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Dear Paul

**South Worcestershire Local Development Framework
Joint Core Strategy – Issues and Options Consultation.**

Thank you for your letter dated 29th October 2007 and the enclosed documents. I am pleased to have had the opportunity to look at the Joint Core Strategy Issues and Options Paper. I have discussed the paper with colleagues in the Government Office and have included their comments in the response. The comments included in this letter are mostly at a general level, although there are a number of detailed points. Some of the matters raised were covered in my e-mail dated 27th July 2007.

From the "Introduction", you appear to appreciate the new approach to the preparation of the Joint Core Strategy and spatial planning. The document has been developed through continuing engagement with both key stakeholders and the public, including a number of specific events, since work on the JCS commenced. This is to be commended. It is important that this continues throughout the preparation of the Joint Core Strategy. In particular you will need to build on the progress you have made in engaging the key infrastructure and service providers, through the work of the Technical Meeting.

The 'Characteristics and Challenges Facing South Worcestershire' section provides a useful brief summary of the area which identifies the key challenges. However, rural regeneration is not included as part of the spatial portrait. This is an important element of the Regional Spatial Strategy which will need to be reflected in the strategy for South Worcestershire.

The Vision which is included in the Issues and Options Paper is a good start which should be developed further through the process of engagement. It already looks ahead, and states what the area will look like and is, to a certain extent, locally distinctive, although there is scope to develop this further. In particular, there is a need to include the roles of other towns such as Malvern and Evesham and their relationship to each other and to Worcester. In particular, the middle paragraph of the Vision should be made more locally distinctive.

There is recognition in the Issues and Options Paper that the evidence base is being developed and it should support the Joint Core Strategy in order to

meet the test of soundness. The evidence base should be in place at the time of submission. I appreciate that a large part of the evidence base relates to Worcester itself and its role as a New Growth Point. By the time of submission, evidence should be available in relation to the other towns and rural areas, sufficient to support policies and proposals.

With regard to implementation and monitoring, it is too early in the process to have established fully an implementation and monitoring framework. However, it is noted that you recognise that the Joint Core Strategy should set this out by the time of submission. The emphasis of the LDF system is on delivery and it is expected that the implementation framework should set out how the Joint Core Strategy will be implemented and who is responsible for the delivery of various parts of the strategy.

The approach to the development of options, using themes from community strategies, is to be supported; this should assist in the development of the spatial strategy and establishing the relationship between the LDF and community strategies. However the Paper identifies a series of topics and specific questions in a way which would have been more appropriate to an "old style" local plan, for example, development of Worcester, the potential for development in the green belt and the development of other towns are dealt with individually rather than considering the spatial implications for the scale and direction of growth and the relationships between the settlements and with the rural areas.

The Core Strategy should consider the key issues facing the District, identified through the spatial portrait, from evidence gathering e.g. Housing Land Availability Assessment and discussions with stakeholders. In developing the strategy you need to look at the options more holistically. For example, concentration of growth around Worcester is a given because of its role as a Sub-Regional Focus and New Growth Point but the direction of growth including the potential use of the green belt is one interrelated issue from which options need to be developed and assessed. Consideration also needs to be given to the impact of the growth options on the other settlements and villages. I would expect the development of options and subsequently the preferred options to be based on the factors discussed with key stakeholders concerning the potential of broad locations. You may need to develop the Issues and Options Paper further, to set out spatial options drawing on that discussion and looking critically at the topics and the key elements of the spatial portrait. The approach would benefit from the use of diagrams and a brief explanation of the implications of spatial options. I am happy to discuss this with you.

Other issues and options are not looked at in a spatial way and some of them relate to delivery mechanisms. For example, the biodiversity options seem to concentrate on delivery. There are also examples of options which relate to national policy, e.g. Issue 19, Option 6 relates to policy on out of town retailing which is covered by PPS 6.

Generally the document does not reflect the needs of children, young people or families as such. In general community plans often recognise the need to improve educational achievement for children and young people. The references to achievement in the document set out in Issue 31 are complacent. There is an issue in relation to the 40% of children who do not do well and how this is to be addressed. Furthermore there is a concern about the lack of consideration of vocational training. Further to this, there is no mention of the importance of schools, children centres, youth facilities being at the heart of communities both town and rural, and how these services and facilities can be key to cohesion and improved access to services. Some of the questions are posed as issues but it is unclear if they really are spatial issues which should be addressed in the Joint Core Strategy.

It is good to see that waste is being addressed in a positive manner however; it is considered that the issues and options raised go beyond the responsibilities of the District Councils. You will need to discuss the issues in detail with the County Council and the Joint Core Strategy should reflect what is to be included in the Waste Core Strategy.

To finish on a positive note it is good to see design and renewable energy being considered with its relation to sustainability highlighted and to see gypsy and travellers provision included, although there are concerns that there are no realistic spatial options. The Joint Core Strategy should identify broad locations for additional provision. The use of compulsory purchase powers is an implementation matter. It is also commendable that you have mentioned the housing affordability issues which are very real for the three districts especially Malvern Hills when it comes to the house price to earnings ratio. We would expect to see evidence taken from the South Housing Market Assessment being used as the strategy is developed. Finally, your approach to including a summary of the conclusions of the Sustainability Appraisal in relation to the options is considered to be good.

These comments are intended to be helpful, however there are some critical issues which I would like you to consider in any future preparation of key documents.

Yours sincerely

Mike Price
Senior Planning Manager.