

## **Matter 1 – Procedural / General Matters**

### **1. Has the Plan been prepared in accordance with relevant legal requirements, including the Duty to Co-operate and the procedural requirements of the National Planning Policy Framework (the Framework)?**

Since there is no other Local Planning Authority immediately adjacent to the Town Centre, we presume that no issue arises under the duty to cooperate. At a previous stage, we made comments that some aspects of Wyre Forest policy were written as if the district were an island, whereas as a retail centre Kidderminster almost certainly has a catchment rather larger than the district. We do not detect this flaw in KCAAP and probably not in SALP.

### **2. Is the Plan in general conformity with the Regional Spatial Strategy (RSS) and consistent with the Framework? Does it reflect the Framework's presumption in favour of sustainable development?**

### **3. Is the KCAAP consistent with the adopted Wyre Forest Core Strategy and Waste Core Strategy?**

### **4. How has the KCAAP evolved in terms of the alternatives considered? How were these evaluated and have all reasonable options been examined? Are the choices made properly justified and is it clear from the Sustainability Appraisal why the preferred options have been chosen? Have the choices and phasing of development been sufficiently informed by the Infrastructure Delivery Plan and Sequential Testing (Flooding) reports?**

### **5. The overall vision for the Plan area relies on a number of enhancements and improvements including, amongst others, the creation of bridging points across the canal, improvements to the Ring Road, improvements to Comberton Hill Island, general improvements to the public realm and the creation of civic spaces? What mechanisms are in place to ensure that the necessary infrastructure and improvements can be delivered?**

We are concerned at the prospect of the Ring Road south of the Comberton Hill island being degraded. This is a strategic though route. It may become less important after the completion of the Hoo Brook link road. With few strategic routes from mid Wales to Birmingham, it is important that nothing should be done to impair the free flow of through traffic past the Town Centre. The relatively short distances between intersections on the other sections of the ring road means that the effect of changes to them will be less.

## **Matter 2 – A Good Place to do Business**

### **1. Is the sequential approach set out in Policy KCA.GPB1 consistent with the Framework?**

We do not read this as a sequential approach. The target areas are certainly suitable for retailing, but we are sceptical as to whether the Eastern Gateway will be rejuvenated by retail development. It is at least as likely that its decline will be long term. The effect of the creation of Weavers Wharf has been to shift the balance of the town centre westwards. The possibility that the decline in the Eastern Gateway will be permanent should be provided for, by allowing for the possibility of a wider range of uses.

We draw a comparison with Stourbridge. It has declined as a retail centre, because Merry Hill is so close. However, the creation of Ryemarket in 1960s and Crown Centre in 1980s, along with the severance caused by the provision of a ring road in the 1960s, has caused the position of the core to shift. What was a prime retail area at the southern end of the town

centre has declined to the point where there is virtually no pure retail left in it. This has been replaced by hairdressers (A1 but not exactly retail), takeaways, estate agents and other financial services, and such like.

**2. Is Policy KCA.GPB7 consistent with other policies in the Plan (in particular policies KCA.GPB2 and GPB3); and effective when read in conjunction with other policies in the Plan, to guide the location of small scale leisure development in the Kidderminster area?**

There need be no difficulty if GPB7 is explicitly made subject to the wider policy of GBP2.

**3. Is the retail floorspace threshold for small scale retail development of 250 sq m referred to in a number of policies appropriate and justified? (It is suggested in one representation that a 280 sq m net limit is appropriate in line with the 1994 Sunday Trading Act).**

We have no strong view on what the limit should be but the 280 sq m figure might be appropriate.

### **Matter 3 - Climate Change**

**1. Do policies in this section have sufficient regard to the Local Flood Risk Management Strategy?**

**2. Does the strategy contained in the Plan have sufficient regard to the low lying nature of the town and the proximity of parts of the KCAAP site allocations to the Kidderminster Flood Alleviation Scheme reservoir?**

It is clearly important that new development should be located above likely flood levels. This can be done by locating habitable space only above ground floor level so that flood water can pass underneath.

### **Matter 4 - A Unique Place**

**1. The reasoned justification for Policy KCA.UP1 refers to a Town Centre Design Framework (TCDF). What are the timescales for the preparation of the TCDF which is intended to guide development?**

Not known to us

### **Matter 5 – Part B**

**1. KCA.EG1-4: Is the inclusion of Comberton Hill within the Eastern Gateway area justified having regard to the location of the Ring Road and the differing retail hierarchies included within the Eastern Gateway area?**

In common, with several other plans we have seen, the Plan seems to want to expand the Town Centre, but this is counterproductive: the result is more likely to be that certain areas cease to be part of the core than that the core becomes bigger. The provision of Weavers Wharf has considerably expanded the core in recent years. This has had an obvious known on effect in leaving a number of larger shops vacant towards the southern edge of the town centre. Incorporating Comberton Hill within the Eastern Gateway is liable to exacerbate the problem. We would suggest that Comberton Hill be treated more like a neighbourhood shopping centre. The construction of the Ring Road severed it from the town centre. To try to reverse this may be counterproductive. It is more to the point to allow a wider range of uses in the Eastern Gateway, where shops have been marketed for a significant period and remain unoccupied.

**2. KCA.HP4 Bus Depot: The site is on a Groundwater Source Area. What implication, if any, is this likely to have on the delivery of the site during the Plan period?**

No comment.