

Wyre Forest District Council

Duty to Co-operate Compliance Statement

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1. Introduction & Purpose

- 1.1 The Localism Act and National Planning Policy Framework have affirmed that Local Authorities are required to act strategically and demonstrate wider co-operation in plan making on cross boundary issues and in consultation with key stakeholders.
- 1.2 This is particularly important following the revocation of Regional Strategies. The Planning Inspectorate has specified that this requirement must be satisfied when the Local Plan is submitted to the Secretary of State for examination and cannot be remedied through the examination process.
- 1.3 The purpose of this statement is to provide an overview of the key issues under the Duty to Co-operate and evidence of the on-going discussion and evidence base that is being undertaken in order to meet the requirements with regard to the Submission Development Plan Documents. Specifically this relates to the Site Allocations and Policies and Kidderminster Central Area Action Plan DPDs, but also includes retrospective analysis of strategic consultation and discussion undertaken in relation to the Council's Adopted Core Strategy.

2. Legal & Policy Background

- 2.1 The Localism Act (Section 110) transposes the Duty to Co-operate into the Planning and Compulsory Purchase Act (2004). It also introduces Section 33a, which sets out a duty to co-operate in relation to the planning of sustainable development. This duty applies to all local planning authorities, county councils and "prescribed bodies" and requires that they must co-operate with each other in maximising the effectiveness with which development plan documents are prepared.
- 2.2 The Localism Act states that in particular the Duty requires that engagement should occur constructively, actively and on an on-going basis during the plan making process and that regard must be given to the activities of other authorities where these are relevant to the local planning authority in question.
- 2.3 The National Planning Policy Framework (NPPF) also specifies requirements in relation to the Duty to Co-operate at Paragraphs 178-182. This includes demonstrating whether plans have been positively prepared, based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring

authorities where it is reasonable to do so and consistent with achieving sustainable development. It also requires demonstration that the plan is deliverable over its period and based on effective joint working on cross boundary strategic priorities.

2.4 Specifically the NPPF states that public bodies should:

- Co-operate on planning issues that cross administrative boundaries, particularly those that relate to strategic priorities including the homes and jobs needed in an area.
- Undertake joint working on areas of common interest for the mutual benefit of neighbouring authorities.
- Work collaboratively with other bodies to ensure that strategic priorities across local boundaries are properly co-ordinated and clearly reflected in individual Local Plans
- Consider producing joint planning policies on strategic matters and informal strategies such as joint infrastructure and investment plans
- Take account of different geographic areas including travel to work areas. In two tier areas, county and district authorities should co-operate with each other on relevant issues.
- Local Planning authorities should work collaboratively on strategic planning priorities to enable the delivery of sustainable economic growth in consultation with Local Enterprise Partnerships. Authorities should also work collaboratively with private sector bodies, utility and infrastructure providers
- Demonstrate evidence of having effectively co-operated to plan for issues with cross boundary impacts when their Local Plans are submitted for examination. Co-operation should be a continuous process of engagement from initial thinking through to implementation.

2.5 There are two tests of soundness directly related to the Duty to Co-operate which are as follows:

- Positively Prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is practical to do so consistently with the presumption in favour of sustainable development;
- Effective – the plan should be deliverable over its period and based on effective joint working on cross boundary strategic priorities.

3. Context

- 3.1 Wyre Forest District is located in the West Midlands within the Worcestershire sub-regional area. It falls within Worcestershire and is adjoined by Bromsgrove, Malvern Hills, Wychavon and South Staffordshire Districts as well as Shropshire's Unitary Authority area.
- 3.2 It is a mixed area with a concentration of three main towns – Kidderminster, Stourport-on-Severn and Bewdley surrounded by a number of smaller settlements and open countryside. To the east of the River Severn, land is largely covered by the West Midlands Green Belt.
- 3.3 The District has strong ties and commuter flows with the Birmingham and Black Country conurbation. Wyre Forest is a two-tier area with Worcestershire County Council providing public services such as highways, education, social services and community libraries.
- 3.4 The Local Enterprise Partnerships that cover the Wyre Forest area are the Worcestershire and Greater Birmingham and Solihull LEPS. These are business driven private and public sector partnerships that are leading economic development in the County.

4. Strategic Planning and cross boundary issues

4.1 Former WMRSS

At the regional scale, West Midlands Regional Spatial Strategy Phase Two Revision (Preferred Options) set a target for the South Housing Market Area (which all the Worcestershire Districts fall into) to provide 53,000 homes over the period 2006-26. There are strong functional links between the Worcestershire Local Authorities and the sub regional geography is of greater importance going forward with the removal of the regional tier of planning.

- 4.2 The Wyre Forest Core Strategy DPD Inspector's Report (October 2010) states at Paragraph 7, *"in general the Council supports the historical strategic planning policy approach of seeking to prevent out-migration from the West Midlands Major Urban Areas. It considers that its evidence and local support for this principle supports the level and locations of new growth proposed in the plan. Since a key aim of the government is to support local choice I consider that this is a generally sound approach. Consequently, notwithstanding the withdrawal of the formerly emerging Phase 3 WMRSS, I support and endorse the Council's suggested change CC8 which makes this clear."*

- 4.3 For clarification purposes, paragraph 5.4 of the Reasoned Justification to Core Strategy Policy DS01 Development Locations states:

“The levels of development required within the District, and the principle of preventing out-migration from the Major Urban Areas were set out in the former emerging WMRSS. Following the revocation of the RSS the Council has demonstrated that there was sufficient local evidence and support to justify these figures.”

The Adopted Black Country Joint Core Strategy seeks to tackle out-migration to surrounding counties through concentrating growth in sustainable locations to help attract private investment and enterprise to improve the local economy. It seeks to achieve a new balance of housing and employment growth utilising mainly previously developed land as part of a major programme of land use change. The regeneration of the Black Country and its role for the future of the wider West Midlands region was recognised in the former Regional Spatial Strategy (RSS). The RSS Panel Report (September 2009, paragraph 8.88) recognised that caution should be expressed over significantly larger figures than 4,000 dwellings which would encourage out-migration from the Major Urban Areas including the Black Country.

Worcestershire’s Sub Regional Planning

- 4.4 Worcestershire County Council and the six Districts within the County have close working relationships; in particular these are affected through the Worcestershire Enhanced Two Tier Programme (WETT) where a number of projects and work streams are delivered collaboratively or on a shared basis. The Planning Team at Worcestershire County Council has developed shared evidence base documents which have informed development of the Local Development Framework. These have included technical research papers on climate change, renewable energy, soils, water and green infrastructure as well as the Worcestershire Infrastructure Strategy.

4.5 **Waste & Minerals Planning**

Worcestershire County Council is preparing a Waste Core Strategy, this is part of the Development Plan, it is a statutory DPD that applies to the whole of the County. The District Council will also use it to make decisions on other types of planning applications that could have waste implications.

The Strategy predicts how much waste is likely to be produced, how much capacity will be needed to manage it and when. It also sets out a Spatial Strategy for where new facilities will be located.

On 20th July 2012, the Inspector issued his report on the Waste Core Strategy. He concluded that with the recommended main modifications set out, the Strategy is sound and legally compliant.

4.6 **Minerals**

Worcestershire County Council are in the early stages of preparing a Minerals Local Plan. It is anticipated that the Minerals Local Plan will be adopted during 2015. The District Council are pro-actively engaging with the County Council on the preparation of the Minerals Local Plan. Officers have had an initial meeting to identify any particular issues which may necessitate further consideration. Officers will continue to meet every six months with additional meetings as and when the need arises. In addition to these meetings, officers will make representations on the Minerals Local Plan where necessary; these representations will be approved by Members. Officers and where relevant, Members will attend stakeholder workshops to engage with the development of the Plan.

4.7 The Minerals Local Plan is likely to be based on a restoration strategy, looking as much at the site's potential end use as the extraction of the minerals. The majority of mineral reserves within Wyre Forest District are located within the Green Belt and as such close working with the County Council will be required in order to ensure that any end uses proposed are appropriate within the Green Belt.

4.8 **Infrastructure Delivery Planning**

The National Planning Policy Framework identifies the importance of ensuring infrastructure is considered through the plan making process. Paragraph 162 identifies that:

“Local planning authorities should work with other authorities and providers to:

- *Assess the quality and capacity of infrastructure for transport, water supply, wastewater and its treatment, energy (including heat), telecommunications, utilities, waste, health, social care, education, flood risk, and its ability to meet forecast demands; and*
- *Take account of the need for strategic infrastructure including nationally significant infrastructure within their areas.”*

4.9 Worcestershire County Council's Strategic Planning team is preparing a County Wide Infrastructure Strategy in consultation with public and private partners including representatives of the Local Enterprise Partnership, Local Authorities and infrastructure providers. The Strategy will:

- Provide a strategic framework for co-ordinating partner investment across the County to meet strategic needs, deliver maximum economic benefit which reflects the challenges of reduced public spending.
- Provide the economic and policy context for private and public sector investment
- Be useful for investors, house builders and developers who need to understand when and how infrastructure will be provided to support their investment decisions
- Serve as a valuable bidding document, demonstrating a commitment by delivery partners to investment priorities.

4.10 It is the County Council's intention that the Infrastructure Strategy will achieve the following aims:

- o Identify and prioritise the strategic infrastructure interventions required to support growth in employment, housing and sustainable communities across Worcestershire
- o Identify and mobilise the resources required to fund these interventions
- o Ensure delivery agents are committed to delivering the infrastructure
- o Identify and agree appropriate governance arrangements for delivery
- o Help implementation of District Local Plans
- o To help the Local Enterprise Partnership understand the opportunities and constraints of growth and shifting demographic patterns
- o Allow Worcestershire County Council and all partners to prioritise their resources in accordance with agreed strategic priorities.

4.11 Worcestershire County Council considers that the preparation of an Infrastructure Strategy at the County level accords with government policy which advocates the use of informal strategies such as joint infrastructure and investment plans, co-operation between tiers and collaboration between planning authorities to enable the delivery of sustainable development in consultation with the Local Enterprise Partnerships.

4.12 As a strategic document, the Infrastructure Strategy should identify the key infrastructure essential for delivery of Development Plans. It will not consider non strategic infrastructure which will be covered by the more comprehensive district level Infrastructure Delivery Plans.

- 4.13 Worcestershire County Council has recently consulted on the strategic options for the Infrastructure Strategy which included the identification of priority sites, strategic infrastructure requirements and funding gaps. The District Council submitted detailed comments in relation to the emerging Strategy.

Community Infrastructure Levy (CIL)

- 4.14 The Worcestershire Authorities Bromsgrove, Malvern Hills, Redditch, Worcester, Wychavon and Wyre Forest jointly commissioned consultants to undertake a CIL viability study. In due course, dependant on the Council's evidence and priorities, each Council will make their own decision as whether or not to adopt CIL and what rates to charge. However, it was considered that through co-operating on CIL evidence gathering the authorities will gain economies of scale but also may be able to set rates in the context of those being set in the wider area.
- 4.15 Each Authority will use the information to strike the balance between deterring development either through adversely impacting on development viability or conversely through there being insufficient infrastructure to service new development.

Green Infrastructure

- 4.16 Worcestershire Green Infrastructure Framework has the status of a guidance paper to provide a framework for the planning of a comprehensive multifunctional green infrastructure throughout Worcestershire.
- 4.17 Development of a green infrastructure framework at a sub-regional level is of importance in considering cross boundary relationships such as connectivity, flooding or the proximity of sites as stepping stones or nodes in a wider network.
- 4.18 The wider sub-regional GI Framework forms the first phase in the adoption of a hierarchical approach in planning for GI in Worcestershire that will differentiate between broad strategic planning at a County Level and Local GI networks at a District Scale.
- 4.19 The sub-regional framework will be accompanied by concept statements/plans that will set out and prioritise the respective GI requirements for an individual site. The potential future inclusion of the GI framework as a material planning consideration in Local Development Documents will mean that planning applications and S106 negotiations can be considered with respect to green infrastructure.

5. Neighbouring Local Plans

- 5.1 The following authorities are developing their Local Plans which share a common boundary with the Wyre Forest District:
- 5.2 South Worcestershire authorities – Malvern Hills District Council, Wychavon District Council and Worcester City Council are jointly producing the South Worcestershire Development Plan. This is working towards publication stage and has potential cross boundary implications for the Western and north westerly areas of the Wyre Forest District including Stourport-on-Severn, the village of Clows Top and the Hartlebury/A449 area.
- 5.3 Bromsgrove District Council – the District shares a common boundary with Bromsgrove District to the east, which is mainly washed over by Green Belt. Bromsgrove District is progressing its Core Strategy; however they are working closely with Redditch Borough Council under the Duty to Co-operate to agree a mutually acceptable solution to Redditch's growth needs which cannot be met in the Borough. Council Officers continue to liaise with Bromsgrove and Redditch Councils through both the Worcestershire Planning Officers Group and the North Worcestershire Economic Development Partnership.
- 5.4 South Staffordshire District – has produced its Core Strategy which has recently undergone examination. The District Council did not submit any representations as there are no significant cross boundary issues (to the North of the District) due to the Green Belt. However, Officers continue to have regular meetings with South Staffordshire Officers under the Duty to Co-operate.
- 5.5 Shropshire Council – the District Council shares a common boundary to the North West with this large unitary authority. Shropshire Council has an Adopted Core Strategy (February 2011). There are no major cross boundary issues but regular correspondence is held with regard to any implications for the Wyre Forest itself.

6. Wyre Forest District Adopted Core Strategy

- 6.1 The first document to be prepared under the Local Development Framework was the Core Strategy which was adopted in December 2010. The Adopted

Core Strategy sets out the strategy and vision that will influence planning and related initiatives up to 2026. It provides the overarching development strategy which will guide future decisions on where to locate new homes, businesses and leisure facilities. The Core Strategy does not specifically identify any particular sites where development would occur. The documents that identify and allocate the sites are the Site Allocations and Policies and Kidderminster Central Area Action Plan DPDs

- 6.2 The Core Strategy provides a wide ranging mechanism for delivering sustainable development objectives by addressing social, economic and environmental issues and relating them to the use of land. The Core Strategy will help to implement other strategies and plans that cover the District, including the Sustainable Community Strategy, the Worcestershire Local Transport Plan and Worcestershire Waste Core Strategy. The Strategy has been produced with close involvement from the Wyre Forest Matters Local Strategic Partnership. Its vision is aligned with the priorities set out in the Sustainable Community Strategy.
- 6.3 The Strategy takes into account the implications of the planning policies of neighbouring authorities. The District Council has consulted neighbouring authorities in the preparation of the Core Strategy and has continued to liaise with neighbouring authorities over the development of planning policies. The main cross boundary issues which have been taken into account are:
- The relationship and role of Hartlebury Trading Estate and the Roxel Plant which straddles the boundary between Wyre Forest District and Wychavon District.
 - The known development pressures for an urban extension south of Stourport-on-Severn into Malvern Hills District.
 - Working with Malvern Hills District Council to ensure complementary planning policies for the settlement of Clows Top which straddles the District boundary.
 - Consideration of economic links with nearby centres of the Black Country, Birmingham and Worcester.
 - Shared areas of nature conservation importance including the Wyre Forest (Shropshire Council), Hartlebury Common(Wychavon District), Kingsford Forest Park/Kinver Edge (South Staffordshire District)
 - Cross boundary public transport services with adjoining authorities
 - Cross boundary issues with traffic and water courses, particularly within the Severn Valley

7. Site Allocations and Policies and Kidderminster Central Area Action Plan DPDs

- 7.1 These DPDs will allocate and designate areas of land for particular uses, most notably land to deliver housing but also for other major development needs such as employment, recreation, open space and community uses, in order to meet the requirements set out in the Adopted Core Strategy. Additionally, they will set out important development management policies which will apply across the whole of the District and will be used for determining planning applications.
- 7.2 The KCAAP will provide a targeted approach to development within the central area of Kidderminster. In a similar way to the Site Allocations and Policies, the KCAAP will allocate sites and provide policies but targeted to the sites within the specific boundaries of the action plan area.
- 7.3 These DPDs have been developed and consulted on over a number of years, involving discussion and collaboration with key infrastructure providers, delivery agents, stakeholders and local communities. The table below sets out an overview of the consultation undertaken. Further details can be found in the Regulation 22(c) statements which have been prepared for each of the DPDs.

Stage of Consultation	Consultation Dates	Methods of Consultation	Groups Consulted	How Responses Informed DPDs
LDF Initial Stakeholder Workshops	February 2008	<ul style="list-style-type: none"> Workshop / Focus Group Meetings 	<ul style="list-style-type: none"> Stakeholders 	The workshops and topic papers informed the preparation of the Core Strategy which sets the over-arching policy for the District and therefore guides the policy choices in subsequent DPDs.
Issues and Options	15 th January – 6 th March 2009	<ul style="list-style-type: none"> Web-site Letters/emails Press 	<ul style="list-style-type: none"> Statutory Consultees General Consultees 	The responses informed the preferred Options Papers.

		<p>release and public notice in local paper</p> <ul style="list-style-type: none"> • Leaflet distribution through local paper & post • Manned exhibitions in towns and villages across the District • Parish Forum/Council presentations • Posters in Post Offices and convenience stores • Mini displays in the District's libraries and hubs 	<ul style="list-style-type: none"> • Local Residents • Those who registered to be notified of LDF consultations 	
Preferred Options	26 th May – 8 th July 2011	<ul style="list-style-type: none"> • Web-site • Letters/emails • Press release and public notice in local paper • Leaflet distribution through local paper 	<ul style="list-style-type: none"> • Statutory Consultees • General Consultees • Local Residents • Those who registered to be notified of LDF consultations 	The responses informed the Pre-Submission Publication DPDs.

		<p>& post</p> <ul style="list-style-type: none"> • Manned exhibitions in towns and villages across the District • Mini displays in the District's libraries and hubs • Town/Parish Council presentation 		
Potential Gypsy, Traveller and Travelling Showpeople Sites	7 th October - 18 th November 2011	<ul style="list-style-type: none"> • Web-site • Letters/emails • Press release in local paper • A series of public meetings 	<ul style="list-style-type: none"> • Statutory Consultees • General Consultees • Local Residents • Those who registered to be notified of LDF consultations • Letters to all properties who share a boundary with any of the sites 	The responses informed the selection of Gypsy, Traveller and Travelling Showpeople sites included within the Pre-Submission Publication DPD.
Additional Potential Gypsy and Traveller Sites	7 th February – 20 th March 2012	<ul style="list-style-type: none"> • Web-site • Letters/emails • Press release in local paper 	<ul style="list-style-type: none"> • Statutory Consultees • General Consultees • Letters to all properties in, or that share a boundary 	The responses informed the selection of Gypsy and, Traveller sites included within the Pre-Submission Publication DPD.

			with, Sandy Lane Industrial Estate	
Pre-Submission Publication	23 rd July – 14 th September 2012	<ul style="list-style-type: none"> • Web-site • Letters/emails • Press release and public notice in local paper 	<ul style="list-style-type: none"> • Statutory Consultees • General Consultees • Local Residents • Those who registered to be notified of LDF consultations 	The responses will be submitted alongside the DPD and be addressed through the Examination in Public. A schedule of minor amendments and statements of common ground will be prepared in response to representations where appropriate.

8. Continuous Co-operation with key stakeholders

8.1 The District Council also focuses on continuous engagement with key stakeholders outside of the statutory consultation process. A Strategic Development Group meeting is held each month which includes representatives from Worcestershire County Council. Strategic Planning, Housing and Transportation issues are discussed.

8.2 Meetings with English Heritage and the Canals & Rivers Trust are held every six months to discuss strategic policy issues as well as site specifics. In addition regular meetings are held with the Environment Agency through the pre-application and development team approach. Joint working and co-operation has also taken place on the evidence base produced to inform the Development Plan Documents, including the following:

- Strategic Flood Risk Assessment Level 1 and Level 2 and Water Cycle Strategy: Joint working with Environment Agency and Severn Trent – also had involvement from Natural England
- Green Infrastructure Strategy which was developed and shared with Natural England and Worcestershire County Council

- Infrastructure Delivery Plan (IDP) was developed alongside the Worcestershire IDP with input from Worcestershire County Council, West Mercia Constabulary and the Environment Agency
- Strategic Housing Land Availability Assessment (SHLAA) – comprised a Developer Panel to ensure deliverability

9. Strategic Environmental Issues

- 9.1 The purpose of Appropriate Assessment of Land Use Plans is to ensure that protection of the integrity of European Sites is a part of the planning process. Requirement for Appropriate Assessment of Plans is outlined in Article 6(3) and (4) of the European Communities Council Directive on the conservation of natural habitats and of wild fauna and flora. European Sites consist of Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Offshore Marine Sites (OMS) which are collectively known as Natura 2000 sites.
- 9.2 A Screening Assessment has been produced and consultation undertaken with Natural England to examine the likely effects of the Core Strategy, Site Allocations and Area Action Plan DPDs upon Natura 2000 sites. As a precautionary measure any Natura 2000 sites within 15km of the District boundary were included in the initial screening process.
- 9.3 There are no Natura 2000 sites within the District; however there are two sites within 15km of the District Boundary.
- The Fens Pool and Lyppards Grange Ponds SACs.
- It was considered that due to the scale of growth envisaged within the District and the fact that the sites are located some distance away, that no further appropriate assessment work would be required. Natural England supported the District Council's conclusion.

10. Local Enterprise Partnerships

- 10.1 The Local Enterprise Partnerships that cover the Wyre Forest area are the Worcestershire and Greater Birmingham and Solihull LEPS. These are business driven private and public sector partnerships that are leading economic development in the County. The involvement of the District in both Partnerships reflects the economic geography of an area that has strong ties with both the county in which it is located, Worcestershire, as well as the larger urban conurbation of Birmingham and its surrounding areas. It is

important that the Council's planning documents, wherever possible; reflect the aims and ambitions of the LEPs.

The Worcestershire LEP's priorities are as follows:

- Deliver the strategic employment sites and related infrastructure needed to secure sustainable economic growth and a low carbon economy.
- Ensure we have the right support for business start up, business growth, business retention – focussing on meeting the needs of our strategic businesses, high growth SMEs and the social enterprise sector.
- Deliver the right infrastructure for business, including improved high speed broadband availability and creating better access for strategic businesses and their supply chains in the north of the County to the motorway network through improvements to east-west links and the A449.
- Invest in the skills of our workforce ensuring that provision is responsive to business needs and relevant to future growth and business opportunities.

10.2 The Greater Birmingham and Solihull LEP was initially formed of Birmingham and Solihull, with East Staffordshire, Lichfield and Tamworth and was subsequently joined by Bromsgrove, Cannock Chase and more recently Redditch and Wyre Forest.

10.3 The LEP produced a Planning Charter in 2012. This lays out the intention of planning partners involved to be proactive and supportive of business and investment while ensuring quality, sustainable and honest dialogue are at the heart of planning decisions. While development must always be appropriate, the way local authorities communicate and work with business should be supportive of investment.

10.4 The Planning Charter also incorporates a Strategic Spatial Framework Plan which reflects the main elements of each District's Development Plan including major regeneration and growth projects and key attractions.

10.5 Discussion is currently ongoing within the context of the Strategic Framework with regard to the implications of accommodating Birmingham City's growth in the future. Birmingham City Council has embarked on a process of reviewing the growth levels that were included in its Draft Core Strategy. To help inform this a Strategic Housing Market Assessment was commissioned which

indicates that Birmingham's housing requirement for the period 2011-31 is in the range of 80,000-105,000. The latest estimated of capacity within the urban area is for around 43,000 dwellings. Therefore, the Council has indicated that it will not be realistic to provide for the full housing requirement within its administrative boundary. Under these circumstances Birmingham City Council will need to look to adjoining areas to accommodate some of Birmingham's housing requirement. The existence of the West Midlands Joint Committee and the now established Local Enterprise Partnerships are structures that emphasise the importance of joint working to meet shared priorities and pressures.

11. Local Nature Partnerships

- 11.1 In its Natural Environment White Paper, the Government set out the vision for Local Nature Partnerships (LNPs). The purpose of LNPs is to drive positive change in the local natural environment; identify local ecological networks; influence decision making relating to the natural environment and its value to social and economic outcomes through working closely with local authorities, Local Enterprise Partnerships and Health & Wellbeing boards.
- 11.2 During July 2012 Worcestershire was identified as one of the first LNPs to gain approval. The District Council will need to work with the Worcestershire LNP to help embed the value of the natural environment in the strategic planning and decision making process through making ecological networks and promoting the threats and opportunities within the planning process

12. Consultation and Statements of Common Ground

- 12.1 During the Core Strategy Examination, the District Council agreed Statements of Common Ground with key stakeholders such as the Environment Agency, Natural England, English Heritage and West Mercia Constabulary. These agreements informed a schedule of minor amendments to the Core Strategy which were also submitted for the Inspector's consideration. The Inspector recognised that the amendments sought to achieve consensus with stakeholders where possible.
- 12.2 This is an approach that has also been taken at the pre-submission stage with both the Site Allocations & Policies and the Kidderminster Central Area Action

Plan DPDs. Statements of Common Ground are in the process of being developed with the following key stakeholders:

- Environment Agency – with specific regard to the Infrastructure Delivery Plan, Sequential Testing and Flood Risk Policy within the KCAAP.
- Homes and Communities Agency – with regard to viable land uses at the former Lea Castle Site and links to the wider regeneration agenda.
- Worcestershire County Council – with regard to conformity with the Adopted Worcestershire Waste Core Strategy.
- English Heritage with specific regard to the Heritage Assets policy.
- West Mercia Constabulary with regard to the evening economy.
- Churchill and Blakedown Parish Council with regard to the definition of Local Housing Need within the DPDs.