



Astrid Tishler  
Ramboll  
60 Newman Street  
London  
W1T 3DA

7<sup>th</sup> August 2014

Email: [nkay@worcester.gov.uk](mailto:nkay@worcester.gov.uk)  
Tel: 01905 722560  
Fax: 01905 722565

Dear Astrid,

**TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT)  
(ENGLAND AND WALES) REGULATIONS 2011: REGULATION 13 SCOPING  
OPINION**

**PROPOSED DEVELOPMENT: NEW RETAIL PARK AT WORCESTER WOODS,  
WORCESTER**

I refer to your request for a Scoping Opinion and the accompanying Scoping Report received on 14<sup>th</sup> July 2014 for the above proposal.

The scoping report has been the subject of consultation in accordance with the Environmental Impact Assessment (EIA) Regulations. However, a number of key consultees have not responded and the Local Planning Authority is therefore unable to offer any specific advice in areas of expertise where information has not been received. Specific concerns and recommendations raised in submitted responses and by the Local Planning Authority have been incorporated in the following comments under specific topics. The Local Planning Authority advises that the recommendations provided below should be addressed by the EIA.

Overall I can confirm that the approach that you are advocating in the scoping report is considered to be generally acceptable and appropriate and this is reflected in the nature of the consultation responses that have been received. To avoid unnecessary repetition, broad guidance and detailed comments provided by consultees have not been duplicated in this letter. You will note the specific points which have been made in the responses and you are required to have regard to these. In particular I would draw your attention to the following:

**Background**

The current pre-application proposes a new retail park in Worcester City bounded by Nunnery Way, Newtown Road and Charles Hastings Way. The proposals includes 37,050

---

**[www.worcester.gov.uk](http://www.worcester.gov.uk)**

**Location:** Orchard House Complex, Farrier Street, Worcester WR1 3BB

**Typetalk:** 18001 01905 722233 **DX:** 716287



sqm of mixed retail Class A1 uses, 400 sqm of Class A3 use, 940 new car parking spaces and associated works.

The site is allocated in the adopted City of Worcester Local Plan (Policy E2) as Employment Land on Greenfield Sites and benefits from outline planning permission (Ref. P10Q0276) for the creation of 55,000 sqm of office floorspace (Class B1). The permission remains extant until the 4<sup>th</sup> October 2019. As the redevelopment of the application site for office space is no longer considered to be viable the proposed revised development is now being promoted.

A bridleway runs across the site and as such this would need to be addressed in any proposal.

The proposed development would constitute a departure from the current Development Plan and would also be both 'major development' and 'development outside town centres' development as defined by The Town and Country Planning (Consultation) (England) Direction 2009.

## **Landscape and Visual**

The proposed assessment methodology is considered appropriate by the City Council's Landscape Consultant apart from that there should be an assessment of lighting on landscape character and sensitive receptors.

It is suggested that protection measures for any retained vegetation during the course of construction and in the long term should be described in detail and should conform to accepted professional standards.

## **Transport**

The Transport Assessment will require written confirmation from the Highway Authority that the scope and detail of the TA work is appropriate and I understand that discussions are currently underway between yourselves and the Highway Authority. I would strongly encourage this is progressed further along with engagement of the Highway Agency. I also note that the scheme impacts on an AQMA therefore I would suggest any TA Scope is agreed by WRS to ensure the TA generates the evidence base that they will also be wanting to see.

Highways Authority has commented:

The use of Guidance on Transport Assessment, DfT 2007, is acceptable. However more local guidance can be gained from the Highway Authority. They also have guidance on workplace travel plans and the Worcester Transport Model Protocol.

In paragraph 6.4.5 the extant permission is referred to, however the uses proposed on this site are very different to the previously considered impact and a fresh approach will be needed as trip times, distribution, volumes and sustainable transport demands will be materially different.

Whilst no details have emerged at this time on the detail of the access arrangements 3 matters are apparent to me from the submitted site location plan:

---

**www.worcester.gov.uk**

**Location:** Orchard House Complex, Farrier Street, Worcester WR1 3BB

**Typetalk:** 18001 01905 722233 **DX:** 716287



1. A proposed entrance slip road is proposed on the A4440, the highway authority on principle (before any design detail is considered) is strongly opposed to this entrance and this has been expressed in the past. Whilst this will no doubt form part of a future discussion I consider that it is worth highlighting this position at an early stage.

2. The access details are car dominated and provision for walking, cycling and bus should be built in to the arrangements.

3. Car Parking will again be subject to discussion and will depend on the sustainable transport arrangements proposed. However I note that 940 car parking spaces are proposed. I have undertaken a quick assessment based on the Local Transport Plan standards and it suggests that 2145 spaces plus disabled provision (approx. 115 spaces), motorcycle, delivery vehicle and bicycle spaces are warranted, therefore the applicant should ensure that a robust evidence base is provided as to why 42% of the theoretical provision is justified.

The Highways Agency (HA) has reviewed the submitted information and offers the following comments.

Highway Agency has commented:

### Transport Assessment

We are pleased that a Transport Assessment (TA) will be submitted to support the planning application and that it will be prepared in accordance with DfT 'Guidance on Transport Assessment'. We would like to note that the TA should also be prepared in line with DfT Circular 02/2013 'The Strategic Road network and the delivery of sustainable development'. We assume that the TA will inform the Transport Chapter of the EIA.

We recommend the TA includes the following:

- Existing sustainable infrastructure – showing the existing conditions including facilities and infrastructure for pedestrians, cyclists, and public transport users; and isochronal mapping from the central point of the development to show accessibility on foot and cycle within 2km and 5km.
- Development proposals – to include information on the size of the proposed development, including phasing, any future infrastructure improvements, parking levels etc.
- Trip rates and generation – eg TRICS analysis for multimodal sites or similar including full outputs.
- Trip distribution and assignment - to be presented as percentages of development trips and in absolute numbers.

If the applicant intends to 'net off' the trips and impact associated with the extant B1 use, the corresponding trip generation, trip distribution and trip assignment information for that use should be provided for comparison purposes.

- Development impact on the SRN – clear demonstration of the number of development trips that will impact on the SRN junctions in the weekday AM peak, PM peak and Saturday peak. Vehicle turning movements should be shown for both M5

---

**www.worcester.gov.uk**

**Location:** Orchard House Complex, Farrier Street, Worcester WR1 3BB

**Typetalk:** 18001 01905 722233 **DX:** 716287



junction 6 and M5 junction 7. This outcome will inform if detailed junction capacity assessments will be required.

- Junction assessment year and mitigation – assessments of development impact should be provided in the opening year, taking into account committed development. Mitigation should be provided where capacities are compromised. In addition, future year assessments should be provided either ten years post application or at end of local plan period, whichever is greater (as the SWDP is emerging, in this case it would be ten years post application). Committed developments should be agreed with Worcestershire County Council (WCC) and submitted to the HA for approval.

We note that the applicant proposes to use the Worcester Transport Model (WTM) for detailed assessment. Should detailed assessment of the SRN junctions be required, the HA and WCC jointly developed VISSIM microsimulation model, which covers the Southern Link Road and junctions 6 and 7 of the M5, is available for use.

- Construction traffic – information on the construction traffic arriving and departing the site and their impact on SRN should be presented in the TA.

### Travel Plan

In addition to the TA, a Framework Travel Plan (FTP) should be prepared for the site and submitted to the HA for review and approval. The FTP should follow the DfT Good Practice guidelines: Delivering Travel Plans through the Planning Process (04/2009).

### Recommendations

We recommend that as a first step the applicant agrees with the Highways Agency the proposed trip generation, including netted off trips, together with an initial trip distribution and assignment. This will identify if detailed assessments of the SRN junctions is required, prior to the commencement of any modelling work. Trip generation should be shown for the SRN peak hours. .

In addition, a Framework Travel Plan (FTP) should be prepared for the site and submitted to the Highways Agency for review and approval.

We look forward to working with the applicant in the future.

### **Air Quality**

Worcestershire Regulatory Services has commented that in general the scope of works is acceptable. However, it is recommended that reference is made to their ADMS Road Model Requirement and AQA Sensitivity Rationale Note.

Should Lyppard Grange Ponds be included in the list of receptors? It may be at the limit of possible effects but it is a SAC the highest level of environmental protection is required for such a designated site.

As I understand it NO<sub>2</sub> levels are affected by the weather conditions therefore I would expect some evidence/discussion of the potential impact of the wet summers since 2007 and what we might expect the NO<sub>2</sub> levels would be in an extended heat wave.

---

**www.worcester.gov.uk**

**Location:** Orchard House Complex, Farrier Street, Worcester WR1 3BB

**Typetalk:** 18001 01905 722233 **DX:** 716287



As air quality improvements are very difficult to implement does the EIA need to consider what mitigation could be provided if minimum air quality standards are exceeded post implementation of the development proposal.

## **Noise & Vibration**

Worcestershire Regulatory Services has commented that in general the scope of works is acceptable. However, it is recommended that reference is made to their Code of Best Practice for Demolition and Construction sites (July 2011).

## **Ecology**

The proposed assessment methodology is considered appropriate by the City Council's Landscape Consultant.

However, I have not received any response from Natural England or Worcestershire Wildlife Trust. The Local Planning Authority is therefore unable to offer any specific advice in areas of expertise where information has not been received. You may therefore wish to contact them directly for their comments.

## **Water Environment**

The Environment Agency largely concur with the findings of the EIA Scoping report. However, neither the Lead Local Flood Authority, Severn Trent Water Limited nor South Worcestershire Drainage Partnership submitted any comments in relation to the scoping proposals. The Local Planning Authority is therefore unable to offer any specific advice in areas of expertise where information has not been received. You may therefore wish to contact them directly for their comments.

Nevertheless, the EA have suggested that:

- The PFS should be supported with information to demonstrate that the proposals accord with our guidance GP3- Groundwater Protection- Principles and Practice.
- Downstream impact on the Barbourne Brook should be studied in the context of the Water Framework Directive (WFD) and betterment opportunities explored accordingly.
- The LLFA and SWLDP should be consulted with regards surface water management and the appropriate use of SUDs.

## **Archaeology & Cultural Heritage**

The City Council's Archaeology Officer has commented that an archaeological desk-based assessment is in preparation and will form a technical appendix in the EIA. Therefore they have no specific issues with the general approach.

## **Socio-Economics**

No consultation responses have been received on this issue. However, the proposed assessment methodology is considered appropriate.

## **Waste Management**

No consultation responses have been received on this issue. However, the proposed assessment methodology is considered appropriate.

---

[www.worcester.gov.uk](http://www.worcester.gov.uk)

**Location:** Orchard House Complex, Farrier Street, Worcester WR1 3BB

**Typetalk:** 18001 01905 722233 **DX:** 716287



## **Environmental Topics**

No consultation responses have been received on this issue. However, the proposed assessment methodology is considered appropriate.

## **Cumulative Effects**

Your consideration of the cumulative effects which may arise as a result of the proposed development is welcomed. The EIA should identify, describe and evaluate the effects that are likely to result from the proposed development in combination with other projects, activities and plans for all types of development that are being, have been or will be carried out. This should include (where information permits) existing completed projects, approved but uncompleted projects, on-going activities, plans or projects under consideration by the consenting authorities, and plans and projects which are reasonably foreseeable.

## **Additional Considerations**

While I understand that the site benefits from a current planning approval any comparison between an alternative development proposal and the approved scheme needs to consider what ever mitigating actions are associated with the approved development as well as any difference in environmental impact.

The Inspectors interim conclusions on the South Worcestershire Development Plan position is that the employment allocations proposed by the plan are about right. Allocations for retail uses were considered separately by the inspector so while retail uses provide employment if they are permitted within proposed/allocated sites the City may not be able to accommodate the number of new jobs the inspector considers are appropriate over the plan period and this should be considered.

It would therefore be helpful if the EIA considers the impact of the proposed use on the ability of Worcester to maintain a balanced portfolio of employment opportunities within the policy section of the EIA.

As the current site is largely unlit some assessment of lighting and its possible impacts on ecological receptors should be undertaken. It would also be expected that consideration should be given to the sensitive design of any lighting within the development to ensure that the "light spill" is reduced through sensitive down lighting or other means.

## **Further issues**

This opinion has been prepared by Worcester City Council with all reasonable skill, care, and diligence within the terms of its duty and within the limitations of the resources devoted to it by agreement of the Council. The Local Planning Authority has sought to be thorough in its assessment of the Scoping Report and has encompassed consultation comments where relevant. However, please note the issuing of this scoping opinion does not prevent the Local Planning Authority from requesting further information at a later stage under Regulation 19 of the SI 1999 no. 293.

---

**www.worcester.gov.uk**

**Location:** Orchard House Complex, Farrier Street, Worcester WR1 3BB

**Typetalk:** 18001 01905 722233 **DX:** 716287



Further to the matters raised within the scoping opinion, the Local Planning Authority would encourage the developer to submit a formal pre-application at this stage. This would provide an opportunity to engage in discussions regarding the development proposal whilst the EIA is being prepared.

I trust this is of assistance.

Yours sincerely

**Nick Kay**  
**Senior Planning Officer**  
**Development Management**