February 2022 - Joint Parishes Committee Follow on question to the South Worcestershire's Council written response to the October 2021 presentation

1. With reference to the first paragraph under 'rail-based strategy' it has never been clear as to how the decision was reached to move from a more distributed allocation and as to what basis the claim is made that there was 'strong support' for a large urban extension and/or new settlements. Clearly those who might have been impacted by the previous strategy would support that, but there is a strong feeling by this committee that the new strategy is an attempt to concentrate objections into fewer locations.

2. The statement in our presentation relating to the rail-based strategy was referring to the fact that potential development sites were ignored purely based on that criteria. The letter dated 13th April from Fred Davies, Head of Planning Policy at that time, states

   There have been other large swathes of land, large enough for a new town submitted, but to date these have been discounted because they have not met the location/juxtaposition with railway stations

   We have repeatedly outlined our view that the rail-based strategy is based on significantly flawed criteria.

3. With reference to that view, the siting of WP Garden Town with quick and easy access to M5 J6 & J7 and access to Worcester and West Midlands road infrastructure makes it far more significant and attractive to people commuting by car as by Train and is counter to the suggestion that it will not be a commuter town. On what evidence is that assertion based? Logically WP is likely to attract employers, looking to relocate or to expand, based on proximity to the road network as well as attracting residents who commute by car to many business locations and business parks across a wide geographical area that are not served directly by rail.

4. The facilities and employment opportunities of the Town are unlikely to be sufficient to meet the needs of most people, in particular to younger people. As previously suggested (by SWC at a Liaison meeting) it cannot compete with Worcester City Centre and the wider catchment for recreation and night life and additionally, in our view, for employment and therefore the assertion that 'needs' will be met within a 10 minute foot / cycle journey is over-stated. As a general point (Fred Davies also referred to people's 'needs'), people are not purely driven by 'needs' but by choice and preference, which cannot be dictated or necessarily influenced by planning authorities

5. The response suggests that funding for road infrastructure is being applied for. The final schemes for major road routes have, as far as we are aware, yet to be determined. We understand that there are two major relief roads being considered as shown as 'possible' on the draft plan. Are these now confirmed and are they, as suggested, expected to be built in the preliminary stages to facilitate construction traffic? Have all of the required road upgrades been assessed and determined and included in the funding submission? Furthermore the basis for the new strategy was that road upgrade costs would have to be principally borne by developers. Again from Fred Davies:

'***Worcestershire County Council advised us that the continuation of the current SWDP spatial development strategy was untenable in that principal road junctions were at or nearing their capacity and that the infrastructure costs to mitigate that would be substantial which would have to be principally borne by development rendering it unviable.***

The December 2021 response states:

This infrastructure will be funded through Section 106 agreements and National Highways funding. WCC are in the process of sourcing this funding.

Arguably the road infrastructure costs will be as significant under the current strategy as it was under the previous with significant investment early on in the development rather than spread out across a number of smaller developments over time.

This reinforces our view that the arguments made during the options appraisal to move to the new rail-based strategy with large urban developments were inaccurate and misleading and merely an attempt to justify a strategy that was easier to gain agreement to from a planning department perspective.

6. We also understand that there is an intention to build the Town Centre in the early stages of the development. At a previous liaison meeting we were told that for the Town to be viable it depended on the scale of development proposed. Given that shops, cafes, hairdressers etc will not be commercially viable without a sufficient population at what point is it expected that they will be viable as opposed to being empty buildings in the middle of a building site? The Infrastructure Delivery Plan (IDP) was referred to. Will these provide detailed plans of sequencing that include all non-residential infrastructure – schools, shops, commercial properties etc. Similarly with commercial premises, schools will not be viable unless sufficient houses are built and occupied.

7. At a meeting at Mucknell Abbey attended by Br Thomas Quin, Joanne Bounds and Peter Bateman (Summix Capital) the issue of soil type, heavy clay, was discussed. They highlighted the difficulty of ensuring that sufficient drainage can be established along with challenges relating to non-Carbon sources of energy such as ground source heating and to foundations. With respect to drainage it will be essential that parameters are based on future flooding risk projections resulting from climate change and more extreme weather events. These issues are likely to affect the cost of development and the risk that developers will seek to reduce some of the design code, green and environmental aspirations that have been set out. This also raises another question as to what, if any, of the aspirations can be mandated outside of legal requirements? The SWDP is reviewed every 5 years and these aspirations can presumably be removed or negotiated away by developers who can refuse to develop if there are insufficient margins. It has to be absolutely clear during the consultation period as to what elements of the design can be guaranteed as deliverable and what elements are merely concept proposals.

8. The Committee is concerned that beyond some pragmatic considerations of providing access for construction traffic, committing to elements such as the Town Centre and the relief road to the South (to facilitate Phase 2) will prevent any future 'row back' of the plan as it stands, irrespective of any future changes to policy, legislation or other external factors that might

reduce the need or appropriateness for a development of this size at Worcestershire Parkway.

9. The response states that the Worcester City Plan has not been formally adopted. This plan was developed over two years with far more detail and estimated costings than the SWDP plan (published several months later) and it states that it has been formally adopted in July 2019 by Worcester City Council. The Worcestershire Parkway Garden Town is still as far as we are aware a Concept Plan. Our principle challenge however is over the discrepancy between the two plans of estimated dwelling opportunities in Worcester City Centre and our belief that SWDP has not taken seriously the need to identify opportunities to develop and refactor existing town centers within Worcestershire. The following comment made by Fred Davies reinforces our view that exploring opportunities to develop new housing within existing towns is difficult when it comes to being able to demonstrate a number to external authorities and therefore not something that planning departments have any appetite for:

   In respect of question/objection 1 we agree that there will be long term impacts arising from Covid-19. One of those is likely to be a reduction in the quantity of retail space, some of which might give use to new residential opportunities. Having said that the quantum for South Worcestershire is likely to be very limited. More to the point a local plan which aimed to meet some of its housing requirement through this approach would not fare well at the examination as not even the associated buildings have been submitted for consideration.

   As we raised at the meeting the need to revisit these opportunities have been brought into focus by COVID and by the political signals resulting from the government's position towards building on green land and a stated need to prioritise development of brownfield sites.

10. On sustainability the response does not in any way address the issues raised of the removal of prime arable land. Referencing biodiversity avoids this question. Questions were also raised relating to the pause in government review of planning policy and the PM's statement that Green Land should not be developed on. These have not been addressed in the response. The committee intends to engage with the local MP in relation to these broader issues. Whilst this area is not formally designated Green Belt the principles for Green Belt designation should apply:

    - to check the unrestricted sprawl of large built-up areas
    - to prevent neighbouring towns merging into one another
    - to assist in safeguarding the countryside from encroachment
    - to preserve the setting and special character of historic towns and
    - to assist in urban regeneration, by encouraging the recycling of derelict
    - and other urban land.

    This development goes against these principles.

11. On a number of occasions we have stressed the need to demonstrate to people what the impacts will be on their lives during development. What will the development look like in 5 years, 10 years etc.? What will the impact be during development on people, ecosystems and wildlife. It is as much the construction of this development that will alarm our Parishioners as the final outcome.

12. Another challenge we have consistently made, and which has not been addressed, relates to the lack of flexibility of this planned scheme and the ability to adapt over time to changing environmental, political, policy and legal factors that will inevitably arise during the timescale of this development. Nobody knows exactly what these will be and their impact, which is why committing to such a 'hard wired' plan that cannot easily be flexed and adapted over this 40 year time frame would' in our view, be a huge mistake. We favor a more 'modular' multiple phase approach of iteratively developing smaller villages or neighborhoods with neighborhood centers that would allow change and adaptation over the 40 year period rather than committing to a development of this type that will be difficult and costly to adapt at a later stage. Again we would stress the question as to the logic of building of a new town with a Town Centre 3 miles from Worcester City Centre that effectively extends Worcester as something of an urban sprawl.

13. We would also like to re-emphasise the inadequate time (and timing) allowed for consultation which according to the latest Newsletter will now run concurrently with the publication and consultation of the latest version of the Travellers Policy that will include additional sites. The time allowed for these on such large and significant development feels like an approach to 'tell' rather than 'consult'. This is something we will also address with our local MP and when we engage with external local media.

Andrew Morris on behalf of the Joint Parish Councils Committee