

South Worcestershire Councils

Strategic Housing and Employment Availability Assessment (SHELAA)

September 2022

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1. Introduction

Background

The Strategic Housing and Employment Availability Assessment (SHELAA) is a technical assessment of the suitability, availability, and achievability (including viability) of land for housing and employment development.

The SHELAA is a joint report produced by the three South Worcestershire Councils (Malvern Hills District Council, Worcester City Council and Wychavon District Council).

The SHELAA report provides background evidence on the potential supply of housing and employment land in South Worcestershire to support the South Worcestershire Development Plan Review (SWDPR).

It is important to note that:

- Whilst the SHELAA is an important technical document, **it does not allocate land for development or include all locations where future housing and employment growth will occur.** The SHELAA ultimately provides information which will be investigated further through the plan-making process.
- The SHELAA is a very strategic assessment of the suitability, availability and achievability (including viability) of individual sites. It is **not intended to be an exhaustive exercise** and has not been informed by a direct assessment from officer service areas such as development management. It has also not been informed by a landscape or visual impact assessment, assessment of protected species, or screened through Habitats Regulations Assessment (HRA). Therefore, further constraints may become apparent during a more comprehensive site assessment exercise, such as during the process of considering sites for allocations or considering a Planning Application on a site.
- Any conclusions reached about the suitability, availability and achievability (including viability) of a site for residential or employment development within the SHELAA are not intended to imply that the South Worcestershire Councils will or will not grant planning permission for residential or economic development upon a site. All Planning Applications for housing and economic development will continue to be considered against the appropriate policies in the Local Plan and have regard to any other material considerations.
- The inclusion of potential housing and economic development sites within the study does not preclude them from being considered for other purposes. Similarly, the identified boundaries of sites are based on the information available at the time of the assessment and may be subject to change for the purpose of a planning application or development plan allocation.
- References to the suitability of a site for open market residential development or residential development within this assessment relate to open market

residential development which provides an appropriate affordable housing contribution at the relevant prevailing rate; assume an appropriate design and layout reflecting site constraints/opportunities present and compliant with Local Plan policies; and provides appropriate developer contributions or contributions to the Community Infrastructure Levy (CIL).

- References to the suitability of a site for employment development within this assessment relate to employment development of a use class appropriate to the site and its setting.
- Site assessments undertaken within the SHELAA are proportionate, with the greatest detail provided for those sites that are not subject to clear and significant constraints and are located within, or in proximity of, a settlement potentially considered an appropriate location for sustainable development. This has been informed by the South Worcestershire Council's hierarchy of settlements assessment in the Village Facilities and Rural Transport Study (2019), available at <https://www.swdevelopmentplan.org/swdp-review/swdp-review-evidence-base/village-facilities-and-rural-transport-study>
- Estimations of capacity, lead-in times and delivery-rates within this assessment are based on best available information and circumstances or assumptions may change.
- The base date for this assessment is the 30th September 2020, sites submitted for consideration after this date will not be included within this assessment.

National Policy

The National Planning Policy Framework¹ (the Framework) says that Local Planning Authorities should assess the availability; suitability; and achievability (including viability) of land for development, and its ability to contribute towards meeting needs for the duration of the plan period.

Specifically, paragraph 68 of the Framework states that *“Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:*

- a) specific, deliverable sites for years one to five of the plan period; and*
- b) specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.”*

1

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf

Annex 2 Glossary of the Framework sets out what are considered to be Deliverable and Developable sites:

| | |
|-------------|--|
| Deliverable | <p><i>To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:</i></p> <p><i>a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).</i></p> <p><i>b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.</i></p> |
| Developable | <p><i>To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged.</i></p> |

Paragraph 81 of the Framework states “*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.*”

National Planning Practice Guidance on Housing and Economic Land Availability Assessment² (referred to in this report as the Guidance) provides further detail, supplementing the Framework. It supports a concurrent review of the potential of land for housing and employment development, to ensure an integrated approach. Specifically, it states *Plan-making authorities may carry out land availability assessments for housing and economic development as part of the same exercise, in order that sites may be identified for the use(s) which is most appropriate.*

The Guidance also provides a methodology for undertaking a SHELAA. It states that an assessment should:

- *identify sites and broad locations with potential for development;*
- *assess their development potential; and*

² <https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment>

- *assess their suitability for development and the likelihood of development coming forward (the availability and achievability).*

This assessment methodology has been utilised as the basis for this assessment in South Worcestershire.

Local Policy

The adopted South Worcestershire Development Plan (SWDP) (2016) is the Local Plan for South Worcestershire. The adopted SWDP sets out the Councils vision, strategic objectives and broad spatial strategy to guide future development and growth in South Worcestershire to 2030. The SWDP also includes site allocations to meet housing and employment land requirements to 2030 and policies to guide future development in order to help deliver the SWDP vision and objectives to 2030.

The South Worcestershire Councils are currently progressing a Local Plan Review to cover the period to 2041. This SHELAA forms part of the evidence base for the Local Plan Review (SWDPR).

Made Neighbourhood Plans are also part of the development plan in south Worcestershire.

SHELAA Database

SHELAA site data for south Worcestershire is stored as a 'live' database. Sites can be submitted to the South Worcestershire Councils for inclusion within the SHELAA database at any time, using the SHELAA Site Suggestion Form available on the South Worcestershire Councils website

at: <https://www.swdevelopmentplan.org/consultations/swdp-review-call-for-sites-and-proposed-shelaa-methodology>

The SHELAA Site Suggestion Form allows identification of:

- General information on the site and its location;
- Information on the sites ownership;
- Information on the sites current land use;
- The sites availability for various forms of development; and
- The sites suitability for various forms of development.

Reviews and Reports

South Worcestershire Councils undertake and publish the results of SHELAA assessments periodically. Therefore, whilst the SHELAA site data is stored as a 'live' database and sites can be submitted at any time, sites will only be incorporated into a SHELAA review, if received prior to the base date of the review itself. If a site is

received after the base date for the SHELAA review, it will be recorded within the SHELAA 'live' database, for consideration within a future SHELAA review.

The base date for this SHELAA assessment is 30th September 2020.

Purpose of this Report

This report summarises the methodology and conclusions reached by South Worcestershire Councils in its review of strategic land available in South Worcestershire. The key aspects of this assessment are:

- A summary of the methodology utilised to undertake the assessment of SHELAA sites;
- Provision of details of the sites considered within the SHELAA database, as at the base date for the report, including:
 - Summary details of each site;
 - A notional development capacity that could be delivered on each site, based on standard assumptions;
 - A summary of the availability of each site;
 - A summary of the assessment of the suitability of each site for development;
 - A summary of the achievability (including viability) of each site for development; and
 - A map of the location of each site;
- Calculation of the potential for the delivery of housing on windfall sites in South Worcestershire. *Windfall development is development delivered in the plan period on unidentified sites or on sites that fall below the minimum threshold to be included in the SHELAA); and*
- Provision of an indicative trajectory of potential development.

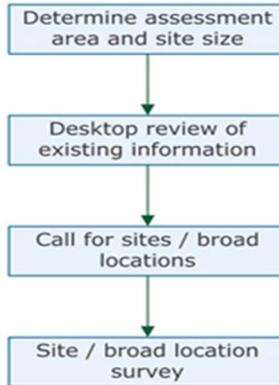
2. The SHELAA Methodology

The flowchart below sets out the stages of the assessment as set out in the Guidance.

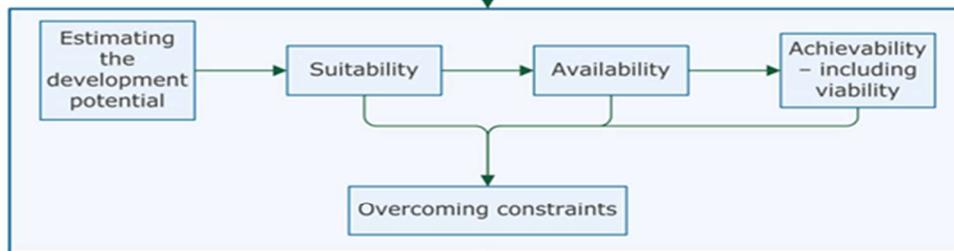
The Guidance indicates what inputs and processes can lead to a robust assessment of land availability. Plan makers should have regard to the guidance in preparing their assessments, but the Guidance also provides the ability to depart from the guidance where this can be justified.

The South Worcestershire Councils consulted on the standard SHELAA methodology between May to July 2018 and amended it in accordance with the responses received. The South Worcestershire Councils have followed the standard methodology, unless local circumstances justified a change.

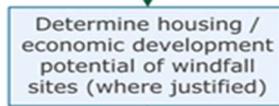
Stage 1- Site / broad location identification



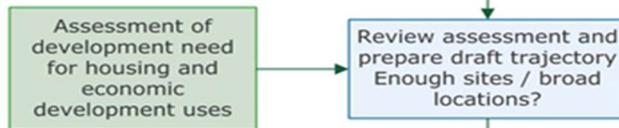
Stage 2 - Site / broad location assessment



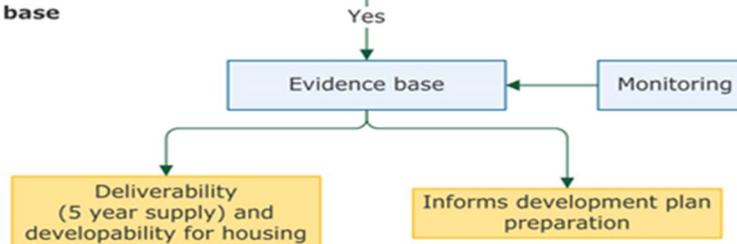
Stage 3 - Windfall assessment



Stage 4 - Assessment review



Stage 5 - Final evidence base



Source: Planning Practice Guidance on Housing and economic land availability assessment - https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/578755/land-availability.pdf

3. Stage 1: Site Identification

Stage 1 of the assessment identifies the assessment area and site size thresholds. It also includes a review of existing information, identification of broad locations considered suitable for development, calls for sites and an initial site / broad location survey.

Assessment Area

The assessment area for the SHELAA is South Worcestershire – covering the administrative areas of Malvern Hills District Council, Worcester City Council and Wychavon District Council.

Site Size Thresholds

The Guidance states that *plan-makers will need to assess a range of different site sizes from small-scale sites to opportunities for large-scale developments such as village and town extensions and new settlements where appropriate*. The Guidance also states that *it may be appropriate to consider all sites and broad locations capable of delivering 5 or more dwellings, or economic development on sites of 0.25 hectares (or 500 square metres of floor space) and above*, but acknowledges that plan-makers may wish to consider alternative site size thresholds.

The Framework (paragraph 69) states that planning policies should identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved.

In accordance with the Guidance the SHELAA considers sites and broad locations for residential or economic development where they are capable of delivering 5 or more dwellings (generally, sites of less than 0.16 hectares are unlikely to achieve this threshold) or 0.25 hectares for economic development.

Desktop Review of Existing Information

The Guidance states that *when carrying out a desktop review, plan-makers need to be proactive in identifying as wide a range of sites and broad locations for development as possible*. The Guidance states that *an important part of the desktop review is to identify sites and their constraints, rather than simply to rule out sites outright which are known to have constraints*.

The types of sites considered within the SHELAA, and examples of where data was sourced, are summarised below:

| Type of Site | Potential Data Source |
|--|--|
| Existing SWDP housing and economic development allocations and site development briefs not yet with planning permission | SWDP and neighbourhood plans Planning applications records Development Briefs |
| Planning Permissions for housing and economic development that are unimplemented or under construction | Planning application records Development starts and completions records 5 Year Housing Land Supply reports |
| Planning applications that have been refused or withdrawn | Planning application records |
| Land in the local authority's ownership | Local authority property records Call for sites |
| Surplus and likely to become surplus public sector land | National register of public sector land Engagement with strategic plans of other public sector bodies such as county councils, central government, National Health Service, police, fire services, utilities services, statutory undertakers Call for sites |
| Sites with permission in principle, and identified brownfield land | Brownfield land registers (parts 1 and 2) National Land Use Database Valuation Office database Active engagement with sector |
| Vacant and derelict land and buildings (including empty homes, redundant and disused agricultural buildings, potential permitted development changes, eg offices to residential) | Local authority empty property register English Housing Survey National Land Use Database Commercial property databases (eg estate agents and property agents) Valuation Office database Brownfield land registers Active engagement with public sector bodies - including consultation on methodology |
| Additional opportunities for un-established uses (eg making productive use of under-utilised facilities such as garage blocks) | Ordnance Survey maps Aerial photography Planning applications Site surveys Liaison with registered providers Call for sites |
| Business requirements and aspirations | Enquiries received by local planning authority Active engagement with sector Economic Development Needs Assessment Call for sites |
| Sites in rural locations | Local and neighbourhood plans |

| | |
|--|---|
| Large scale redevelopment and redesign of existing residential or economic areas | Planning applications Ordnance Survey maps |
| Sites in adjoining villages and rural exceptions sites | Aerial photography Site surveys |
| Potential urban extensions and new free-standing settlements | Call for sites |

Call for Sites

A 'Call for Sites' is a request to private, public, and voluntary sector bodies and individuals to submit potential development sites for consideration within the SHELAA.

The Guidance notes that plan makers should issue a call for potential sites and broad locations for development, which should be aimed at as wide an audience as is practicable so that those not normally involved in property development have the opportunity to contribute.

The South Worcestershire Councils undertook a 'Call for Sites' exercise between May and July 2018.

This exercise was published on the South Worcestershire Councils website; with notifications issued to consultees on the Planning Policy consultation database; and within South Worcestershire Council's main office buildings. Consultation responses were accepted both by email and post. During this exercise around 1,230 site suggestions were received.

Further sites were also submitted for consideration during the Preferred Options Consultation, which occurred between November and December 2019.

Many sites have also been submitted outside the 'Call for Sites' and Local Plan Consultations using the SHELAA Proforma available on the South Worcestershire Councils website – <https://www.swdevelopmentplan.org/swdp-review/swdp-review-evidence-base/strategic-housing-and-employment-land-availability-assessment>

Using the above sources, 1,294 (9,005.104 hectares) individual sites were identified for inclusion within the SHELAA as at the base date (not including 315.68 hectares of duplicated land). Sites submitted for consideration after this date have not yet been fully assessed, so will be included in a future SHELAA review.

Site / Broad Location Survey

The Guidance states that following the collation of a comprehensive list of sites and broad locations derived from data sources and the call for sites, *plan-makers can assess potential sites and broad locations prior to a more detailed survey to:*

- *ratify inconsistent information gathered through the call for sites and desk assessment;*
- *get an up to date view on development progress (where sites have planning permission);*
- *obtain a better understanding of what type and scale of development may be appropriate;*
- *gain a more detailed understanding of deliverability, any barriers and how they could be overcome; and*
- *identify further sites with potential for development that were not identified through data sources or the call for sites.*

Duplicate Sites

If the same site (or part of site) was submitted more than once, then the “duplicate” site (or part of site) was ruled out to avoid double-counting the site. If the landowner submitted a new parcel of land which included the original site, the original site was superseded and deleted.

Level 1 (Red) Constraints

The Guidance states that *at this stage, there may be some sites which, when taking into account national policy and designations, it will not be appropriate to carry out more detailed assessments for, where it is clear that they will not be suitable for development. The initial surveys need to be proportionate, with a more detailed assessment being made at Stage 2.*

The initial assessments undertaken by the South Worcestershire Councils identified sites that may be restricted by a “level 1” (red) constraint. These are severe constraints that render a site unsuitable or undevelopable and not appropriate for further assessment. The Level 1 (red) constraints were:

| | |
|----------------------|--|
| Flood Risk | Site is in Flood Zones 2 or 3 |
| Green Belt | Site is in the Green Belt |
| Nature Designation | Site of international or national wildlife importance - Site of Special Scientific Interest, Special Area of Conservation, Ramsar or Local Nature Reserve |
| Historic Environment | Site likely to result in loss or substantial harm to national heritage assets, including Scheduled Monuments or Registered Historic Parks and Gardens |
| Contaminated Land | Site severely affected by land contamination issues |

If it was considered that the level 1 (red) constraint could be overcome without severely restricting development (for example, if just part of a site was in the Green Belt or Flood Zones 2 or 3) a judgement was made by officers as to whether part of the site may still be suitable for housing or employment and whether the site should progress to Stage 2. If a “smaller cut” of the site was progressed to Stage 2, the smaller site was given a new site reference number with a “sc” suffix. For example, a smaller cut of site CFS0001 would become CFS0001sc.

Based on the initial assessment, 148 sites (1,060.99 hectares (not including 84.46 of duplicated land) were identified as being restricted by level 1 “red” constraints that rendered them unsuitable or undevelopable and not appropriate for further assessment.

Appendix A summarises the sites ruled out by level 1 (red) constraints at Stage 1.

4. Stage 2: Site / Broad Location Assessment

Stage 2 of the assessment represented a proportionate appraisal of the development potential; suitability; availability; and achievability (including viability) of the sites and broad locations identified, but not ruled out, through Stage 1 of the assessment. As these factors are inter-related, assessment of each site against each factor was carried out in parallel.

The assessments undertaken were proportionate, with the greatest focus on those sites that are not subject to clear and significant constraints and are located within or in proximity of a settlement potentially considered an appropriate location for sustainable development. This has been informed by the adopted SWDP Development Strategy, the emerging SWDPR Development Strategy and the South Worcestershire hierarchy of settlements assessment -

<https://www.swdevelopmentplan.org/swdp-review/swdp-review-evidence-base/village-facilities-and-rural-transport-study>

Development Strategy and Settlement Hierarchy

The SWDP sets out the development strategy and settlement hierarchy for South Worcestershire to 2030. The SWDP focuses development on two urban extensions (Worcester South and Worcester South) and the main urban areas (Worcester city and the towns of Droitwich Spa, Evesham, Malvern, Pershore, Tenbury Wells and Upton upon Severn), where both housing needs and accessibility to lower-cost public services are greatest. In order to deliver the social objectives of sustainable development, the SWDP directs some growth to rural settlements (Category 1, 2 and 3 villages) that enjoy some local facilities and services. The SWDPR will set out the revised development strategy and settlement hierarchy for south Worcestershire for the period 2021 – 2041, with as much of the additional growth as possible being located within easy reach of existing or proposed new rail stations in order to facilitate rail travel and reduce dependence on the private car. The SWDPR focuses the majority of additional development at four new or expanded settlements (based around Worcestershire Parkway, Throckmorton Airfield, Rushwick and Mitton).

The table below summarises the development strategy and settlement hierarchy proposed for South Worcestershire within the ongoing Local Plan Review:

| Settlement Type | Settlement | |
|-----------------------------|-------------------------------|----------------------------|
| Strategic Allocation | Worcestershire Parkway | |
| | Throckmorton | |
| | Rushwick | |
| | Mitton | |
| Urban Extensions | Worcester South | |
| | Worcester West | |
| Urban Area (1) | Worcester | |
| | Malvern Hills District | Wychavon District |
| Urban Area (2) | Malvern | Droitwich Spa |
| | | Evesham |
| Urban Area (3) | Tenbury Wells | Pershore |
| | Upton-upon-Severn | |
| Category 1 Settlements | Callow End | Badsey |
| | Clifton upon Teme | Bredon |
| | Great Witley | Broadway |
| | Hallow | Drakes Broughton |
| | Hanley Swan | Fernhill Heath |
| | Kempsey | Hartlebury |
| | Lower Broadheath | Honeybourne |
| | Martley | Inkberrow |
| | Suckley | Offenham |
| | Welland | Omersley |
| | | Upton Snodsbury |
| | | Wychbold |
| | Category 2 Settlements | Abberley Common |
| Alfrick | | Beckford |
| Astley | | Bretforton |
| Bayton | | Church Lench |
| Broadwas | | Cleeve Prior |
| Clows Top | | Crophorne |
| Holt Heath | | Crowle and Crowle Green |
| Powick (inc Colletts Green) | | Defford |
| Tunnel Hill | | Eckington |
| | | Elmley Castle |
| | | Harvington |
| | | Himbleton |
| | | Lower Moor |
| | | Overbury |
| | | Pinvin |
| | | South Littleton |
| | Tibberton | |
| | Whittington | |
| Category 3 Settlements | Bransford | Bishampton |
| | Grimley | Cutnall Green |
| | Knightwick | Flyford Flavell |
| | Leigh Sinton | Hanbury |
| | Lindridge | Littleworth |
| | Mamble | North and Middle Littleton |
| | Rushwick | Norton Juxta Kempsey |
| | Shrawley | Pebworth |
| | Ryall and Holly Green | Sedgeberrow |
| | Hanley Castle | Stoke Prior |

Estimating the Development Potential of Each Site

The Guidance states that *the estimation of the development potential of each identified site can be guided by the existing or emerging plan policy including locally determined policies on density. When assessing development potential, plan makers should seek to make the most efficient use of land in line with policies set out in the National Planning Policy Framework.*

Housing Sites

Policy SWDP 5 (Green Infrastructure) in the adopted SWDP includes the following gross to net development ratios to take account of items such as roads, green infrastructure and sustainable drainage systems when identifying the developable land available on a site. Specific site considerations may provide a reason to deviate from the ratios below, and this will be clearly set out where necessary.

| Site Type and Size | Gross to Net Development Ratio |
|---|--------------------------------|
| Greenfield sites up to 0.2 ha and brownfield sites | 100% |
| Greenfield sites of less than 1 ha but more than 0.2 ha | 80% |
| Greenfield sites exceeding 1 ha | 60% |

Density is also used to calculate the housing potential of a site. For the purpose of the SHELAA, standard assumptions have been applied to calculate housing development potential. Specifically:

| Location | Average Density (dwellings per hectare - minimum) |
|---------------------------------|---|
| Worcester and Towns | 40 dph |
| Category 1, 2 and 3 Settlements | 30 dph |
| Worcestershire Parkway | 40 dph |
| Throckmorton Airfield | 40 dph |
| Rushwick | 35 dph |
| Mitton | 35 dph |

Given the strategic nature of the SHELAA exercise, it is recognised that the standard assumptions and indicative development potential represent a starting point for

assessing the capacity of a site. More detailed site constraints may be identified as part of a more comprehensive site review. Where a more refined development potential has been provided, having regard to local circumstances, a clear explanation will be set out.

Where planning permission has been granted, the density provided will reflect the consented development scheme (therefore likely to deviate from the above indicative densities).

Employment Sites

Given the strategic nature of the SHELAA exercise, it has been assumed that the gross site area (hectares) is the potential amount of development an employment site can deliver.

Mixed Sites

Where land is indicated for a mix of residential and employment land uses, a standard assumption has been applied. In these cases, it has been assumed that 50% of the land could be housing development and 50% for employment uses, unless the landowner has proposed an alternative ratio.

Assessing Suitability

The Guidance states that *sites in existing development plans or with planning permission can generally be considered suitable for development although it may be necessary to assess whether circumstances have changed which would alter their suitability.*

Sites with Planning Permission

A total of 9,329 dwellings had planning permission as at 31st March 2021. The local planning authority has engaged with all the relevant landowners/developers regarding the deliverability/developability status of these sites, and the likely phasing of development, as part of the annual housing monitoring process.

Of the 9,329 dwellings with planning permission, 1,632 were under construction at 31st March 2021. For further information on which sites are permissioned, please see the South Worcestershire Councils Five Year Housing Land Supply 2022 document, available at

<https://www.malvern hills.gov.uk/component/fileman/file/Documents/Planning/Planning%20Policy/Annual%20Monitoring%20Reports/Housing%20Land%20Supply/South%20Worcs%20Five%20Year%20Housing%20Land%20Supply%20Report%202021.pdf?routed=1&container=fileman-files>

Site Allocations in the Current Adopted SWDP (2006 – 2030)

Appendix B summarises housing, employment and mixed-use allocations in the adopted SWDP which did not have planning permission as at 31st March 2021. Where planning applications have been submitted or determined after this date the relevant sites still appear in Appendix B. The local planning authority has engaged with the relevant landowners/developers in order to ensure that the most up-to-date information is available regarding deliverability/developability and phasing.

Site Allocations in Made Neighbourhood Plans

Made Neighbourhood Plans form part of the statutory development plan and the allocations have the same status as those within the current adopted Local Plan. The following made Neighbourhood Plans allocate sites over-and-above those allocated in the adopted SWDP:

- North Claines (April 2017) – allocated sites for 39 dwellings
- Kempsey (November 2017) – allocated a site for 99 dwellings
- Hanley Castle (January 2019) – allocated 3 sites for 19 dwellings
- Harvington (September 2019) – allocated 1 site for 40 dwellings
- Eckington (February 2020) – allocated 3 sites for 44 dwellings
- Hallow (July 2021) – allocated a site for 40 dwellings

Appendix C sets out the delivery projections for those neighbourhood planning allocations which did not already have planning permission at 31st March 2021.

In addition to the existing made Neighbourhood Plans, a number of other Neighbourhood Plans are fairly advanced in their preparation. Once ‘made’, any further housing allocations contained within these Neighbourhood Plans will also contribute to the housing land supply and will be included in the SHELAA next time.

Site Suitability Criteria

The Guidance states that *a site or broad location can be considered suitable if it would provide an appropriate location for development when considered against relevant constraints and their potential to be mitigated.*

The Guidance also states that *when considering constraints, plan-makers may wish to consider the information collected as part of the initial site survey, as well as other relevant information, such as:*

- *national policy;*
- *appropriateness and likely market attractiveness for the type of development proposed;*
- *contribution to regeneration priority areas;*
- *potential impacts including the effect upon landscapes including landscape features, nature and heritage conservation.*

Suitability is the consideration of the appropriateness of a use or mix of uses on a site. However, it is not an assessment of what should or will be allocated / developed on a site.

The SHELAA includes a very strategic assessment of a sites suitability. As such it is not intended to be an exhaustive exercise and has not been informed by a direct assessment from officers in service areas such as development management. It has also not been informed by landscape or visual impact assessments, assessment of protected species, or screened through Habitats Regulations Assessment (HRA). Therefore, further constraints may become apparent during a more comprehensive site assessment exercise, such as during the process of considering sites for allocations or considering a Planning Application on a site.

Assessment of a sites suitability was undertaken through consideration of numerous factors, including:

- Whether the site is consistent with the Development Strategy - within or in proximity of a settlement potentially considered an appropriate location for sustainable development.
- Site specific factors, including physical limitations to the development, such as:
 - Topography of the site;
 - Ability to provide safe access the site;
 - Flood risk to the site or its immediate access;
 - Ability to access water and sewerage supplies
 - Agricultural land quality of the site;
 - Hazardous risks, pollution or contamination of the site;
 - Whether the site has overhead or underground infrastructure, such as pylons, water / gas pipes and electricity cables which may impact on development / levels of development;
 - Other physical constraints, which may impact on development / levels of development.
- The potential impact on natural environment assets, such as:
 - Sites of Special Scientific Interest
 - Special Wildlife Sites
 - Local Nature Reserve
 - Regionally Important Geological Site
 - TPO's
 - Ancient Woodland
 - Ancient Hedgerows
- Whether the site is within, or would affect the setting of, an Area of outstanding Natural Beauty/or National Landscape
- Whether the site is located within the Green Belt.
- Whether the site is located within a Significant Gap
- Potential impact on heritage assets, such as:
 - Conservation Areas

- Listed Buildings
- Scheduled Monuments
- Access of the site to key services

The Framework says that *planning policies should avoid the development of isolated homes in the countryside unless specific circumstances apply*. However, the Framework also says that *the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes)*.

For employment, the Framework says that *planning policies should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport*.

In light of the above, it was considered that sites submitted for dwellings not located within, or in proximity of, a settlement potentially considered an appropriate location for sustainable development should be ruled out due to location (isolated) or village categorisation, but sites submitted purely for employment purposes were not ruled out solely for this reason unless the location would make them unsuitable for market suitability purposes.

Level 2 (Red) Constraints

The site assessments undertaken by the South Worcestershire Councils at Stage 2 identified sites that may be restricted by “level 2” (red) constraints - constraints that render a site unsuitable or undevelopable, unless the constraint can be overcome by mitigation. The level 2 (red) constraints are listed in Appendix D.

If it was considered that the red constraint could be overcome without severely restricting development a judgement was made by officers as to whether part of the site may still be suitable for housing or employment. If a “smaller cut” of the site was proposed, the smaller site was given a new site reference number with a “sc” suffix.

Based on the Stage 2 assessment, 789 sites (5,773.56 hectares) were identified as being restricted by level 2 “red” constraints that rendered them unsuitable or undevelopable (not including 268.9 hectares of duplicated land).

Appendix E summarises the sites ruled out by level 2 “red” constraints at Stage 1.

Summary

Reflecting upon the above factors, following the very strategic assessment of the suitability of sites it was concluded that a site would be:

- **Suitable**, subject to further detailed assessment, for the particular use or mix of uses, if it is located within, or in proximity of, a settlement potentially

considered an appropriate location for sustainable development³ **and** had no known constraints or restrictions that would prevent development or had known constraints that could potentially be suitably overcome through mitigation⁴.

- **Not Suitable** if it is not located within, or in proximity of, a settlement potentially considered an appropriate location for sustainable development, **or** it is subject to known constraints which it is considered cannot be suitably overcome through mitigation.

A copy of the site assessments for housing and employment land are available at [SWDPR Draft Regulation 19 Publication Evidence Reports - South Worcestershire Development Plan \(swdevelopmentplan.org\)](http://swdevelopmentplan.org)

Assessing Availability

The Guidance states that a site can be considered available for development, when, on the best information available (confirmed by the call for sites and information from landowners and legal searches where appropriate), there is confidence that there are no legal or ownership impediments to development. For example, land controlled by a developer or landowner who has expressed an intention to develop may be considered available.

The Guidance also states that *the existence of planning permission can be a good indication of the availability of sites.*

Reflecting the above Guidance, all the sites which were promoted in the call for sites or more recent site submissions were considered available unless information was received which indicated that this was not the case.

Where sites benefit from an unimplemented planning permission, the site promoter was contacted as part of the annual housing monitoring process to confirm the latest position. If there were potential impediments to the availability of sites, officers considered whether those issues could realistically be overcome.

Assessing Achievability (including Viability)

The Guidance states that a site is considered achievable for development where there is a reasonable prospect that the particular type of development will be developed on the site at a particular point in time. This is essentially a judgement

³ As this is a very strategic assessment, where sites are currently contrary to the SWDP Development Strategy but are located within or in proximity of a settlement potentially considered an appropriate location for sustainable development, no judgement was made about whether such a change to policy would be appropriate, this is the role of the SWDP Review.

⁴ As this is a very strategic assessment, where sites are subject to known constraints and it was considered that the constraints could potentially be suitably overcome through mitigation, further detailed assessment would be required to confirm if such mitigation is effective and the impact of this mitigation on the developable area.

about the economic viability of a site, and the capacity of the developer to complete and let or sell the development over a certain period.

As the SHELAA is a very strategic assessment, the South Worcestershire Councils used very general assumptions to inform the assessment of achievability and viability of a site, specifically:

Residential Development

For a scheme to be 'viable' it must make financial sense to both the developer and the landowner, within the constraints imposed by the market; planning policies; and any required infrastructure obligations. It is within this context that the Framework defines a viable scheme as one that provides competitive returns to a willing landowner and developer.

South Worcestershire's geographical location and rural character make it a desirable place to live. Whilst South Worcestershire has a diverse housing market, residential development is generally considered viable, unless there are any known site-specific issues which impact upon viability.

Consequently, residential development on a site is generally considered achievable and viable unless there are site specific issues evident.

Employment Development

South Worcestershire has a diverse economy, reflecting both the agricultural base of the countryside and the diverse industrial/commercial history of its settlements. The main employment areas are located within Worcester and the Towns where the majority of additional demand and provision is likely to arise. Outside of these areas new employment development will generally be in response to a specific need or business use.

For the purpose of the SHELAA, where a site has been promoted for employment use within a settlement, or a specific occupier is apparent for a site in a rural location, it has been assumed that the site will be viable for employment development.

Viability Assessment

The above approach is considered proportionate. However, to support the Local Plan Review a SWDPR viability assessment has been undertaken – available at https://www.swdevelopmentplan.org/swdp-review/swdp-regulation-19-publication/swdpr-draft-regulation-19-publication-evidence-reports#viability_assessment

Overcoming Constraints

Where constraints have been identified, the assessment considers what action could be taken to remove or successfully mitigate them. For example, if just part of a site

affected by a constraint a judgement was made by officers as to whether a “smaller cut” of the site may still be suitable for housing or employment.

Conclusions

Following an assessment of each sites’ potential suitability, availability and achievability (including viability) an overall conclusion was reached.

Appendices F - J of this document provides a summary of the assessment undertaken for each of the sites included within the SHELAA. Specifically:

- Appendix F - summarises the assessment of those sites in and around the proposed Strategic Allocations (Worcestershire Parkway, Throckmorton Airfield, Rushwick and Mitton).
- Appendix G – summarises the assessment of those sites in and around Worcester and the Towns.
- Appendix H – summarises the assessment of those sites in and around Category 1, 2 and 3 Settlements.
- Appendix I – summarises the assessment of Employment Sites.
- Appendix J - provides a link to an interactive map showing the location of potential Residential and Employment Sites included within the SHELAA.

5. Stage 3: Windfall Assessment

A windfall site is one which has not been identified within the Local Plan. Paragraph 71 of the Framework states that *where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends. Plans should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area.*

Analysis undertaken on historic rates of delivery provides clear evidence that small sites (sites accommodating less than 10 units) have consistently become available within South Worcestershire. Therefore, the principle of a small site windfall allowance is considered to be justified.

As shown in the table below, a total of 4,184 dwellings were completed between 2006/07 to 2020/21 on small windfall sites, giving an average of 279 windfall completions annually across South Worcestershire.

| Monitoring Year | Malvern Hills Small Windfall Completions | Worcester Small Windfall Completions | Wychavon Small Windfall Completions | Total |
|-----------------|--|--------------------------------------|-------------------------------------|--------------|
| 2006/07 | 85 | 90 | 128 | 303 |
| 2007/08 | 168 | 101 | 88 | 357 |
| 2008/09 | 85 | 73 | 84 | 242 |
| 2009/10 | 63 | 82 | 55 | 200 |
| 2010/11 | 60 | 66 | 79 | 205 |
| 2011/12 | 82 | 61 | 110 | 253 |
| 2012/13 | 61 | 56 | 93 | 210 |
| 2013/14 | 76 | 45 | 154 | 275 |
| 2014/15 | 86 | 95 | 132 | 313 |
| 2015/16 | 44 | 80 | 148 | 272 |
| 2016/17 | 68 | 88 | 174 | 330 |
| 2017/18 | 86 | 41 | 167 | 294 |
| 2018/19 | 128 | 120 | 160 | 408 |
| 2019/20 | 51 | 72 | 70 | 193 |
| 2020/21 | 101 | 60 | 168 | 329 |
| Total | 1,244 | 1,130 | 1,810 | 4,184 |
| Average | 83 | 75 | 121 | 279 |

Although there is evidence to suggest a consistent supply of large windfall sites (10 or more dwellings) across South Worcestershire, to remain cautious in determining a windfall allowance, large windfall completions have not been included.

The approach of including a small site windfall allowance was accepted by the Local Plan Inspector and is reflected in the current adopted SWDP. It was agreed a figure

of 180 dwellings per annum as a windfall allowance, which allowed a conservative and cautious approach to windfall allowance.

A windfall allowance of 180 dwellings per annum has therefore been included as part of the anticipated housing supply for the SWDPR. To ensure double counting does not occur, the windfall allowance is not included in years 1-3, with years 4-10 including the full windfall allowance of 180 dwellings per annum.

6. Stage 4: Assessment Review

Assessment of Development Need for Housing and Economic Development Uses

The housing need for south Worcestershire, based on the Government's standard methodology for calculating housing need, for the period to 2041 is 25,860. Including 500 dwellings at Mitton for Tewkesbury District Council, results in a housing requirement of 26,360 dwellings.

The South Worcestershire Economic Development Needs Assessment (EDNA) published in March 2022 - <https://www.swdevelopmentplan.org/swdp-review/swdp-review-evidence-base/economic-development-needs-assessment> – forecasts a demand for some 280.4 hectares of employment land in South Worcestershire between 2021 and 2041. Including a five-year buffer to allow for choice in the market increases the demand to 350.5 ha.

Timescales and Rate of Development

The Guidance states that once the sites and broad locations have been assessed, the development potential of all sites can be collected to produce an indicative trajectory. This should set out how much housing and the amount of economic development that can be provided, and at what point in the future (i.e. within years 1 to 5, 6 to 10, and 11 and beyond). An overall risk assessment should be made as to whether sites will come forward as anticipated.

The information on suitability, availability and achievability and constraints information was used to assess the timescale within which each site may be capable of development. In line with the Guidance, the SHELAA uses the following time bands when assessing likely delivery, linked to the SWDPR Plan period (2020/21 to 2040/41):

- Within 0 – 5 years (2020/21 – 2025/26)
- Within 6 – 10 years (2026/27 – 2030/31)
- Within 11 – 20 years (2031/32 – 2040/41)

The first 5 years encompass deliverable sites as defined in the Framework, whilst those sites outside of the first 5 years are assessed in relation to whether they are developable. Some of the large strategic allocations are expected to still be under construction post 2030/31.

Sites which are under construction or have planning permission are assumed to be deliverable unless, after discussion with the applicant, it is no longer their intention to develop within 5 years.

Sites allocated in the adopted SWDP or in a made Neighbourhood Plan are assumed to be deliverable within 5 years, unless existing site restrictions (such as

infrastructure delivery on strategic sites) indicate a longer delivery time will be more realistic.

The timescale for the delivery of all other sites is based on the landowner / developers estimation of availability.

Assessment and Draft Trajectory – Housing

The South Worcestershire Councils Five Year Housing Land Supply 2021 document shows that a total of 9,329 dwellings have planning permission at 31 March 2021.

Appendix B shows that the current adopted Local Plan contains 41 housing and mixed-use allocations for 1,841 dwellings which did not have planning permission as of 31 March 2021. Those allocations with planning permission as of 31 March 2021 are included in Five Year Housing Land Supply document referred to above.

Appendix C shows that made Neighbourhood Plans contain housing allocations for 80 dwellings which did not have planning permission as of 31 March 2021. Those allocations with planning permission as of 31 March 2021 are included in the Five Year Housing Land Supply document.

Appendices F to H identify sites which are accepted within the SHELAA (considered suitable, available, achievable and viable) for housing development that have not been subject to a planning application. Those sites which are subject to “level 1” or “level 2” (red) constraints that render them unsuitable or undevelopable are listed in Appendices A and D respectively. As densities will vary depending on settlement characteristics the dwellings per hectare average of 35 has been used in the calculations below as it is considered that this is a reasonable cross district average which takes into account housing densities in both rural and urban areas. Furthermore, 40% of each site area has been netted off the total to capture Green Infrastructure requirements.

Following an assessment of the sites in Appendices F to H:

- 297 sites - 586.07 hectares (20,512 dwellings) are considered deliverable in years 1 to 5
- 7 sites - 68.4 hectares (2,394 dwellings) are considered developable in years 6 to 10
- 1 site - 39.5 hectares (1,382 dwellings) is considered developable in years 11 to 20
- 37 sites - 210.05 hectares (7,351 dwellings) are on brownfield land
- 76 (38.46) sites (1,346 dwellings) are on sites of 1 hectare or less

Stage 3 demonstrates that a windfall allowance of 180 dwellings per annum in years 4 to 10, and 120 dwellings per annum in years 11 to 20, across South Worcestershire would be appropriate.

Table 1 below summarises the number of dwellings that could potentially be provided in South Worcestershire, grouped into the specific timeframes.

Having regard to:

- completions already achieved in 2020/21;
- sites with planning permission (as at 31 March 2021), assuming a 5% lapse rate on those where construction has not started;
- sites allocated in the current adopted Local Plan and made Neighbourhood Plans without planning permission;
- sites considered suitable, available and achievable in the SHELAA; and
- an appropriate windfall allowance.

it is considered that there are sufficient deliverable and developable sites / broad locations in South Worcestershire to meet housing need.

The SWDP Review will continue to support small and large-scale windfall development on appropriate sites consistent with the Local Plan. These sites will contribute to the housing land supply and housing delivery in South Worcestershire.

Table 1 - Indicative Housing Trajectory for South Worcestershire from 2020/21 to 2040/41

| Time Period | Completions* | Dwellings with Planning Commitments* | Allocated in current Local Plan without planning permission* | Allocated in made Neighbourhood Plans | Dwellings | | | Windfall Sites** | Total |
|--------------------------------------|--------------|--------------------------------------|--|---------------------------------------|---|-------------------|--------------------------|------------------|--------|
| | | | | | Suitable, Available & Achievable SHELAA Sites | | | | |
| | | | | | Strategic Allocations | Worcester + Towns | Cat 1, 2 & 3 Settlements | | |
| 2020/21 | 1,719 | 9,329 | 1,841 | 80 | 20,512 | | | N/A | 33,841 |
| Years 1 – 5 (2021/22 – 2025/26) | - | - | - | - | | | | 360 | |
| Years 6 – 10 (2026/27 – 2030/31) | - | - | - | - | 2,394 | | | 900 | 3,294 |
| Years 11 – 20 (2031/32 – 2040/41) | - | - | - | - | 1,382 | | | 1,200 | 2,582 |
| Total Supply | 1,719 | 9,329 | 1,841 | 80 | 24,288 | | | 2,460 | 39,717 |

* Information sourced from the South Worcestershire Council’s Five Year Housing Land Supply available on the SWDPR website at <https://www.malvern hills.gov.uk/component/fileman/file/Documents/Planning/Planning%20Policy/Annual%20Monitoring%20Reports/Housing%20Land%20Supply/South%20Worcs%20Five%20Year%20Housing%20Land%20Supply%20Report%202021.pdf?routed=1&container=fileman-files>. The base date for this information is 31st March 2021.

** A windfall allowance of 180 dwellings per annum has been applied for years 4 to 10, and 120 dwellings for years 11 to 20 (see Stage 3: Windfall Assessment).

Assessment and Draft Trajectory – Employment

Appendix B shows that the current adopted Local Plan contains 14 employment and mixed-use allocations (87.3 hectares) which did not have planning permission as of 31 March 2021.

Appendix I identifies 88 sites, 1231.27 (gross) hectares which are accepted within the SHELAA (considered suitable, available, achievable and viable) for employment development (pure employment and mixed-uses) that have not been subject to a planning application. Those sites which are subject to “level 1” or “level 2” (red) constraints that render them unsuitable or undevelopable are listed in Appendices A and D respectively.

Following an assessment of the 88 sites in Appendix I:

- 79 sites (522.29 hectares) are considered deliverable in years 1 to 5
- 4 sites (90.48 hectares) are considered developable in years 6 to 10
- 2 sites (70.18 hectares) are considered developable in years 11 to 20
- 3 sites (8.62 hectares) are considered ‘availability unknown’
- 16 sites (195.03 hectares) are on brownfield land

Table 2 below summarises the amount of employment land that could potentially be provided in South Worcestershire, grouped into the specific timeframes.

Having regard to:

- completions already achieved in 2020/21;
- sites with planning permission (as at 31 March 2021);
- sites allocated in the current adopted Local Plan without planning permission; and
- sites considered suitable, available and achievable in the SHELAA;

it is considered that there are sufficient deliverable and developable sites / broad locations in South Worcestershire to meet the identified need for employment in South Worcestershire over the Plan period.

The SWDP Review will continue to support small and large-scale windfall development on appropriate sites consistent with the Local Plan. These sites will contribute to the employment land supply and housing delivery in South Worcestershire.

Table 2 - Indicative Employment Trajectory for South Worcestershire from 2020/21 to 2040/41

| Time Period | Completions | Employment Land with Planning Permission | Allocated in current Local Plan without planning permission* | Employment Land | | | | Total |
|-----------------------------------|-------------|--|--|--|-------------------|--------------------------|---|--------|
| | | | | Suitable, Available & Achievable SHELAA Sites (ha) | | | | |
| | | | | Strategic Allocations | Worcester + Towns | Cat 1, 2 & 3 Settlements | Category 4 + Unclassified Villages (open countryside) | |
| 2020/21 | 41.08 | 155.48 | 87.3 | - | - | - | - | 283.86 |
| Years 1 - 5 2020/21 – 2025/26 | - | - | - | 354.22 | 6.59 | 28.91 | 84.9 | 474.62 |
| Years 6 - 10 2026/27 – 2030/31 | - | - | - | 62.40 | 4.72 | 0 | 23.34 | 90.46 |
| Years 11+ 2031/32 – 2040/41 | - | - | - | 71 | 0 | 0 | 0 | 71 |
| Total Supply | 41.08 | 155.48 | 87.3 | 487.62 | 11.31 | 28.91 | 108.24 | 919.94 |

7. Stage 5: Final Evidence Base

The Guidance states that *the following set of standard outputs are expected to be produced following the assessment:*

- *a list of all sites or broad locations considered, cross-referenced to their locations on maps;*
- *an assessment of each site or broad location, including:*
- *where these have been discounted, evidence justifying reasons given;*
- *where these are considered suitable, available and achievable, the potential type and quantity of development, including a reasonable estimate of build out rates, setting out how any barriers to delivery could be overcome and when;*
- *an indicative trajectory of anticipated development based on the evidence available.*

The final evidence base provides a summary of the assessment undertaken.

The SHELAA report provides a standard set of outputs to ensure consistency, accessibility and transparency. These outputs include:

- A list of all sites and broad locations considered;
- An assessment for each site and broad location;
- Where appropriate, justification for discounting (ruling out) sites;
- Where appropriate, a summary of the assessment of each site and broad locations of suitability, availability and achievability (including viability);
- An indicative trajectory setting out how much housing and employment land could be provided, and at what point in the future (i.e. within years 0 to 5, 6 to 10, and 11 and beyond).
- An interactive map) showing the location of the sites (available at <https://www.swdevelopmentplan.org/>), cross-referenced to their assessment and overall conclusion.

Please Note: The assessments undertaken were proportionate, with the greatest focus on those sites that are not subject to clear and significant constraints and are located within or in proximity of a settlement potentially considered an appropriate location for sustainable development.

Evidence Base

The South Worcestershire Councils undertake and publish the results of SHELAA assessments periodically.

SHELAA sites can be submitted at any time and will be stored in the 'live' SHELAA database.

However, they will only be incorporated into a SHELAA review, if received prior to the base date of the review itself. If a site is received after the base date for the SHELAA review, it will be recorded within the SHELAA 'live' database, for consideration within a future SHELAA review.

Monitoring

Consistent with the recommendations in the Guidance, the assessment of sites will be kept up-to-date as part of the annual monitoring process within the South Worcestershire Councils assessment of its Five Year Housing Land Supply and its Monitoring Report.

Appendices

As the SWDPR is a joint plan between three Local Authorities – Wychavon District, Worcester City and Malvern Hills, for clarity the appendices show which authority each site falls within using the following colour coding:

