

## **Statement of Community Consultation**

### **Summary of responses to the draft Wychavon Design Code Supplementary Planning Document (SPD) formal consultation 2026**

The Wychavon Design Code SPD has been prepared to cover Wychavon District, and supports the implementation of SWDPR 05 Design and Sustainable Construction; and SWDPR 28 Design of the South Worcestershire Development Plan Review adopted on 26 March 2026. A formal consultation took place during March–April 2026. The consultation was open to all interested parties. Responses were received from residents, developers, statutory consultees, town councils, and other stakeholders.

This Statement of Community Consultation summarises the findings of engagement work undertaken during the preparation of the SPD. A formal four-week period of consultation took place from 30 March to 30 April 2026. The consultation was an open consultation and therefore anybody with an interest was able to respond. In response the councils received comments from eight individual respondents and one statutory consultee organisations.

| Respondents                                      | Response                                                                                                                                                                                                                               | Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
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| <b>David Barton, community campaigner</b>        | Strong preference for traditional architecture as the primary approach. Advocates mandatory use of traditional design, prohibition of demolition of pre-1950 buildings, and stronger protection and reconstruction of heritage assets. | The response reflects a clear preference for traditional architecture and heritage-led development. National policy supports local distinctiveness but does not support mandating a single architectural style or restricting innovation. Design codes must allow for both traditional and contemporary responses where justified by context. Proposals such as banning demolition or requiring reconstruction fall outside the scope of a design code and are controlled through statutory heritage policy. The code already addresses local character appropriately and should not become overly prescriptive. No change required. |
| <b>E. Dean Butler, resident</b>                  | Considers the document lacks specific, actionable design guidance, is overly long, and does not function as a practical working tool for decision-making.                                                                              | Concerns on specificity and usability noted. The code contains a comprehensive and measurable framework aligned with national guidance, and a process-led structure linking analysis to design. The comments reflect a preference for a simpler or more prescriptive format rather than a policy deficiency. Minor edits to improve clarity and usability. No fundamental change required.                                                                                                                                                                                                                                           |
| <b>Michael Hodges, developer/agent/landowner</b> | Raises concerns about rigidity, potential formulaic outcomes, impacts on viability, and balance between local character and innovation. Suggests greater flexibility and professional judgement.                                       | Comments reflect recognised national issues regarding balancing certainty with flexibility. The code addresses this through “must” and “should” provisions and a process-led approach. Proportionate flexibility is already embedded. Undertake targeted review of “must” and “should” provisions to ensure appropriate balance.                                                                                                                                                                                                                                                                                                     |
| <b>Emily Horton, resident</b>                    | No substantive comments provided.                                                                                                                                                                                                      | No change required.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |

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| <b>Pershore Town Council</b>         | Concern regarding implementation and enforcement, including risk of highways considerations overriding design principles and inconsistent application by developers.                                       | The code will form part of the development plan and be applied consistently through development management, supported by pre-application engagement and Design and Access Statements. Many of the issues raised relate to implementation rather than content. No change required.                                       |
| <b>Evesham Town Council</b>          | Considers a district-wide code does not reflect local character sufficiently. Requests more localised coding and application to smaller developments. Also raises concerns about long-term relevance.      | The district-wide approach is consistent with national guidance and provides a clear, consistent framework. Local distinctiveness is addressed through contextual analysis and site-specific design response. Extending scope or introducing town-specific codes is not necessary or proportionate. No change required. |
| <b>Robert Kwolek, Create Streets</b> | Raises concerns regarding document clarity, overlap between sections, lack of precision in diagrams, and use of vague terminology. Suggests improving structure and presentation.                          | Issues relate primarily to clarity, presentation, and usability rather than content. The structure and inclusion of contextual analysis are intentional and consistent with national guidance. Minor presentational refinements to improve clarity, navigation, and consistency of terminology.                         |
| <b>Canal &amp; River Trust</b>       | Emphasises importance of waterways as green-blue infrastructure. Requests stronger recognition of canals in analysis, design coding, and site-specific response, including detailed design considerations. | The code already incorporates blue and green infrastructure within a process-led framework that enables site-specific responses. However, clarity and completeness can be improved. Amend wording to explicitly reference canals and strengthen cross-referencing where appropriate.                                    |
| <b>Natural England</b>               | Emphasises green infrastructure, biodiversity net gain, landscape character, and climate resilience. Recommends alignment with national frameworks and stronger integration in design.                     | These principles are already embedded within the code and aligned with national policy and local plan requirements. Minor amendments to improve clarity and references to relevant guidance.                                                                                                                            |

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| <b>Jacob Bonehill, Tetra Tech<br/>(on behalf of Barratt Redrow<br/>and Mac Mic Land)</b> | Raises concerns regarding overlap with other guidance, complexity, duplication, lack of clarity across planning stages, application of “must” and “should”, and perceived over-prescription affecting viability. Also queries translation from analysis to design. | The Design Code has been prepared in line with national guidance to translate policy into locally specific requirements and is intended to complement, not duplicate, other documents. Strategic and detailed coding reflects different stages of the planning process and ensures continuity rather than conflict. The “must” and “should” structure provides necessary certainty while allowing flexibility. While the overall approach is appropriate, improvements to clarity, consistency, and usability are justified. Undertake targeted refinements, including review of “must”/“should” balance, improved cross-referencing, and presentational consistency. |
| <b>Margaret Rowley, resident</b>                                                         | Notes interaction between the design code and other SPDs, and the need to balance design with climate and other considerations. Also comments on document length.                                                                                                  | The code is intended to operate alongside other guidance and reflects the need to balance multiple considerations through the design process. Environmental factors are embedded within the overall approach. No change required.                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <b>Mrs Charlie MacIntyre,<br/>Pershore Town Council</b>                                  | Raises concerns about implementation and whether the design code will be consistently applied in practice.                                                                                                                                                         | The code will be applied as part of the development plan framework with established processes to ensure consistency. No change required.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <b>DM Officer Workshop, Green<br/>and Blue Infrastructure</b>                            | Some GI/BI requirements require clearer explanation, including parameter plans, blue-green networks and response to water in the wider landscape. Diagrams and wording could be clearer. Some overlap and duplication identified.                                  | Clarify wording of GI/BI requirements. Improve explanations of key concepts. Review diagrams. Rationalise and simplify “must” statements.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>DM Officer Workshop,<br/>Character, Identity and<br/>Context</b>                      | Need to ensure alignment between referenced documents and validation requirements. No other significant issues identified.                                                                                                                                         | Remove or reduce references to specific documents. Refocus requirements as “musts” with supporting “shoulds”.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |

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| <b>DM Officer Workshop, Landscape, Development Edges, Boundaries and Public–Private Interface</b> | Some requirements would benefit from clearer wording and improved distinction between “must” and “should”. Certain terms require clarification. Document referencing could be improved.                                                                                                                                                                                                  | Recalibrate “must” and “should” provisions. Clarify terminology. Improve structure and referencing. Amend specific boundary and interface requirements.                                                                                                                                                                                      |
| <b>DM Officer Workshop, Access, Streets and Parking</b>                                           | Some requirements would benefit from clarification in application. Diagrams and terminology could be made clearer. Opportunities identified to improve consistency and presentation.                                                                                                                                                                                                     | Revise and clarify streets and parking requirements. Adjust overly prescriptive “musts” where appropriate. Improve diagrams and terminology. Ensure consistent layout.                                                                                                                                                                       |
| <b>DM Officer Workshop, Structure, Blocks, Edges and Density</b>                                  | Some inconsistency in definition and application of “must” and “should”. Structure and cross-referencing could be clearer. Some requirements would benefit from clearer expression.                                                                                                                                                                                                      | Standardise definitions of “must” and “should”. Improve structure and cross-referencing. Clarify density and site context requirements. Refine wording for clarity and proportionality.                                                                                                                                                      |
| <b>DM Officer Workshop, Code Structure, Definitions and Internal Consistency</b>                  | Need for clearer and more consistent definition and presentation of “must” and “should” requirements. Some duplication and inconsistency between sections. Requirements and supporting material not always clearly structured or located. Some wording unclear or difficult to interpret in practice. References to supporting documents and validation requirements not always aligned. | Standardise and clarify definitions of “must” and “should”. Improve structure and positioning of requirements within sections. Remove unnecessary document requirements from the code where they are already required elsewhere. Refine wording to improve clarity and consistency. Review cross-referencing and overall document structure. |
| <b>Must/Should review</b>                                                                         | <b>Description of issue</b>                                                                                                                                                                                                                                                                                                                                                              | <b>Recommendation</b>                                                                                                                                                                                                                                                                                                                        |
| <b>Overuse of “Must” for policy/introductory text</b>                                             | Many “must” statements repeat national policy or explain process rather than set requirements.                                                                                                                                                                                                                                                                                           | Remove “must” from descriptive or policy-repeating text. Retain only where adding clarity or measurable requirement.                                                                                                                                                                                                                         |

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| <b>Definition and use of “Must” and “Should”</b>                           | Inconsistent wording and application across document. Some “musts” not essential; some “shoulds” unclear.                                | Standardise definitions. Recalibrate so only essential requirements remain “must”; convert others to “should”.                         |
| <b>Baseline analysis and site assessment</b>                               | Requirements broadly supported but wording often unclear or not measurable.                                                              | Simplify wording. Downgrade to guidance where not enforceable. Retain as “must” only where clearly defined and evidenced.              |
| <b>Process and submission requirements (DAS, plans, statements)</b>        | Some requirements duplicate validation or policy expectations; others unclear or overly detailed.                                        | Remove duplication. Clarify proportionate requirements without introducing new validation requirements through the code.               |
| <b>Use of external documents and references (National or WCC guidance)</b> | Duplication of existing policy/guidance and unclear status of referenced material.                                                       | Simplify references. Downgrade to guidance where duplicates requirements set out in other documents, retain only where adding clarity. |
| <b>Strategic vs detailed code structure</b>                                | Some statements describe purpose rather than set requirements. Overlap between strategic and detailed sections.                          | Remove “must” from explanatory text. Clarify role of sections. Improve structure and separation.                                       |
| <b>“Must” / “Should” and planning application stages</b>                   | Lack of clarity on how requirements apply at outline, full and reserved matters stages.                                                  | Improve clarity of application through wording and diagrams. Avoid overly prescriptive rules that cannot apply to all cases.           |
| <b>Flexibility within the code</b>                                         | Some “musts” restrict flexibility or do not reflect need for flexibility to enable response which fits the proposal and site conditions. | Reframe as guidance where appropriate. Retain flexibility through “should” wording and justification approach.                         |
| <b>Landscape, GI/BI and environmental requirements</b>                     | Some requirements duplicate existing policy or are descriptive rather than measurable.                                                   | Retain key structuring requirements as “must”. Simplify, consolidate and downgrade others to “should”.                                 |
| <b>Climate change, energy and carbon requirements</b>                      | Some measures not supported by policy or conflict with building regulations, others broad or unclear.                                    | Focus on a limited number of policy-supported “musts”. Downgrade others to “should”. Redraft for clarity and coherence.                |
| <b>Density, typologies and land use</b>                                    | Some density ranges and typologies duplicate policy or introduce inflexible standards.                                                   | Align with local plan policy. Remove duplication. Avoid overly prescriptive thresholds.                                                |
| <b>Movement, streets and transport hierarchy</b>                           | Mix of clear requirements with detailed or prescriptive design solutions to meet those requirements. Duplication across sections.        | Retain clear, policy-supported “musts”. Remove duplication. Downgrade design-detail prescriptions to guidance.                         |

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| <b>Parking standards and layout</b>                     | Many detailed design rules and dimensions not policy-based and overly prescriptive.                               | Simplify approach. Retain key principles. Convert detailed layout and dimensional rules to “should” or guidance.     |
| <b>Block structure, enclosure and layout rules</b>      | Heavy use of fixed ratios and detailed spatial rules.                                                             | Reduce prescriptive numeric rules. Retain high-level principles. Downgrade detailed controls to guidance.            |
| <b>Landscape design, trees and planting</b>             | Extensive prescriptive species lists, spacing rules and technical detail where other solutions are equally valid. | Convert detailed specifications to guidance. Retain only key principles as “must”.                                   |
| <b>Boundary treatments and materials</b>                | Highly prescriptive material and dimensional requirements not always locally justified.                           | Simplify. Retain principles only. Downgrade detailed specifications to “should”.                                     |
| <b>SuDS and water management</b>                        | Mix of valid requirements with overly specific design solutions or duplication.                                   | Retain core SuDS and flood risk “musts”. Simplify and remove duplication. Downgrade specific techniques to guidance. |
| <b>Diagrams, figures and captions containing “must”</b> | Some diagrams introduce requirements or duplicate requirements unintentionally.                                   | Remove “must/should” from diagrams. Use figures as illustrative support only.                                        |
| <b>Internal consistency and duplication</b>             | Repetition and inconsistency across sections.                                                                     | Rationalise content. Remove duplication. Improve cross-referencing and consistency throughout.                       |