



Bishampton and Throckmorton Parish Council, Hill and Moor Parish Council and Pinvin Parish Council Joint Representation to the SWDPR Preferred Options Consultation

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Stable One, Manor Farm Courtyard, Southam Lane, Cheltenham, GL52 3PB

 www.brodieplanning.co.uk  01242 898368  info@brodieplanning.co.uk

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*Contributor Prof. Brian Bone, Bone Environmental Consultant Ltd. with regard to contamination matters

1. Introduction

- 1.1 These representations are submitted on behalf of Bishampton and Throckmorton Parish Council, Hill and Moor Parish Council and Pinvin Parish Council (the 'Parish Councils') in respect of the South Worcestershire Development Plan Review (SWDPR) Preferred Options Consultation 2019. The SWDPR Preferred Options is being prepared by the three south Worcestershire authorities: Worcester City Council, Wychavon District Council and Malvern Hills District Council ('the Councils').
- 1.2 These representations relate specifically to 'Land at Throckmorton Airfield', which is being proposed as a new settlement within draft policy SWDPR50. Proposed land uses include:
- i. 2,000 dwellings (with a further 4,000 beyond 2041).
 - ii. 20 ha of employment land (with a further 40 ha beyond 2041).
 - iii. Local centre comprising retail, office, medical and community uses (expanding to a town centre beyond 2041).
 - iv. Education; secondary school and two primary schools (possibly adding a second secondary school and 2-3 more primary schools beyond 2041).
 - v. At least 40% Green Infrastructure and sufficient solar power capacity to power the whole development
- 1.3 These representations are framed in the context of the requirements of the National Planning Policy Framework (NPPF), 2019, the latest National Planning Policy Guidance (NPPG) and Section 19(1B) - (1E) of the Planning and Compulsory Purchase Act 2004.
- 1.4 The Parish Councils object to the inclusion of Land at Throckmorton Airfield as a proposed new settlement. The reasons for this objection are numerous and are set out in this detailed report.

2. The Site

Site Description

- 2.1 The SWDPR Preferred Options Consultation has proposed an area of land centred on Throckmorton Airfield for a significant new settlement. The exact boundaries of the proposal are undefined.
- 2.2 The core of the site is identified as Throckmorton Airfield, a brownfield site but the SWDPR Topic Paper – Determining an Appropriate Spatial Development Strategy confirms that the broad area for consideration for the scale of proposed development is land bounded by the A44 to the south, B4082 to the west and the C class road linking Bishampton with Fladbury to the east; much of the land in this broad area is previously undeveloped greenfield land currently in agricultural use.



Figure 1: Aerial photo showing the broad area of land being considered. Source: SWDP interactive mapping website

- 2.3 The existing land uses include the Airfield, a brownfield site which is currently in use as a successful employment site with a high level of occupancy. There are a range of businesses located within the hangars and permanent and temporary built structures including a storage company, skip hire, testing chamber, and laboratory. The former runways and areas of hardstanding are used for car storage by SMH Fleet Solutions and for military testing facilities and laser equipment. There are some relic building bases on the site but the majority of the 86 hectare site comprises grassland.

- 2.4 Within the broad area there is the operational Hill and Moor Landfill Site; a former DEFRA Foot and Mouth Burial Site; an area of contaminated land at Ridgeway Park Farm that has been the subject of Environment Agency enforcement action; a Poultry Farm; an anaerobic digester and solar farm, a significant amount of agricultural land including areas of grassland, woodland and ponds, and the small rural settlements of Tilesford, Hill and Throckmorton.
- 2.5 The extent of the area of land being considered means that adjacent settlements could also be subsumed within the proposed new settlement; the rural villages of Bishampton, Lower Moor, Upper Moor, Pinvin and Wyre Piddle about the broad area that has been identified.
- 2.6 The majority of the land identified in the SWDPR falls within the Landscape Character type 'Village Claylands' as defined by the Worcestershire County Council Landscape Character Assessment. Described as an open, gently rolling agricultural landscape characterised by an ordered pattern of hedged fields and discrete rural villages connected by a network of minor roads. This is a landscape of heavy, poorly drained soils, typically associated with broad clay vales backed by steeply sloping escarpments. The field pattern tends to define the scale of the landscape.
- 2.7 As can be seen on the aerial photograph the landscape is predominantly made up of a mix of small to medium sized fields in pastoral and arable use with some larger fields in arable use to the north and east of the Airfield.
- 2.8 The topography of the area is shown at Figure 2. The Airfield is located on a shallow ridgeline in an area of gently rolling countryside. The area around the Airfield is generally at an elevation of 30-40 metres AOD. The landform falls towards Piddle Brook to the west, which drains south towards the Avon Valley, a wide meandering valley below 20 metres AOD. The landform rises gently to approximately 60 metres AOD to the southeast of the Airfield along the foot of Bishampton Bank¹ and then rises steeply to above 100 metres AOD. The lanes at Hill and at Hill Furze both climb steeply from the A44, as the names suggest. The land within the landfill site rises to the east toward Hill.
- 2.9 To the north and west of the Airfield the land undulates slightly between 20-50m AOD, rising steadily to the north and west. To the south is the River Avon, the western end of the Vale of Evesham. The valley floor is below 20m AOD with a floodplain up to 1 km wide on the southern bank. Localised high points occur at Allesborough Hill 56m AOD in Pershore and over 50m AOD at Endon Hall. The designated landscape feature of Bredon Hill 8 km to the south of the Airfield is at 294m AOD.

¹ Bishampton Bank is an escarpment, orientated north-south which increases in height steadily from 40 m to the east of the Airfield to 209m 3 km to the north, where it terminates in hills above Rous Lench.

2.10 Pockets of vegetation on and around the former Airfield currently soften the visual impact of the existing areas of development on the Airfield (e.g. Marshalls Transport and the entrance to Ridgeway Park Farm) and help to integrate the site into the surrounding landscape. However, along Long Lane there are wide open views into the Airfield, in particular with expansive views across the runways to Bredon Hill beyond.

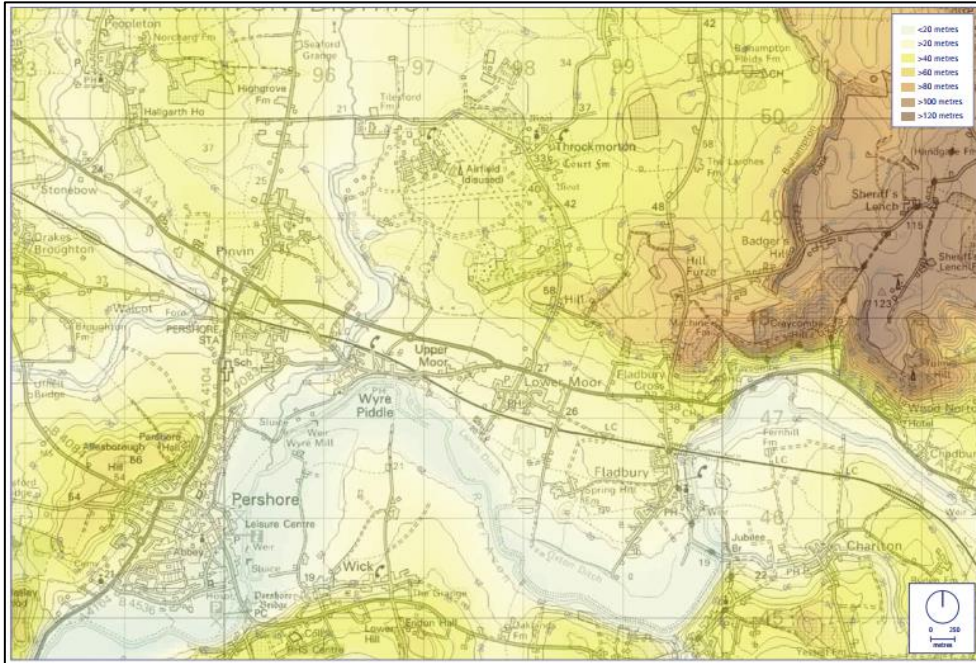


Figure 2: Topography of the area. Source: Wychavon Policy ECON10 SPD, 2007

2.11 Within the broader identified area there are trees, hedgerows and planting associated with residential curtilages within the settlements of Throckmorton, Hill and Tilesford that provide some screening. The lanes are lined with low hedgerows interspersed with occasional trees and grass verges and in general views are afforded across the open countryside into the wider rural landscape.

2.12 Views from the A44 are screened with hedgerows planted along grassed mounds.

2.13 More widely the area can be seen from high points in the local area including from elevated viewpoints on the ridgeline to the east along Bishampton Bank and from Bredon Hill to the south.

2.14 The historic market town of Pershore lies to south west of the broad area with its own recent expansion stretching the development toward smaller villages of Pinvin and Wyre Piddle giving the appearance of one large settlement. In all other directions the development is bounded by the open countryside except where it abuts the settlements already identified above.

Planning History

- 2.15 At the centre of the proposed settlement is the former Airfield which has a complex planning history. The Airfield was created as a military flying base during World War II but ceased to operate in 1977. It has since been used as an employment site with mix of B1, B2, B8, Sui Generis and agricultural uses on site.
- 2.16 There is an area of land to the south west which was used in 2001 as a burial site for the carcasses of over 130,000 animals afflicted with foot and mouth disease.
- 2.17 The remainder of the Airfield has been the subject of a number of planning applications for change of use and consideration by the government to meet strategic needs. The site has:
- been the subject of an application for large scale residential development in 1981 and 1987;
 - shortlisted as a possible site to accommodate asylum seekers in 2002;
 - suggested as a prison camp to relieve overcrowding in Britain's jails in 2008;
 - Unsuccessfully submitted as an Eco-Town by the former owners QinetiQ for a population of up to 20,000 in 2008.
- 2.18 The land to the south that is not included in the Call for Sites is the Hill and Moor Landfill site which has expanded to cover an area of approximately 120 hectares. To the north there is further employment land in B8 use on the former Airfield north of Long Lane, an intensive poultry farm, an anaerobic digester, a solar farm and glasshouses.
- 2.19 Other land within the broader area remains in agricultural use with little or no associated planning history.

3. Objection to Proposed New Settlement

- 3.1 The Parish Councils strongly object to the proposal for a new settlement at Throckmorton Airfield on a number of grounds each of which is addressed under separate headings below.

Insufficient Justification

- 3.2 It is accepted that there is a requirement to deliver a further 14,000 dwellings in South Worcestershire until 2041. However the brief justification for development at Throckmorton Airfield in the Councils' 'Determining an Appropriate Spatial Development Strategy' Topic Paper is insufficient and unsound. The new settlement would in fact contribute to many of the issues that the Councils' identify and use as justification for deviating from the current strategy of urban extensions.
- 3.3 Urban extensions are considered to be too far from railway stations, stating that *"Increased distances will also make walking and cycling more challenging and a less realistic alternative to car based journeys"*.
- 3.4 The proposed indicative centre of the Throckmorton Airfield settlement is approximately 3km from Pershore Railway Station as the crow flies. However, the land to the south of the Airfield is contaminated and currently in use as a landfill site; any access route to the station would not be able to follow a direct route. There are also other constraints including archaeologically sensitive areas and a flood plain, as well as the installation of a safe and suitable crossing of the A44. All of these factors are likely to increase the distance of the development to approximately 4 to 5km from Pershore Railway Station, making it more likely that residents will not walk and cycle these distances, but will instead be reliant on cars.
- 3.5 The requirement of the provision of a 500 space car park at Pershore Railway Station also suggests that the Councils are well aware that the Station will not be easily accessible on foot or by bicycle. The Councils are relying on the Railway Station *being "easily linked by new walking and cycling routes"* to make this a sustainable location. Yet it is not realistic for the Councils to rely on a whole community making a modal shift to justify its sustainability, particularly when it is not going to be easily accessible. The site is not considered to be sustainably located; it will without doubt be a car dominated settlement.
- 3.6 This is further confirmed as the Topic Paper goes on to state that there is an *"ongoing decline in the economics of commercial bus service provision"*. Therefore it is not unreasonable to assume that a new settlement would be any different; bus services are likely to be limited and therefore the car would become even more dominant as the chosen mode of transport.
- 3.7 The Topic Paper also states that the highway network is already heavily constrained at a number of important road junctions across the SWDP area, therefore adding to this should be

avoided due to the economic and environmental costs associated with traffic congestion. Yet, contrary to this, the SWDPR proposes a new settlement that will be dominated by private car travel and has been demonstrated, through transport modeling, to have a major impact on congestion hotspots on the A44, A46, and at Junction 6 of the M5. The A44 is one of the main transport routes through Wychavon District leading on to the A46 and M5; adding further congestion to this heavily trafficked route will be detrimental to both the environment and the local economy.

- 3.8 It is likely that it will take well over decade to deliver many of the facilities, services and vital the infrastructure that a new settlement would require. This will result in unsustainable travel patterns with residents needing to travel to existing towns for schools, shops, employment opportunities and leisure facilities; placing further pressure on the highway network.
- 3.9 Another reason the SWDPR are deviating from urban extensions is to avoid coalescence of settlements. The proposed broad area at Throckmorton Airfield is vast and due to a significant amount of land within its core being undevelopable the settlement is likely to coalesce with a number of rural settlements and potentially the town of Pershore, creating a vast area of urban sprawl.
- 3.10 As highlighted there are clear inconsistencies in the way in which the Councils have justified their rationale for not adopting a strategy of urban extensions, but have instead gone on to select a broad location for a new settlement that is in an unsustainable location.
- 3.11 Furthermore, they state within their justification for the site allocation that some of the land identified in the broad location is not suitable for certain types of development, and that the core of the site is brownfield land. What the justification fails to recognise is the true extent of the land that is not suitable for development and the implications of the existing constraints.
- 3.12 There are multiple constraints that would need to be overcome that effect the viability and deliverability of the proposed settlement; these include but are not limited to land assembly, contamination, land stability, major access constraints, the historic environment and the cumulative impact on the highway network. Once all of these have been considered the amount of brownfield land that is actually developable is significantly reduced; and the proposed development would be more likely to be delivered on greenfield land. These constraints need to be fully understood to truly understand whether the benefits of such a proposal outweigh the substantial harm caused.

Inadequate Evidence for Public Consultation

- 3.13 The SWDPR Preferred Options Consultation for significant development on Land at Throckmorton Airfield, draft policy SWDPR50, has been published with limited evidence to

justify the level of development required at the site. There is no published evidence regarding consideration of the multiple constraints to developing the site except a basic overview in the Sustainability Appraisal, nor are there any clearly defined boundaries as to the extent of the proposed development. The concept is simply presented with a star symbol referred to as an 'indicative growth area' at the centre of the Airfield with concentric circles demonstrating the extent of 10 minute walking and cycling times from the central point. A substantial section of highway land and the existing railway line are highlighted as safeguarded land for transport infrastructure.

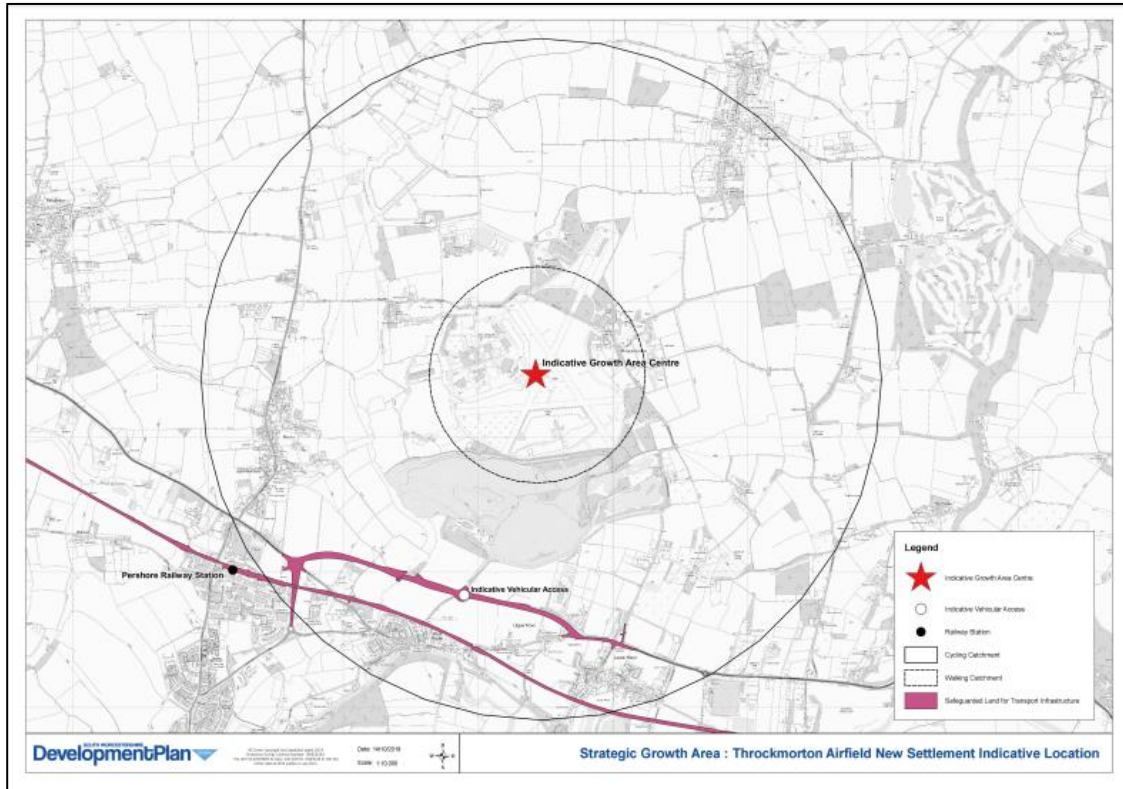


Figure 3: Throckmorton Airfield New Settlement Indicative Location Source: SWDPR

3.14 Maps contained within the SWDP Strategic Housing and Employment Land Availability Assessment (SHELAA), 2019 give a clearer understanding of the parcels of land that have been submitted by landowners as being available in the general area. However, the Councils have not completed any of the detailed site assessments. Instead they state under each parcel considered to form part of the strategic area for the new settlement of Throckmorton:

“This site is located beyond the development boundary of Throckmorton” [or other named settlement]. “Therefore for the purposes of considering the suitability of the site meeting its housing needs it is considered to be too far removed and would usually rule the site out with respect to a SWDPR housing allocation. However for some sites near Throckmorton it would be premature to rule them out until the provisional allocation boundaries for the strategic growth locations have been determined. For sites that do ultimately fall within the

strategic allocation boundaries the proposed land use(s) will not be confirmed until the associated master planning work has been concluded."

3.15 The NPPG is clear that the following information should be recorded or checked if the data has been sourced through a call for sites.

- *"site size, boundaries, and location;*
- *current land use and character;*
- *land uses and character of surrounding area;*
- *physical constraints (eg access, contamination, steep slopes, flood risk, natural features of significance, location of infrastructure/utilities);*
- *potential environmental constraints;*
- *consistency with the development plan's policies;*
- *proximity to services and other infrastructure, such as public transport;*
- *where relevant, development progress (eg ground works completed, number of units started, number of units completed); and*
- *initial assessment of whether the site is suitable for a particular type of use or as part of a mixed-use development."*

Paragraph: 015 Reference ID: 3-015-20190722

3.16 Although this information may have been collated by the Councils it has not been made available as part of the consultation exercise.

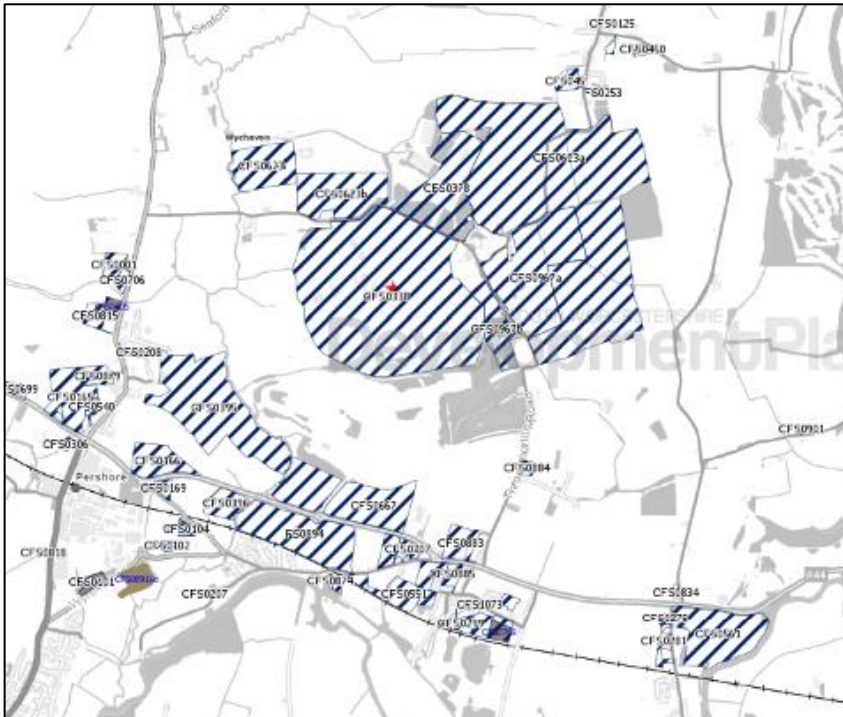


Figure 4: Submitted Sites in the broad area. Extract from SWDPR interactive mapping.

3.17 What is clear from the mapping within the SHELAA is that the Councils are considering development of a scale far greater than Throckmorton Airfield itself. There are 21 parcels of land which lie within the adjoining parishes of Bishampton and Throckmorton, Hill and Moor, Pinvin, and Wyre Piddle. Depending on the final extent of the new settlement the impact of development could significantly affect the settlements of Bishampton, Throckmorton, Tilesford, Hill, Lower Moor, Upper Moor, Pinvin and Wyre Piddle. It is unclear from any of the information presented where the boundaries of the proposed settlement will extend to and how much land is needed to deliver the scale of development proposed.

3.18 This lack of detail and understanding of the true extent and scale of development is both alarming and concerning. It provides no clarity as to where the proposed development will be located and the proximity of development to existing neighbouring rural settlements. There is substantial outstanding work to be completed in assessing the constraints of the submitted sites and further information needs to be shared with the local communities and Parish Councils affected by the proposal for them to be able to comment accurately on its scale and implications. The community require as a minimum a further consultation stage on more detailed proposals before the SWDPR is submitted for examination.

3.19 The NPPG states that,

"Plan-makers will need to assess the suitability, availability and achievability of sites, including whether the site is economically viable. This will provide information on which a judgement can be made as to whether a site can be considered deliverable within the next five years, or developable over a longer period."

Paragraph: 017 Reference ID: 3-017-20190722 and that,

"where sites are proposed for allocation, sufficient detail should be given to provide clarity to developers, local communities and other interested parties about the nature and scale of development."

Paragraph: 002 Reference ID: 61-002-20190315. This information has not been made publically available and a star on a map with concentric rings is not sufficient for communities to understand the nature and scale of the proposed development.

3.20 The Sustainability Appraisal that has been prepared as part of the evidence base has been carried out a very high level and fails to fully consider all of the constraints at this stage. In relation to the proposed settlement at Throckmorton 16 parcels of land have been considered (see Figure 5 and Table 1). Although they are referred to as a cluster each site has been looked at individually rather than the cumulative effect of developing a number of the sites to form a new settlement of the scale proposed.

E.5 Wychavon - Throckmorton

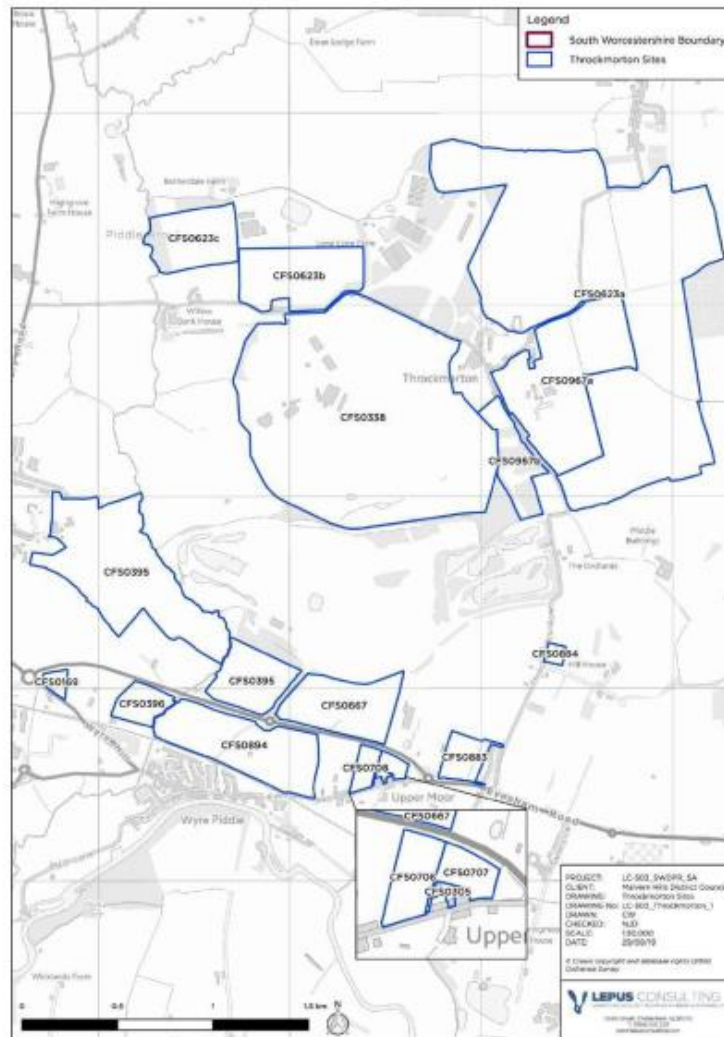


Figure 5: Extract of Sites considered from Appendix E Source: Sustainability Appraisal of the SWDPR Regulation 18 (II) SA Report Volume 2 of 2: Appendices September 2019, Lepus Consulting.

- 3.21 To fully understand the implications of the scale of development proposed far more detailed assessment needs to be done and consideration of the impact of the full extent of the development including that proposed for post 2041 needs to be considered at the earliest opportunity.
- 3.22 The Sustainability Appraisal fails to address the issue of the proximity of sites to contaminated land for example the landfill site, former Airfield, Foot and Mouth burial site or the unknown contamination at Ridgeway Park Farm. These are all likely to have impacts on the health and wellbeing of residents and cause pollution in the wider environment.

Throckmorton (New Settlement) Sites				
Site Reference Number	Site Address	Site Use	Area (ha)	Housing number if applicable
CFS0169	Land off Abbey View Road (B4083), Wyre Piddle, Worcs. WR10 2HT Wyre Piddle	Employment	1.37	N/A
CFS0305	The Woodlands, Upper Moor, Worcs. Wr10 2jr, Upper Moor	Residential	0.30	7
CFS0338	Land and Buildings at Throckmorton Airfield, Long Lane, Pershore	Mixed	124.8	2246
CFS0395	Home Farm, Church Lane, Pinvin, Pershore	Mixed	50.4	907
CFS0396	Land immediately adjoining southern side of A44, Wyre Piddle, Pershore, Worcestershire, WR10 2HS Wyre Piddle	Mixed	4.80	84
CFS0623a	Land at Throckmorton	Residential	144.63	2603
CFS0623b	Land at Throckmorton	Residential	18.93	341
CFS0623c	Land at Throckmorton	Residential	13.51	243
CFS0667	Woodlands farm (north), Piddle Brook Lane, Upper Moor Upper Moor	Employment	15.99	N/A
CFS0707	Plot 1 - Land at Woodlands Farm, Upper Moor, Worcs. WR10 2JR Upper Moor	Employment	1.58	N/A
CFS0708	Plot 2 - Land at Woodlands Farm, Upper Moor, Worcs. WR10 2JR Upper Moor	Employment	2.52	N/A
CFS0883	Land adj to A44 Throckmorton Road, Lower Moor	Mixed	4.94	89
CFS0884	Storage Yard + Industrial Units at the Firs, Hill	Residential	0.94	17
CFS0894	Land at Wyre Piddle Wyre Piddle	Residential	23.06	419
CFS0967a	Throckmorton Court near Pershore Farm	Residential	37.22	670
CFS0967b	Throckmorton Court near Pershore Farm	Residential	9.376	169

Table 1: Sites considered as Throckmorton Cluster in SWDPR Sustainability Appraisal, 2019. Appendix E

3.23 The brief Topic Paper to support the spatial strategy and site allocation states that:

“Throckmorton Airfield has been identified as a suitable broad location for growth. The current evidence base is not yet as comprehensive as for Worcestershire Parkway and therefore the SWDPR Preferred Options simply sets the quantum of deliverable growth by 2041, i.e. 2,000 dwellings and 40 hectares of employment land and the provisional associated infrastructure to include 1-2 primary schools, a Local Centre with retail and leisure uses. The detailed masterplan and the fine-tuned infrastructure requirements are therefore to be set out in a separate Development Plan Document which will subject to a separate public examination.”

3.24 It appears that Councils are hastily relying on a site for their emerging Plan without full evidence to justify that it is suitable, available or achievable. There is an assumption that the Plan can proceed to examination with limited information about whether the 2000 homes it is relying upon the site delivering, between 2030 and 2041, can actually be achieved. There is a significant amount of outstanding work that needs to be undertaken to ascertain whether the site is capable of delivering the scale of development being proposed.

Preventing Early and Inappropriate Development

- 3.25 The Plan does not specify phasing in the policy but suggests that *"it is anticipated that development will not commence until 2030 by which time the critical transport infrastructure, i.e. a new link to the A44 and a 500 space car park at Pershore Railway Station will have been provided."* Neither the infrastructure requirements nor the phasing are stated as policy requirements. It is therefore questionable whether there is any mechanism to prevent development from coming forward earlier in the Plan period prior to the adoption of a Development Plan Document containing a masterplan and defined boundary for the proposed settlement.
- 3.26 There is the very real risk that development could be approved along the periphery of the broadly identified area, for example along the existing road network, prior to the adoption of a masterplan. This would create unsustainable ribbon development with no funding secured for the required infrastructure. The NPPF does not make it easy for proposals to be refused on the grounds of prematurity.
- 3.27 Developers are likely to be attracted to the greenfield parts of the site with fewer constraints and associated costs. Without a defined boundary the SWDPR opens itself up to speculative and unplanned development and the inability for development and be truly Plan-led.
- 3.28 Including a phasing requirement within the policy may not provide certainty for delaying development until 2030 either, as previous attempts to include phasing in the SWDP were thrown out at Examination. It would be more appropriate to complete the evidence base and establish a clear site boundary before including the site as a new settlement within the SWDPR; there are considered to be too many uncertainties to include the settlement at this stage.

Development Constraints

- 3.29 There are significant constraints to developing a new settlement at Throckmorton Airfield. The Councils, as highlighted above, have failed to adequately acknowledge development constraints in determining the proposed scale and nature of development at Throckmorton Airfield and the surrounding area. There is very little information published within their evidence base to demonstrate how any constraints have been taken into account. This is of significant concern to the Parish Councils and considered to be a major failing in the site selection process.
- 3.30 In order to determine whether the land at Throckmorton Airfield is developable it is imperative that the constraints are fully understood so that a planning judgement can be made as to whether the benefits of the proposed new settlement outweigh the substantial harm caused.

3.31 The constraints to development are addressed under a number of subheadings.

Contamination

3.32 Whilst it is generally positive to base a new settlement location on brownfield land, it presupposes that a sufficient proportion of the land will be viable and available for development of 2,000 new homes.

3.33 As Brownfield land has been previously developed, but has subsequently become vacant, derelict or contaminated such land typically requires preparatory work (e.g. demolition, site clearance, remediation) before any new development commences. From knowledge of former use, this site poses a number of challenges that have the potential to place significant constraints on its suitability for housing, financial viability, and potential impacts on local amenities and the environment.

3.34 A request for information from Worcestershire Regulatory Services (wrsenquiries@worcsregservices.gov.uk) under the Environmental Information Regulations 2004 identified four current/historic landfills (3 associated with Hill and Moor) and 32 flagged sites in response to the question "Does any site, or any adjacent site, appear on the Council's list of potentially contaminated sites which may require further investigation under Part 2A of the Environmental Protection Act 1990?" The current status of each of these sites is unknown.

3.35 Of the 32 potentially contaminated sites 16 are identified as ponds or former ponds. It is likely that these features have been infilled with waste, the nature of which is unknown. One site is located well beyond the area of interest, and this is considered to be an error in co-ordinates. Another site is located in-county, but beyond the area of interest. The entire Airfield site, given as 2,794,426 m², is identified as a single site.

3.36 Any former or current use may include potential sources of contamination and would need to be assessed on a case by case basis, following good practice guidance. (<https://www.gov.uk/government/collections/land-contamination-technical-guidance>). It is considered that a significant amount of information is needed to understand the feasibility of the proposed land allocation. Of the 32 sites, a number are known that have the potential to place significant constraints on development and may impact the ability to achieve the proposed land use. The main potential contamination issues are within the inner circle, the Walking Catchment, and between the inner and outer circle, representing the Cycling Catchment, as identified in Figure 3.

Walking Catchment

3.37 The Walking Catchment predominantly comprises the Throckmorton Airfield site. The development of this site may be significantly impacted by at least two potential sources of contamination:

- Activities associated with previous use as an Airfield; and
- Foot and Mouth Disease burial site.

Activities associated with previous use as an Airfield

3.38 The Airfield was first opened in 1934 by Worcestershire Flying School and closed soon after the start of WW2 when the airfield was requisitioned. It re-opened in 1941 as an RAF base (Persore) and used until 1944 as an Operational Training Unit (23 OTU). The crews trained at Persore were mainly Canadian and they saw active service with leaflet drops and bombing raids on Essen, Bremen and Dusseldorf, among others. The No. 1 Ferry Unit was established to collect and deliver a variety of aircraft between 1944 and 1948. The 10 Advanced Flying Unit then occupied the site until 1953. In 1957 the Royal Radar Establishment Flying Unit moved in, carrying out testing of radar test bed aircraft. The Airfield closed for flying in 1978².

3.39 The brief review above confirms that the Airfield was used for both operational and research purposes, there is an indication, without detail, of accidents, but no direct air strikes. A number of potential contamination sources may be present on site, and emissions from site use may have caused contamination of surrounding land. The latter is not possible to expand on further without intrusive investigation. Any remediation that may have been carried out on release from RAF control would have been to the standards of the current time. It is considered unlikely that all potential contamination sources would have been identified, removed or remediated at that time. Currently the likelihood of contamination must be considered to be high, but the extent and significance of contamination to redevelopment are uncertain. The feasibility, including cost, of construction of 2,000 houses is therefore uncertain without further scoping works being carried out.

3.40 Potential sources of contamination within the Airfield may be related to, but not restricted to:

- Storage, leakage and spillage of fuel;
- Storage, leakage and spillage of chemicals (e.g. de-icing, degreasing, weed control);
- Unregulated disposal or burning of wastes (e.g. demolition, operational, luminising paint and luminescent products from aircraft (radium) wastes);

² Sources: <https://www.forces-war-records.co.uk/units/1650/raf-persore/>
<https://www.westernregional.co.uk/defending-skies-worcestershire/>
<http://www.warstateandsociety.com/Bombing-Britain>

- Heat & power production (e.g. boilers, including boiler ash tips, generators);
- Maintenance of aircraft, plant & equipment (spillage, de-greasing);
- Old drainage infrastructure (e.g. soakaways, interceptors, drains);
- Aircraft crash or "graveyard" sites if present;
- Old underground storage tanks, as indicated on the list from WRS; and
- Old backfilled air raid shelters if present.

3.41 The geology of the site is Lower Lias (Jurassic) Charmouth Mudstone Formation – clays with interbedded limestone (cementstone) bands. No superficial deposits are indicated but granular made ground is likely to be present, forming a capping and sub-base to the site infrastructure (e.g. runways, building foundations). This information suggests that contamination may be constrained to the made ground by the low permeability clay. However, wider and deeper contamination may be present where the upper clay layer is thin or structures cut into limestone bands. Some contaminants, such as chlorinated solvents, have the ability to migrate through and accumulate within clays, and the extent of such contamination may spread beyond the source.

3.42 A wide range of contaminants may be present on site, including fuels, chlorinated solvents (de-greasing agents), heavy metals, asbestos (from demolition waste), substances from general waste and potentially munitions and radium. The distribution of contaminants is likely to be constrained by the location of potential contaminative activities (bulleted list above), the extent of granular made ground and the thickness of clay over limestone bands. Information on the location of potentially contaminative activities may be available from a number of sources³ but records are unlikely to be complete or comprehensive.

Foot and Mouth Disease Burial Site

3.43 In 2001 part of the Airfield was used for the burial of animals culled during the foot and mouth disease outbreak. Most carcasses were from pre-emptive culling (non-infected), and the risk of Foot and Mouth Disease virus surviving, if present in the first place, is considered to be negligible (Science Advisory Council 2017). A low permeability (clay) cut-off wall was installed around the burial pits to restrict the migration of leachate and ground gases arising from degradation of the carcasses.

3.44 The 2017 report also recommends that *"Defra should commit to not disturbing the burial pits (cells) beyond essential maintenance requirements (noting advice under 3c above). The subgroup identified a small risk that a major disturbance of the site could potentially increase the*

³ RAF archive collection (<https://www.rafmuseum.org.uk/research/default/archive-collection.aspx>), Pershore Heritage Centre and Historic England (aerial photographs @ <https://historicengland.org.uk/images-books/archive/collections/aerial-photos>).

risk of contamination of spores through the release of microbial material from partially degraded carcasses." This places a major constraint on the use of this part of the site, and the cost and impact of remedial measures to make the land suitable for development. The proposal to locate housing in the vicinity of the Foot and Mouth burial site needs to consider both security and health and safety measures needed in the event of accidental access.

- 3.45 Monitoring of water quality and ground gases within and around the burial pits continues at the Throckmorton burial site to assess the impact on water quality from contamination. This work is currently carried out by SOCOTEC and managed by Interserve Facilities Management on behalf of Defra. Annual reports are produced to review water quality within and around the burial site although these do not appear to be available on the government's website.
- 3.46 The monitoring data indicates that the concentration of key contaminant in leachate has declined, but the levels of decline are tailing off. It is considered that this degradation "tail" may persist for decades and that monitoring/aftercare is likely to be needed for some time to come.
- 3.47 Groundwater level data indicate a flow of water to the southwest. Flow is likely to occur through the limestone bands known to occur in the area. Most groundwater monitoring data are collected down-gradient in order to assess the impact of migration of leachate from the burial cells. The need for continuing monitoring is confirmed by contaminant concentrations in down-gradient boreholes.
- 3.48 The ground gases methane and carbon dioxide are also monitored and show peak concentrations inside the cut-off wall, but typically low concentrations outside the wall. Ground gases continue to be generated, but show no discernible trend. Production is likely to continue for a significant period of time, but the emissions appear to be contained by the cut-off wall. The integrity of this wall must not be compromised by any development activity proposed in the vicinity of the boundary to the Foot and Mouth burial pits.
- 3.49 It is clear from the monitoring data that degradation of the carcasses continues within the burial pits. The production of leachate and ground gases is likely to continue for some time to come (decades) and it is unlikely that this site would be suitable for development by 2030.

Cycling Catchment

- 3.50 There are two known significant sources of contamination within the Cycling catchment that may impact the location and extent of any housing allocation within the indicative Strategic Growth Area. Other sources flagged by WRS would also need to be investigated before any detailed plan could be prepared.

Illegal waste disposal and burning at Ridgeway Park Farm

- 3.51 Wychavon District Council and the Environment Agency have taken successful prosecutions, resulting in fines and jail sentences for illegal waste activities (tipping and burning). It is estimated that around 26,000 cubic metres of waste have been illegally deposited on land, including hazardous waste. This land is still subject to regulatory scrutiny. It is therefore uncertain whether this land can be considered suitable for development until enforcement action comes to a close and the cost of waste removal is fully evaluated.

Hill and Moor permitted landfill site

- 3.52 The Hill and Moor landfill site is located mainly along the southern boundary of the Walking Catchment. The landfill is managed under an environmental permit and management, including monitoring, will continue beyond the operational phase. This land is highly unlikely to be available for development for the foreseeable future and this is reflected in the submitted sites plan (Figure 4). The landfill emissions (landfill gas, leachate) will need to be considered for any development proposed close to the landfill boundary. This is particularly pertinent in relation to achieving an access into the site (see subsection on access) and any development immediately abutting the site, i.e. to the north the southern part of the Airfield, and to the south sites along the A44.
- 3.53 It is clear that there are a number of potentially contaminated sites within the indicative growth area that are likely to pose significant constraints to the proposed new settlement. Some sites are not suitable for development, such as the Foot and Mouth burial pits, and may not be suitable for the foreseeable future. Other sites, including the Airfield, the core brownfield land, has a long history of use and there is significant uncertainty over the level and extent of contamination likely to be encountered and therefore the impact on the proposed 2,000 new dwellings. Without more detailed information the proposal to allocate the land for such a sensitive end use is unfounded.

Land Stability

- 3.54 The exact location and route of the access road into the site is not known. The preamble to the draft policy states that "a new link to the A44" will need to be provided. There is an area highlighted on the location map as the indicative vehicular access coming off the A44 through the existing entrance to the landfill site at Hill and Moor.
- 3.55 This point of access into the site would require an access road to be constructed across or around the landfill site. The landfill site has been in operation since the 1970s and although improved environmental management and regulations have resulted in more controls over how waste is dealt with since the 1990s, there are likely to be issues with methane and land

stability for years to come. It is understood the landfill site has approximately 22 years of capacity left at existing recycling/ refuse rates; and continues to generate electricity from methane-rich landfill gas produced at the site.

- 3.56 Paragraph 179 of the NPPF is clear that "*Where a site is affected by contamination or land stability issues, responsibility for securing a safe development rests with the developer and/or landowner.*" Therefore constructing an access through, and developing a settlement adjacent to a live and former landfill site presents significant constraints and the required mitigation will have a substantial impact on costs and development viability.
- 3.57 It is well understood that building on landfill sites containing putrescible materials, which are generating landfill gas should be avoided; not only will ground stability be affected there is also a risk to human health, groundwater and the ecological environment,
- 3.58 It is considered that the entire landfill site is undevelopable for residential use; reducing the overall developable area. Further work needs to be undertaken to understand the full extent of the environmental risk, the cost of remediation and engineering requirements to establish whether an access route through it is realistic and achievable and what future land use the site can be safely used for.

Access

- 3.59 The SWDPR Topic Paper – Determining an Appropriate Spatial Development Strategy states that "*A new settlement will require a new, direct road from the centre to the A44 before any development commences.*" Although, the exact location and route of the access road into the site is not fully understood, nor is the requirement stated within the policy wording.
- 3.60 Work undertaken by Wychavon District Council in 2007 in preparation of the previously adopted Supplementary Planning Document ECON10, to develop the core part of the Airfield as a business park provided an overview of three potential routes into the site. This work was produced in support of the now expired Wychavon District Council Local Plan, 2006.
- 3.61 It is not clear whether any of these options will be revisited as part of the proposal for a new settlement or whether alternative routes are being looked at; all three of the options present significant viability issues.
- 3.62 A route would need to be established that avoids crossing a large extent of the unstable contaminated landfill site, the contaminated Foot and Mouth Burial Site and land at Ridgeway Park Farm that has been the subject of illegal waste disposal. To gain suitable access it may be necessary to provide a bridge to cross the Piddle Brook that is prone to flooding thereby adding significant cost. The area around Throckmorton and Wyre Piddle contains important archaeological remains, which have previously included an Iron Age settlement and a

Romano-British Settlement therefore further assessment will be required adding to cost and possible diversion depending on their significance. A new access road would be required to cross third party land, some of which is in public ownership and some that is in other private landholdings. The deliverability of a new route will be dependent on successful land assembly and agreement with the relevant adjoining landowners.

3.63 Figure 6 shows the 3 routes that were explored as part of the ECON 10 policy.

3.64 Option A: Commences at Georges Lane roundabout on the A44 and loops around the western edge of the landfill site (to the east of Piddle Brook), and then across part of the former airfield to the Policy ECON10 site.

3.65 Option B: A variation of Option A that involves a wider loop around the western side of the landfill and crosses Piddle Brook

3.66 Option C: This option involves a link from the western Wyre Piddle bypass roundabout, as an alternative to Georges Lane roundabout. This route crosses agricultural land in a north easterly direction from the roundabout, crossing the Piddle Brook and entering the Policy ECON10 area from the west.

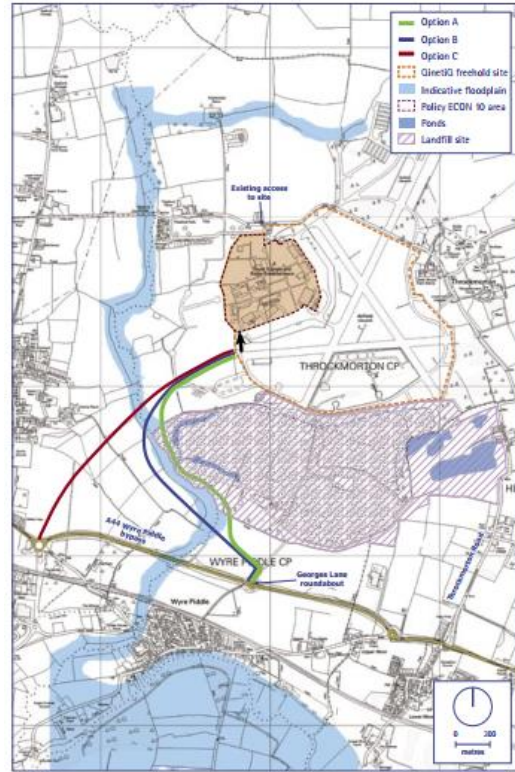


Figure 6: Map of Access Options for Throckmorton Airfield Employment Site. Source: Wychavon District Council Econ10

3.67 Further work needs to be undertaken to establish whether an access road can actually be achieved from the A44 given the physical and financial constraints. It would not be suitable to provide access through the existing rural road network given the scale of the proposal.

3.68 Should development go ahead on the Airfield an access route must be clearly defined within the policy, as there is the very real risk that developers will take the easy option of using existing rural routes. For example, via Long Lane which would have a significant impact on the villages of Pinvin and Tilesford; or via Throckmorton Road, passing properties on the edge of Lower Moor, Hill and potentially Throckmorton depending on where access is made onto the Airfield. These rural roads are incapable of accommodating high volumes of traffic and both are prone to surface water and fluvial flooding meaning that they are impassable at times of heavy rainfall. Long Lane is impassable at Tilesford Bridge and Throckmorton Road is impassable on the S bend adjacent to the drainage ponds in the landfill site.

3.69 Gaining a suitable access onto the site is seen as a significant constraint to developing the site and the wider area.

Heritage

3.70 There are a number of significant heritage assets within the vicinity of the Airfield that need to be taken into account. The Airfield itself has a number of World War II military buildings and structures on the site that are of local historic significance, including the Control Tower.

3.71 Developing the Airfield and surrounding area would cause substantial harm to designated heritage assets within the settlement of Throckmorton. Immediately east of the Airfield is the scheduled monument known as 'Moated site and medieval settlement remains at Throckmorton' (National Heritage List for England (NHLE) 1016938). Throckmorton also contains several listed buildings including the Grade II* late medieval hall of Court Farmhouse (NHLE 1273256) and the Grade II* parish church (NHLE 1258642), which are both surviving standing structures of the medieval and early post-medieval development of the village.

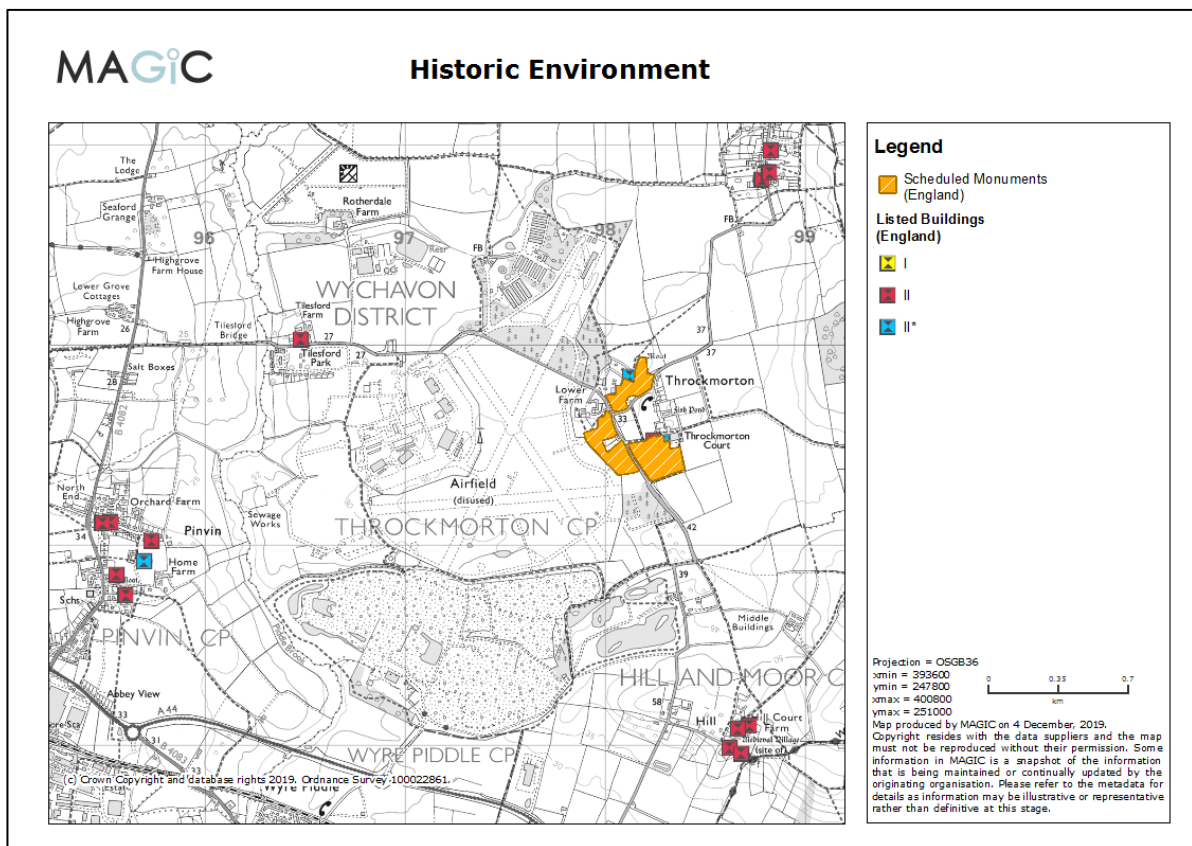


Figure 7: Map of Scheduled Ancient Monuments and Listed Buildings. Source MAGiC website, 2019

3.72 The proposed settlement is likely to cause significant harm to the Grade II listed Tilesford Farmhouse (NHLE 1273259) at Tilesford immediately north west of the Airfield.

- 3.73 Depending on the full extent of the boundaries of the proposed settlement there is the potential for harm to be caused to the four Grade II listed properties and the historic site of a deserted medieval settlement at Hill; as well as to the five Grade II listed properties and the Grade II* listed Church of Nicholas at Pinvin.
- 3.74 Should the proposed development expand to the south to abut the settlements of Lower Moor and Wyre Piddle there are numerous listed buildings and two Conservation Areas that would need to be taken into account to avoid causing harm to their setting. To the north the settlement of Bishampton has numerous listed buildings that would need to be considered.
- 3.75 The NPPF is clear that *“great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.”* Only in exceptional circumstances is substantial harm acceptable.
- 3.76 The setting of these valuable historic assets is of major significance in determining the form and location of any future development. Landscape and visual buffers would need to be provided and the area around the Scheduled Ancient Monument could not be developed on because of its historic significance; this is a further constraint on where development could be suitably located.

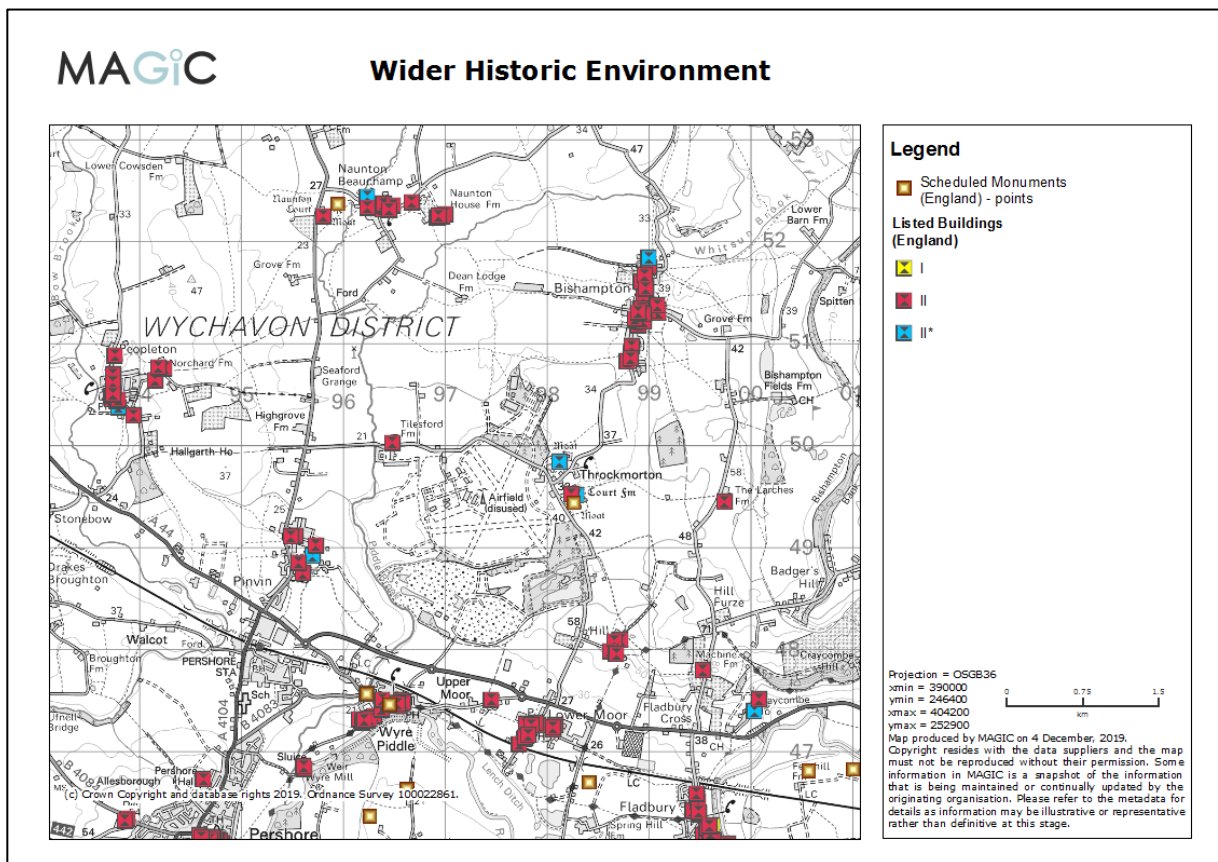


Figure 8: Map of Scheduled Ancient Monuments and Listed Buildings in the Wider Area. Source MAGIC

- 3.77 Previous archaeological investigations in and around the Airfield have also revealed a rich archaeological history in the area. Archaeological works undertaken during the excavation of the burial pits for the Foot and Mouth outbreak in 2001 revealed a previously unknown Bronze Age barrow cemetery dating back c.4,000 years; this has subsequently been preserved due to its historical significance and cannot be developed upon. The excavation for the burial pits also identified part of the medieval open field system and a geophysical survey identified that the majority a Roman farmstead continues to lie preserved beneath the runway and land to the north of the Airfield.
- 3.78 To the south, near to the indicative access point, there is evidence of Bronze Age remains. These were identified during the construction of the Wyre Piddle by-pass in the area around Georges Lane, Wyre Piddle. Therefore the potential for further archaeological remains occurring locally is very high. The significance of future finds could further limit the extent of development, as consideration will need to be given to how the heritage asset will be recorded and if necessary preserved, all of this investigation adding significant cost to developing the site.

Flood Risk and Drainage

- 3.79 The western area of the indicative site is constrained by the Piddle Brook, this is a Principal Watercourse; a tributary to the River Avon to the south. The Brook is prone to flooding and any land within the floodplain would need to be avoided. The South Worcestershire Strategic Flood Risk Assessment (SFRA) states that a full Flood Risk Assessment and Surface Water Drainage Strategy will be needed for all major developments.



Figure 9: Fluvial Flood Plain of the Piddle Brook. Extract from SWDPR interactive mapping

- 3.80 The cumulative effect of the new proposed development does not appear to have been assessed at this stage. It is essential that the environmental impacts of the scheme are fully understood, not only with regard to the limitations they place on the site itself, but the implications to dwellings and businesses further downstream, at Wyre Piddle and Pershore.
- 3.81 At the moment much of the flooding associated with the Brook occurs on greenfield land, however there is frequent flooding at Tilesford Bridge on Long Lane which leaves the road impassable at times of heavy rainfall.
- 3.82 There is also a large extent of surface water flooding within the broad area; this is directly related to the poorly draining soils and the geology of the area. The soils are known to have impeded drainage, contributing to the high level of surface water flooding.
- 3.83 The geology in and around the Airfield comprises Lower Lias deposits, which are dominated by clays and shaley mudstones with silts in places near the top of the sequence and limestone bands near the base. Lias clays are a non-aquifer although the limestone bands can yield significant quantities of water.
- 3.84 There is concern that large scale development could exacerbate problems for existing residents increasing the risk of surface water run-off, which in turn could contribute to more flood events further downstream due to the topography of the site.

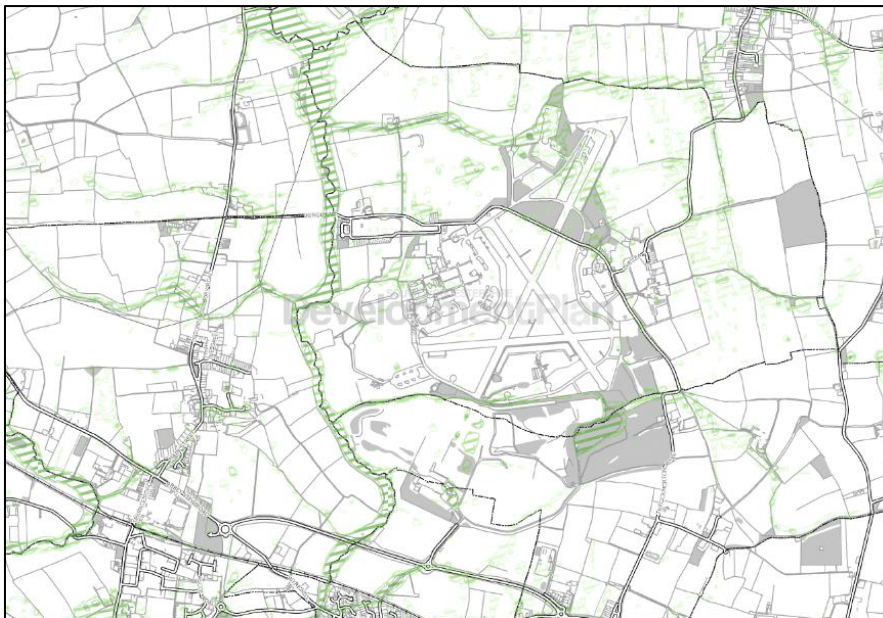


Figure 10: Current Risk of Surface Water Flooding/ Extract from SWDPR interactive mapping

- 3.85 To cope with the level of surface water in the area a significant amount of land would need to be set aside for appropriate sustainable drainage solutions to avoid increasing the level of flood risk, to avoid additional water flows through large areas of contaminated land, and to achieve the necessary betterment that would be required to make the site a safe a suitable

place to develop. This is likely to add substantial cost to the scheme and reduce the extent of developable land.

Oil Pipeline

3.86 There is an oil pipeline that runs east west across the north of the Airfield; part of the 14 inch underground Midline Pipeline that runs from Esso's Fawley oil refinery near Southampton to Seisdon in Staffordshire. This would need to be considered in any development and the necessary easement and buffers could affect what can be constructed on or near to it.

Cumulative Impact on Wider Road Network

3.87 As part of the evidence base modelling of the highway impact of the proposed Throckmorton Development has been undertaken by Jacobs. The model has assumed 2000 dwellings and 10 hectares of employment land both with access on a new link directly off the A44 east of the Pershore Northern Road.

3.88 Modelling has looked at the likely impact on the Pershore, Evesham and Worcester highway networks, and has taken account of cumulative impacts of the proposed Worcestershire Parkway settlement. It has based travel pattern assumptions on gravity distribution models developed as part of the Evesham model build, which takes into consideration travel patterns on the A44 that were captured as part of road side interviews (between Pershore and Evesham).

3.89 The Throckmorton Airfield settlement would undoubtedly be a car dominated settlement which would have limited infrastructure for a number of years. The proposal is likely to generate substantially more traffic movements than the Evesham model on which it is based; therefore the modelling may have underestimated the number of traffic movements and impact on the highway network. Evesham already has a significant range of facilities and services including shops and employment opportunities that can be accessed on foot, bicycle and by public transport. This new settlement will not have the benefit of such a range of facilities for well over a decade, nor will it have its own Railway Station. Development north of the proposed centre will be over 5km from the train station and the A44 will need to be crossed adding further cost to the developer and acting as a deterrent for pedestrians and cyclists.

3.90 The modelling forecast shows significant congestion would occur on A44. This will in turn cause vehicles to rat run through Hill Furze Rd and B4088 to get back to A44 to avoid the delays, having a detrimental impact on the rural road network. The development is also expected to cause a significant increase in travel time as a result of congestion leading to the A46 around Evesham.

- 3.91 The modelling shows that there will be increases of approximately 20% to the volume of traffic in the Pershore area, with congestion issues at Pinvin lights, Wyre Road and at the Station Road junction with the High Street; all of which will add to journey times in the area.
- 3.92 There are also considered to be impacts further afield on traffic travelling west of Pinvin on the A44 toward the A4440 and M5 and vice versa. The M5 J6 and the other junctions along A44 are already predicted to experience capacity problems in 2041 under the baseline conditions and will be further impacted by the Throckmorton development trips.
- 3.93 The model has failed to look adequately at travel routes north which are likely to significantly affect the rural road network with increased traffic travelling through the rural settlements of Bishampton, Pinvin and Upton Snodsbury.
- 3.94 There has been no evidence published about the implications on the road network and the potential infrastructure requirements that will be needed to realise the SWDPRs aspiration to expand the settlement to 6000 dwellings post 2041; the modelling has stopped at 2000 dwellings. In planning for a new settlement of this scale it is surely necessary to establish whether it is even achievable in the longer term before committing to this strategy given the constraints to the wider road network.
- 3.95 Locating a vast standalone settlement in the open countryside will encourage car based travel. It will add to an already congested road network that will require substantial investment to enable it to cope with the increased demand; this is unlikely to be able to be achieved through developer contributions alone, bringing into question the viability of such as scheme.
- 3.96 The level of proposed growth will cause an increase in air pollution from standing traffic which is contrary to the planning system's requirement to actively manage patterns of growth to reduce congestion and emissions, and to improve air quality and public health (para 103).
- 3.97 The necessary enhancements that will be required to the road infrastructure will have a wider urbanising effect on the landscape creating a large conurbation overwhelming Pershore and the surrounding villages. Throckmorton Airfield is not considered to be a sustainable location for this scale of development.

Impact on Rail

- 3.98 The SWDPR's rationale for locating development at Throckmorton Airfield includes the fact that the site is considered to be *"close to Pershore Railway Station and is easily linked by new walking and cycling routes, making this a sustainable location"*.

- 3.99 The centre of the proposed site is almost 3km as the crow flies to Pershore Railway Station. Once road, cycle and footpath infrastructure has taken account of the physical constraints of getting around the contaminated landfill site, avoiding archaeologically sensitive areas, bypassing the flood plain and creating a safe crossing over the A44 the route will undoubtedly be much longer and far less direct. Any development north or east of the indicative centre would be an even greater distance from the Railway Station.
- 3.100 The whole premise of the development being sustainably located seems to be hinged on the idea of a new community committing to a modal shift to public transport. A shift that is unrealistic and that will not be easily accessible or achievable to the majority of residents.
- 3.101 The proposed provision of a large car park for 500 vehicles suggests that the Councils are well aware that anybody wanting to use the trains from the new settlement would actually need to drive to the station as the distance from the settlement is too great.
- 3.102 The South Worcestershire Infrastructure Study and Delivery Plan 2019 identifies that the cumulative impact of Ashchurch (Tewkesbury), Throckmorton and Worcestershire Parkway are seen as both an key opportunity for rail but also as a significant concern for meeting the anticipated levels of demand. They state that depending on emerging travel to work patterns and travel plans, on-train capacity would be a concern based on existing levels of service provision.
- 3.103 Without further work to understand capacity and potential demand, the proposed development's demand for trains may not actually be able to be met. The impact of this would be to force residents to make even more car journeys thereby adding to the capacity issues on the road network. This would further undermine the premise of this settlement being in a sustainable location.

Impact on Landscape Character

- 3.104 The impact of the proposed development on the rural landscape is significant, development would see the loss of a huge area of greenfield land, much of it traditional pastoral land as well as the loss of the individual identity of a number of rural villages and hamlets that would be subsumed within this vast conurbation.
- 3.105 The landscape character assessments undertaken by the Worcestershire County Council state that the management strategy for the village claylands *"would be one of conservation and enhancement with conserving the distinctive scale of hedged fields and pastoral character of the landscape being the priority, whilst enhancing the areas in and around settlements with new tree planting."*

- 3.106 One of the key attributes of the area is the distinctive dispersed settlement pattern; the integrity of which will be lost by the scale of development proposed as a number of them would become consumed within a wider urban sprawl. Development would see the loss of characteristic pastoral fields some of which have relic Ridge and Furrow and a considerable amount of hedgerow.
- 3.107 The scale of the proposal is such that the character of the area would be dramatically altered and its proximity to the villages of Pinvin and Wyre Piddle to the south which both immediately abut the historic town of Pershore means that the whole area would become one large conurbation taking on a very urban form.
- 3.108 This impact would be visible from important viewpoints within the wider landscape including from the rising land at Bishampton Bank that leads to the Lenches, Bredon Hill, AONB and Allesborough Hill in Pershore.
- 3.109 The landscape character would be significantly altered and its impact on the local and wider area has been underestimated in the Sustainability Appraisal.

Impact on Neighbouring Settlements

- 3.110 As already discussed above the proposed new settlement would have significant detrimental impact on neighbouring settlements. The historic settlements of Throckmorton, Hill and Tilesford would be consumed within the town and would lose their Individual identity and integrity. The proposal provides no information or consideration of the impact on local residents and settlements or the requirement for landscape buffers to protect residents' amenity, and the setting and character of existing settlements.
- 3.111 These settlements would not only be affected in terms of their appearance but they would be affected by a substantial increase in noise, light and air pollution from increased traffic and scale of proposed development.
- 3.112 Bishampton, Pinvin, Upper Moor, Lower Moor and Wyre Piddle are also under threat, at risk of coalescence. As highlighted through this report a significant amount of the land identified for the new settlement is not considered to be developable. Therefore, it is assumed that the proposed development would need to spread further into the open countryside to be able to achieve the level of growth the SWDPR has identified. This will result in the loss of each of these settlement's individual identities and irreversibly erode the area's rural heritage. These small rural settlements have developed over hundreds of years and would be destroyed by this allocation.
- 3.113 The area in and around Bishampton has an isolated character as there are no main roads within 3 miles of the settlement. At present the village has very limited passing traffic, with

very low levels of noise and light pollution. Developing a settlement at Throckmorton would increase air, noise and light pollution as well as having a significant impact on the volume of traffic through a rural community.

- 3.114 The existing village of Throckmorton lies 3.5 miles northeast of Pershore a market town that has already grown significantly since 2014. The current SWDP has allocated 695 dwellings on land to the north of the settlement along Station Road and Wyre Road expanding the settlement toward the Railway Station; many of these have already been constructed. This expansion to the north combined with the development at Throckmorton could merge to create one large conurbation; dramatically altering the landscape.
- 3.115 There is also concern that the proximity of a new town so close to Pershore could have a detrimental on the town's vitality and viability. The historic core of the town is constrained by the physical landscape of the River Avon and rising land at Allesborough Hill and has one main road the B4084 (High Street) running north south. The volume of traffic that would be generated from the proposed growth within both Pershore itself (662 further dwellings in the SWDPR) and the new settlements at Throckmorton and Worcestershire Parkway just 5 miles north west, could result in the town becoming a bottleneck, increasing levels of air pollution within the town centre. This could result in local communities avoiding it as a destination, and travelling to new town centres at Throckmorton or Worcestershire Parkway to meet their needs.

Impact on Biodiversity

- 3.116 Throckmorton Airfield and the wider area are not subject to statutory or local nature conservation designations; however there are a number of priority habitats identified on the Natural England Priority Habitat Inventory. These include areas of traditional orchard and deciduous woodland. There is a concentration of trees around the south eastern end of the Airfield and the drainage ponds adjacent to the landfill site where there is a mix of broadleaved and young trees. The map at Appendix 1 shows the location of tree coverage in the area more clearly. These are important as both habitats for a range of wildlife and perform an important role in helping with land drainage and screening.
- 3.117 The Natural England Priority Habitat Inventory also identifies an area of good quality semi improved grassland at Hill (see Appendix 1); and Wychavon's ECON10 SPD identifies areas of rich unimproved grassland within the Airfield site and a smaller patch of semi improved grassland. Despite the Airfield's brownfield status there are vast areas of grassland within the site that would need to be assessed to understand the extent of any ecological networks to ensure that important habitats are retained and where possible enhanced.

- 3.118 Previous applications on the Airfield site have identified a moderate population of European protected Great Crested Newts (GCN) within two static tanks in the north and central part of the Airfield. Further work would need to be undertaken to understand whether other protected species are affected by the proposed settlement. The whole area is known to be a breeding area for declining farmland birds.
- 3.119 There needs to be a greater level of assessment undertaken to understand the full impact on biodiversity, as the proposal would see the loss of a significant amount of greenfield land that forms an important ecological network for the transit of flora and fauna.

Loss of Best and Most Versatile Agricultural Land

- 3.120 Best and most versatile agricultural land is defined in the NPPF as land in grades 1, 2 and 3a of the Agricultural Land Classification. The majority of the agricultural land surrounding the Airfield site is considered to be grade 3, good to moderate agricultural land; whilst areas of land adjacent to Pinvin and Lower Moor are considered to be Grade 2, very good agricultural land. The NPPF is clear at footnote 52 that *"where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality."*
- 3.121 The extent of loss of agricultural land is not clear from the proposals but the indicative numbers associated with the development and the known constraints associated with the brownfield areas of the site, contamination, flood risk and the historic environment suggest that the loss could be substantial. This would see the loss of a vital irreplaceable resource. The Councils must explore opportunities to identify poorer quality land to avoid this loss.

Viability

- 3.122 As has been demonstrated throughout this report there a significant number of constraints to delivering a new settlement in this broad location that will ultimately affect the viability of the site.
- 3.123 The South Worcestershire Councils have undertaken some viability work in identifying the site, but have based their assumptions on a settlement of 4000 dwellings. This number of dwellings has not been used in any of the other studies to understand the constraints and opportunities for development; it is halfway between the 2000 allocated in the SWDPR up until 2041 and the total of 6000 proposed for post 2041.
- 3.124 The Councils' viability work is flawed for a number of reasons. It has failed to take account of the fact that some of the land being proposed for development is brownfield land and has instead assumed that the site is greenfield. The work fails to consider site specific requirements: for example the issues of achieving a safe and suitable access road from the

A44, remediation to deal with contamination, large areas of land that cannot be developed, the requirement for new schools, healthcare and facilities. All of these costs could have a serious impact on the type of homes delivered and the quality of the built environment.

- 3.125 Where developer contributions are high and viability is considered a constraint developers will seek to justify a reduction in the number of affordable homes delivered, they will look to increase densities to generate a higher return and reduce the provision of green infrastructure. Savings are often sought through a reduction in the provision of on-site renewable energy generation and the achievement of the minimum energy efficiency standards to reduce costs and increase profits. This leads to an overall reduction in the quality of the new environment and undermines the social and environmental benefits of the proposal.
- 3.126 Both the viability assessment and the Sustainability Appraisal need to be revisited to take account of the true constraints to developing in this area and at the proposed scale; this will establish whether the proposal is viable and assist in determining the level of harm versus the benefits of the scheme.

4. Conclusions

- 4.1 The Parish Councils consider that there are a number of significant issues and constraints to developing a proposed settlement at Throckmorton and strongly object to the sites allocation for large scale residential development.
- 4.2 The proposal has not been fully assessed or demonstrated to be achievable given the range of constraints on and around the site. As highlighted throughout this document there are multiple constraints that would need to be overcome, some of which are insurmountable; these affect both the viability and deliverability of the proposed settlement.
- 4.3 The constraints include but are not limited to land assembly, contamination, land stability, major access constraints, the historic environment, and the cumulative impact on the highway network, neighbouring settlements and landscape character.
- 4.4 The considerable reliance on a brownfield site at its core is not justified given the level of constraints outlined in the report. Until these are better understood it is considered inappropriate to allocate the land for such a sensitive end use.
- 4.5 The proposal is not considered to be sustainable; it is too removed from public transport to persuade significant numbers to walk or cycle and would contribute to unsustainable patterns of development with a heavy reliance on car travel.
- 4.6 Development in this broad location would destroy huge swathes of greenfield land and cause irreversible harm to the historic landscapes and adjoining rural villages. Its proximity to the historic town of Pershore would result in vast urban sprawl and coalescence of multiple settlements.
- 4.7 The proposal appears rushed and ill-founded and the Parish Councils and the community deserve to be presented with a far greater level of detail and information to be able to comment accurately on this proposal. The community require as a minimum a further stage of consultation before the SWDPR is submitted for examination.

Appendix 1 Contaminated Land Records

The response from Worcestershire Regulatory Services regarding known contamination sources at Throckmorton Airfield Site and surrounding area, dated 10th December 2019, stated the following:

Standard Question CL1: Has my site, or any adjacent site, been determined as Contaminated Land under Part 2A Environmental Protection Act 1990?

We can confirm that the above subject site has not been determined as Contaminated Land under Part 2A of the Environmental Protection Act 1990.

We can confirm that no sites adjacent to the above subject site have been determined as Contaminated Land under Part 2A of the Environmental Protection Act 1990.

Standard Question CL2: Are there any historic landfills within a 250m radius of my site?

We can confirm that the following landfill sites lie within a 250m radius of the above subject site:

WRS Reference:	WD/685/CL	WD/497/CL (*)	WD/686/CL	WD/643/CL
Site Name:	Hill and Moor Landfill Site (Co-Disposal)	Foot&Mouth Burial Cells (Landfill)	Hill & Moor Waste Amenity Site	Hill and Moor Landfill Site (D, C and I)
Site Address:	Severn Waste, Throckmorton Road, Pershore WR10 2PW	F&M burial cells, DEFRA, TH		
Grid reference:	X 397545, Y 248540 348,548 m ²	X 397458, Y 249149 24,636 m ²	X 397431, Y 248425 7844 m ²	X 397545 Y 248540 348, 548m ²
Dates of operation:				
Type of waste received:	Inert/Domestic Landfill/Landraise site and Waste Reclamation Centre	Cattle (Foot & Mouth)		Refuse and waste
License holder:	Severn Waste Limited	DEFRA		

Standard Question CL3: Does my site, or any adjacent site, appear on the Council's list of potentially contaminated sites which may require further investigation under Part 2A of the Environmental Protection Act 1990?

The above subject site appears on this list due to the following potentially contaminative use of the site:

Our Ref	Site name	Previous land use	Period	Status if known
WD/1568/CL	Sewage Works	X 396245 Y 249235, 12,190m ²		Unknown
WD/820/CL	Marsh	X 396123, Y 250803, 10,090 m ²		Unknown
WD/1665/CL	Depot	X 398413, Y 248200 2348 m ²		Unknown
WD/1240/CL	Pond	X 398156, Y 249299 99m ²		Unknown
WD/1229/CL	Pond	X 411254, Y 244917 37,510 m ²		Unknown
WD/1241/CL	Pond	X 397994, Y 249485 62 m ²		Unknown
WD/493/CL	Underground Storage Tanks QinetiQ, DERA, TH	X 397066, Y 249862 437 m ²		Unknown
WD/2134/CL	Former Pond	X 397925, Y 249876 431m ²		Unknown
WD/1242/CL	Pond	X 397977, Y 249193 83 m ²		Unknown
WD/499/CL	Marshalls Transport Depot	X 397891, Y 250412 31,537 m ²		Unknown
WD/1237/CL	Pond	X 298069, Y 249453 68 m ²		Unknown
WD/2125/CL	Cemetery And Burial Ground	X 398123, Y 249836 1437 m ²		Unknown
WD/2386/CL	Old Gravel Pits	X 397756, Y 548867 398 m ²		Unknown
WD/2613/CL	Pershore Poultry Farm, EC Drummond, Long La. Throckmorton	X 397644, Y 250492 35,935 m ²		Unknown
WD/1238/CL	Pond	X 398036, Y 249447 103 m ²		Unknown
WD/494/CL	Underground Storage Tanks	X 397060, Y 249550 244 m ²		Unknown
WD/1243/CL	Pond	X 398183, Y 249237 183 m ²		Unknown
WD/1780/CL (*)	Airfield (former military establishments)	X 397299, Y 249418 2,794,416 m ²		Unknown
WD/2170/CL	Old Brick Works	X 396063, Y 250899 8,654 m ²		Unknown
WD/496/CL	Underground Storage Tanks	X 396936, Y 248935 437 m ²		Unknown
WD/368/CL	Electricity Generation Hill & Moor LF Gas extraction	X 397393, Y 248414 534 m ²		Unknown

WD/495/CL	Underground Storage Tanks	X 396976, Y 249550 647 m ²		Unknown
WD/498/CL	Spray Coating Process	X 397043, Y 249606 372,205 m ²		Unknown
WD/1246/CL	Liable to floods	X 396271, Y 250260 16,813 m ²		Unknown
WD/1239/CL	Pond	X 398003, Y 249450 172 m ²		Unknown
WD/1074/CL	Pond	X 398843, Y 251081 116 m ²		Unknown
WD/2644/CL	Pond r/o Fairways, Main Street, Bishampton	X 398902, Y 250910 225 m ²		Unknown
WD/2648/CL	Pond	X 398837, Y 250810 120 m ²		Unknown
WD/1072/CL	Pond	X 398887, Y 251063 196 m ²		Unknown
WD/1073/CL	Pond	X 398895, Y 251026 419 m ²		Unknown
WD/1071/CL	Pond	X 398883, Y 251093 448 m ²		Unknown
WD/2647/CL	Garage, Woodside, Main Street, Bishampton	X 398884, Y 250840 2,380 m ²		Unknown

Contaminated Land - General Information:

In addition to the answers to your specific enquires it should be noted that the responses above do not exclude the above subject site from being determined as contaminated land at any time in the future or prohibit planning conditions being imposed on any future development, should new information come to light.

WRS seek to identify actual contaminated land from records of land with a history of potentially contaminating land uses within the Council's district, through the planning regime and the contaminated land regime. Currently, no action is proposed and there are no known records of contamination actually being present on the site, or complaints or incidents arising from potential contamination.

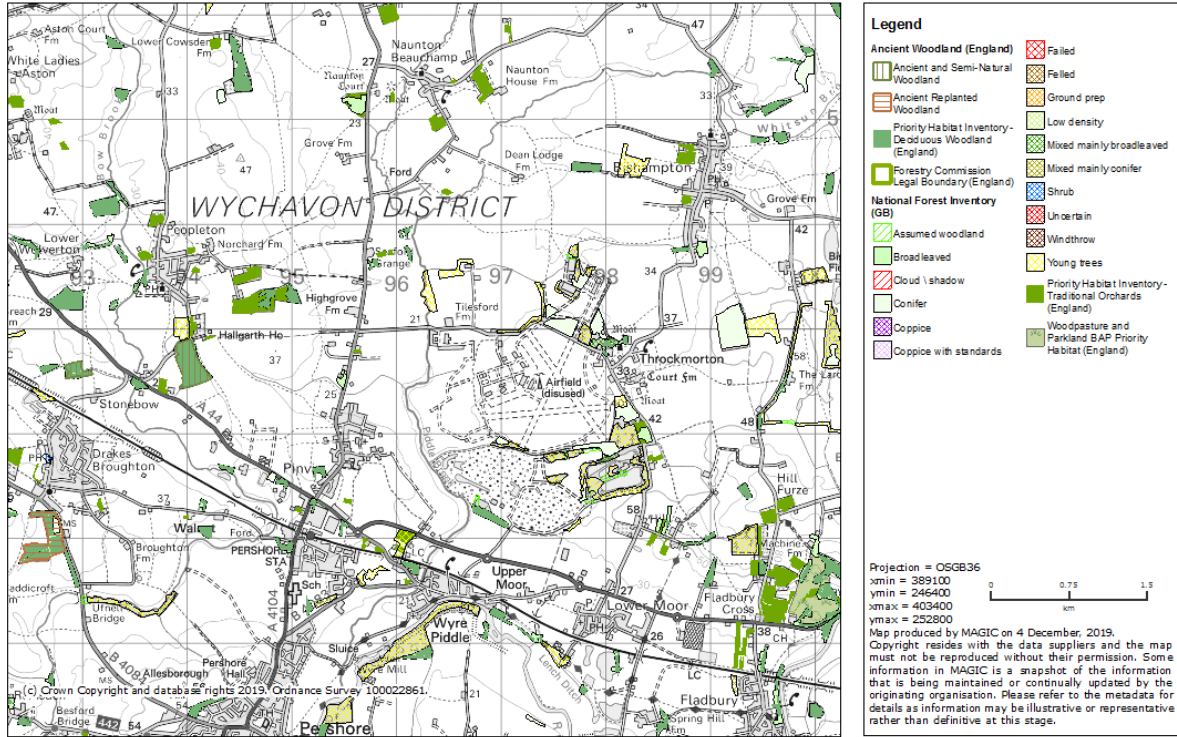
However, due to the former potentially contaminative land uses that have taken place on the site, there is a likelihood that Worcestershire Regulatory Services (WRS), on behalf of the Local Authority will undertake further review of those sites under Part 2A of the Environmental Protection Act 1990. No prioritisation of this work has been undertaken since WRS was formed and those sites within this District area were combined with those of four other District areas. Consequently no timescale can be provided on when the sites may be considered further.

For land to be determined as contaminated a source, pathway and receptor of contamination has to be established via a thorough professional investigation. At this time WRS does not hold evidence which would identify the subject site to be contaminated land. Furthermore, there are not presently any plans to place this site on the public register of contaminated land under Part 2A of the Environmental Protection Act 1990.

Appendix 2 Habitats

MAGiC

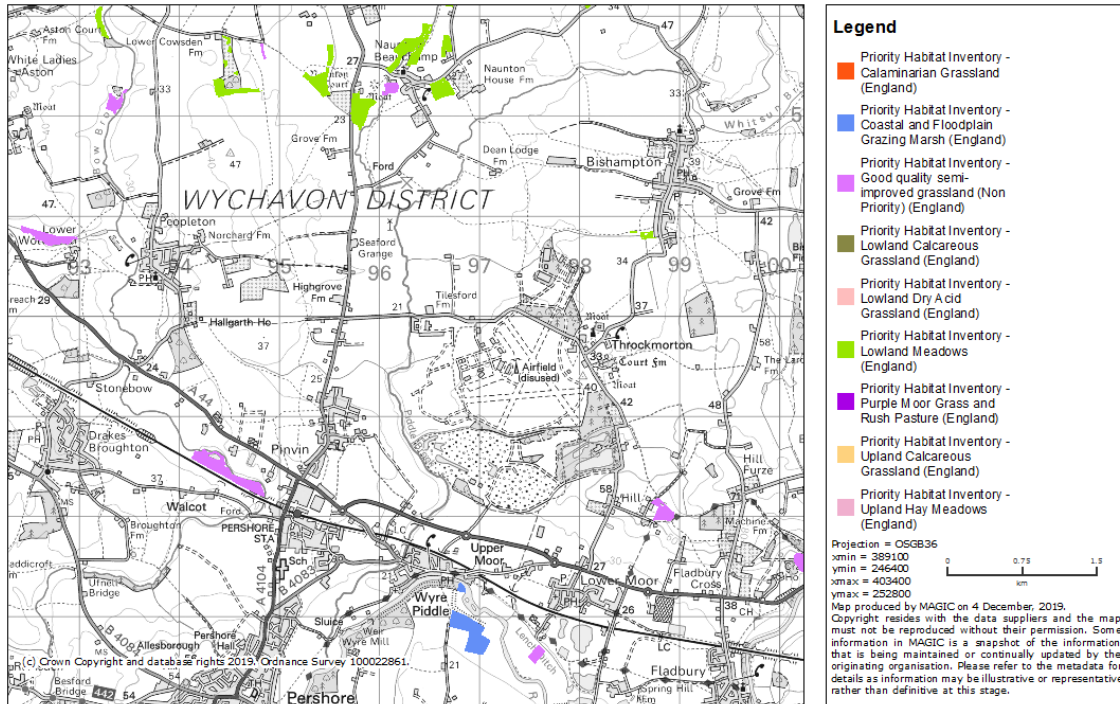
Throckmorton Habitats



Woodland Habitats. Source MAGIC website, 2019

MAGiC

Grassland Habitats



Grassland Habitats Source MAGIC website, 2019



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Stable One, Manor Farm Courtyard, Southam Lane, Cheltenham, GL52 3PB

Company No: 08601004  www.brodieplanning.co.uk  01242 898368  info@brodieplanning.co.uk