

Whittington Parish Council

One Parish : One Community



Planning Application W/25/02776/OUT, B4084 Pershore Road, Whittington

At its core, this planning application seeks approval in principle for the siting of a vehicular access into new employment land. The location and layout of this junction, immediately opposite established residential properties, is of paramount concern to the Parish Council, as it directly impacts a wide range of unacceptable issues, including harm to residential amenity, health and wellbeing, landscape character, highway safety, and environmental quality. The Parish Council does not object to the Wychavon Town proposals in principle, nor to the strategic ambition for growth, but considers the proposed junction location to be fundamentally inappropriate. By placing the access at this point, the application creates adverse effects that cannot be adequately mitigated and which conflict with both the intent and requirements of the South Worcestershire Development Plan.

Traffic and Highways – Transport and Sustainability

The Parish Council objects on transport and highway grounds. The strategic allocation of Worcestershire Parkway Garden Town was founded on principles of sustainable development, with a clear emphasis on creating local job opportunities, reducing reliance on the private car and promoting public transport, particularly rail-based travel.

However, the current proposal for the site is justified primarily by being a prime location 'directly adjacent to a major movement corridor', with assessment based on a 28-minute car-based labour market catchment. The proposal includes large-scale logistics and employment floorspace which will generate significant additional car and HGV movements along the B4084 Pershore Road.

The Parish Council notes that the applicant's own Construction Traffic Management Scoping Options Document (page 36) confirms that the construction phase will be prolonged and generate significant vehicle movements, including HGVs. This approach is fundamentally inconsistent with the objectives of the SWDP, particularly:

- SWDP 4 – requires development to be located and designed to minimise the need to travel by car and to prioritise sustainable modes of transport
- SWDP 5 – requires development proposals to demonstrate that opportunities for walking, cycling and public transport are maximised and that highway safety is not compromised
- The Emerging SWDPR512 (vii) outlines that the associated movement strategy for the strategic allocation must 'prioritise walking, cycling and public transport'

Traffic and Highways – Existing Accesses and Safety

The Parish Council raises objections regarding the proposed highway arrangements along Pershore Road and their impact on existing residents. The submitted Transport Assessment document (5.4.4) clearly states that the plan should 'not conflict with existing roads or access to private drives'.

Many existing residential properties rely on reversing manoeuvres into the existing highway “safe zone” before joining Pershore Road due to constrained parking arrangements. This area is now proposed to accommodate a cycle and pedestrian route, a complex junction layout, and a pedestrian crossing, significantly increasing conflict between road users.

Furthermore, the proposal fails to adequately consider oil deliveries, foul waste removal, refuse collection and postal services and visitors. All of which rely on the current configuration of the highway and involve large vehicles using the existing access arrangements. The removal of the “safe zone” and its replacement with mixed pedestrian, cycle and vehicular movements would compromise safe access to existing dwellings.

The Parish Council considers that this creates an unacceptable highway safety risk, contrary to:

- SWDP 4 - which requires development to be safe for all users
- SWDP 21 - which requires development to create safe and functional environments

Traffic and Highways - Cumulative Effects

The Environmental Statement concludes that impacts on local road traffic during construction are temporary and that there will be “no long-term deterioration of conditions” and therefore these impacts are not considered further. The Parish Council strongly disputes this conclusion as the proposal will result in significant increases in car and HGV movements during construction; and substantial long-term operational traffic associated with logistics and employment uses.

Crucially, the application fails to properly assess the cumulative impacts of multiple construction phases across the proposed new settlement; and the long-term traffic generation of the completed new town. The Parish Council considers that cumulative impacts are a materially relevant and should be assessed comprehensively rather than dismissed.

Despite this, the Road Traffic Assessments (5.5.25) conclude that effects on human receptors are “not significant” and that no further assessment is required. This approach is fundamentally flawed and contrary to:

- SWDP 4 - which requires full consideration of transport impacts
- SWDP 22 - increased traffic contributes to noise, air quality and disturbance impacts
- SWDP 31 – increased traffic contributes to noise, air quality and disturbance impacts

Noise Impacts

The Parish Council objects on the grounds of unacceptable noise impacts arising during both the construction and operational phases of the proposed development. The Planning for Health in South Worcestershire Supplementary Planning Document (SPD) confirms that noise disturbance is a well-established public health concern, with accepted impacts including sleep disturbance, psycho-physiological stress responses and cardiovascular effects. Paragraph 12.5.8 of the SPD states that development should be located and designed to avoid conflicts between land uses and to mitigate adverse noise impacts where avoidance is not possible.

The Environmental Statement (ES) identifies existing background noise sources as including traffic, bird noise, leaves moving, distant train noise and occasional HGV alarms (ES 12.10.6). These are characteristic of a predominantly semi-rural residential environment. The Parish Council notes that ES paragraph 15.5.8 identifies residents along Pershore Road as high to very high sensitivity receptors during the construction phase. This classification implicitly acknowledges the vulnerability of existing residents to noise impacts.

The Environmental Statement concludes that construction noise will give rise to significant moderate effects at properties along Pershore Road, but asserts that these impacts can be mitigated and are therefore “not significant”. The Parish Council strongly disputes this conclusion. Mitigation measures rely heavily on proposed working hours of 08:00–18:00, with additional flexibility allowing works between 07:30 and 18:30, six days per week, and up to 13:00 on Saturdays. The Parish Council notes that these hours do not include plant, machinery or HGV travel during construction (6-7 years) then 24-hour site operation.

Furthermore, the Environmental Statement identifies that noise thresholds are expected to be exceeded, particularly during piling works (ES 12.5.9 and 15.5.21), which are acknowledged to be likely to cause significant disturbance to residents. Noise impacts of this magnitude and duration cannot reasonably be described as temporary or insignificant, particularly given the prolonged construction period.

The Environmental Statement (ES 12.5.24) considers noise arising from the operation of commercial floorspace, including HGV movements, and concludes that there will be no significant impact on nearby residents. The Parish Council considers this conclusion to be unsupported and flawed. The assessment does not adequately consider the noise associated with increased HGV movements, especially at the newly proposed junction directly adjacent to residential properties; it fails to address 24-hour operational activity, including night-time vehicle movements and deliveries; and it underestimates the contrast between the existing sound environment and the proposed industrial and logistics-related noise profile.

The introduction of sustained industrial and traffic noise represents a fundamental and permanent change to the living conditions of residents, replacing an environment characterised by low-level natural sounds with prolonged mechanical and vehicle noise expected for many years.

The Parish Council is particularly concerned that the application assesses noise impacts in isolation, without proper consideration of cumulative effects. The proposal forms part of a wider new settlement, with multiple construction sites and future employment and residential developments expected to operate concurrently. The cumulative noise generated by this has not been adequately assessed.

The Parish Council considers that the predicted increase in noise during both construction and operation will have a demonstrable adverse impact on residential amenity and public health, contrary to:

- SWDP 21 – which requires development to safeguard the amenity of existing residents
- SWDP 31 – which requires proposals to avoid unacceptable impacts from noise and disturbance
- The Planning for Health in South Worcestershire SPD

Air Pollution

The Parish Council objects on the grounds of air quality and associated impacts on human health. It is well established that air pollution is linked to serious health conditions including cancer, asthma, stroke, heart disease, diabetes, obesity and dementia, and these risks are not adequately addressed within the submitted Environmental Statement

Chapter 7 of the Environmental Statement confirms that no site-specific air quality monitoring has been undertaken and acknowledges the presence of more than ten sensitive receptors in close proximity, with the sensitivity of the area in respect of dust soiling assessed as high (ES 7.5.9). Despite this, the assessment concludes that impacts on human health during earthworks and construction are low solely due to the limited number of nearby residents, resulting in an overall judgement of 'not significant' and not requiring further consideration. This approach fails to recognise that the severity of health impacts is not reduced by the number of people affected and represents a fundamental flaw in the assessment methodology.

The Parish Council strongly objects to the expected high to very high levels of dust pollution arising from the proposed development and the resulting adverse effects on residents' health and residential amenity. These impacts would be directly contrary to the requirements of SWDP 31 to prevent unacceptable risks from pollution and to safeguard the health and living conditions of existing communities.

The application relies on Defra background concentration data (2021) rather than locally representative monitoring, and no specific assessment has been undertaken of Pershore Road, including the complex junction serving the proposed development. The Scoping Opinion document (Page 190) concludes that traffic emissions are below the IAQM screening threshold and therefore considered insignificant, yet this conclusion is unsupported by site-specific evidence and fails to consider cumulative impacts, particularly in the context of existing and future traffic movements.

The Environmental Statement (7.10.14) further assumes that air quality will improve following construction and that operational impacts will be insignificant, despite the proposal comprising a large industrial development with significant HGV movements. This assumption is unrealistic and fails to reflect the likely deterioration in local air quality arising from substantially increased heavy vehicle traffic.

Notably, the Environmental Statement (7.120.15) identifies health damage costs of approximately £261,902 over a five-year period arising from air quality impacts. Given the relatively small number of nearby residents, this figure indicates a significant level of harm and further undermines the conclusion that air quality effects would be insignificant.

For these reasons, the Parish Council considers that the proposal would result in unacceptable harm to public health and residential amenity and should be refused as it fails to comply with:

- SWDP 31 – requires that development does not give rise to unacceptable levels of pollution, including air, water, and soil pollution, and that residential amenity, human health, and the environment are protected.
- SWDP 21 - which requires development to safeguard the amenity of existing residents

Light Pollution

The Parish Council objects on the grounds of light pollution and impacts on residential amenity. Although bat-sensitive lighting is proposed along Pershore Road, the planned new road junction opposite existing residences has been described in the application as a 'conflict area' requiring 'one step higher lighting than the highest lighting class for the road'. The Institution of Lighting Professionals guidance (ILP GN01:2021) states that, where no existing street lighting exists, consideration must be given to limiting light from new development. This proposal will create a high level of light pollution in front of existing residential properties, without mitigation for construction or future HGV movements. Due to the proposed access location opposite existing properties, vehicle headlights (including HGV) will illuminate these properties when exiting the site, potentially 24 hours a day, 7 days a week.

The application also states that daylight, sunlight, overshadowing, and solar glare have been scoped out on the basis that the proposed five-storey (15–18m) buildings are comparable to existing structures in the area. This assessment is inaccurate, as the surrounding area is predominantly rural and existing properties are mostly single-storey. The proposed warehouses will cast significant shadows, particularly during winter months, reducing access to natural light for nearby residents, increasing reliance on artificial lighting, and diminishing the associated health and wellbeing benefits of daylight.

The Parish Council therefore objects to this application on the grounds that the proposed road layout and development will create significant light pollution where currently there is little or no artificial lighting. Insufficient consideration has been given to the cumulative impacts of lighting from the junction, construction activity, operational vehicle movements, and the scale of the warehouses on natural light and residential amenity. The proposal would fail to comply with:

- SWDP 21 - which requires development to protect local amenity
- SWDP 31 - which seeks to prevent unacceptable pollution and environmental harm

Trees, Hedgerows and Loss of Habitat

The Parish Council objects on the grounds of loss of protected trees, hedgerows, and natural habitat. The proposal requires the removal of eleven trees currently protected by Tree Preservation Orders, seven of which are located along Pershore Road opposite residential properties. These trees have been designated for protection due to their value to public amenity and contribution to the local treescape. The application assesses these trees as being of only moderate value, significantly undervaluing their environmental and amenity contribution and showing disregard for the purpose of the protection order process.

An alternative access location exists, as outlined in the South Worcestershire Design Guide (SDP), which would allow these protected trees and associated habitats to be retained through joint working with other landowners. The removal of these trees is not essential for the delivery of this development and the parish council objects to the unnecessary and avoidable loss of protected trees, hedgerows, and associated habitats.

The proposed development would result in the loss of 0.14% of the county's veteran trees, an irreplaceable habitat, and most existing hedgerows (the development area currently has 2.26 km of hedgerow and all but 0.54km are proposed for removal). The Environmental Statement considers this acceptable due to Worcestershire's extensive hedgerow networks. The parish council refutes this as the majority of the hedgerows contain mature trees and valuable well-established habitats, which will be permanently lost. The proposed mitigation measures, including replacement tree planting at a 10:1 ratio, lacks detail regarding location, timing, or maintenance, and does not address the immediate or long-term loss of biodiversity or amenity value. Trees planted elsewhere on the development will be of little benefit to existing residents that have enjoyed the amenity value of the existing trees and hedgerows.

For these reasons, the Parish Council objects to the destruction of protected trees, large sections of hedgerow, and natural habitat. The proposed removal is unnecessary for the development, will result in irreversible loss of environmental value, and conflicts with:

- SWDP 21 – which requires that development protects the amenity of neighbouring properties, maintains local character, and integrates well into its surroundings
- SWDP 22 – which requires development to protect, enhance, and restore biodiversity, ensuring no net loss of ecological value
- SWDP 25 – which requires that development conserves and enhances the quality, character, and distinctiveness of the landscape
- Existing Tree Preservation Orders (TPOs)

Warehousing

The Parish Council objects on the grounds of the visual impact, scale, and overbearing nature of the proposed development. The proposed development, by reason of its height, size, and location, will have an unacceptable adverse impact on the surrounding area and especially residential properties immediately opposite. The proposals are visually overbearing and will result in a loss of views and a reduction of natural light. The scale and design of the warehouses are not in keeping with the predominantly residential and rural character of the area, and the proposal is unsympathetic to the local landscape and built environment.

Tree and hedge planting will not mitigate these impacts due to the scale of the buildings. Unit 1, directly opposite residential properties, has a suggested height of 13 metres, but the application allows for flexibility up to 16.4 metres plus or minus 10 metres, potentially reaching 26.4 metres. The magnitude of this structure is significant, and comparisons with recent large warehouse developments, such as in Wigan, demonstrate the adverse effects that buildings of this scale have on residential amenity and the surrounding area. Unlike the Wigan development, which is positioned behind residential properties, this proposal places the warehouses directly in front of homes, meaning no reasonable screening or landscaping could prevent the visual dominance and overbearing effect.

SWDPR09 states that development must complement local character, avoid being overbearing, and ensure that prominent views are maintained. The proposed warehouses completely fail to meet these requirements. Residents' views and enjoyment of their properties will be significantly compromised, and the development will dominate the streetscape in a manner inconsistent with local character.

For these reasons, the Parish Council objects to the location, height and scale of the proposed development, with the proposed Unit 1 being particularly damaging to local amenity. The proposal will be visually overbearing, will fail to maintain local character, and is contrary to:

- SWDP 21 – requires that new development is well-designed, sympathetic to its surroundings, and protects local amenity.
- SWDP 25 – focuses on protecting and enhancing the character and distinctiveness of the landscape.
- SWDPR09 – states that development must complement local character, avoid being overbearing, and ensure prominent views are maintained.

Lack of Consultation

The Parish Council objects on the grounds that meaningful and effective consultation has not taken place, contrary to the principles of the National Planning Policy Framework and the adopted Statement of Community Involvement. The Environmental Statement (Chapter 4, Page 1) states that consultation has taken place and that responses have influenced the evolution and design of the proposal; however, the Parish Council, as well as residents most directly affected by the development, considers this statement to be inaccurate.

The Merton College Statement of Community Involvement lists a series of engagement activities undertaken prior to submission, yet the Parish Council notes that residents' concerns were consistently raised and subsequently disregarded. The proposals, including the location of the site access, have remained fundamentally unchanged despite objections, undermining the claim within the application that access arrangements have been carefully assessed to minimise impacts (ES Chapter 17). This demonstrates that consultation has been treated as a procedural requirement rather than a genuine opportunity to influence the scheme.

In May 2024, residents of Pershore Road received correspondence from the Woodhall Community developers proposing the creation of a Community Liaison Group. Engagement was limited, with only two residents involved despite further expressions of interest, and although a dedicated email address was established, no communication has followed and no meetings have taken place. Subsequent doorstep engagement by students with no knowledge of the proposals does not constitute meaningful consultation. The Parish Council considers that the application has failed to take residents' concerns into account, repeatedly dismissing them as being of 'no significance', while asserting that the scheme has been responsive to community needs.

The overall approach by Merton College and the developers has been to defend and justify predetermined proposals rather than to engage constructively with local concerns. This reinforces the Parish Council's view that consultation has been superficial and ineffective, failing to meet the expectations set out in the Statement of Community Involvement and the National Planning Policy Framework, which require early, transparent, and meaningful engagement with affected communities.

For these reasons, the Parish Council objects to this planning application on the basis that genuine consultation has not taken place and that the application is founded on an inaccurate representation of community engagement.

Protecting Views

The Parish Council objects on the grounds of landscape impact, loss of locally significant views, and harm to the character and natural beauty of the area. Natural England's Scoping Opinion (Page 28) states that long-distance views of the Malvern Hills and the Cotswolds should be considered and that the siting and design of the proposed development should reflect local characteristics and the landscape qualities that underpin natural beauty. The proposed development fails to respond to these requirements and ignores the established residential and rural character of Pershore Road.

The planning application's own visual assessment identifies the effects of both construction and operational development as significant in relation to existing residents. Residents will lose part of their view of Whittington Tump and all views of the Malvern Hills, while the historic view of Crookbarrow Hill will be forever blighted and in its place will be large warehouses. Despite this, the application does not provide visual representations of the views that residents will experience from their properties once the development is built, unlike the visualisations provided for views from Woodhall. The absence of this information prevents a transparent assessment and masks how out of character the proposed development would be in this location.

The visual assessment for Pershore Road records impacts as medium to high (Section 14.5.3), with construction impacts assessed as high and major adverse, and therefore significant. The application fails to demonstrate how these impacts would be adequately mitigated. While Section 14.6.4 suggests that landscape planting would reduce residual effects to moderate adverse after 15 years, the Parish Council asserts that an 18-metre-high warehouse directly opposite residential properties will continue to have a significant visual impact regardless of proposed planting. No amount of landscaping can realistically mitigate the scale and proximity of the buildings.

The proposal includes two large and one very large warehouse, the cumulative effect of which would be severely detrimental to residential amenity and the visual environment. The scale and massing of the buildings may also lead to loss of privacy and overlooking, particularly given the unknown number and placement of windows. As detailed designs have not been provided, the Parish Council and residents are unable to assess or comment meaningfully on these impacts.

The development would also fundamentally alter the role and character of Pershore Road, transforming it into a main thoroughfare serving a large industrial site. This location is intended to form part of the gateway to the proposed new Wychavon Town, which is described as a naturally designed settlement inspired by its landscape setting, hedgerows, and mature trees. The scale and industrial nature of this proposal are totally incompatible with those aspirations and would undermine the natural beauty and character that the new town seeks to promote.

For these reasons, the Parish Council objects to the loss of locally significant views and the introduction of an out-of-character development that would cause lasting harm to the landscape, residential amenity, and natural beauty of the area, contrary to:

- SWDP 21 - which requires that development protect residential amenity and requires development to be sympathetic in scale, massing, and appearance to its surroundings

- SWDP 25 - which requires that development protect landscape character, locally and nationally significant views, and the natural beauty of the area, including long-distance vistas and key landmarks

Health and Wellbeing

The Parish Council objects on the grounds that it fails to properly assess or safeguard the health and wellbeing of existing residents. SWDPR 10 states that new development must consider its impacts on health and wellbeing, demonstrate how it meets current and future needs of all members of the community, and support both mental and physical health.

The Environmental Statement repeatedly concludes that impacts on existing residents are 'not significant' and therefore require no further assessment. Construction road traffic impacts on human receptors are dismissed as insignificant (ES 7.5.25), no inherent design mitigation for human health and wellbeing is identified (ES 12.4.4) and wider health determinants during the construction phase are scoped out entirely (ES 12.5.3). This approach fails to reflect the lived experience of residents who will be exposed to prolonged construction activity, traffic movements, dust, noise, vibration, and light disturbance.

The Environmental Statement further assesses construction phase health impacts in isolation, concluding that traffic-related effects remain minor and temporary even when considered cumulatively (ES 12.9.2). This methodology underestimates the combined and repeated effects on residents' physical and mental health and does not accord with SWDPR 10's requirement to consider holistic health outcomes. The persistent dismissal of impacts on the basis that they are 'not significant' demonstrates a failure to meaningfully assess or mitigate harm to current residents.

The National Planning Policy Framework requires development to be designed to avoid unacceptable adverse impacts on health and quality of life arising from pollution, noise, and light. By failing to adequately assess cumulative impacts or provide credible mitigation, the proposal conflicts with this requirement and with SWDP 31, which seeks to prevent unacceptable risks to health and living conditions, and SWDP 21, which requires development to protect residential amenity.

For these reasons, the Parish Council objects to the application on the basis that it does not adequately consider, assess, or mitigate the impacts of the development on the health and wellbeing of existing residents and therefore fails to comply with:

- SWDP 21 - protects residential amenity and requires development to be designed in a way that safeguards the living conditions and wellbeing of existing residents
- SWDP 31 - requires development to prevent unacceptable risks to human health and living conditions from pollution, including noise, air quality, light, and vibration
- SWDPR 10 - requires proposals to assess and address impacts on physical and mental health, consider cumulative effects, and demonstrate how development supports health and wellbeing for current and future communities
- National Planning Policy Framework - requires planning decisions to avoid unacceptable adverse impacts on health and quality of life arising from pollution, nuisance, and environmental harm

Human Rights

The Parish Council objects on the grounds that it fails to adequately consider the human rights of existing residents. Article 1 of the First Protocol protects the right to the peaceful enjoyment of possessions, including residential property. The proposed development, by reason of its scale, proximity and industrial nature, would materially interfere with residents' ability to enjoy their homes and land.

Residents currently use their properties for food production, including the growing of fruit and vegetables and the keeping of livestock. The introduction of large-scale industrial development would result in increased dust, vibration, noise, traffic and air pollution, adversely affecting the use, enjoyment and value of these properties. These impacts directly conflict with SWDP 31, which requires development to prevent unacceptable risks to health, living conditions and the environment, and to avoid pollution that would adversely affect existing communities.

Article 8 of the Human Rights Act provides a right to respect for private and family life and the home. Case law, including *Britton v Secretary of State*, confirms that this protection extends to the surrounding environment where it forms part of the enjoyment of the home. The loss of residential tranquillity, rural character and environmental quality resulting from this proposal would therefore engage Article 8 rights. These impacts also conflict with SWDP 21, which requires development to protect residential amenity and ensure that proposals are sympathetic to their surroundings.

The Parish Council considers that the application fails to demonstrate that the interference with residents' human rights is necessary, proportionate, or justified in the public interest. The proposal therefore fails to achieve an appropriate balance between development objectives and fundamental rights, and permission should be refused on the basis that it is contrary:

- Article 1 of the First Protocol - protects the peaceful enjoyment of property; significant interference through dust, noise, pollution, vibration, loss of use of land, or diminished residential enjoyment must be justified, proportionate, and in the public interest
- Article 8 Human Rights Act - protects the right to respect for private and family life and the home, including the surrounding environment where it forms part of residential enjoyment; serious harm to outlook, tranquillity, and environmental quality engages this right and must be properly assessed and balanced in decision-making
- SWDP 21 - requires development to protect residential amenity and ensure that proposals are sympathetic to their surroundings.
- SWDP 31 - requires development to prevent unacceptable risks to health, living conditions and the environment, and to avoid pollution that would adversely affect existing communities.

Legality

The Parish Council objects on the grounds that the process leading to this proposal raises serious concerns regarding transparency, fairness, and residents' ability to make informed decisions, contrary to the principles of the National Planning Policy Framework and the South Worcestershire Development Plan. Until as recently as September 2022, discussions between the SWDP Team and the Joint Parish Committee were conducted in confidence and withheld from public disclosure on the basis of commercial confidentiality. This prolonged lack of transparency prevented existing and

prospective residents from being aware of the scale and nature of planned development affecting the area.

Residents who undertook due diligence prior to moving to Pershore Road were therefore unable to access information about proposals that would fundamentally alter the character of their surroundings and living conditions. While the Parish Council recognises the need for planned growth and new housing, this application relates to industrial development and would result in residents living for the long term adjacent to an active construction site followed by a large-scale warehouse and logistics operation, with all the associated adverse impacts on amenity, health, and quality of life.

The National Planning Policy Framework emphasises the importance of early, transparent and meaningful engagement in the planning process, enabling communities to participate effectively in decisions that affect them. The inappropriate use of confidentiality and the late release of information undermine these principles and call into question whether residents have been afforded a fair opportunity to understand, influence, or respond to proposals that will have permanent consequences for their homes and environment.

The Parish Council therefore objects to this application on the basis that residents have not been afforded appropriate procedural fairness or effective legal protection in relation to the development, contrary to:

- NPPF - requires early, transparent, and meaningful engagement so communities can participate effectively in planning decisions that affect them
- SWDP (general principles) - supports openness, informed decision-making, and public confidence in the planning process, ensuring development proposals are brought forward in a fair and transparent manner

Waste

The Parish Council objects on the grounds that it fails to demonstrate that adequate foul wastewater infrastructure is available to serve the proposed development. The Environmental Statement acknowledges that the Severn Trent Water area is classified as 'seriously water stressed' (ES 13.3.39), yet no comprehensive foul wastewater management strategy has been provided for either this application or the wider Wychavon Town proposals.

The application gives assurances that foul waste will be removed via drainage infrastructure passing beneath the railway line at the bridleway; however, no detail is provided as to how this would be achieved given the low and narrow nature of the underpass, the likely requirement for excavation, or the implications for the railway network. There is also no explanation of how foul waste infrastructure would be delivered or maintained if large warehouse units are constructed across the site, potentially obstructing future access and connections.

In the absence of confirmed wastewater infrastructure, it remains unclear whether foul waste would need to be tankered from the site, for how long this would occur, and what the resulting traffic and HGV movements would be. This uncertainty represents a significant omission in the assessment of environmental and amenity impacts and fails to demonstrate that the development would not place unacceptable pressure on existing wastewater systems in a water-stressed area.

The Parish Council therefore objects to the application on the basis that no viable or deliverable foul wastewater management plan has been provided, contrary to:

- SWDP 30 - requires development to demonstrate that adequate foul wastewater treatment and infrastructure are available and deliverable, particularly in water-stressed areas
- NPPF - requires development to manage water resources sustainably and ensure that infrastructure capacity is sufficient to support growth without unacceptable environmental or amenity impacts

Vibration

The Parish Council objects on the grounds that vibration impacts have been inappropriately scoped out of the assessment. The application provides no justification for excluding vibration from consideration, despite the scale and nature of the proposed industrial development.

No assessment has been undertaken of the potential effects of construction-related vibration on existing residential properties, some of which are known to be particularly vulnerable to vibration, especially from piling. Large warehouse construction typically requires piling and heavy groundworks, which are well recognised sources of significant vibration. The absence of any assessment or mitigation strategy represents a serious omission.

The application also fails to consider the effects of vibration on existing livestock. Prolonged or repeated vibration can cause distress, behavioural change, and physical harm to animals, particularly during intensive construction phases. The failure to assess these impacts further demonstrates that the proposal has not adequately considered its effects on existing land uses or rural livelihoods.

The Parish Council therefore objects to the application on the basis that vibration impacts on residential properties and livestock have not been assessed or mitigated, contrary to:

- SWDP 21 - requires development to protect residential amenity and existing land uses from harm, including disturbance arising from construction activities
- SWDP 31 - requires development to prevent unacceptable impacts on health, property, and the environment from pollution and disturbance, including vibration
- NPPF - requires planning decisions to avoid unacceptable adverse impacts on living conditions and rural activities arising from development

Public Rights of Way

The Parish Council objects on the grounds that it fails to adequately protect existing Public Rights of Way. The County Council Public Rights of Way Team's general obligations state that, where possible, Public Rights of Way should be retained on their legal and definitive routes. The application proposes the removal of an existing Public Right of Way without providing clear information as to whether the route would be retained, diverted, or permanently extinguished. The absence of a defined and deliverable alternative route prevents proper assessment of the impact on public access, connectivity, and local amenity.

The Parish Council therefore objects to the application on the basis that the unjustified loss of an existing Public Right of Way would harm public access and amenity and fails to comply with:

- SWDP 21 - protects public amenity and access and requires development to respect existing routes and community infrastructure.
- County Council Public Rights of Way guidance - requires Public Rights of Way to be retained on their legal and definitive routes wherever possible.

Major Disasters

The Parish Council objects on the grounds that it fails to adequately assess and plan for the risk of major accidents or disasters. The Environmental Statement (Chapter 5, Part 2) assumes that major disasters are unlikely and therefore scopes this matter out of further assessment. This approach is flawed, given that the application does not specify the future uses of the proposed warehouses or the nature of materials that may be stored or processed within them. Without this information, the potential risks associated with fire, explosions, or hazardous incidents cannot be properly evaluated.

Given the close proximity of the proposed development to existing residential properties, any major incident would have direct and severe consequences for residential safety and amenity. The absence of a robust risk assessment and emergency mitigation strategy demonstrates a failure to take a precautionary and plan-led approach to development.

The Parish Council therefore objects to the application on the basis that it does not adequately consider or mitigate the risks of major disasters, placing existing residents at unacceptable risk, contrary to:

- SWDP 21 - requires development to protect the safety, health, and amenity of existing communities
- NPPF - requires planning decisions to ensure developments are safe and do not give rise to unacceptable risks from pollution or other hazards

Wind

The Parish Council objects on the grounds that it fails to assess the potential wind and microclimate impacts of the proposed development. The Environmental Statement dismisses wind impacts on the basis that tall buildings are located away from sensitive receptors; however, this fails to reflect the reality of the site and surrounding residential properties on Pershore Road.

The proposed warehouses would surround existing properties with large, tall structures. Tall buildings are known to redirect wind and create adverse microclimate conditions at ground level, particularly in areas prone to strong winds. The Environmental Statement does not include any assessment of these effects, nor does it propose mitigation to protect residents' amenity, safety, or comfort.

By scoping out wind impacts without justification, the application fails to demonstrate that the development would not give rise to unacceptable environmental or living condition impacts. The Parish Council therefore objects to the application on the basis that potential wind and microclimate effects have been ignored, contrary to:

- SWDP 21 - requires development to protect residential amenity and ensure that environmental impacts, including microclimate changes, do not adversely affect existing communities
- SWDP 31 - requires development to prevent unacceptable risks to health, safety, and the environment, including impacts arising from wind and microclimate
- NPPF - requires planning decisions to ensure development does not create unacceptable environmental or living condition impacts

Cumulative Effect of Development

The Parish Council objects on the grounds that it fails to adequately consider the cumulative effects of development. The Environmental Statement dismisses cumulative impacts, stating that they do not require further assessment, despite the clear likelihood that multiple building sites will operate simultaneously as part of the wider Wychavon New Town proposals.

This proposal is not an isolated development. It forms part of a larger programme of construction and industrial development that, collectively, will generate significant environmental, amenity, traffic, and public health impacts. By failing to assess these cumulative effects, the application does not provide a complete or robust understanding of the total impact on residents, the landscape, or local infrastructure.

The Parish Council therefore objects to the application on the basis that the cumulative impacts of the wider development are ignored, conflicting with good planning practice, and that the application does not demonstrate that potential adverse effects on communities and the environment can be adequately managed or mitigated, contrary to:

- SWDP 21 - requires development to protect residential amenity and ensure that cumulative impacts do not unacceptably affect communities or the environment
- SWDP 31 - requires development to prevent unacceptable risks to health, safety, and the environment, including cumulative impacts from multiple developments
- NPPF - requires planning decisions to assess and take account of cumulative environmental, social, and economic effects of development

Conclusions

The Parish Council considers that the impacts of this proposal extend beyond Pershore Road to the wider Whittington Parish, particularly regarding road infrastructure, traffic volumes, congestion, rat-running, and the cumulative effects of noise, light, and air pollution.

While the Parish Council recognises the local and national need for new homes, it is clear that this application prioritises business parks, warehouses, and industrial development over housing. The building of 1,250 homes are not planned concurrently with the business parks, meaning that employment will initially rely on commuting into the area, and future residents will likely need to travel elsewhere for work. This phasing fails to achieve the intended balance between homes and employment.

The application emphasises public consultation, detailing the issues raised and how some of these issues were addressed. However, two longstanding concerns remain unresolved: the location of the

main access to the business park directly opposite existing residential properties, and the siting of warehouses in very close proximity to Pershore Road homes. Previous discussions and project board meetings had indicated these matters would be resolved, with access closer to Junction 7, a boulevard entrance to the town, and warehouses positioned away from existing homes, yet the current application ignores these commitments entirely.

The Parish Council strongly objects to the proposed access point and warehouse siting on the grounds that they would have a severe and direct impact on residential amenity. Locating the access opposite homes on a dual carriageway is unsafe and inappropriate. The nearest warehouse, potentially up to 26.4 meters high, would completely dominate views and replace long-established outlooks across the Malvern Hills with industrial structures. Combined with 24/7 operation, HGV movements, and associated noise, light, and air pollution, the development would create a wholly unacceptable environment for existing residents.

The proposed development, as currently designed, fails to deliver the quality, coherence, and sense of place envisaged for Wychavon Town. It demonstrates a fundamental disregard for the adopted Supplementary Planning Document, including its timeline, boulevard-led access, and the need for coordinated delivery alongside other developers. Rather than forming a high-quality gateway to a new flagship settlement, the scheme reads as a standalone, warehouse-dominated development more characteristic of a regional distribution centre. This approach undermines the strategic vision for a well-designed new town and replaces what could be a visually impressive entrance with a real 'wow factor', with large warehouses, HGV traffic, and industrial infrastructure that erode both character and identity.

Given the scale and significance of the proposal, the Parish Council anticipates that determination will be by Planning Committee, if not, the Parish Council would request this.

The Parish Council respectfully urges the Planning Committee to consider the human impact of this proposal. These are not abstract concerns, they affect families who have chosen to make Pershore Road their home, who enjoy their gardens, views, and rural tranquillity, and whose daily lives would be utterly dominated by noise, pollution, and industrial activity. To place huge warehouses and a 24/7 business park directly opposite people's homes is to totally disregard the basic rights of this community.

We ask that the Planning Committee pause and reflect on what this development would mean for the residents of Pershore Road, not just as policy numbers or plots on a map, but as real people whose health, wellbeing, and quality of life would be irreversibly altered. This is about more than employment or infrastructure; it is about fairness, humanity, and respect for the community that already exists here. We implore the Committee afford adequate protection to these homes and families, and the character of the parish that will be forever altered.