SWDPR should seek to ensure that residents have access to NHS hospitals ……’. This is merely an unrealistic and unresearched wish. It is well known and documented that Worcester Royal is already operating beyond its built and operational capacity therefore putting a whole new town and the majority of the other new proposed settlements in the vicinity of Worcester, none of which will have a hospital, will inevitably swamp the NHS services resulting in a collapse of healthcare with inevitable fatal results.

Scoring Parkway highly against the criteria of Health and Wellbeing because it is only 1.7 km from an over capacity hospital is only a theoretical positive impact, the reality is very different and indicates a total lack of local understanding. The S.A. states ‘The provision

of transport infrastructure including the expansion of existing bus services would be anticipated to provide good access to new and existing health facilities including the Worcestershire Royal Hospital'. This is an outrageous statement and clearly shows the total lack of understanding of the well documented failure of people to use public transport when The Worcestershire Royal hospital was originally planned.

This is another example of reality being very different to that which was proposed, as when the hospital was constructed the planners had originally predicted, and planned for travel by public transport, thus providing little parking. Instead, visitors travel virtually wholly by car hence the well documented terrible parking issues experienced over the years by those attending the hospital from the day it was opened. This proposal in the S.A. merely further reflects the complete lack of local understanding as to the reality of the situation by making one mistake and then compounding it with another.

Accordingly, 'The Health and Wellbeing' score for which Parkway scores highly is consequently wholly incorrect as visitors will, just like they do now, all travel by car and the S.A. saying otherwise is factually incorrect and ridiculous.

Transport and Accessibility

Again, Parkway scores the highest in this category due to the railway station.

From liaison meetings with the SWDP planners they envisage a form of utopia where the population of Parkway will either walk, cycle or get the train to work, for shopping etc and the town will have a very low car ownership. This argument is being formulated so as to justify the omission of a link road between Parkway and the A44 and other normal highway requirements which otherwise will lead to insufficient parking as is the reality of many new housing estates where all drives and roadways are jammed full of parked cars.

The new train station is being used as an argument to promote a low car ownership town and to justify why the development will not overload the existing highway network around J6 and J7. The reality as evidenced and proven elsewhere in multiple locations across the UK is that if you put around 12,000 new people in the middle of rural Worcestershire then they will all have cars and households will have multiple cars. It is merely planning expediency to justify low car ownership development rather than true reality.

We support the garden town concept with all the green infrastructure but only on the basis that it can support the realistic car ownership that the town will generate.

Rail focussed development i.e., all new developments within two miles of a station assumes that peoples places of work and leisure are easily reached by existing or future train lines. That is unlikely to be true now and even less so in the future. The rail-based strategy is fundamentally flawed.

The proposal to restrict access from Stoulton and the surrounding villages to J7 M5 essentially cuts off the surrounding parishes from a direct access to Worcester. Scoring the new development highly on accessibility at the expense of the existing population being unable to travel through to J7 for the reasons of work, shopping, education leisure etc is in fact a major negative impact and yet is portrayed in this report as a major positive!

Another example of the flawed scoring system, and the impact on the existing surrounding population has been ignored.

Landscape and Townscape

The Parkway proposal rates 3rd best in this category and yet the proposal utilises the largest of all high quality agricultural land and creates urban sprawl for Worcester. The report states that the 'proposed development at Worcestershire Parkway would be expected to have some scope to mitigate landscape impacts through good design'. Why does that only apply to Parkway, surely that statement should apply to all proposals? The scoring is completely arbitrary backed up by sweeping statements that should be applied to all proposals.

For Hanley Castle the report states that the '900 dwellings and associated infrastructure …… would be expected to significantly alter the local landscape, character and perception of tranquillity of the area'. Yet Parkway with 5,000 dwellings going up to 10,000 dwellings and a total development area 11.5 x larger than that of Hanley Castle would have a significantly more serious impact on the local landscape yet merits no such mention. Somehow Hanley Castle scores only 2 whilst Parkway scores 7 !!! This is yet another example that the S.A. is biased in favour of the Parkway development and has been written in such a way so as to promote one development above another and to push Parkway to the forefront. The scoring and narrative are inconsistent, flawed, subjective and biased in promoting Parkway whist pretending to be a scientific analysis.

Biodiversity and Geodiversity

The report states 'the difference between each strategic location's performance under this objective is minimal'. And yet in the afore mentioned predetermined way, Parkway inevitably scores one of the highest in this field. If there is no difference why is Parkway not scored the lowest? This report is so biased it utterly lacks any objectivity especially when the report even states 'it should be noted that no ecological surveys have been completed by Lepus to inform the assessment in this report'.

Climate Change Mitigation

Parkway is the largest proposal in the Plan with 5,000 dwellings going up to 10,000 dwellings. Inevitably it will produce more Co2 emissions and this is played down in the S.A. which merely states that greenhouses gases (GHG's) will merely increase to 'some extent'. The blatantly obvious reality is that building the biggest proposal in this plan with an equally large future extension will increase GHG's to a greatly significant extent.

One of the reasons Parkway scores well is because of the proposed solar farm but why not put solar farms in all locations rather than just at Parkway and Throckmorton? Hinton on the Green which can provide 5,000 dwellings, similar to Parkway has no such proposed solar farm however, why is a solar farm not proposed at that location? Why indeed are there any solar farms, they are a visual abomination and the much better alternative would be to insist that all new homes have solar panels on their roofs.

Parkway scores as the 2nd best location in this category despite its size which is yet again another seriously flawed S.A. assumption designed yet again to promote Parkway.

Summary

This S.A. report is premature and completely ignores the world changing event of Covid which is one of the greatest natural disasters experienced by this planet and which will and already is, beginning to change the way we live our lives. Producing such a report in these times and ignoring such an event and pretending it has not happened is negligent and is merely expedient so as to meet a predetermined deadline.

The scoring technique is unweighted thereby producing an erroneous score and promoting the wrong sites.

The S.A. is written in such a predetermined way so as to promote Parkway whilst at the same time over emphasising the lack of sustainability of other proposed developments, like the 5,000 dwellings at Hinton on the Green - which will in effect be a suburb of Evesham connecting into the existing highway and community infrastructure. What has not been put forward is why this allocation could not be downsized to say 2,500 dwellings thus being smaller it would have a much reduced impact from any nearby AONB.

It is interesting to note that the SWDP planners previously rejected any extension to Evesham due to the congested A46 corridor. Yet Hinton on the Green is a proposal albeit a downplayed one. As the A46 is obviously an area where proposals are being considered why is the area to the north of Evesham around Harvington not a proposed location? It would move traffic in a north/south axis away from the M5 J6 and J7 and instead would create an alternative traffic corridor up to J3 M42 and J9 M5 at Tewkesbury and away from Worcester which is being severely impacted by the majority of the other proposals.

Parkway has at every turn in this report been projected as the ideal location irrespective of the reality resulting in erroneous and biased scoring as indicated in the many examples above. The narrative is subjective, biased and blatantly seeks to disadvantage other locations on an arbitrary basis in order to give a higher score for the Parkway development. Parkway will be nothing more than a suburb of Worcester separated solely by the M5 motorway and the additional urban sprawl will destroy 612 hectares of 'best and more versatile land' yet these factors hardly raise a mention.

Out of the 9 sites under consideration, 5 of the top 6 sites as scored by Lepus, impact the M5 at Worcester and predominantly at J7. This has conveniently also never even merited a mention in the S.A. thus the report is fundamentally flawed.

The S.A. report omits to compare any cumulative impact these developments have on each other and on the existing highway network as a whole should the preferred options all be constructed. Instead, each site is scored in isolation to any other proposal.

This train factor is the main driver for the Parkway development and yet the trains have always run into Worcester from Pershore and Evesham but with very few passengers so why will all the new Parkway residents suddenly be expected to use the train when no one else does? The train factor is merely a tool for saying there will be fewer cars, therefore no congestion on the surrounding road networks and therefore no need to build a sufficient road structure to support 5,000 dwellings thus saving money. This planning expediency is outrageous, defies any evidence and will cause congestion and misery to the existing surrounding population as well as to those in the new town.

It is very obvious through multiple examples in the report that the SA was drafted to support the conclusion that Parkway is the most preferred location.

In our opinion this S.A. report is subjective to fit the planner's narrative and flawed at its core and consequently invalid.

Will the SWDP planners and Lepus provide full legal disclosure as to how this report was constructed and how the conclusions were derived?

Drakes Broughton, Wadborough and Pirton Parish Council and Stoulton Parish Council are not adverse to a smaller village proposal of say 2,500 in keeping with the rural nature of the landscape, but we do reject this large new town proposal. The additional 2,500 dwellings could be removed from Parkway and located at Hinton on the Green and elsewhere and this should be considered.

Issued for and on behalf of the Parish Councils of

STOULTON **DRAKES BROUGHTON & WADOROUGH with PIRTON**
Chairman – Cllr D Reece **Chairman – Cllr J Butterworth**

19/04/2021