

LOCAL PLAN REVIEW

ISSUES AND OPTIONS PAPER

CONSULTATION RESPONSES (SEPTEMBER 2015)

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A New Development Strategy 2016-2032

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INTRODUCTION (SECTION 1) RESPONSES**

Reporting Name	Response No	Para / Question	Type of Response	Summary	Officer Response
Siddall Mr I	LPRIO6	Document	Comment	Raises monitoring for noise pollution. The Local Plan Review needs to include safeguards to address noise levels in new developments.	Comments are noted. Worcestershire Regulatory Services are a statutory consultee with regard to noise pollution. This could be addressed under health and wellbeing policies and has relevance to residential amenity.
Worcestershire Regulatory Services	LPRIO48	Document	Comment	Confirm that we have reviewed the proposals with regard to environmental impacts not withstanding contaminated land and air quality) and confirm that we have no adverse comments to make.	Comments are noted.
Shropshire Council	LPRIO210	Document	Comment	This authority proposes to consider any potential implications for Shropshire arising from the Wyre Forest Local Plan Review on the publication of the Preferred Option next year	Comments are noted under the Duty to Co-operate requirements.
Barratt Homes West Midlands	LPRIO77	Document	Comment	The emerging Plan does not explore an option for growth that would result in development to the south west of Stourport on Severn on land outside of the Green Belt on the basis that it contains sensitive landscape areas. This submission identifies the land in my Clients control to the south west of Stourport that we believe should be allocated for development in the emerging plan.	Comments are noted. No options have been ruled out at this early stage in the Plan Review process.
Spokes N	LPRIO211	Document	Comment	What Where When and Why. Then I feel people can have good discussions on the whole topic and concrete decisions and options can be made.	Comments are noted. Preferred Options will be published for consultation in Summer 2016.
Schroders UK Property Fund	LPRIO809	Document	Comment	Support the preparation of a plan that has positive economic aspirations. They also welcome improvements to the strategic highways network. Improving accessibility to the Hartlebury Trading	Comments are noted.

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				Estate will help encourage the retention of tenants and help to attract new tenants.	
Rushock PC	LPRIO886	Document	Comment	Very impressed by the Local Plan document and the amount of work that has gone into it that has identified a range of options for the future of Wyre Forest District	Comments are noted.
Historic England	LPRIO1092	Document	Comment	We would recommend working with local and county conservation and archaeology staff during the preparation of your Local Plan.	Noted and agreed.
Stanmore Properties Ltd	LPRIO1006	Document	Comment	The plan period should be extended or the ambitions in terms of the scale of allocations should be reduced with a partial review to bring forward of Areas of Development Restraint for housing.	Noted. The District Council's timetable is to have the plan adopted by the end of 2017. If this were delayed for unforeseeable reasons then the plan period would be extended. The Council has an excellent record of timely plan reviews and much of the evidence base including the OAHN is under preparation.
Severn Trent Water Ltd	LPRIO1481	Document	Comment	On this particular occasion we have no further comments to make.	Noted.
Revelan Group	LPRIO482	Document	Comment	Revelan Group Plc are supportive of aspects of the Plan, there are areas where there are significant shortcomings in the proposed approach.	Noted. The agents are reminded that the intention of the Issues and Options consultation is to outline the key issues and broad options for addressing future development within the District. It should not at this stage be viewed as a Plan.
Revelan Group	LPRIO627	Document	Comment	The ambition to prepare a plan promptly is supported. However, we are of the view that it will be difficult for Wyre Forest to progress a plan from the Issues and Options Consultation stage to	These comments with regard to the plan period are noted. However, the Council has an excellent record of timely plan production and this is a review of the

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				adoption in a two year period. Considers it would be prudent for the plan period to be extended to add flexibility to the plan making process. Suggests that the plan period extends to 2036 in order to provide sufficient flexibility.	existing strategy. Much of the evidence is already at an advanced stage and will be available to inform the selection of preferred options.
Revelan Group	LPRIO641	Document	Comment	We fully support the Council in undertaking an objective assessment of housing need based upon the most up to date evidence available. It is, however, a concern that a proposed housing target is not available to comment as part of the Issues & Options Consultation. It is our view that following the completion of the work on determining the objective assessment of housing need that this work should be the subject of a separate consultation.	Comments are noted. However the Council considers that the OAHN is being progressed during the very early stages of the plan review. Indeed a number of Councils such as South Worcestershire, Birmingham and Bromsgrove and Redditch did not undertake the OAHN until the submission/examination stages of the Plan. We are not therefore concerned that they should be subject to a separate consultation since they are a technical piece of evidence and cannot be altered on the basis of consultation.
Paris R	LPRIO459	Document	Comment	This document is a credit to your department and shows dedication to encourage comment. An excellent basis for debate and the formation of a sound Local Plan.	Support for the Issues and Options Consultation is welcomed.
Bennett A	LPRIO619	1.2	Comment	The council needs to review its brown field site policy, to allow building of homes on smaller plots and infill. This encourages smaller local builders to invest in the town. Not only to first time buyers but to the expanding families, who need to vacate the starter properties and allow the growing family to move on to a more suitable, spacious home, to accommodate their growing family.	The comments with regard to the efficient use of brownfield land are noted.

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Doncaster P	LPRIO123	1.3	Comment	An awful lot of time and money already spent but so sad only a few people are given the chance to see it properly. I get the impression you are ticking boxes and don't really want the public involved.	Do not agree with this statement. The consultation process has included four public exhibitions located and timed to be convenient and accessible to members of the public. We also undertook a twitter debate to help engage younger residents and have loaned out numerous copies of the document and sent literature out to all local households and businesses. There is also an online consultation portal. We have received over 1,100 responses to our consultation – one of the best response levels to date.
Voice E	LPRIO175	1.3	Comment	Considers the consultation process is difficult to access. Designed to put people off from participating.	Disagree. A leaflet drop was made to all local residents informing them of the consultation and a series of manned local roadshows. A live twitter debate was also undertaken and a series of press releases to raise awareness. Documents were made available at the Hub and local libraries. The Issues and Options stage is the first consultation stage in the Plan Review.
Barratt Homes West Midlands	LPRIO78	1.7	Comment	Concerned that in order for the emerging Wyre Forest Local Plan to have a fifteen year time period from the date of adoption it must be adopted in 2017. Note this is the aspiration, however, considers this is extremely ambitious. It will be difficult for Wyre Forest to progress a plan from the Issues & Options Consultation to adoption in a two year period. Considers it would	These concerns are noted. The Authority has an excellent record of Plan Review including having a full Local Development Framework Adopted by 2013. Much work has already been undertaken on the evidence base. We note the comparisons to Bromsgrove, Redditch and the South Worcestershire Authorities and the length

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				be prudent for the plan period to be extended to 2036 in order to provide sufficient flexibility.	of time taken to produce their plans. However, this is not a considerable matter of concern to us as it is our full intention to ensure that both the OAHN firmly informs the Plan Review right from the outset rather than at examination stage and the Sustainability Appraisal work has already begun in house to inform options development and site selection. This will be subject to an Independent Assessment. We do not intend to lengthen the Plan Period and expect to submit the Plan in early 2017.
Question 1. Is the list of evidence set out above appropriate and sufficient to inform the Plan. If not, what should be added or deleted?					
Hallam Land Management	LPRIO236	Question 1	Comment	The evidence for the Local Plan Review should include a report setting out how cross boundary issues have been addressed	Noted and agreed. A full Duty to Co-operate Statement will be produced as part of the evidence base to help inform preferred options and will constitute one of the submission documents in due course.
Richards Mr H	LPRIO189	Question 1	Comment	Considers that a Green Belt Boundary Review should be added to the evidence base. This should look at the purposes of including land in the Green Belt.	Noted. Should the Objective Assessment of Housing Need figures constitute a significant increase in the level of housing required for the District it will be necessary to undertake a Green Belt Boundary Review to inform future site allocations.
Persimmon Homes Limited	LPRIO733	Question 1	Comment	We would expect to see a separate document analysing economic growth factors which should be prepared in conjunction with the objective assessment of housing need. The Council should produce a Green Belt boundary review document	Noted. The Council has commissioned a full Employment Land Review to inform the Plan which will look at forecasts and existing allocations and future employment land requirements, this is being prepared in

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				given that it is likely that the Green Belt will have to be reviewed.	conjunction with the OAHN. A Green Belt Boundary Review will only be undertaken if the level of housing need as established in thru forthcoming OAHN is such that it would be warranted in terms of land allocations.
Churchill and Blakedown PC	LPRIO299	Question 1	Comment	Considers that Neighbourhood Plans and County Policies in relation to education, transport, highways and health need to be considered.	Noted and agreed.
WFDC (Strategic Housing Team)	LPRIO681	Question 1	Comment	Housing Market information, Economic stats, Health Profiles for WFDC, Health Impact Assessments when available, Wyre Forest Climate Change Strategy , Worcestershire Climate Change Strategy , The economics of low carbon cities: a mini Stern-review for Birmingham and the wider urban area , Worcestershire Renewable Energy Study and Research Papers, Local Transport Plan, Joint Strategic Needs Assessment , Energy/ carbon impacts assessment	Noted. All of these documents represent evidence and information that would inform the SA Scoping process.
British Horse Society	LPRIO460	Question 1	Comment	Equestrians often don't get the same consideration as walkers and cyclists when evidence is assessed in relation to specific sites. Along with disabled people and families with young children, horse riders are among the most vulnerable group of road users with the greatest need for safe, off road riding opportunities. The BHS would like to see the promotion of shared use routes reflected in the evidence base.	These comments are noted and are considered of particular relevance to the semi rural areas, villages and open countryside.
Taylor N	LPRIO55	Question 1	Comment	Potential for the plan to address the need to accommodate refugees - housing need, employment and education.	Comment is noted. The Plan would need to address this issue through assessment of housing need and following a clear

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					strategic steer on numbers of refugees to be accommodated.
Willets K	LPRIO93	Question 1	Comment	Considers that the Lea Castle site should be allocated for eco development including eco strawbale homes to provide affordable rental properties for local people with housing needs.	These comments are noted. The former Lea Castle site is a large site, owned by the HCA with considerable remediation costs which mean that development viability will be a particularly important consideration for this key site in the Plan Review.
Barratt Homes West Midlands	LPRIO79	Question 1	Comment	The Issues & Options Consultation document has already suggested that it would be inappropriate to extend to Stourport further south due to landscape constraints. However, no evidence has been prepared to support this position.	The Issues and Options document has not at this stage ruled out any options. It merely flags up that although there is no Green Belt to the South of Stourport, the area forms part of the previous Landscape Protection Area and that therefore the Landscape is important to the setting of the town. This Option has not been dismissed at this early stage in the plan review and would be subject to a full Sustainability Appraisal. There are other factors to consider for this area, including trip generation and traffic congestion through Stourport to access employment opportunities. The consideration of options very much depends on the level of development that needs to be accommodated.
Paris R	LPRIO458	Question 1	Support	Support for question 1.	Support is noted.
Fyshe F	LPRIO522	Question 1	Comment	Raises inclusion of Neighbourhood Plans	Comment is noted.
Warwickshire &	LPRIO630	Question 1	Comment	Considers that the evidence base could be	These comments relating to crime are

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West Mercia Police and H&W Fire and Rescue Service				extended to include predicted crime and incident levels across the district based on different scales of development. Attaches a report on predicted % increase in crime across the District. The references to crime included in the existing DPDs need to be transferred over to the new Local Plan.	noted and will provide useful context for the evidence base and to help inform the Sustainability Appraisal. The Local Plan will include references to crime in the vision and objectives as these issues are very important to Local Residents and Businesses.
West Midlands HARP	LPRIO1054	Question 1	Comment	The OAHN should take into account the findings of Inspectors' conclusions on the Eastleigh Borough Plan and Stroud District Local Plan, both of which make it clear that private rented housing does not constitute a valid substitute for affordable housing. Given the significant projected increase in the older age cohorts across the plan area, it is vital that the councils ensure that their joint evidence base considers the range of housing models which may be required, not just provision of standard care beds in C2 Use Class care homes. Fully account for market signals. Ensure any housing figure is based on aspirational economic projections;	These comments on the OAHN are noted. The Council has commissioned the OAHN and requires it to be fully consistent with national policy and guidance. The detailed points are helpful and will be considered fully through the process.
Miller Homes	LPRIO832	Question 1	Comment	Should also a Green Belt Boundary Review. Cannot just rely on (updating) its existing evidence base. It should be noted that an Option is only a realistic and tangible Option if it is deliverable. To be deliverable, it needs to be properly evidenced.	The Council has no intention of relying on its existing evidence base and has already commissioned an OAHN, Employment Land Review, and Retail Needs Assessment and is undertaking the HELAA and Sustainability Appraisal. A Green Belt Boundary Review will only be required if the OAHN indicates that the level of housing need is significant enough to justify one.
WCC, Planning	LPRIO1392	Question 1	Comment	The public health team have identified a number of	These comments on the Health Evidence

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Economy & Performance				areas to cover in the evidence base as follows: need to use the Joint Strategic Needs Assessment (the Assessment) of health and well-being; reflect the priorities of Worcestershire's Joint Health and Well-being Strategy; Older people and management of long term conditions; Health Impact Assessment.	Base are noted.
Persimmon Homes Limited	LPRIO996	Question 1	Comment	Need to include the SHMA, Green Belt Review. The decision to undertake such a review should swiftly follow the publication of the OAN in order to provide justification that all reasonable alternatives have been considered from an early stage of plan production.	Noted. A SHMA (OAHN) has been commissioned and is fully underway to inform the Preferred Options. Only if the level of need is significant to justify a Green Belt Boundary Review will one be commissioned as part of the Plan Review. Of course Sustainability Appraisal must also be central to the selection of sites for future development.
Wolverley & Cookley PC	LPRIO1093	Question 1	Comment	Support for Evidence Base.	Support is noted.
Upper Arley PC	LPRIO1317	Question 1	Comment	Fine but Neighbourhood Plans and County Policies in relation to education, transport, highways, health and farm diversification need to be considered.	Comments are noted.
Worcestershire Wildlife Trust	LPRIO891	Question 1	Comment	We would caveat that with the need for the Green Infrastructure Strategy to include up to date information on the distribution of high value ecological features including SSSI and LWS. We consider that this evidence is fundamental in determining the best spatial approach to development in the district and the lack of such evidence could undermine decisions regarding the	These comments relating to the Green Infrastructure Strategy are noted and agreed.

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				plan's spatial strategy.	
Staff & Worcs Canal Society	LPRIO1267	Question 1	Comment	We recommend that, in the absence of a single report, the many ecological reports that will have been submitted to the Council's planning department by both statutory and non-statutory consultants over the past decade should be used to inform the Plan. Any plans for future developments need to take account of their impact upon the rich and diverse ecology of the District.	Comments on ecology are noted. This will form an essential element of the Sustainability Appraisal.
Stanmore Properties Ltd	LPRIO1007	Question 1	Comment	A Green Belt Review may need to be undertaken. Considers that a further Call for Sites should be made before Summer 2016 to ensure it is robust.	Noted. A significant number of additional sites have also been submitted for the HELAA through this Issues and Options consultation as well as those identified by Officers under the desk top review. All will be assessed by an Independent Panel for deliverability in November/December.
Bewdley Civic Society	LPRIO1554	Question 1	Comment	Add Conservation Area Review to list of evidence	Noted.
CPRE	LPRIO1423	Question 1	Comment	Research is required into commuting patterns, to determine where those economically active are respectively living and working. Evidence should be sought on the net need for affordable houses and the distribution of applicants. There is a tendency to rely on housing list data, but that is only evidence of gross need. The SHLAA needs to be compiled to a consistent standard with others in the GBS LEP area, so that the capacity of the area can be judged in the same manner as other LPAs.	These comments on the evidence base are noted. The OAHN work is taking account of commuting patterns and the need for affordable housing. The SHLAA (HELAA) is being prepared in accordance with national planning practice guidance.
Associated	LPRIO835	Question 1	Comment	The list of evidence is not sufficient it should	Noted. However, the OAHN figures may not

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British Foods Plc				contain a full Green Belt Boundary Review which should be undertaken once the OAHN work has been completed.	be sufficient to justify a Green Belt Boundary Review for the District. This is why it is not included in the lost of evidence base documents at this early stage in the Plan Review.
Shuttes J	LPRIO1128	Question 1	Comment	Welfare/Health and education needs associated with local population increase in age	Noted and agreed.
J & H Evans	LPRIO811	Question 1	Comment	Wyre Forest District Council (WFDC) therefore cannot simply rely upon its existing evidence base. It is highly unlikely that Wyre Forest District Council will be able to rely on previously developed land and existing unimplemented allocations alone to meet the housing need for the next Plan period. It is considered likely that Green Belt release will be required, even if all the remaining ADRs are developed, to meet the housing need for the next Plan period. A Green Belt boundary review should be added to the evidence base list.	Noted. The Council has no intention of relying on its existing evidence base and has already commissioned the OAHN, Employment Land Review, Retail Needs Assessment and commenced the Sustainability Appraisal and Housing and Economic Land Availability Assessment. A Green Belt Boundary Review will only be undertaken if the level of housing in the OAHN is significant enough to warrant it. T
Taylor Wimpey UK Ltd	LPRIO740	Question 1	Comment	<u>Land to the north of Stourport/eastern side of Bewdley Rd</u> Appropriate for the Council to undertake a comprehensive and robust Green Belt Review to identify parcels of land suitable for development adjacent to the main towns to promote sustainable patterns of development. In conjunction with a Green Belt Review, we advise that a Landscape Character Assessment to be undertaken in order to identify greenfield areas of lower landscape value.	Noted. A Green Belt Boundary Review will only be undertaken if the level of housing need identified in the OAHN justifies it. The comments on landscape character assessment are noted and agreed.
Taylor Wimpey	LPRIO1033	Question 1	Comment	<u>Land South West of Stourport on Severn</u>	Noted. A Green Belt Boundary Review will

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UK Ltd				Appropriate for the Council to undertake a comprehensive and robust Green Belt Review to identify parcels of land suitable for development adjacent to the main towns to promote sustainable patterns of development. In conjunction with a Green Belt Review, we advise that a Landscape Character Assessment to be undertaken in order to identify greenfield areas of lower landscape value.	only be undertaken if the level of housing need identified in the OAHN justifies it. The comments on landscape character assessment are noted and agreed.
Taylor Wimpey UK Ltd	LPRIO774	Question 1	Comment	<u>Land to the north of Stone Hill, eastern Kidderminster</u> Appropriate for the Council to undertake a comprehensive and robust Green Belt Review to identify parcels of land suitable for development adjacent to the main towns to promote sustainable patterns of development. In conjunction with a Green Belt Review, we advise that a Landscape Character Assessment to be undertaken in order to identify greenfield areas of lower landscape value.	Noted. A Green Belt Boundary Review will only be undertaken if the level of housing need identified in the OAHN justifies it. The comments on landscape character assessment are noted and agreed.
Bewdley Town Council	LPRIO871	Question 1	Comment	<i>Conservation Area Review should be added to the list of evidence.</i>	Noted. The Conservation Areas are used as part of the historical evidence base to inform the Local Plan Review.
Topland Hotels (No. 14) Ltd	LPRIO1228	Question 1	Comment	The list makes no reference to the potential for a Strategic Green Belt Review being prepared as part of the Local Plan process	Noted. However, the need has yet to be established for a Green Belt Boundary Review through the OAHN. It would not have been prudent to include this at such an early stage in the plan review if it may not be required.
Karma Developments	LPRIO752	Question 1	Comment	We agree that all documents listed in the consultation paper will be necessary. However a	The respondent should note pages 6 and 7 of the Issues and Options document that

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Ltd				key omission from this list is the Sustainability Appraisal. The Council should ensure that the results of the SA process clearly justify its policy choices.	clearly sets out the process and procedure for the Sustainability Appraisal as an integral part of the plan process. Indeed the Council has produced an SA Scoping Report to inform the Issues and Options Paper.
Telereal Trillium	LPRIO812	Question 1	Comment	We would expect to see a separate document analysing economic growth factors which should be prepared in conjunction with the objective assessment of housing need.	Noted. An Employment Land Review has been commissioned alongside the OAHN. This also fully considers employment forecasts and the Functional Economic Market Factor as well as the positive impacts of infrastructure improvements such as the Hoobrook Link Road.
Environment Agency	LPRIO960	Question 1	Comment	An up to date Strategic Flood Risk Assessment (SFRA) and Water Cycle Study (WCS). There is currently no reference to groundwater, source protection zones (SPZs) or the Water Framework Directive (WFD). Within the WCS update, we'd expect a review of groundwater vulnerability and SPZs and information on WFD. The SA/Strategic Environmental Assessment (SEA) process with reference to the River Basin Management Plan (RBMP) and WCS /other evidence will inform key issues, opportunities and constraints; and in turn inform the need/scope of the local plans water policies, where necessary. We would welcome a meeting to discuss waste water infrastructure and the potential impacts of development growth. With reference to the SFRA, we are expecting revised climate change allowances to be published in	The Environment Agency's comments on the SFRA and Water Cycle Study are noted and we will of course be working closely with the EA on these areas of the evidence base to help inform policy development.

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				Autumn 2015. We would be happy to discuss the scope of the SFRA going forwards, with you and the North Worcestershire Water Management team (Lead Local Flood Authority (LLFA)) looking at all sources of flooding.	
Thomas E	LPRIO963	Question 1	Comment	Consideration should be given to the surrounding infrastructure to support any development and increasing populations	Noted and agreed. This will be covered through the Infrastructure Delivery Plan.
Willsgrove Developments Ltd	LPRIO1195	Question 1	Comment	We also consider that the Council should produce a Green Belt boundary review document given that it is likely that the Green Belt will have to be reviewed. This review should look at both housing allocations for the current local plan period as well as the identification of safeguarded land in order to provide development opportunities in future local plan reviews.	Noted. This is being considered through the Employment Land Review work.
Gladman Developments Ltd	LPRIO1244	Question 1	Comment	The Council need to ensure that these documents are used to inform the decisions made and they are not merely retrofitted to support predetermined strategies or approaches.	Noted and agreed.
Gladman Developments Ltd	LPRIO1245	Question 1	Comment	A key omission from the list or supporting evidence is the Sustainability Appraisal (SA) under Section 19 of the 2004 Planning and Compulsory Purchase Act policies set out in Local Plans must be subject to Sustainability Appraisal (SA).	The SA has not been excluded. Pages 6 - 7 of the document cover this in detail.
Thomas G	LPRIO1483	Question 1	Comment	A vital study should be carried out to determine the proportion of residents who reside within Wyre Forest but are employed outside the area. This would inform the identity of the town and confirm	Noted. This is being undertaken as part of the OAHN work.

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				whether it is acting as a dormitory for other areas or that it is predominantly self-sustained with internal employment.	
Natural England	LPRIO1617	Question 1	Comment	There are no evidence based studies specifically relating to the environment. As development will be restricted by potential impact on designated sites, it would be appropriate to collate all evidence on designated sites.	Comments are noted. The Sustainability Appraisal will look at potential impact of any policies or allocations on designated sites.
Paris R	LPRIO393	1.15	Comment	Would like to know of sites being put forward both previously and in the current call. Will the results of the technical assessment (due Summer 2016) be available to the public and if so how will we be notified?	The current call for sites information is commercially sensitive and not in the public domain. However all sites submitted will be included within the Housing and Economic Land Availability Assessment report which will be published in April and made publicly available online. This is a technical piece of evidence which will inform the Plan Review.
Warwickshire & West Mercia Police and H&W Fire and Rescue Service	LPRIO631	1.16	Comment	The police nor the Fire and Rescue Service are not in a position to put forward any potential sites for development. A Place Review (facilitated by WFDC) will look strategically at the public sector estate in Kidderminster, Stourport and Bewdley. At the end of this process there may be some public sector sites that are surplus to requirements.	These comments relating to land availability are noted.

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WYRE FOREST DISTRICT TODAY (SECTION 2) RESPONSES**

Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
CAMRA	LPRIO188	Section 2	Comment	Wish to see in chapter 2 definition of sustainable settlement or what services a settlement needs to have available in order to be a sustainable location for development and social needs. No mention of role of public houses which in rural areas often represent sole social facility. Should be recognition of importance of public houses in making communities sustainable, reduce need to travel, employment. Many pubs in Wyre Forest closed down and when this happens the heart of community is lost. For this reason would like to see reference to Assets of Community Value included within Local Plan and recognition that pubs are such assets and included in a new definition of what constitutes a sustainable community.	Comments noted. We do accept that a public house is important in the community.
Doncaster P	LPRIO124	2.2	Comment	Static population so new housing not necessary. Need to look at why more housing needed, why can't families live together? Green Belt should be protected at all costs.	Comments noted. Green Belt review would be required before development could take place in Green Belt.
Atkin G	LPRIO7	2.3	Comment	The three towns should be kept separate with their separate characters.	Agreed, important for each town to keep separate identity.
CPRE	LPRIO1429	2.7	Comment	Inconsistency in the drafting between paragraphs 2.7 and 3.6. The villages explicitly named in each should be the same; of wording explaining the difference should be added. Though they are only named by way of example, three named at 3.6 are the largest villages west of the Severn, which may have policy implications.	Disagree regarding consistency, the examples are to indicate that villages in the East have more services and better public transport than those in the West.
Atkin G	LPRIO8	2.11	Comment	Further development at Safari Park needs to assess impact on local communities as well as	Comments noted, planning permission for further development at the Safari Park has

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				traffic impact in Bewdley and Kidderminster.	been granted.
Cotterill J	LPRIO268	2.11	Comment	In the town centre too many empty buildings, these should be replaced with housing.	Agree – part of the redevelopment of Kidderminster could incorporate housing within the town centre.
Richards Mr H	LPRIO190	2.12	Comment	Land should only be taken out of the Green Belt in the plan making process and boundary altered in exceptional circumstances (NPPF). Therefore the Local Plan will need to decide if those circumstances exist.	Land would only be taken out of the Green Belt if a Green Belt review was carried out.
Voice E	LPRIO176	2.12	Comment	Strategic overview of Kidderminster with vision of what town centre should look like – quality shops required not retail outlets, cafes or restaurants.	Comments noted, market forces determine retailers opening stores.
Question 2. Are there any other strengths, weaknesses, opportunities and threats to our District that you feel should be identified?					
Nth Worc Housing & Water	LPRIO44	Question 2	Comment	Fuel poverty exacerbated by poor quality pre 1919 terraced houses mainly in inner urban Kidderminster, poorly insulated rented to lower income.	Comments noted.
Huizer K	LPRIO61	Question 2	Comment	Congestion and lack of cycling links between towns and villages more of a weakness than poor accessibility from motorways. Future development should take into account congestion and improve cycle routes and links.	Agree that cycling routes and links should be incorporated into future development schemes and traffic congestion should be taken into account.
Willetts K	LPRIO94	Question 2	Comment	Should be more eco homes and communities, as sustainable, natural and affordable, make more use of canals. No public transport in Cookley after 6pm. Lea Castle - need tourism and jobs for people in Cookley and surrounding areas. Need to do more for natural surroundings and planet.	Comments noted, a mix of housing including eco homes throughout the District would provide different choices for occupiers. Increased use of the canal would make additional use of an important resource.
Churchill and	LPRIO300	Question 2	Comment	Fine.	Noted.

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Blakedown PC					
Paris R	LPRIO394	Question 2	Support	Full list of strengths, weaknesses, opportunities and threats to district.	Comments noted.
Persimmon Homes Limited	LPRIO734	Question 2	Comment	Stanklyn Lane - New development, including housing, represents an opportunity to generate investment into the district. Additional housing can help to attract new businesses. The provision of new housing is an opportunity for businesses to accommodate new staff and to expand. Economic benefits of new housing - provide direct employment, support retail and leisure locally.	Comments are noted.
WFDC (Strategic Housing Team)	LPRIO682	Question 2	Comment	Lack of affordable housing in the rural areas – affecting long term sustainability of villages Health abnormalities – higher levels of LD and deprivation and poverty in population and mental health leading to higher regional rates of self harm, alcohol related hospital stays etc.	Comments noted.
British Horse Society	LPRIO461	Question 2	Comment	Development in rural parts and on urban fringe can make it harder for vulnerable users to access public rights of way and green space. New development, especially on a large scale increases traffic making it difficult for horse riders and other users using roads to access bridleways and green spaces.	Comments noted.
Taylor Wimpey UK Ltd	LPRIO741	Question 2	Comment	Land north of Stourport-on-Severn located on the eastern side of Bewdley Road (B4195) approx 6 hectares has the potential to deliver up to 150 dwellings alongside justified contributions towards local services and infrastructure. Key opportunity for the Council is to seek appropriate extensions to sustainable settlements;	Comments are noted.

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				<p>as acknowledged in paragraph 2.3-2.5, these include Kidderminster and Stourport-on-Severn as the largest two settlements in the District.</p> <p>Vital that appropriate opportunities for growth are taken to progress the economic aspirations of the area, provide enough housing to meet needs and assist affordability, increase viability of services and facilities in key settlements. To meet the Plan's suggested job growth target (5.4%, 2016-2032), at least 8,480 dwellings will be required (530 dwellings per annum).</p> <p>The site is well located on edge of Stourport-on-Severn, respecting the key aspirations of Green Belt policy and being in the control of a national house builder (Taylor Wimpey) with an excellent track record of delivering high quality residential developments, we consider that this site provides an excellent opportunity for future growth.</p>	
Taylor Wimpey UK Ltd	LPRIO778	Question 2	Comment	<p>Land north of Stone Hill, on eastern edge of Kidderminster which is approximately 51 hectares has the potential to deliver up to 1,200 dwellings alongside justified contributions towards local services and infrastructure on a residential led development.</p> <p>Key opportunity for the Council is to seek appropriate extensions to sustainable settlements; as acknowledged in paragraph 2.3-2.5, these include Kidderminster and Stourport-on-Severn as the largest two settlements in the District.</p> <p>Essential that appropriate opportunities for growth are taken to progress economic aspirations of the area; provide enough housing to meet needs and assist affordability; and increase the viability of services and facilities in these key settlements.</p>	Comments noted.

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				To meet the Plan's suggested job growth target (5.4%, 2016-2032), at least 8,480 dwellings will be required (530 dwellings per annum). With this site being well located on the edge of Kidderminster, capable of respecting the key Green Belt functions and being in the control of a national house builder (Taylor Wimpey) with an excellent track record of delivering high quality residential developments, we consider that this site provides an excellent opportunity for future growth.	
Bewdley Town Council	LPRIO872	Question 2	Comment	<i>Include the desire to protect the Green Belt from inappropriate development.</i>	Comments noted.
Upper Arley PC	LPRIO1318	Question 2	Comment	Threat to elderly needs to cover more care homes for housing.	Comments noted.
Staff & Worcs Canal Society	LPRIO1268	Question 2	Comment	All the main strengths, weaknesses, opportunities and threats to the District have been identified.	Comments noted.
Warwickshire & West Mercia Police and H&W Fire and Rescue Service	LPRIO632	Question 2	Comment	Question 2 – Key issues – With the potential significant increase in housing stock there is a threat that there would be an increase in crime and incident levels and an increase in need for the emergency services. This would require a strategic approach to expanding the emergency services infrastructure to meet this increased need and ensure the same level of provision remains to existing households. Paragraph 2.10 (weaknesses) could include a reference to the concern of local residents about crime and anti-social behaviour. The would conform with the key issue on page 24 of the Community Strategy 2004–2014 which is worded as follows – <i>“Promoting Wyre Forest as a safe district is going</i>	Comments are noted.

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				<p><i>to be one of the key challenges of the Community Strategy. The district is already a safe place to live, work and visit. However even the low levels of crime and disorder, anti-social behaviour and fear of crime that are experienced can have a significant impact on local people's lives and the cohesion of our rural and urban communities. These issues can also deter private sector investment to the area."</i></p> <p>It is essential that the Local Plan helps to fulfil the Council's duties under the Crime and Disorder Act 2008. Section 17 states: <i>"Without prejudice to any other obligation imposed upon it, it shall be the duty of each local authority to exercise its various functions with due regard to the likely effect of those functions on, and the need to do all that it reasonably can, to prevent crime and disorder in its area."</i></p> <p>In order to implement this duty, the Council will need to incorporate any strategic priorities identified by the North Worcestershire Community Safety Partnership, including those relating to the Safer Wyre Forest group.</p>	
Walters	LPRI0672	Question 2	Comment	<p>The district has improved immensely in character and appearance as heavy industry has gradually closed. The beauty and <i>accessibility</i> to the local surrounding countryside is essential to maintain and improve the attractiveness of Wyre Forest to all existing and potential residents. Any further development either housing or Industrial must be done sympathetically without over-developing existing areas and creating vast swathes of factories or houses which cause a deterioration of living conditions to existing residents, and an</p>	<p>Additional housing development and maybe additional employment land will be required in the District but your comments regarding how it is done will be considered.</p>

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				overwhelming of local public and transport services.	
Stanmore Properties Ltd	LPRIO1008	Question 2	Comment	Additional housing and employment will bring in migration that will help balance an aging population and provide opportunities to enhance sustainability with more people supporting additional services and facilities.	Comments noted.
Bewdley Civic Society	LPRIO1555	Question 2	Comment	Opportunities: New Traffic Mgt Plan to be done through Neighbourhood Plan (NP) (including the introduction of 20 mph zone in town centre). Threats: Lack of Traffic Mgt Plan; Eroding of Green Belt; HGV traffic; Increase in traffic due to Water Park at WMSP	Would be interested to know the reasoning behind a proposed 20 mph and how this will help air quality and traffic congestion, and if County Highways think that this is the best solution.
CPRE	LPRIO1426	Question 2	Comment	Decline of the traditional carpet trade is key reason for the present state of the district. Low numbers of younger adults and several of the other factors identified are ultimately due to this. Consequence is that Kidderminster remains a depressed town. How that can be addressed is not obvious. This needs to be more firmly expressed in the supporting description at 2.16. This is such a fundamental weakness that it should perhaps also be covered within 2.08-12 From the western part of Kidderminster people commute to work in Birmingham. Most by car, this results in A456 through Hagley being the busiest A-class road in Worcestershire. The alternative means of commuting is by train, with Park and Ride car parks. A key location for this is Stourbridge Junction Station, where the car park has recently undergone an expansion, after becoming full to capacity before the end of the	Agree that the decline in the carpet industry has had a huge impact on the District also agree that to encourage more to commute by train parking at stations needs addressing.

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				<p>rush hour. This is provided on land that was once used for railway sidings. However, there is no more land available for that. Since the site adjoins residential areas, multi-storey parking would probably not be acceptable. Accordingly there may well be a need before the end of the Plan Period to provide additional parking adjoining the railway line. There is nowhere acceptable for this to go in Hagley. Despite the proposal to improve Kidderminster Station it is doubtful where substantial new capacity can be provided there. Another option might be to focus on Blakedown as a location for this. This needs to be a free facility, as long as that provided by Centro at Stourbridge Junction is free.</p>	
Shuttes J	LPRIO1129	Question 2	Comment	In Stourport especially failure to fulfil development opportunities on which tax payers money has been spent.	Comments noted but do not know which schemes are referred to.
Taylor Wimpey UK Ltd	LPRIO1034	Question 2	Comment	<p>Approximately 6 hectares of land south west of Stourport-on-Severn, located northern edge of Rectory Lane, Areley Kings has the potential to deliver up to 100 dwellings alongside justified contributions towards local services and infrastructure.</p> <p>Key opportunity for the Council to seek appropriate extensions to sustainable settlements; as acknowledged in paragraph 2.3-2.5, these include Kidderminster and Stourport-on-Severn as the largest two settlements in the District.</p> <p>Essential that appropriate opportunities for growth are taken to progress economic aspirations of the area; provide enough housing to meet needs and assist affordability; and increase the viability of</p>	Agree that additional housing will increase viability of facilities and services.

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				services and facilities in these key settlements	
Topland Hotels (No. 14) Ltd	LPRIO1229	Question 2	Comment	Tone in considering strengths, weaknesses, opportunities and threats, appears to engender a sense of inertia in the District. "Static and aging population" and "little in-migration". Also refers to a low rate of higher qualifications, lower house prices and low wages. In part, this appears to be the consequence of the Council's approach placing too much emphasis on housing development on brownfield sites that are unlikely to come forward, and the unintended consequence that economic development is stifled. The "Key issues for Wyre Forest District" suggests that one of the greatest "threats" to the Authority is pressure on the Green Belt. In fact, this could be seen as an opportunity: the opportunity to re-enliven settlements; to increase the aspiration to live in towns such as Kidderminster and Stourport, and to re-invigorate the population. The biggest threat to the future of Wyre Forest is the status quo. This Plan process offers an opportunity to use the planning system to achieve sustainable growth in appropriate locations that will ensure that the future of the District as a collection of thriving settlements set within a high quality environment is maintained.	Comments are noted.
Thomas E	LPRIO964	Question 2	Comment	Weakness - Road links and capacity of roads to Birmingham. Building works at Hagley and A456. Changes to road layouts impact traffic into and out of Kidderminster. Retired from Black Country moving into area with limited capacity to contribute economically. Lack of employment especially for young, poor ability to attract businesses due to	Agree with many of the points raised.

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				transport links. Trains at capacity. Threats - Retail at Merry Hill, Worcester and Birmingham with free parking and more choice. Kidderminster ability to offer something different. Strengths - Severn Valley trains and Safari Park – both of which attract visitors from outside the region	
Willsgrove Developments Ltd	LPRIO1196	Question 2	Comment	New development including housing represents an opportunity to generate investment into the district, additional housing can: help attract new business and an opportunity for business to accommodate new staff and expand, economic benefits by providing direct employment, supporting retail and leisure in the district. As one of the district's two main market towns in the district, Bewdley should be a focus for new residential development.	Agree that if more live in district this will support retail and leisure and provide direct employment and businesses may be attracted into district.
Thomas G	LPRIO1485	Question 2	Comment	SWOT analysis strengths - absence from this list is industry and employment and competitiveness on this front compared to outside areas. Important to allocate an identity to Kidderminster and develop a plan to support and retain this, not try to urbanise and turn it into something that it will struggle to naturally become. Further housing development will erode strengths listed in plan. The question arises as to who would like to travel through acres of urban development to access reduced quality environment? Threats not listed exist from the internet together with neighbouring employment and retail developments like Merry Hill and Birmingham.	Agree that some residents in Wyre Forest District do out-migrate for employment to Worcester and Birmingham.
Natural England	LPRIO1618	Question 2	Comment	The plan is an opportunity to reach government targets for improving SSSIs rather than just	Comments on opportunities and threats are noted.

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				avoiding impacts on them. Threats should include threat of increased development on SSSIs.	
Atkin G	LPRIO9	2.15	Comment	Poor public transport in the District and so even if houses built within 30 minutes public transport time of key facilities the service could be cut.	Comments regarding poor public transport in the District are noted.
Thomas G	LPRIO1486	2.15	Comment	Any new build as cheaper than surrounding areas could be occupied by people commuting out of the District for employment. Original issue remain – large town, insufficient infrastructure to accommodate sustainability.	Comments noted, attracting people to live and work within District would be much better than residents commuting out but they are likely to still contribute to economy through retail, leisure etc.
Question 3. Do you think that these are all of the social issues in Wyre Forest District, are there others that we should have included?					
Nth Worc Housing & Water	LPRIO41	Question 3	Comment	Compare disability levels in Wyre Forest District to rest of Worcestershire, higher levels lead to more demand on services.	Comments noted.
Willetts K	LPRIO96	Question 3	Comment	Ageing population so smaller units needed, small eco homes that have low running costs means elderly could afford to stay in their homes. Mixed eco hamlets create communities, living and working on site nurturing elderly. Park and ride needed in Bewdley and Kidderminster	Comments noted, with an ageing population some smaller residential units are required so that some elderly people can downsize. Comments regarding park and ride are noted, however Worcester City have had their park and ride removed and so it is unlikely that Kidderminster or Bewdley would be provided with one.
Richards Mr H	LPRIO191	Question 3	Comment	Young people who have grown up in rural communities should have opportunity to remain there with lower cost market housing and social housing. Issue is how to grow the population with economically active younger people as this	Agree - for rural communities to flourish affordable accommodation needs to be available for younger economically active people especially those with a local connection.

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				enables an ageing population to be supported and grows the local economy. This will affect spatial planning priorities.	
Churchill and Blakedown PC	LPRIO301	Question 3	Comment	If facilities are built for older people relevant facilities including medical provision need to be built as no Doctor in village.	Comments noted.
Paris R	LPRIO395	Question 3	Support	Consider all social issues listed are a full list.	Comments noted.
WFDC (Strategic Housing Team)	LPRIO683	Question 3	Comment	Need to recognise not all older people will want to move so housing needs to be capable of adaptation e.g. lifetime homes standard or similar Need to include more around deprivation and poverty / fuel poverty in areas of the District and more about health inequalities unless addressed by Question Two.	The issues raised will be investigated.
Bewdley Town Council	LPRIO873	Question 3	Comment	The vision for Bewdley should include the enhancement of the riverside environment, safer river crossings and the retention of unique retail outlets to attract visitors along with local shopping outlets.	Comments are noted, the Local Authority does not have jurisdiction over the type of retail outlets.
West Midlands HARP	LPRIO1057	Question 3	Comment	Affordable housing is a social issue, not supplying affordable homes for people in the community to live in creates social inequality. The Wyre Forest SHMA Overview Report (February 2012) states at paragraph 3.9 that there is ' <i>a relatively high level of unmet need for affordable housing which remains an important priority for the authority to address</i> '. Figure 3.9 gives an affordable housing need of 210 per year. The Annual Monitoring Report 2013/14 (December 2014) shows affordable housing completions to be 163 in 2013/14 with the	Providing as many affordable dwellings within the District as possible is extremely important to Wyre Forest District Council.

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				previous year only showing 60 completions. Clearly affordable housing need is not being met; the Council should be ambitious in its drive to house all residents and make clear that they understand the need to provide good quality, affordable homes	
Upper Arley PC	LPRIO1319	Question 3	Comment	Pound Green - no doctors in the village so if proposing to build facilities for older people need medical provision, only one bus per week, community travel schemes needed.	Comments noted.
Staff & Worcs Canal Society	LPRIO1269	Question 3	Comment	Would wish to draw attention to the impact of anti-social behaviour on the canal. The Society recommends that the plan, with regards to developments adjacent to the canal, should recognise the existence of these problems and indicate, as a matter of policy, that developers should take steps to mitigate the effect of such behaviour. In practice this might be a matter of increasing lighting, surveillance facilities, and advising developers to avoid creating out of the way corners which are often the focus of trouble. They should, as a matter of planning policy be encouraged to treat the canal as a valuable resource to be integrated into the open areas and providing an attractive outlook for residents and the general public.	Agree that antisocial behaviour can be a problem along canals and that new development around these areas should incorporate schemes to reduce this as much as possible.
Fyshe F	LPRIO523	Question 3	Comment	Limited healthcare provision outside main settlements.	Agree that few villages have local GP surgeries.
Warwickshire Police, West Mercia Police and Hereford	LPRIO633	Question 3	Comment	Question 3 – Social issues – the Local Plan needs to make reference to the maintenance and creation of safe and secure environments across the district. This will need to take into account	Comments are noted.

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and Worcester Fire and Rescue Service				existing levels of crime and those predicted once the proposed developments are complete. These developments will put increased pressure on the police and fire and rescue services and therefore additional emergency services infrastructure will be required to meet that demand. These issues were addressed in our response to Question 2 above.	
Walters	LPRIO673	Question 3	Comment	Local people need continued access to leisure facilities and encouraged to walk, cycle, ride horses to improve health and obesity issues. Protection of Green Belt benefits the area enormously. Strategic planning of neighbouring areas needs to be recognised, particularly with regard Green Belt boundaries around Kidderminster, Stourport and Bewdley main priority must be that existing quality of life and expectations of current residents must be protected and enhanced where possible.	Agree that people need to be encouraged to walk, cycle and ride and that this has benefits for health and obesity levels.
Stanmore Properties Ltd	LPRIO1009	Question 3	Comment	Affordability of housing should be considered, the more housing that is provided the more affordable it becomes because supply is increased. Also, as market housing sites bring forward Affordable Housing, the more sites allocated the more Affordable Housing is provided.	Comments noted.
Shuttes J	LPRIO1130	Question 3	Comment	Action/pressure by WFDC on reducing healthcare provision by outside authorities	Healthcare is under the jurisdiction of the Health Authority not Wyre Forest District Council.
Thomas E	LPRIO965	Question 3	Comment	Higher than average number of unemployed, single parent families and those claiming benefits.	Comments noted.
Thomas G	LPRIO1487	Question 3	Comment	Needed - Apartment style accommodation close to	Agree than some residentail

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				town centre attractive to single occupancy and younger economically active, easy access to shops and restaurants rather than greenfield development which means more travel, congestion, pollution, un-sustainability and health issues.	accommodation in the town centre would be beneficial.
Atkin G	LPRIO10	2.16	Comment	Empty shops do not attract visitors and businesses. Car parking charges have been increased.	Agree that empty shops do not encourage visitors. Kidderminster town centre will be enhanced and this will encourage more visitors. Comments regarding parking charges noted.
Thomas G	LPRIO1488	2.16	Comment	Kidderminster unattractive for new businesses compared to neighbouring towns as location and transport infrastructure inadequate.	Agree that road network and distance from motorways does have an impact on attracting new business.
Atkin G	LPRIO11	2.20	Comment	Employment sites should be accessed by suitable public transport.	Comments noted agreed it is important that employment sites are served by public transport.
Voice E	LPRIO177	2.20	Comment	Local attractions keep visitors on site spending money so they do not visit the local towns and spend money there.	Comments noted.
Atkin G	LPRIO12	2.21	Comment	Comberton Hill underpass needs proposed improvement to encourage use of railway station.	Agree, Comberton Hill underpass needs improvement, with proposed improvements to Eastern gateway this should encourage links between Kidderminster town centre and railway station.
Mardon P	LPRIO680	2.21	Comment	Redevelopment of Kidderminster Rail Station good but some trains should go to New Street so link to HS2. Public do not want to walk to New Street from Snow Hill or Moor Street.	Agree that Kidderminster Station redevelopment is good for the area, train destination is outside the jurisdiction of the Local Authority.

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CPRE	LPRIO1425	2.21	Comment	Paragraph 2.21 fails to acknowledge any possibility of the Severn Valley Railway serving a transport rather than merely a heritage function. Possibility of upgrading the line between Kidderminster and Bewdley to be able to carry heavy rail passenger traffic should not be ruled out, with a new station at old sugar beet factory site.	Agree that more use of Severn Valley Railway by commuters should be encouraged.
Thomas G	LPRIO1489	2.21	Comment	Simply upgrading the railway station at Kidderminster will not improve journey capacity or improve travel experience as passengers stand for much of their journey into Birmingham and back on overcrowded trains. Suggest that most employment lies outside the area and Kidderminster is becoming a dormitory. Further housing will simply exacerbate this problem and attract more commuters drawn by cheaper housing stock pressurising all forms of existing infrastructure including town parking problems, congested roads, increased safety risk to vulnerable road users, environmental pollution.	Comments are noted.
Thomas G	LPRIO1484	2.22	Comment	A full study would determine the proportions and inform needs of the town together with its purpose regarding commuting to Worcester or Birmingham for higher paid jobs.	Comments noted.
Question 4. Do you think that there are more economic issues within the District that we have not included?					
Willetts K	LPRIO97	Question 4	Comment	Should consider other forms of public transport such as trams run by green energy and park and ride. If industrial development is in the Green Belt - problems of pollution emissions. Future development should be Eco from materials	Comments noted.

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				to energy.	
Churchill and Blakedown PC	LPRIO302	Question 4	Comment	Nothing to add.	Noted.
Paris R	LPRIO396	Question 4	Support	All economic issues in District have been included.	Response noted.
Persimmon Homes Limited	LPRIO735	Question 4	Comment	Stanklyn Lane - housing could help support economic growth in District by virtue of economic impact of construction, creating opportunities for in-migration workers occupying houses, expenditure from residents in new housing will boost local economy.	Comments noted.
Shuttes J	LPRIO687	Question 4	Comment	Too much emphasis on Kidderminster, attention required to failing retail uses in Stourport and Bewdley. Public transport needs review and action.	Comments noted.
Persimmon Homes Limited	LPRIO997	Question 4	Comment	Economic issues - This section should also refer to the fact there is high youth unemployment in the District, as evidenced in the Worcestershire Strategic Economic Plan. Economic issues - should make reference to the need for in-migration from outside the District to assist in maintaining a sustainable balanced workforce.	Agree that these points should be included.
Upper Arley PC	LPRIO1320	Question 4	Comment	Too many charity shops which compete with other retailers and banks closing due to lack of footfall.	Comments noted.
Staff & Worcs Canal Society	LPRIO1270	Question 4	Comment	Developments, whether commercial or residential, adjacent to water ways have a proven national track record of returning higher value sales, improving lifestyles and general health and wellbeing. Retail activity is increased where the setting is attractive and offers diverse interests,	Agree that property in attractive settings are more likely to have higher value and that if a town centre is attractive and diverse more are attracted and so retail sales improve.

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				thereby increasing local and regional tourism. The society would wish the District council to take the fullest advantage of the potential for CIL or S106 based investment to the benefit and improvement of the canal and rivers and their environs.	
British Horse Society	LPRIO466	Question 4	Comment	Support all issues listed in economic issues. Fails to recognise agriculture, tourism and rural industries suffer if large scale housing development approved in villages and urban fringe. These areas normally have highest equestrian businesses or livery which can suffer through loss of or urbanisation of bridleways and riding routes and increased traffic.	These are all issues which are considered by the Local Authority.
Warwickshire Police, West Mercia Police and Hereford and Worcester Fire and Rescue Service	LPRIO634	Question 4	Comment	Question 4 – Economic issues – It is important to provide a safe and secure environment in which economic development can flourish. The Local Plan needs to consider the potential impact of expanding the evening and night time economy, particularly in Kidderminster. These types of businesses will thrive if the location is secure and will have the confidence to invest in the local area. In some cases specialised infrastructure is required. The evening and night time economy is currently addressed in some detail in the Kidderminster Central Area Action Plan (KCAAP) and should not be excluded from the new plan. In particular paragraphs 5.66 and 5.71 and Policy KCA.GPB7 of the KCAAP are important to transfer over to the emerging Local Plan. In terms of the emergency services, this places additional pressure on police resources. The impacts can be reduced to some extent through careful design of new	Comments are noted.

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				developments. Improvements to the design of public space should be co-ordinated and driven by the Local Plan. The issue of crime, and particularly 'Secured by Design' is also addressed in the current Churchfields Masterplan SPD. Design principles 4, 5 and 7 address regeneration principles, including crime prevention.	
Telereal Trillium	LPRIO813	Question 4	Comment	New housing could help to support the economic growth in the district, creating new opportunities for in-migration workers occupying housing and supporting economic growth in the district. The expenditure from residents of new housing will also help to boost the local economy	Agree that in-migration and people moving into the District can help boost the economy and economic growth.
Bewdley Civic Society	LPRIO1556	Question 4	Comment	Threat from Traffic. Carry out investigation into the opportunity of using SVR as a commuter line	If SVR could be used as a commuter line this could help congestion.
CPRE	LPRIO1424	Question 4	Comment	Decline of the traditional carpet trade is key reason for the present state of the district. Low numbers of younger adults and several of the other factors identified are ultimately due to this. Consequence is that Kidderminster remains a depressed town. How that can be addressed is not obvious. This needs to be more firmly expressed in the supporting description at 2.16. This is such a fundamental weakness that it should perhaps also be covered within 2.08-12 From the western part of Kidderminster people commute to work in Birmingham. Most by car, this results in A456 through Hagley being the busiest A-class road in Worcestershire. The alternative means of commuting is by train, with Park and Ride car parks. A key location for this is	Agree that the decline in the carpet industry has had a huge impact on the District also agree that to encourage more to commute by train parking at stations needs addressing.

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WYRE FOREST DISTRICT TODAY (SECTION 2) RESPONSES**

Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
				<p>Stourbridge Junction Station, where the car park has recently undergone an expansion, after becoming full to capacity before the end of the rush hour. This is provided on land that was once used for railway sidings. However, there is no more land available for that. Since the site adjoins residential areas, multi-storey parking would probably not be acceptable. Accordingly there may well be a need before the end of the Plan Period to provide additional parking adjoining the railway line. There is nowhere acceptable for this to go in Hagley. Despite the proposal to improve Kidderminster Station it is doubtful where substantial new capacity can be provided there. Another option might be to focus on Blakedown as a location for this. This needs to be a free facility, as long as that provided by Centro at Stourbridge Junction is free.</p>	
Topland Hotels (No. 14) Ltd	LPRIO1230	Question 4	Comment	<p>Yes: Fails to address relationship between Green Belt, brownfield land availability, housing completions and employment opportunities. This is critical in ensuring that the social and economic issues highlighted can be addressed during the Plan period. References to the high percentage of the population with higher qualifications moving away from the District, a stagnation of the population, and the need to attract better paid jobs, are all the unintended consequences of prevailing policies that have constrained growth in the District. In order to address these issues, consideration must be given to:</p> <ul style="list-style-type: none"> • the potential for brownfield sites to come forward for development on a realistic, rather than idealistic basis; 	Comments are noted.

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Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
				<ul style="list-style-type: none"> • the constraints on development in place to the Green Belt boundary; and • the need for aspirational housing within the District to give a stimulus to the static population. If the Plan is taken forward on the basis of consideration of these elements, then the economic issues can be addressed and dealt with more effectively.	
Thomas E	LPRIO966	Question 4	Comment	Economically active people will not choose to live in the town. Hagley, Stourbridge Bromsgrove, Droitwich, Worcester all offer better transport links and the same if not better facilities than Kidderminster.	Many residents who are economically active choose to live in the District and commute to Worcester and Birmingham for work.
Willsgrove Developments Ltd	LPRIO1197	Question 4	Comment	Housing could help support the economic growth in the district by virtue of economic impact of construction and creating new opportunities for in-migration workers who will occupy the houses. Expenditure from residents of new housing will also help to boost the local economy.	Agree that additional housing and residents can help to boost the local economy.
Thomas G	LPRIO1490	Question 4	Comment	List of economic issues do not say how employment opportunities will be created. Misses the point that the right type of businesses will not move into Kidderminster when infrastructure is poor together with connections to customers and supplies. This is the primary focus that should be addressed, the rest will naturally follow. House building for the sake of it will simply draw in more commuters and stifle infrastructure and any potential for core growth.	Comments are noted.
Historic England	LPRIO1062	2.25	Support	Support the recognition of the importance of the historic environment within paragraph 2.25 and would request that this be expanded to take	Comments are noted.

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Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
				account of other heritage assets such as below ground archaeology where the importance may not yet be known as well as Heritage at Risk. Additionally, it is important to consider the historic environment in a holistic manner and consider the character of areas, what makes an area locally distinctive and how the Plan will have a 'positive strategy' for the historic environment (NPPF Para 126).	
Thomas G	LPRIO1491	2.26	Comment	Further development will worsen air quality. Improvement to transport infrastructure to make it more efficient would bring improved environment and businesses to the area. Greenfield housing would have detrimental effect and create extra load.	Agree that improved transport infrastructure to make it more efficient would have many benefits.
Question 5. Are there any more environmental issues that are affecting Wyre Forest District that we have not included ?					
Atkin G	LPRIO13	Question 5	Comment	Kidderminster ring road needs a complete ring road. Air quality would improve. Traffic chaos from Safari Park needs to be sorted. Too many road works	Comments relate to Worcestershire County Council Highways.
Barratt Homes West Midlands	LPRIO80	Question 5	Comment	Significant pressure for Green Belt development, Framework allows for Green Belt release in exceptional circumstances, our view is exceptional circumstances will only exist if it can be demonstrated that non Green Belt options which are available for development are demonstrated to be not suitable or sustainable.	Comments noted.
Willetts K	LPRIO98	Question 5	Comment	Natural materials such as straw should be considered as building materials.	Comments noted.
Coal Authority	LPRIO187	Question 5	Comment	Coal Mining Issues in Wyre Forest District.	Comments noted regarding future

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Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
				<p>Coal mining in the past generally benign but development activities can trigger stability and public safety problems. Such problems could include collapses of mine entries and shallow mine workings, spontaneous combustion, discharge of water. These hazards can be found in any coal mining area particularly where coal exists near to the surface, including existing residential areas. Within plan area 52 recorded mine entries and a coal mining related hazard. Also mining features in north west and south west of the District. The Coal Authority High Risk Development Area covers approximately 2% of the Council Area.</p> <p>Mine entries and mining legacy matters should be considered by Planning Authorities to ensure site allocations and other policies will not lead to public hazards, No development should take place over mine entries.</p> <p>Land instability and mining legacy is not always a complete constraint on new development because mining legacy matters have been addressed the new development is safe, stable and sustainable. Permission from Coal Authority may be required. Mining legacy in Wyre Forest District located in areas where it is unlikely that the Local Plan will propose major development. Should comply with paragraphs 109,120 and 121 of NPPF. Policy approach could be included in development management policy.</p> <p>Wishes to be consulted at future stages.</p>	consultation.
Churchill and Blakedown PC	LPRI0303	Question 5	Comment	Development between built up areas will not be supported by Parish Council as should not merge into each other. Refer to emerging Neighbourhood	Comments noted

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Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
				Plan.	
Worcestershire Regulatory Services	LPRIO186	Question 5	Comment	No adverse comments with regards contaminated land. Lack of improvement in air quality in the Horsefair/Coventry Street AQMA WRS recommend proposed plans to deal with the problem be finalised and implemented as soon as possible. WRS have no adverse comments on air quality on the other aspects of the consultation.	Agree air quality in the Horsefair/Coventry Street does need addressing as soon as possible.
Paris R	LPRIO397	Question 5	Support	All environmental issues affecting the District have been included.	Response noted.
Worcestershire Wildlife Trust	LPRIO894	Question 5	Comment	Add increased recreational pressure (on the natural environment) to list. Increasing public access to nature and green space is important but control needed to avoid adverse impacts on wildlife and important habitats. The need to deliver new public open space for recreation so as to reduce pressure on high value ecological sites could therefore be a significant component of strategic decision-making.	Comments noted.
Bewdley Town Council	LPRIO874	Question 5	Comment	The Strategic Character Area of Bewdley should include the designation "market town" in order to identify with its historical significance and describe the town's distinctive character.	Comments noted.
Bewdley Town Council	LPRIO875	Question 5	Comment	CIL will manage the expectations of both developer and WFDC and will require less negotiation which can be costly in time and resources. CIL will potentially benefit town/parish councils in the future. It is noted that S106 will still be used for housing developments.	Comments are noted.

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Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
Persimmon Homes Limited	LPRIO998	Question 5	Comment	Under the environmental issues, says that there is a pressure for development in the Green Belt. This issue may confuse members of the public as reference to the Green Belt should not be included in this section. The Green Belt is a policy restriction, not an environmental designation	Comments are noted.
Upper Arley PC	LPRIO1321	Question 5	Comment	Bewdley - Not beneficial air quality due to congestion, issues with drains, extra congestion up Dowles Road if present procedure in Welch Gate is altered, more and more people, tarmac drives etc. soaking in water, contributing to flood issues. DC need to look closer at planning apps.	Agree that there is an issue with poor air quality in Welch Gate and this does need addressing.
Staff & Worcs Canal Society	LPRIO1271	Question 5	Comment	The Society commends the continued vigilance of the District Council in ensuring that the district's heritage structures are protected and its adherence to the aims and objects set out in the National Planning Policy Framework (NPPF).	Comments are noted.
Fyshe F	LPRIO524	Question 5	Support	Support retention of Green Belt. Would not support development between built up areas merging into each other.	Agree the Local Authority would not wish towns and villages to merge into one another.
Historic England	LPRIO1065	Question 5	Comment	Would recommend that there is a separate issue identified for the natural and the historic environment and that it should relate to the need to protect, conserve and where possible, enhance the significance of heritage assets and their setting as well as the wider historic environment of the District. We recommend amending 'historic assets' to 'heritage assets' in line with the NPPF.	Comments noted, amending historic assets to heritage assets will be considered.
Bewdley Civic Society	LPRIO1557	Question 5	Comment	Desire to protect the Green Belt from inappropriate development (like Water Park at WMSP)	Comments noted although water park has planning permission.

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Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
CPRE	LPRIO1427	Question 5	Comment	The supporting text might usefully refer to the number of SSSIs. The Wilden Marshes and the valley of the Wannerton Brook above Hurcott Pool are significant wetland sites. They ought to be acknowledged. However, this is unlikely to affect policy much.	Comments noted.
Shuttes J	LPRIO1131	Question 5	Comment	Maintaining the green separation between the towns is essential	Comments noted.
Thomas E	LPRIO968	Question 5	Comment	Green Belt is one of the reasons people visit and live in Kidderminster. If removed the town will drastically decline further as will lose any advantage and will have no unique features. Property values will decline.	Comments are noted but development land will be required within the District as there will not be enough brownfield sites for all the development required and so the Local Authority may need to look at Green Belt sites.
Natural England	LPRIO1619	Question 5	Support	Agree with statement: 'Protecting, conserving and, where it is possible to do so, enhancing the District's rich natural environment and historic assets.'	Support is welcomed.

**LOCAL PLAN REVIEW ISSUES & OPTIONS CONSULTATION (SEPTEMBER 2015)
VISION AND OBJECTIVES (SECTION 3) RESPONSES**

Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
Homes and Community Agency	LPRIO653	Section 3	Support	Support for vision and objectives. However, important that Objective 5 is supported by policies in accordance with Green Belt Policy in the NPPF, including previously developed sites in the Green Belt.	Support and comments are noted.
WCC, Planning Economy & Performance	LPRIO1393	Section 3	Comment	Welcome objectives 12 and 13. Also welcome the various policies which directly or indirectly aim to improve the health and wellbeing of local residents, such as green infrastructure policies and encouraging sustainable transport modes. Feel that the Local Plan could be strengthened in terms of references to public health. Would like to see policies which aim to reduce the proliferation of hot food takeaways in the district.	These comments are noted and will be used to help develop the Preferred Options.
Mardon P	LPRIO679	Section 3	Comment	A balance must be achieved and people affected by the changes must be kept informed. Trying to get to local shops and the hospital is very difficult. So please sort out the road network, especially around planned road works which exacerbate the situation.	Comments are noted. Road works and transport planning are the responsibility of Worcestershire County Council.
Richards Mr H	LPRIO192	3.1	Comment	Considers that if the outlying villages are to be/remain sustainable settlements (retaining their shops and services) they will probably need to grow, and this may require land to be taken out of the Green Belt.	Comments are noted. The Objective Assessment of Housing Need will inform the level of development to be allocated to each of the villages. If the numbers are significantly larger then it will indeed be necessary to undertake a Green Belt Boundary review for those settlements to the north and east of the District.
Paris R	LPRIO398	3.5	Comment	Considers that St Annes Church in the centre of Bewdley needs the stonework cleaning as it is in such a prominent position.	The comment is noted, however it is not considered to be a land use planning matter of relevance to the Local Plan.

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Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
					However these comments will be passed on to the Council's Conservation Officer.
Richards Mr H	LPRIO193	3.6	Comment	It should be recognised that Chaddesley Corbett serves a rural hinterland.	Noted and agreed.
Upper Arley PC	LPRIO1323	3.6	Support	particularly supports statement 3.6 and 3.7 so long as the growth is organic	Support is noted.
Fyshe F	LPRIO525	3.6	Comment	Support organic growth for the rural settlements only.	Comments are noted.
Richards Mr H	LPRIO194	3.7	Comment	Considers that a balanced population structure is unlikely to be achieved unless we can attract young families to move to the District.	Noted and agreed.
Upper Arley PC	LPRIO1324	3.7	Support	particularly supports statement 3.6 and 3.7 so long as the growth is organic	Support is noted.
Atkin G	LPRIO14	3.9	Object	Currently we do NOT have good access to our towns. Neither does the railway station and Comberton Hill provide attractive access.	Noted. Promoting better accessibility by all modes of transport will be a key objective for the Local Plan Review.
British Horse Society	LPRIO471	3.10	Object	Considers that reference to horse riders needs to be included within the vision.	Noted. It is considered that references could be made to vulnerable users which include pedestrians, cyclists and horse riders.
Question 6. Do you agree with the vision set out above? If not, what changes would you make?					
Willetts K	LPRIO99	Question 6	Comment	Agrees with the vision and objectives. Considers that development should enhance local landscapes through strawbale building, wooden buildings and cladding.	Support is welcome. The comments on building materials are noted.
Churchill and Blakedown PC	LPRIO304	Question 6	Comment	Agrees with the vision and particularly supports statement 3.6 and 3.7 so long as the growth is	Support for the vision is welcomed.

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Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
				organic	
Chaddesley Corbett PC	LPRIO214	Question 6	Comment	This section contains few forward looking statements, but seems to be a good summary of the current position	Noted.
Paris R	LPRIO399	Question 6	Support	More could be made of Bewdley's riverside cafe culture to attract investment and financially active people. There should be greater planning support for restaurants, wine bars and fine dining opportunities.	These comments are noted. This is also something which could be pursued through the Bewdley Neighbourhood Development Plan.
Mahoney Mr S	LPRIO755	Question 6	Comment	Considers that Bewdley should be a focus for new housing and employment opportunities in order that the community is robust and sustainable.	Comments are noted. This would also be dependent upon the level of OAHN for the town.
Persimmon Homes Limited	LPRIO736	Question 6	Comment	Believe that the plan should run to 2035 in order to have a minimum fifteen year life from the date of adoption in accordance with the advice set out at paragraph 157 of the Framework. The Green Belt Review should consider needs to 2050 when identifying safeguarding land in order to allow for the Green Belt boundary to endure beyond the current local plan review date.	The timetable for the Plan Review is clearly set out in the LDS. The District Council has an excellent record of timely plan reviews and as such we do not consider it is necessary to lengthen the plan period unless there is a delay with the forthcoming plan review stages, which will be avoided at all possible costs. The comments regarding the GBBR are noted.
Worcestershire Wildlife Trust	LPRIO896	Question 6	Support	Helpful to make reference in section 3.2 to the need for outdoor interests to reflect the intrinsic ecological importance of the district's green infrastructure and to be delivered in a way that does not compromise it. Would help to guide the plan towards delivering development that respects (and works within) sustainable environmental limits	Comments are noted and agreed.

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Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
WFDC (Strategic Housing Team)	LPRIO686	Question 6	Comment	3.2 Expand upon low carbon theme: energy and resource efficiency, as well as reliance on renewable energy. 3.7 should make it clearer that choice is around types of properties and <u>tenure</u> . Also need stock that is flexible to changing needs over time. Supports a healthy population through access to green space, good quality housing, walking and cycling infrastructure, opportunities for people to grow their own food etc.	Comments are noted and agreed.
Associated British Foods Plc	LPRIO836	Question 6	Comment	ABF would agree that Kidderminster should be the main focus for development. However the vision should look beyond just brownfield regeneration due to the likely scale of requirement for new development. Otherwise growth will be stifled and the platform provided by the improved railway station will be wasted.	Comments are noted. The likely scale of development has yet to be established through the OAHN. Subject to this it may be necessary to amend the vision as suggested by the respondent.
Horsefair Traders Partnership	LPRIO824	Question 6	Comment	HTP would also request that reference is made in the vision to the need to maintain a network of vibrant local and neighbourhood centres that will play a complementary role to the higher order centres by serving the day-to-day needs of local communities.	Comments on the vision are noted and agree that amendments can be incorporated.
Taylor Wimpey UK Ltd	LPRIO742	Question 6	Support	<u>Land to north of Stourport, eastern side of Bewdley Road (B4195)</u> We agree broadly with the vision set out by the Council and commend the approach. However we would suggest that the vision should be amended to note that appropriate opportunities for greenfield release will be taken to maximise the affordability of housing and to enhance the economic competitiveness of Wyre Forest. The vision should	These comments are noted. The vision would only be amended if the level of need established through the OAHN justified greenfield/greenbelt release. Certainly the issue of addressing population imbalance is key for the Local Plan Review.

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Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
				also note the key role that development has to play in achieving the Council's aspirations; through the provision of additional population and appropriate and justified developer contributions.	
Taylor Wimpey UK Ltd	LPRIO779	Question 6	Comment	<u>Land North of Stone Hill, eastern edge of Kidderminster.</u> We agree broadly with the vision set out by the Council and commend the approach. However we would suggest that the vision should be amended to note that appropriate opportunities for greenfield release will be taken to maximise the affordability of housing and to enhance the economic competitiveness of Wyre Forest.	Noted. However, the vision would only be amended as suggested by the respondent if the level of housing need as established through the OAHN justified it through robust evidence.
Bewdley Town Council	LPRIO876	Question 6	Comment	<i>Identifiable development opportunities within the current boundary (green field and brown field) should be fully assessed before considering settlement boundary changes. One such site could be adjacent/behind All Saint's Church, Wribbenhall.</i>	These comments are noted. The site referred to is being assessed through the HELAA assessment. Care needs to be taken to consider the impact on the setting of the Church.
Upper Arley PC	LPRIO1322	Question 6	Support	Nothing to object to, the Parish Council agrees with the vision and particularly supports statement 3.6 and 3.7 so long as the growth is organic	Support is noted.
Staff & Worcs Canal Society	LPRIO1272	Question 6	Comment	The Society wishes to show its support for the District Council's vision and objectives set out in Section 3 and the subject of questions 6 and 7. The vision for the future as set out in section 6 will ensure the continued conservation and sensitive development of the environs of the canal to the benefit of future generations. It recognises that the heritage of the canal has a vital role to play in enhancing the lives of future residents by	Support is noted.

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Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
				reinforcing local diversity and identities.	
Historic England	LPRIO1068	Question 6	Comment	Could be more detailed reference to the historic environment within the vision to ensure it is entrenched within the Plan. Support inclusion of an objective for the historic environment - may be useful to expand this to recognise the wider value of the historic environment.	Comments are noted. It is considered that the vision and objectives could be amended to incorporate these wider references to the District's historic environment.
Warwickshire & West Mercia Police and H&W Fire and Rescue Service	LPRIO635	Question 6	Comment	Considers that at paragraph 3.10 the statement would be more effective if it said: " <i>Crime and disorder in the District remain low and local residents live in secure communities where they feel safer</i> ". The Vision could be made more effective in relation to the town centre and crime prevention by incorporating the 3 rd paragraph of the Vision in the KCAAP - " <i>The town centre will be a vibrant, attractive, safe and crime free environment in which people wish to spend their time at all times of the day and night, taking advantage of a variety of retail, leisure, learning and employment opportunities. New public open spaces will provide pleasant and dynamic breathing spaces for people and play host to a variety of events and activities.</i> "	These comments relating to the vision are noted and agreed.
Telereal Trillium	LPRIO814	Question 6	Comment	Agree that Kidderminster has benefitted from sustainable brownfield regeneration. Kidderminster should continue to benefit from the redevelopment of brownfield sites for a mix of uses in the town centre, increasing the vitality and viability of the centre.	Comments are noted and agreed.
Bewdley Civic Society	LPRIO1558	Question 6	Comment	Enhancement of the riverside environment, retention of unique retail outlets. Encourage	Comments are noted.

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Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
				growth of tourism - 'A Great Place to Live, Work & Play'.	
CPRE	LPRIO1428	Question 6	Comment	The vision is about the future, not the present. Accordingly the use of the present (not future) tense throughout the section is bizarre.	Noted.
Shuttes J	LPRIO1132	Question 6	Support	Agree with Question 6.	Noted.
Taylor Wimpey UK Ltd	LPRIO1035	Question 6	Comment	<u>Land to South West Stourport, northern edge of Rectory Lane, Areley Kings.</u> We agree broadly with the vision set out by the Council and commend the approach. However we would suggest that the vision should be amended to note that appropriate opportunities for greenfield release will be taken to maximise the affordability of housing and to enhance the economic competitiveness of Wyre Forest.	Noted. However, the vision would only be amended as suggested by the respondent if the level of housing need as established through the OAHN justified it through robust evidence.
Topland Hotels (No. 14) Ltd	LPRIO1231	Question 6	Comment	Vision needs to reflect what the Council is trying to achieve during the Plan period, rather than what services residents already have access to. Without any Vision, the Plan becomes purely an exercise in preparing a series of development control documents, and will provide developers and investors with no confidence in the District.	Disagree. The vision is an aspirational picture of what the District will be like in 2032, this includes good access to all services arising from sustainable development patterns which make the most of existing resources.
Thomas E	LPRIO970	Question 6	Comment	It is difficult to get to Stourport, Bewdley from Kidderminster and the Bus transport system is unreliable without any of the advantages of the west midlands transport service. There are no public train services to Stourport and Bewdley. Rather than reduce green field and agricultural land I would increase it – encourage people to use the Green Belt more, promote the	Many of the questions asked by the respondent are exactly what the Plan Review will address through developing new policies. Disagree with the comments relating to housing. The exact level of housing need for the District will be shown through the OAHN, but there are significant affordability issues for younger people and

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				wetlands and the nature valleys throughout the region. These are not promoted nearly enough. Foster education in nature and what the region has to offer. Agricultural land is essential to support the overall Promote Stourport, Bewdley and their facilities. Improvement employment opportunities within these facilities in the Green Belt, nature space. There are already housing developments (on former sugar beet factory and old Brindley carpet areas) with homes which are not sold and which appear to be difficult to sell. What is the intention for unsaleable property? Why is there a need to build more? What is the vision for attracting businesses to the area? What is the intention for Kidderminster town which is half empty and appears to be moving to Weavers wharf?	therefore a growing and unsustainable ageing, economically inactive population.
Willsgrove Developments Ltd	LPRIO1198	Question 6	Comment	The Green Belt Review should also consider the longer term needs beyond the current plan period when assessing the boundaries. Accordingly we believe that the plan should run to 2035 in order to have a minimum fifteen year life from the date of adoption.	Noted. However, it has yet to be ascertained through the OAHN whether it will be necessary to undertake a Green Belt Boundary Review, which should only be undertaken in exceptional circumstances.
Gladman Developments Ltd	LPRIO1246	Question 6	Comment	Gladman believe that within the vision further emphasis could be placed on ensuring that the housing needs of the district are met in full.	Comment is noted.
Thomas G	LPRIO1492	Question 6	Comment	I would add that housing delivery has been sensitively planned to protect the Green Belt which is so important to the setting of the towns, local wildlife and tourism. Modern high quality single occupancy apartments have been made available	Noted. However housing needs outside of Kidderminster will also need to be met.

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VISION AND OBJECTIVES (SECTION 3) RESPONSES**

Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
				close to the town centre facilities avoiding encroachment onto Green Belt. Supports a 24hr town presence and vibrant shop/restaurant core. If the above is delivered in 2032, I would certainly wish to continue living in Kidderminster.	
Natural England	LPRIO1620	Question 6	Comment	Wish to see more reference to SSSIs, specifically the Wyre Forest, improving their condition and enhancing where possible. The document states that the community relies on the natural environment, especially for tourism, and therefore it should be a high priority to protect and enhance it.	Comments are noted. Suggest amend vision to refer specifically to Wyre Forest itself and its benefits for sustainable tourism
Question 7. Do you agree with the objectives? If not, what changes would you make? Are there any other issues which need to be covered by the objectives?					
Willetts K	LPRIO100	Question 7	Comment	Agree with all the objectives	Support is welcomed.
Richards Mr H	LPRIO195	Question 7	Comment	<p>There are real opportunities to attract young families to the District. Kidderminster in particular should be thought of and promoted as a 'place of opportunity' with a 'new town' pro-growth agenda.</p> <p>a) Wyre Forest should seek to meet some of Birmingham's Housing Need under Duty to Co-operate</p> <p>b) Secure funding from BCC and the GBSLEP to attract new jobs and infrastructure.</p> <p>c) Volunteer to accept economically active migrants</p>	These comments are noted and it is agreed that steps need to be taken to address the District's ageing population. Through the GBSLEP the District has been fully involved in the Housing Needs Assessment for the LEP area. The work concluded that Wyre Forest does not fall within the Greater Birmingham Housing Market and would only be considered to accommodate some of the City's housing needs if an export option were to be pursued. The preference is for the need to be met within the Housing Market area first as set out in National Planning Policy.

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Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
				Green Belt was not designated to protect the countryside for its intrinsic value A Green Belt Review should look carefully at land to the north, east and south of Kidderminster in particular to see if it really fulfils any of the purposes of the Green Belt.	
Churchill and Blakedown PC	LPRIO305	Question 7	Comment	Support for objectives 4,5,6 and 11	Support for these objectives is welcomed.
Chaddesley Corbett PC	LPRIO215	Question 7	Comment	We agree with and support the objectives. Consider that they provide a good balance of emphasis.	Support for the objectives is welcomed.
Cotterill J	LPRIO269	Question 7	Comment	The centre of the Kidderminster has been moved from its traditional area and that area needs to be regenerated or replaced. The cost of parking deters people from visiting the town.	Comments relating to the regeneration of Kidderminster town centre are noted.
Paris R	LPRIO400	Question 7	Support	More could be made of Bewdley's riverside cafe culture to attract investment and financially active people. There should be greater planning support for restaurants, wine bars and fine dining opportunities.	These comments are noted and could also be implemented through Bewdley's Neighbourhood Plan.
Mahoney Mr S	LPRIO759	Question 7	Comment	Bewdley is a sustainable settlement which can accommodate additional housing development without the need to alter the Green Belt Boundary and therefore should be one of the focuses for housing growth within the district.	The comments relating to Bewdley are noted. However this will also be dependent upon the level of its housing need.
Persimmon Homes Limited	LPRIO773	Question 7	Comment	We note that in respect of Objective 5, which refers to safeguarding the Green Belt the plan will in fact need to review Green Belt boundaries in order to accommodate development and longer	The plan will only review the Green Belt boundary if the level of housing and employment needs as established through the OAHN justifies it.

**LOCAL PLAN REVIEW ISSUES & OPTIONS CONSULTATION (SEPTEMBER 2015)
VISION AND OBJECTIVES (SECTION 3) RESPONSES**

Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
				term, safeguarded land.	
Worcestershire Wildlife Trust	LPRIO897	Question 7	Support	Pleased to support the objectives. Recommend modification to bullet point 8 where substituting the word replenish with enhance would offer a better fit and provide more clarity.	Noted and the minor amendment is agreed.
Wyre Forest District Council	LPRIO688	Question 7	Comment	Add in low carbon and renewable energy to the objectives.	It is considered that this could be expanded on within Objective 9.
Associated British Foods Plc	LPRIO837	Question 7	Comment	ABF disagrees with Objective 5. The Green Belt cannot be safeguarded indiscriminately without understanding first the need for development and second the opportunities that exist.	Noted. If the level of housing and employment need is such that a GBBR is warranted then one will be undertaken.
Horsefair Traders Partnership	LPRIO826	Question 7	Comment	The HTP are broadly in support of the objectives, however they would also request that the need to support the vitality of the District's Local and Neighbourhood Centres is also included as a further key objective of the Local Plan.	Noted. It is considered that a reference to the District's Local and Neighbourhood Centres could be included within the objectives.
British Horse Society	LPRIO473	Question 7	Support	Support for the objectives.	Support is noted.
Taylor Wimpey UK Ltd	LPRIO743	Question 7	Comment	<u>Land to the North of Stourport located on the eastern side of Bewdley Road (B4195)</u> Support the Council's inclusion of objective 3 in which Stourport has been identified as a market town. seek an amendment to the wording of number 5, to state that, 'In accordance with development requirements over the plan period, the District's unique landscape character, Green Belt, natural environment and green infrastructure will be safeguarded and enhanced'.	The suggested amendments are noted and will be considered through the development of the preferred options.
Taylor Wimpey	LPRIO781	Question 7	Comment	<u>Land North of Stone Hill, eastern edge of</u>	The suggested amendments are noted and

**LOCAL PLAN REVIEW ISSUES & OPTIONS CONSULTATION (SEPTEMBER 2015)
VISION AND OBJECTIVES (SECTION 3) RESPONSES**

Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
UK Ltd				Kidderminster Support the Council's inclusion of objective 3 in which Stourport has been identified as a market town. seek an amendment to the wording of number 5, to state that, 'In accordance with development requirements over the plan period, the District's unique landscape character, Green Belt, natural environment and green infrastructure will be safeguarded and enhanced'.	will be considered through the development of the preferred options.
Sport England	LPRIO663	Question 7	Support	Support for objective 12.	Support for objective 12 is welcomed.
Persimmon Homes Limited	LPRIO999	Question 7	Comment	Support for objective three and the strategic focus for development on the main towns. Objective five should be amended. This seeks to safeguard and enhance the Green Belt, which is included as part of the District's natural assets. The Green Belt is not a natural asset and should not be treated as such. It may well be that sympathetic releases of the Green Belt are required in order to meet housing need and for the Council to remain consistent with its objectives, reference to the Green Belt should be removed from this objective.	The comments relating to the Green Belt are noted. The respondent's interpretation of the Green Belt as a natural asset within this Objective is not correct. However, it is considered that reference to the Green Belt could be incorporated into Objective 4 instead, where more context is provided.
Upper Arley PC	LPRIO1325	Question 7	Comment	Alter priority going into Bewdley	Comments are noted.
Fyshe F	LPRIO526	Question 7	Support	Support for Objectives 4,5,6 and 11	Support for the listed objectives is noted.
Poultney C	LPRIO620	Question 7	Object	Objection to Option 3. The Spennells estate is big enough! Extra housing would cause more congestion on a morning and pollution. A large proportion of the Spennells estate use this countryside everyday and this will be lost if built on. Talking to local people there is a strong sense of objection	Strong objection to Option 3 is noted.

**LOCAL PLAN REVIEW ISSUES & OPTIONS CONSULTATION (SEPTEMBER 2015)
VISION AND OBJECTIVES (SECTION 3) RESPONSES**

Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
Warwickshire & West Mercia Police and H&W Fire and Rescue Service	LPRIO637	Question 7	Comment	Question 7 – Objectives - The police and fire and rescue services support the proposed objectives and are particularly pleased to see the inclusion of Objective 13 relating to community safety and crime reduction.	Support for the objectives is welcomed.
Telereal Trillium	LPRIO815	Question 7	Comment	We fully support the continued development of Kidderminster as the strategic centre for the district. Kidderminster is the largest settlement in the district. Its status as the main focus for residential, retail and leisure uses in the district should be enhanced.	Noted and agreed.
Bewdley Civic Society	LPRIO1559	Question 7	Support	Agree with Question 7	Support is noted.
CPRE	LPRIO1430	Question 7	Comment	Kidderminster's role as a retail centre is concerned with a catchment extending beyond the boundary of the district. Commuting into the West Midland conurbation may be significant in the west of the district.	Comments are noted.
Shuttes J	LPRIO1133	Question 7	Comment	Visitors require facilities such as adequate parking at a reasonable price and WC's, all well maintained to ensure visitor experience and that they return.	Noted and agreed.
Taylor Wimpey UK Ltd	LPRIO1036	Question 7	Comment	<u>Land to the south west of Stourport on northern edge of Rectory Lane</u> Support the Council's inclusion of objective 3 in which Stourport has been identified as a market town. seek an amendment to the wording of number 5, to state that, 'In accordance with development requirements over the plan period,	The suggested amendments are noted and will be considered through the development of the preferred options.

**LOCAL PLAN REVIEW ISSUES & OPTIONS CONSULTATION (SEPTEMBER 2015)
VISION AND OBJECTIVES (SECTION 3) RESPONSES**

Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
				the District's unique landscape character, Green Belt, natural environment and green infrastructure will be safeguarded and enhanced'.	
Topland Hotels (No. 14) Ltd	LPRIO1232	Question 7	Comment	The objectives should embrace a more strategic approach to plan making. Needs to be a more positive prospect towards settlements other than Kidderminster. To realise Objectives 1 and 2, then Objective 3 needs to be more positive towards "market towns" rather than seeking to consolidate their roles.	Comments are noted.
Willsgrove Developments Ltd	LPRIO1199	Question 7	Comment	We note that in respect of Vision 5, which refers to safeguarding the Green Belt, the plan will in fact need to review Green Belt boundaries in order to accommodate development and longer term, safeguarded land.	Noted. A Green Belt Boundary Review will only be undertaken if the OAHN requires it.
Gladman Developments Ltd	LPRIO1247	Question 7	Comment	Gladman are slightly concerned that the council have specified within this objective that the houses will be highly energy efficient. If the Council are overly prescriptive in terms of energy efficiency policy requirements for new housing this may act to hinder delivery of housing. Provide two separate objectives in relation to the delivery of full housing needs; one specifically relating to market housing and the other to affordable housing.	Comments are noted. The Council does not agree that this objective is overly prescriptive. Housing should be provided to the best standard possible if viable.
Thomas G	LPRIO1493	Question 7	Comment	High grade quality apartments close to town centre should be provided rather than greenfield. Work with neighbouring districts and transport providers to improve the efficiency of both rail and road transport key corridors for workers and businesses to prosper.	Comments are noted.

**LOCAL PLAN REVIEW ISSUES & OPTIONS CONSULTATION (SEPTEMBER 2015)
CROSS BOUNDARY RELATIONSHIPS (SECTION 4) RESPONSES**

Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
Revelan Group	LPRIO628	Section 4	Comment	Supports recognition that the District may need to accommodate housing growth associated with Worcestershire and Birmingham. As a consequence of additional development in the southern area of the Birmingham HMA it may displace households to Wyre Forest. Will need to consider these implications as part of the plan review.	These comments are noted and agreed.
WFDC (Strategic Housing Team)	LPRIO684	Section 4	Comment	Dependence on energy provision from outside the District – potential opportunities to develop provision.	Noted and agreed as a potential cross boundary issue.
Homes and Community Agency	LPRIO654	Section 4	Support	Support for the Council's approach to the identification of strategic planning issues and to take a place based approach to addressing key issues and achieving the vision and objectives for the area.	Support is welcomed.
Birmingham City Council	LPRIO669	Section 4	Comment	Provision will be required for some 38,000 new homes to meet Birmingham's needs in neighbouring areas in the period 2011 to 2031. The City Council is working with its partners within the Greater Birmingham and Solihull Local Enterprise Partnership (including Wyre Forest District Council) and the Black Country Authorities to address this. It is expected that proposals for distributing this growth will be published for consultation towards the end of 2015. The Local Plan Review will need to take account of the outcome of this process. Wyre Forest District lies outside the Birmingham HMA and so is not being considered as a primary location for accommodating this growth. Parts of the District do have good public transport links to Birmingham	Wyre Forest District Council has a duty to address strategic cross boundary issues within its Development Plan. The District is part of the Greater Birmingham and Solihull Local Enterprise Partnership (GBSLEP). Together the LEP authorities are looking to address the housing shortfall within the Birmingham Housing Market Area (BHMA). The District does not fall within this (HMA) and therefore would only be required to accommodate additional growth to meet this housing need if it were necessary to resort to an option which would see an export of housing provision to beyond the HMA boundary. If it is evidenced that the

**LOCAL PLAN REVIEW ISSUES & OPTIONS CONSULTATION (SEPTEMBER 2015)
CROSS BOUNDARY RELATIONSHIPS (SECTION 4) RESPONSES**

Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
				and so the potential for housing to be provided within the District to help meet Birmingham's needs will need to be considered through the Review process.	housing need shortfall cannot be met from within the BHMA, then the exact amount of housing to be accommodated within the District will need to be agreed with Birmingham City Council and appropriate locations allocated within the Submission Plan.
South Staffordshire District Council	LPRIO932	Section 4	Comment	Agree with the list of strategic planning issues. The scale of the unmet housing need identified in the main modifications of the Birmingham Development Plan 2031 is considerable. A shortfall of 37,900 dwellings has been identified as arising from the Birmingham administrative area alone. We request that the Council makes reference to this identified housing shortfall in the neighbouring Greater Birmingham HMA and if possible assists in an element of accommodating an element of export from this neighbouring HMA, when arriving at the future housing requirement for the plan period of the new Wyre Forest Local Plan.	Noted. The Council will be considering this through the Duty to Co-operate Requirements to be addressed in the Plan Review. It is noted that the GBSLEP Housing Needs Assessment report recommended that Birmingham's Housing Needs should firstly be met from within the Housing Market Area. The District Council would expect it to be demonstrated that all options from within the HMA had been looked at prior to any export option being progressed.
SWDP	LPRIO1082	Section 4	Comment	At this stage there does not appear to be any need to use land in either Malvern Hills District or Wychavon District in order to meet the likely requirements for housing, employment or retail. In the current South Worcestershire Development Plan Main Modifications (MM15/02A refers) it is proposed to remove the Roxel site from the Green Belt. Following any representations made should the inspector's final report confirm the latest position there will be a large freestanding employment site which is in the defined open	Comments relating to housing need in Malvern Hills and Wychavon are noted under the Duty to Co-operate. With regard to the Roxel Site the District would work with Wychavon DC on preparing joint supplementary planning guidance.

**LOCAL PLAN REVIEW ISSUES & OPTIONS CONSULTATION (SEPTEMBER 2015)
CROSS BOUNDARY RELATIONSHIPS (SECTION 4) RESPONSES**

Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
				countryside and which straddles the administrative boundary of Wyre Forest and Wychavon. It would therefore seem appropriate that consideration is given to preparing joint supplementary planning guidance for this site.	
Thomas G	LPRIO1494	4.9	Comment	4 th bullet is particularly important and working together particularly with transport providers is vital for the prosperity of towns such as Kidderminster and Blakedown. The transport corridor in its entirety needs to be managed in a co-ordinated fashion to improve efficiency of journeys to work and not just bits of it at one end	Comments are noted.
Question 8. Do you agree with the strategic planning issues identified above? Are there any other strategic planning issues which you feel should be included here? Are there any particular local authorities nearby or strategic bodies that you feel we should be engaging with and why?					
Barratt Homes West Midlands	LPRIO81	Question 8	Comment	As a consequence of additional development taking place in the southern section of the Birmingham HMA it may displace households to Wyre Forest. The Council will need to consider these implications as part of the plan making process.	Noted and agreed. This would need to be modelled through the housing needs assessment and will require a clear steer through the Duty to Co-operate with authorities falling within the Birmingham Housing Market Area.
Hallam Land Management	LPRIO237	Question 8	Comment	There are still suitable development sites & ADR's adjacent to a number of the main settlements which are situated outside of the Greenbelt. These should be prioritised for development before any Greenbelt review is undertaken.	Comments are noted. A Green Belt Boundary Review will only be undertaken should the level of Objectively Assessed Housing Need warrant it. All potential sites will be assessed via sustainability appraisal and also their suitable and overall contribution to the long term sustainable development strategy for the District. It should be noted that the ADRs fall predominantly with the Green Belt to

**LOCAL PLAN REVIEW ISSUES & OPTIONS CONSULTATION (SEPTEMBER 2015)
CROSS BOUNDARY RELATIONSHIPS (SECTION 4) RESPONSES**

Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
					the east and North of the District and a review would still be required to allocate them for future development purposes.
Churchill and Blakedown PC	LPRIO306	Question 8	Comment	No comment	Noted.
Chaddesley Corbett PC	LPRIO216	Question 8	Comment	The Strategic Issues seem to be comprehensive, and emphasise the need for cross-boundary engagement and collaboration. Support for engagement with the LEPS.	Comments and support are noted.
Paris R	LPRIO401	Question 8	Support	To the three parts of Q8, Yes, No, No	The response to Question 8 and the strategic planning issues is noted.
Mahoney Mr S	LPRIO760	Question 8	Comment	Housing need should be met in full across Housing Market Areas therefore the Council may be in a position where it is necessary to plan for a higher level of housing growth in order to accommodate housing need from the HMA which cannot be met elsewhere. These considerations should take place as part of the OAN work and Duty to Co-operate discussions with neighbouring planning authorities.	This is already being done through the Council's Duty to Co-operate Requirements and involvement with the GBSLEP. The Housing Needs Assessment work undertaken for the GBSLEP concluded that the Wyre Forest District did not form part of the Greater Birmingham HMA. However, if an export option were the only solution then Wyre Forest District will need to consider this through the plan review.
Miller Homes	LPRIO838	Question 8	Comment	The Strategic Housing Needs Study Stage 3 Report was published in August 2015 and it states that whilst Wyre Forest District is within the Greater Birmingham and Solihull Local Enterprise Partnership (GBSLEP), it is peripheral to the Housing Market Area (HMA). There is potential for arterial railway corridors to play a part in meeting the housing shortfall and highlights that Wyre Forest District includes railway stations at	The comments relating to Green Belt Boundary Review are noted.

**LOCAL PLAN REVIEW ISSUES & OPTIONS CONSULTATION (SEPTEMBER 2015)
CROSS BOUNDARY RELATIONSHIPS (SECTION 4) RESPONSES**

Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
				Kidderminster and Blakedown. Agree with the identified strategic issue relating to the potential need for a Strategic Green Belt Boundary Review across the West Midlands.	
Worcestershire Wildlife Trust	LPRIO898	Question 8	Comment	Add a need to consider strategic Green Infrastructure. Strategic GI links into, through and out of the district need to be maintained and strengthened. Specific reference to the Sub-Regional Green Infrastructure Strategy for Worcestershire may be helpful here.	Comments are noted and agreed.
WFDC (Strategic Housing Team)	LPRIO689	Question 8	Comment	Should this section also make reference to the potential for a combined authority?	Noted. However it is considered too early to include reference to this as the Plan will need to be future proofed.
Associated British Foods Plc	LPRIO839	Question 8	Comment	ABF considers that the potential impact of road and rail infrastructure improvements on the location of new development should be considered also. This was referenced by the GBSLEP Housing Needs Assessment Stage 3 Report that considered planned improvements on road and rail infrastructure (Kidderminster Railway Station being a good example) should be built on.	Comments are noted and agreed.
J & H Evans	LPRIO834	Question 8	Comment	The report identifies potential for arterial railway corridors to play a part in meeting the housing shortfall and highlights that Wyre Forest District includes railway stations at Kidderminster and Blakedown. Options for accommodating some of the Birmingham HMA housing need (shortfall) is likely to be considered through the Local Plan Review and evidence base. The western side of WFDC is not designated Green Belt and an outstanding opportunity exists to provide housing	Comments are noted. However, land to the rural west of the District is not well related to the conurbation to meet Birmingham's Housing Need and would generate excess trip generation by private car. Access to services and the towns in this area is poor, including to services in the adjoining District authority areas of Malvern Hills and Shropshire which are extremely rural in their character. Large

**LOCAL PLAN REVIEW ISSUES & OPTIONS CONSULTATION (SEPTEMBER 2015)
CROSS BOUNDARY RELATIONSHIPS (SECTION 4) RESPONSES**

Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
				land outside this designated land notwithstanding it will be "greenfield".	scale development to the rural west is simply inappropriate in terms of sustainability.
British Horse Society	LPRIO475	Question 8	Object	Considers that there should be a strategic plan for Worcestershire. This would help address Green Belt development.	Objection noted. The County Structure Plan was abolished along with the West Midlands Regional Spatial Strategy. This has been replaced with the Duty to Co-operate. All the Worcestershire authorities have been consulted on the Issues and Options Paper as Duty to Co-operate Partners.
Taylor Wimpey UK Ltd	LPRIO744	Question 8	Comment	<u>Land to north of Stourport - eastern side of Bewdley Rd (B4195)</u> Welcome the identification of the strategic issues for the LPR, in particular the need to consider the housing provision needs of the Worcestershire HMA and Greater Birmingham HMA. Close consideration should be given to the implications of BCC's unmet housing needs and this being met within the wider HMA in accordance with the Duty-to-Cooperate. Recommended that the Council closely monitor the progress of the West Midlands Combined Authority (WMCA)	Comments are noted. The issue of Birmingham's Housing Need will be kept under review through the Council's Duty to Co-operate requirements.
Taylor Wimpey UK Ltd	LPRIO784	Question 8	Comment	<u>Land north of Stone Hill on the eastern edge of Kidderminster</u> Welcome the identification of the strategic issues for the LPR, in particular the need to consider the housing provision needs of the Worcestershire HMA and Greater Birmingham HMA. Close consideration should be given to the implications of BCC's unmet housing needs and this being met within the wider HMA in accordance with the	Comments are noted. The issue of Birmingham's Housing Need will be kept under review through the Council's Duty to Co-operate requirements.

**LOCAL PLAN REVIEW ISSUES & OPTIONS CONSULTATION (SEPTEMBER 2015)
CROSS BOUNDARY RELATIONSHIPS (SECTION 4) RESPONSES**

Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
				Duty-to-Cooperate. Recommended that the Council closely monitor the progress of the West Midlands Combined Authority (WMCA)	
West Midlands HARP	LPRIO1059	Question 8	Support	We agree with the strategic issues and are pleased to see the acknowledgment of the Worcestershire and Greater Birmingham HMAs.	Support is welcomed.
Persimmon Homes Limited	LPRIO1000	Question 8	Comment	It is considered that Wyre Forest should not sit back and wait for a sub-regional Green Belt review to occur. Instead, the Council should be more proactive and undertake a Green Belt review in tandem with studies on housing need and housing land availability. The Council may also want to consider how socio-economic linkages with neighbouring Authorities can be explored. This will assist the Council in determining a strategy to increase levels of inward migration consistent with its economic aspirations and to address any existing and expected imbalances in the local demography.	Noted. The Council will not be in a position to undertake a Green Belt Boundary Review unless it is warranted through the OAHN housing needs figures or progressed through the GBSLEP. The comments about the socio-economic linkages are noted.
Upper Arley PC	LPRIO1326	Question 8	Comment	Should engage with Redditch, Dudley, and Wolverhampton as we are sent to their hospitals for health care, sometime sent to Cheltenham.	Noted. All of these authorities are consulted under the Duty to Co-operate.
Staff & Worcs Canal Society	LPRIO1273	Question 8	Comment	We concur with the view that the geographic situation of Wyre Forest within the region requires inter authority agreement on strategies to protect the Green Belt as a vital public amenity into the distant future.	These comments are noted.
Historic England	LPRIO1070	Question 8	Comment	We are keen to be involved in any relevant cross boundary discussions that may affect the historic environment and would be happy to attend any meetings of this nature. We are aware of the	These comments are noted.

**LOCAL PLAN REVIEW ISSUES & OPTIONS CONSULTATION (SEPTEMBER 2015)
CROSS BOUNDARY RELATIONSHIPS (SECTION 4) RESPONSES**

Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
				Greater Birmingham and Solihull LEP Strategy for Growth and are keen to remain involved with discussions about wider housing distribution and the impacts this may have for the historic environment.	
Bewdley Civic Society	LPRIO1560	Question 8	Comment	Add Shropshire as an authority that we should be engaging with. We suggest that land West of the River Severn should be allocated as Green Belt as this land has great landscape value.	Noted. However, for land to be allocated for Green Belt it must fulfil the five purposes of including land within it. It is not just included because of landscape value.
CPRE	LPRIO1431	Question 8	Comment	<p>The plan fails to identify what cross-boundary needs WFDC is going to have to meet:</p> <ul style="list-style-type: none"> Birmingham has a housing land deficit of 38000 sites; and Bromsgrove perhaps 2400. How these deficits will be met is the subject of on-going work by GBS LEP and others. Some portion of these targets may fall upon WFDC. NPPF provides that where land is removed from the Green Belt a compensating area should be designated as Green Belt in its place. This probably requires WFDC to seek cooperation from Wychavon DC to provide for a compensating new area of Green Belt. The alternative is for land on the western fringes of Bewdley and Stourport to be designated, but that is not an attractive option 	Noted. However the cross boundary chapter clearly sets this out at Paragraph 4.7 - Housing Market Area and within the issues box. WFDC does not fall within the Greater Birmingham HMA and would only be required to accommodate growth if an export option outside of the HMA were necessary.
Shuttles J	LPRIO1134	Question 8	Comment	Action is needed to make use of these provisions by drawing in joint/collaborative opportunities.	Comment is noted.

**LOCAL PLAN REVIEW ISSUES & OPTIONS CONSULTATION (SEPTEMBER 2015)
CROSS BOUNDARY RELATIONSHIPS (SECTION 4) RESPONSES**

Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
Taylor Wimpey UK Ltd	LPRIO1037	Question 8	Comment	<u>Land to the south-west of Stourport-on-Severn located on the northern edge of Rectory Lane, Areley Kings.</u> Welcome the identification of the strategic issues for the LPR, in particular the need to consider the housing provision needs of the Worcestershire HMA and Greater Birmingham HMA. Close consideration should be given to the implications of BCC's unmet housing needs and this being met within the wider HMA in accordance with the Duty-to-Cooperate. Recommended that the Council closely monitor the progress of the West Midlands Combined Authority (WMCA)	Comments are noted. The issue of Birmingham's Housing Need will be kept under review through the Council's Duty to Co-operate requirements.
Topland Hotels (No. 14) Ltd	LPRIO1233	Question 8	Comment	Greater emphasis should be placed on the need for the Strategic Green Belt Review. It is appreciated that other Authorities are relevant to the process, but any work undertaken now will future-proof the Green Belt.	The need for a strategic Green Belt boundary review has yet to be agreed and established by all authorities involved in the GBSLEP.
Gladman Developments Ltd	LPRIO1248	Question 8	Comment	Housing need must be met in full across the Housing Market Area (HMA) therefore the Council need to be mindful that they may find themselves in a position where it is appropriate and necessary to plan for a high level of housing growth than solely to meet their OAN to accommodate housing need which cannot be met elsewhere within the HMA. These types of considerations need to take place early in the plan making process as part of the consideration of OAN and Duty to Cooperate discussions with neighbouring local planning authorities.	Noted and agreed.
Natural England	LPRIO1621	Question 8	Comment	Key strategic issue should be impact of cumulative development on the environment. This	Comments are noted. Agree that the cumulative impact of development needs

**LOCAL PLAN REVIEW ISSUES & OPTIONS CONSULTATION (SEPTEMBER 2015)
CROSS BOUNDARY RELATIONSHIPS (SECTION 4) RESPONSES**

Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
				is often overlooked as applications are dealt with individually. This issue needs to be raised with neighbouring authorities.	to be taken into consideration.

LOCAL PLAN REVIEW ISSUES & OPTIONS CONSULTATION (SEPTEMBER 2015)
KEY LOCAL PLAN APPROACHES (SECTION 5) RESPONSES

Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
Revelan Group	LPRIO629	Section 5	Comment	<p>Considers that all existing allocations should be reviewed as part of the plan making process. The allocations in the existing plans have had in excess of two years to come forward for development. In preparing the emerging plan the local authority should explore the development potential of all brownfield sites within the urban area. This includes employment land allocations that have not delivered. With the exception of a short period of occupancy by Farm Foods in 2014 and early 2015, my Client's site at Zortec Avenue has been vacant since May 2015. It will be difficult to find an operator for the site given the unit's location, configuration and the demand for premises in Kidderminster. The building has a number of operational difficulties. The Council should consider allocating the site for residential development in the emerging Plan. The site has been promoted through the SHLAA Call for Sites Consultation 2015 and we are of the view that it would be a sensible location for residential development. Revelan Group Plc also control land at the junction of Stourport Road and Walter Nash Road. A plan showing the location of this site is attached at Appendix 2. This site is a vacant employment site. It has been on the market for a considerable period of time. Revelan Group Plc have now managed to attract an occupier who has expressed an interest in acquiring a significant proportion of the site. If, however, for any reason it is not possible to conclude discussions with the potential operator the plan should allow for alternative forms of development to come forward on the site to bring it back into an active use. It</p>	<p>The comments regarding the long term safeguarding of employment land are noted. The District Council has commissioned an employment land review to inform the Local Plan and this technical and robust evidence will assess all current employment sites in terms of their quality and suitability. It will also test future job generation and employment land requirements. This will be used to inform future allocations. The Stourport Road Corridor within the South Kidderminster Enterprise Park will remain the focus for employment particularly given the implementation of the Hoo Brook Link Road which will improve accessibility for businesses within this area. It is not considered that the Ceramaspeed Site has been vacant for any length of time given the time periods provided - it would only be 5 months.</p>

LOCAL PLAN REVIEW ISSUES & OPTIONS CONSULTATION (SEPTEMBER 2015)
KEY LOCAL PLAN APPROACHES (SECTION 5) RESPONSES

Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
				would be inappropriate to protect this site for employment use in the long term if there is no realistic prospect of it coming forward for employment development.	
Revelan Group	LPRIO636	Section 5	Comment	It must be ensured that CIL is properly informed by viability assessment work and detailed assessment of infrastructure requirements.	Comments are noted and agreed.
WFDC (Strategic Housing Team)	LPRIO685	Section 5	Comment	Ensuring that development allows us to meet our carbon reduction targets. The Wyre Forest and Worcestershire climate change strategies set out a series of carbon reduction targets for these sectors, to ensure that this trend continues and that the longer term aims are met.	Comments are noted.
Homes and Community Agency	LPRIO655	Section 5	Support	The HCA is supportive of a brownfield approach to the regeneration of sites in accordance with the NPPF and other government guidance.	Support is noted.
Williams H	LPRIO56	5.1	Comment	Scientific evidence suggests that climate change is not as significant as those with a vested interest would have you believe.	Comments are noted.
Paris R	LPRIO402	5.3	Support	Strongly support the vision stated for Wyre Forest.	Support is noted.
British Horse Society	LPRIO476	5.4	Object	Neighbourhood Plans should operate within the context of the Local Plan and should specifically consider all the various policies outlined in the Objectives set out in the Wyre Forest District Design Guide SPD adopted in June 2015. Particularly interested in ease of access to the countryside and design principles for larger residential developments.	Objection and comments are noted.
Richards Mr H	LPRIO196	5.5	Comment	Existing Neighbourhood Plans were brought	Agree with these comments on

LOCAL PLAN REVIEW ISSUES & OPTIONS CONSULTATION (SEPTEMBER 2015)
KEY LOCAL PLAN APPROACHES (SECTION 5) RESPONSES

Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
				forward in the context of the current Local Plan. Indeed, all Neighbourhood Plans have to be in general conformity with the adopted local plan and aligned with the strategic needs and priorities of the wider area. A current Neighbourhood Plan should not be allowed to constrain growth that is identified as being needed in the next Local Plan. Once the new LP is adopted, any conflict with an existing NP in a development management decision must be resolved by the most recently adopted taking precedence	Neighbourhood Planning. Neighbourhood Plans can't be used to restrain development that is needed within their areas.
Question 9. Do you agree with the broad character areas shown on the map overleaf and the overview of each? If, you disagree, in what way would you change the character areas? What additional character areas do you think should be identified? What would you add to or remove from the character area overviews?					
Williams H	LPRIO57	Question 9	Support	Support for the character areas.	Support is welcomed.
Huizer K	LPRIO62	Question 9	Comment	Considers the Strategic Character Areas focus too much on the town centres. Access to the surrounding countryside and green back streets should be safeguarded for the future. This makes living in a smaller Wyre Forest town so valuable.	Comments are noted.
Churchill and Blakedown PC	LPRIO307	Question 9	Comment	Agree with broad character areas.	Support is welcomed.
Chaddesley Corbett PC	LPRIO217	Question 9	Comment	Chaddesley's facilities are under threat (proposed closure and relocation of the Village Post Office), and bus services are limited and sometimes unreliable.	Comments regarding local services are noted.
Paris R	LPRIO403	Question 9	Support	Particularly wish to retain 'Rural West' designation and to encourage the 'Vibrant Evening Economy' in Bewdley	Support for the rural west designation and to encourage a vibrant evening economy in Bewdley is noted.
Persimmon	LPRIO775	Question 9	Comment	We do not think that there is sufficient distinction	Disagree. The Local Plan should be based

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Homes Limited				between parts of the district to justify identifying particular character areas. It is unusual to use these character areas to help shape local plans. We believe that it would be more appropriate to develop the plan along positive growth and sustainable development principles as set out in the Framework.	on local distinctiveness and subject to consultation with local residents and businesses. If it merely reflected the NPPF there would be no requirement for Local Plans.
Worcestershire Wildlife Trust	LPRIO899	Question 9	Support	We agree with the overarching character areas and their respective descriptions.	Support is welcomed.
Upper Arley PC	LPRIO1327	Question 9	Support	Support for character areas.	Support is noted.
Staff & Worcs Canal Society	LPRIO1274	Question 9	Comment	We share the belief that 'safeguarding Character and Local Distinctiveness' - which 'looks at issues and options relating to a number of topics which contribute to local distinctiveness including green infrastructure and open space, biodiversity and geodiversity, the historic environment, design quality, the Green Belt and the District's natural landscape', is essential to providing an attractive environment where residents, investors and employers wish to be located.	Comments are noted.
Historic England	LPRIO1073	Question 9	Comment	We would welcome the use of historic characterisation as a form of evidence base to inform the preparation of the Plan.	Noted. Historic characterisation will form a key part of the historical evidence base to the Plan.
Fyshe F	LPRIO527	Question 9	Support	Support for the broad character areas identified.	Support for the broad character areas is noted.
Stanmore Properties Ltd	LPRIO1010	Question 9	Comment	In Kidderminster character area reference to the railway station should be added.	Noted.
Bewdley Civic Society	LPRIO1561	Question 9	Comment	The distinctive character of Bewdley as a "Market Town" should be maintained and emphasised. Extreme care should be taken as to the conflict	Noted. The Neighbourhood Plan will need to be in general conformity with the Local Plan. The Council will work closely with the

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				between the local plan and the new Bewdley NP.	Town Council to avoid conflict, however the Neighbourhood Plan cannot be used to block future development on allocated sites which are required to meet local housing needs.
CPRE	LPRIO1432	Question 9	Comment	It is therefore desirable that the District Plan should provide explicitly as to those areas where NPs are free to depart from the detailed provisions of a Local Plan. The plan on page 22 refers to "neighbourhood areas". "Neighbourhood Areas" is a brand for a crime-prevention initiative. The description should be "Neighbourhood Plan Areas".	Comments on Neighbourhood Plans are noted.
Shuttes J	LPRIO1135	Question 9	Support	Agreed. Although Stourport does not have a vibrant retail centre.	Comments are noted.
SWDP	LPRIO1050	Question 9	Comment	The Strategic Character Areas Map is both logical and informative.	Support for the Character Areas Map is welcomed.
Willsgrove Developments Ltd	LPRIO1200	Question 9	Comment	We do not think that there is sufficient distinction between parts of the district to justify identifying particular character areas. It is not clear how the identification of the character areas will then lead to the shaping of the strategic and development management policies. More appropriate to develop the plan along positive growth and sustainable development principles as set out in the Framework.	Noted. However a local plan should be planned on local issues and subject to consultation with local residents and businesses with the intention of securing quality place making. It should not just reflect national policy, otherwise there would be no requirement for Local Plans.
Thomas G	LPRIO1495	Question 9	Support	I agree to the overview of the character areas.	Support is noted.
Natural England	LPRIO1622	Question 9	Comment	Due to the size, complexity and local impact that the Wyre Forest has this should be a character area in itself.	Comments are noted. However, officers consider that the 'Rural West' owes much of its character to the Forest itself.

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Historic England	LPRIO1074	5.7	Comment	We raise the need for the Council to appropriately assess the impact of any proposed allocations on the significance of heritage assets. Historic England has recently consulted on a draft advice note to assist Local Authorities in allocating sites for development.	Noted. This will form a significant part of the Sustainability Appraisal process for sites and the draft advice note will also be referred to.
Question 10. Do you agree that the District should continue to focus on brownfield regeneration and that the existing allocations still provide a basis for this to happen?					
Williams H	LPRIO58	Question 10	Support	Support for brownfield regeneration and existing allocations.	Support is welcomed.
Huizer K	LPRIO63	Question 10	Comment	Supports brownfield regeneration. Where appropriate existing low quality housing areas could be rejuvenated.	Support is welcome and comments are noted.
Barratt Homes West Midlands	LPRIO82	Question 10	Comment	Considers that all existing allocations should be reviewed as part of the plan making process. If not already delivered then their suitability for development is questionable. The allocations have had in excess of two years to come forward for development, if there is clear evidence that any are unlikely to be deliverable then they should be excluded from the Plan. Suggests that a non delivery allowance is included in the emerging plan to ensure a consistent supply of housing.	Agreed that all existing allocations should be reviewed in terms of their deliverability. The Independent HELAA Site Assessment Panel will consider the deliverability of all allocated sites to inform the Plan Review. However, it should be noted that the allocated sites within the Adopted KCAAP and Site Allocations Local Plans are phased throughout the Plan Period until 2026. Therefore we certainly would not want or expect them all to come forward within a two year period! We note the points relating to a non-delivery allowance this will be an important consideration in ensuring that the plan is flexible enough. As part of the evidence base the Council will be undertaking a Viability Assessment of its allocated sites.

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Eriksson-Flegg B	LPRIO125	Question 10	Comment	Agrees that the District should focus on brownfield regeneration.	Support is welcomed.
Hallam Land Management	LPRIO238	Question 10	Comment	By allocating both Greenfield and brownfield sites for development, it will ensure the new Local Plan has a robust strategy for the delivery of affordable homes. In areas where land values are typically low, housing allocations should be split between Greenfield and brownfield land. This issue is most prevalent in Stourport, where only 21% of the houses built in the last 10 years have been affordable. This compares with a policy requirement of 30%. Furthermore, the viability problems surrounding brownfield land has significantly delayed the delivery of these much needed affordable homes.	The comments relating to viability are noted. As part of the evidence base to inform the Plan Review, a viability assessment will be undertaken on potential site allocations to inform the preferred options. The Council fully recognises that allocated sites need to be deliverable within the new plan period.
Churchill and Blakedown PC	LPRIO308	Question 10	Comment	Agree with Question 10.	Agreement is noted.
Chaddesley Corbett PC	LPRIO218	Question 10	Comment	Agree with the continued focus on regeneration of brownfield sites.	Support is noted.
Cotterill J	LPRIO270	Question 10	Support	Support for continued focus on brownfield regeneration and existing allocations.	Support is noted.
Paris R	LPRIO404	Question 10	Support	Improve area whilst providing for housing needs.	Support is noted.
Mahoney Mr S	LPRIO761	Question 10	Comment	Some greenfield sites will be required in order to achieve the other objectives identified, in particular to focus on maintaining the role of Bewdley as a thriving market town. Furthermore, not all brownfield sites will be viable or sustainably located. Need to ensure that the Local Plan includes a range of sites, in terms of size and locations, so that they are capable of	Comments are noted. The Plan Review and sites allocated will be subject to a viability appraisal to ensure that the plan can deliver a rolling supply of housing land. Housing Land Supply has not been an issue that has adversely affected the District.

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				demonstrating a rolling supply of housing land and that housing delivery takes place throughout the plan period.	
Miller Homes	LPRIO842	Question 10	Comment	Any focus on previously-developed land should not be at the expense of maintaining a suitable, deliverable and viable land supply. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development, taking account of the needs of the residential and business communities. WFDC needs to consider the quantum, suitability, delivery timescales and viability of these sites to ensure that the District can present and maintain a sufficient supply of development land. Consider that WFDC needs to consider the quantum, suitability, delivery timescales and viability of these sites to ensure that the District can present and maintain a sufficient supply of development land.	Comments are noted. The District has an excellent 5 year Housing Land Supply record and currently all sites allocated are brownfield - deliverability has not been a significant issue with a proactive approach from planning officers. The HELAA is also assessing greenfield sites as well as brownfield in terms of deliverability and all sites allocated through the Plan Review will be subject to a viability assessment.
Persimmon Homes Limited	LPRIO776	Question 10	Comment	Should not lead to the inclusion of any phasing policy or preference for brownfield sites to be brought forward in advance of greenfield sites. Greenfield sites will be needed to deliver the Framework paragraph 47 objectives regarding the need to boost significantly the supply of housing land. Much of the brownfield land will be needed to accommodate commercial and employment uses.	The District has not had a problem with its housing land supply during the plan period with all sites currently allocated being brownfield. All were subject to viability assessment and this again will be a key part of the plan review. A phasing policy will need to be included in the plan but this will be informed by the viability assessment.
Worcestershire Wildlife Trust	LPRIO901	Question 10	Support	Yes, we agree with the continued focus on brownfield development where this does not compromise important biodiversity.	Support is welcomed.
WFDC	LPRIO690	Question 10	Comment	Whilst brownfield regeneration is important the	Noted. This will be dependent upon the

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(Strategic Housing Team)				viability of some sites means that we do need to consider wider than brownfield to meet future housing needs and encourage more economic growth.	outcome of the OAHN and the Employment Land Review.
Associated British Foods Plc	LPRIO840	Question 10	Comment	Early indications suggest that brownfield regeneration will be insufficient, both quantitatively and qualitatively. Brownfield regeneration will give diminishing returns and will be far less reliable in terms of delivery as those brownfield sites still remaining are likely to be more difficult to develop.	Noted. Allocation of sites within the Plan will also be informed by a viability assessment.
J & H Evans	LPRIO910	Question 10	Comment	Any focus on previously-developed land should not be at the expense of maintaining a suitable, deliverable and viable land supply. Consider that the District should be assessing unallocated greenfield sites alongside the existing previously developed and allocated sites to ensure that it can demonstrate and maintain a suitable schedule of available sites.	The Council has an excellent record of housing delivery and has not experienced problems with its 5 year Housing Land Supply despite all allocations being on brownfield land. A comprehensive assessment of both greenfield and brownfield sites are being assessed for deliverability through the HELAA process and a viability assessment will also be undertaken before sites are allocated. The respondent is reminded that all allocated sites must also represent the most sustainable option when assessed against alternatives. It is questionable whether allocating a large amount of development to small settlements to the west of the District, with poor access to local services, is the most sustainable option.
British Horse Society	LPRIO479	Question 10	Comment	I do agree that the District should continue to focus on brownfield site allocation, but I am not sure whether the existing allocations still provide a basis for this to happen. Future developments can	The purpose of the Plan Review is to promote a sustainable development strategy to encourage planned development and avoid piecemeal

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				often happen piecemeal, depending on where developers have been acquiring land, rather than with any reference to the strategic needs of the District.	development coming through on appeal.
Taylor Wimpey UK Ltd	LPRIO745	Question 10	Comment	<u>Land to the north of Stourport - eastern side of Bewdley Rd (B4195)</u> Whilst the Council will consider brownfield land as part of this, it should not give undue weight to the previously developed nature of land. Certainly if there are 'existing allocations' then the Council should assess robustly why they have not yet been delivered and at what rate they can realistically be expected to come forward during the Plan period. It is preferable to work with developers to allocate appropriate greenfield/Green Belt sites, potentially as safeguarded land if it is deemed that they are not required for immediate development. This would also serve to provide additional flexibility within the LPR.	The Council has always had an excellent record of delivery and not had problems with its 5 yr Housing Land Supply, despite its brownfield only allocations. The HELAA will assess both greenfield and brownfield allocations for deliverability and all allocated sites will be subject to viability appraisal first.
Taylor Wimpey UK Ltd	LPRIO787	Question 10	Comment	<u>Land to the north of Stone Hill - eastern edge of Kidderminster</u> The focus of the LPR should be to understand and meet the full, objectively assessed housing and employment needs of the District's residents. Whilst the Council will consider brownfield land as part of this, it should not give undue weight to the previously developed nature of land. Certainly if there are 'existing allocations' then the Council should assess robustly why they have not yet been delivered and at what rate they can realistically be expected to come forward during the Plan period. It is preferable to work with developers to allocate appropriate greenfield/Green Belt sites, potentially as	The Council has an excellent record of housing delivery and has not experienced problems with its 5 year Housing Land Supply despite all allocations being brownfield. All sites will be fully assessed for deliverability through the HELAA process and subject to viability assessment before being allocated. The respondent is reminded that all sites will also need to be assessed against the sustainability appraisal framework.

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				safeguarded land if it is deemed that they are not required for immediate development. This would also serve to provide additional flexibility within the LPR.	
Wolverley & Cookley PC	LPRIO1094	Question 10	Support	Support for Question 10.	Support is noted.
Upper Arley PC	LPRIO1328	Question 10	Support	Support for question 10	Support is noted.
Staff & Worcs Canal Society	LPRIO1275	Question 10	Support	The District should continue to focus on brownfield regeneration and that the existing allocations will, for some time, provide a basis for this to happen.	Comments are noted.
Fyshe F	LPRIO528	Question 10	Support	Support for continued focus on brownfield regeneration.	Support is noted.
Walters	LPRIO674	Question 10	Comment	This could be extended by the sympathetic conversion of redundant industrial, commercial and retail premises near Kidderminster town centre. This could make use of empty premises in Oxford Street, Green Street and New Road, as well as the old Brinton's building. The Bromsgrove Street area should also be considered for private housing use again, since the retail sector of the town has now shifted and this large area could provide an extensive area for the town's future housing needs.	The comments relating to the efficient use of brownfield land are noted. The KCAAP does allocate some of the buildings referred to for redevelopment.
Telereal Trillium	LPRIO816	Question 10	Comment	We fully support the priority given to the continued regeneration of brownfield sites in the district's main towns, particularly Kidderminster as the largest settlement in the district.	Support for regeneration is welcomed.
Stanmore	LPRIO1011	Question 10	Comment	The existing allocations need to be re-assessed in	Noted. All sites greenfield and brownfield

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Properties Ltd				any event to demonstrate that they will still deliver within the plan period. Greenfield sites, for example, the Areas of Development Restraint, so allocated to meet long term needs, would offer a short term option to ensure the requirement can be delivered.	are to be assessed for deliverability through the HELAA and then subject to Sustainability Appraisal and Viability Assessment.
Bewdley Civic Society	LPRIO1562	Question 10	Support	Agree with Brownfield regeneration	Noted.
CPRE	LPRIO1433	Question 10	Comment	<ul style="list-style-type: none"> The land adjoining the West Midland Safari Park is greenfield land. Some of it is parkland, which is at worst cognate with garden land, which is not now classified as previously developed. Lea Castle Hospital certainly contains a brownfield site, but not all land within the former hospital land boundary is necessarily previously developed 	Comments relating to Previously Developed Sites in the Green Belt are noted.
Shuttles J	LPRIO1136	Question 10	Comment	Tourism must be recognised as an important part of the local income in actions not just rhetoric.	Comments relating to the importance of tourism are noted and agreed.
Taylor Wimpey UK Ltd	LPRIO1038	Question 10	Comment	<u>Land to South West of Stourport - northern edge of Rectory Lane</u> The focus of the LPR should be to understand and meet the full, objectively assessed housing and employment needs of the District's residents. Whilst the Council will consider brownfield land as part of this, it should not give undue weight to the previously developed nature of land. Certainly if there are 'existing allocations' then the Council should assess robustly why they have not yet been delivered and at what rate they can realistically be expected to come forward during the Plan period.	The Council has an excellent record of housing delivery and has not experienced problems with its 5 year Housing Land Supply despite all allocations being brownfield. All sites will be fully assessed for deliverability through the HELAA process and subject to viability assessment before being allocated. The respondent is reminded that all sites will also need to be assessed against the sustainability appraisal framework.

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				It is preferable to work with developers to allocate appropriate greenfield/Green Belt sites, potentially as safeguarded land if it is deemed that they are not required for immediate development. This would also serve to provide additional flexibility within the LPR.	
Topland Hotels (No. 14) Ltd	LPRIO1234	Question 10	Comment	The emerging plan must ensure that an honest and open debate is had on the deliverability of existing brownfield land, the availability of greenfield sites and the potential of development on the latter to assist with the provision of the Relief Road	Comments are noted and agreed.
Environment Agency	LPRIO969	Question 10	Comment	We would support a Policy that seeks to protect and enhance the quality of natural resources and also makes reference to assessing and remediating contaminated land. Recommend that you assess potential site allocations with regard to the previous use of the site and with sufficient detail to ensure the site is appropriate and viable for remediation.	The comments from the Environment Agency are noted, particularly with regard to site assessment.
Thomas E	LPRIO973	Question 10	Comment	I agree that development should be concentrated on brown field and not green field or any agricultural land.	Support for brownfield regeneration and quality housing is noted.
Willsgrove Developments Ltd	LPRIO1201	Question 10	Comment	All existing allocations should be reviewed as part of the plan making process. If, for any reason existing allocations have not already been delivered their suitability for development is questionable. It is appreciated that the Kidderminster Area Action Plan and the Site Allocations Policies Local Plan were adopted relatively recently. The housing allocations in these documents have had in excess of two years	Disagree. The Council has an excellent record of housing delivery and has not experienced problems with its 5 year housing land supply, unlike many authorities. In any case the Site Allocations are phased over the plan period until 2026, it is poor planning to expect them all to come forward within the first two years of the plan. All sites will be subject to

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				to come forward for development. If there is clear evidence that any of the allocations in these documents are unlikely to come forward for development they should be excluded from the emerging plan. Whilst we acknowledge the need to regenerate existing brownfield sites this should not lead to the inclusion of any phasing policy or preference for brownfield sites to be brought forward in advance of greenfield sites.	deliverability assessment through the HELAA process and the viability appraisal.
Gladman Developments Ltd	LPRIO1249	Question 10	Comment	Brownfield development should not be the sole focus of the plan, at the expense of sustainable development in other locations. Need to ensure that the Local Plan includes a range of sites, in terms of size and locations, so that they are capable of demonstrating a rolling supply of housing land and that housing delivery takes place throughout the plan period. The Council is likely to need to review the overall strategy and potentially promote a revised strategy for the new plan period	Comments are noted. All potential sites are being assessed under the HELAA. The amount of sites required will be dependent upon the outcome of the ELR and the OAHN.
Thomas G	LPRIO1496	Question 10	Support	Strongly agrees with Q.10	Support is noted.
Natural England	LPRIO1623	Question 10	Comment	Support brownfield regeneration, but impacts on local SSSIs should be taken into account, especially where there is a hydrological link	Agree with comments. As wildlife designations are mapped and so any potential impacts from developments should be readily identifiable.
Paris R	LPRIO405	5.9	Comment	Please can I see the existing SPD and be notified of the availability of the revised SPD?	The SPD is available to view and download from the website. A public consultation will take place on the Draft SPD in January.

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Question 11. Should the District Council aim to put a CIL Charging Schedule in place following the adoption of the new Local Plan? Do you think that this will help us to better deliver infrastructure to support new development?					
Atkin G	LPRIO15	Question 11	Comment	We should have CIL. Infrastructure especially transport is vital to development.	These comments with regard to Infrastructure are noted. An Infrastructure Delivery Plan (IDP) will be produced as part of the Plan Review.
Barratt Homes West Midlands	LPRIO83	Question 11	Comment	It must be ensured that the CIL is properly informed by viability assessment work and a detailed assessment of infrastructure required.	Comments are noted and agreed.
Richards Mr H	LPRIO197	Question 11	Comment	It is absolutely vital that WFDC adopts a charging schedule given the end of the interim arrangements in April 2015 and the effects of Regs 122 and 123. Without a CIL schedule developer contributions to infrastructure will reduce over time as the '5 pooled contributions limit' kicks in.	Noted. However, given resourcing issues the Council is unable to bring forward CIL ahead of the Local Plan Review. This would also not allow us to take into account the potential higher viability ratios on any greenfield sites that could come forward through the Plan Review as it would need to be based on our current site allocations which are all brownfield land. Therefore CIL contributions would be lower.
Churchill and Blakedown PC	LPRIO309	Question 11	Comment	Unable to comment on CIL.	Noted.
Chaddesley Corbett Parish Council	LPRIO219	Question 11	Comment	The Parish Council would welcome the receipt of 25% of any CIL income generated.	Support for CIL is noted.
Cotterill J	LPRIO271	Question 11	Support	Support for CIL Charging Schedule.	Support is noted.
Paris R	LPRIO406	Question 11	Comment	Would like to understand the SPD and how it interacts with CIL.	These comments are noted. The Draft Planning Obligations SPD will be published for public consultation in January 2016.
Miller Homes	LPRIO844	Question 11	Comment	Should review the potential implications of	These comments are noted and agreed.

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				introducing Community Infrastructure Levy (CIL) on the viability of development in the District before committing to implement a CIL Charging Schedule. WFDC should therefore continue to focus on ensuring that new development is viable, to encourage new development and investment in the District and should accordingly assess the viability of introducing CIL alongside the production of the new Local Plan. Ultimately, if a CIL Charging Schedule is put in place and no contributions are made towards the items on the Regulation 123 List due to the viability issues of sites then that could impact adversely on the delivery of new development and the funding of infrastructure.	
Persimmon Homes Limited	LPRIO777	Question 11	Comment	The system of using Section 106 obligations provides greater flexibility and enables the Council and the Developer to respond to development needs whilst taking on board matters such as viability issues. If the Council choose to use CIL for certain matters then it will be necessary for Section 106 agreements to have regard to viability for matters such as affordable housing where contributions may have to be varied in order to ensure that schemes remain viable.	Comments regarding Section 106 and CIL are helpful and noted.
WFDC (Strategic Housing Team)	LPRIO691	Question 11	Comment	CIL presents a real threat to affordable housing as many sites won't be economically viable to deliver both. Under the previous plan only 22% of units were for affordable housing against policy of 30%.	Noted. If CIL were to be progressed it would be subject to rigorous viability assessment.
British Horse Society	LPRIO481	Question 11	Comment	Does not feel informed enough about CIL to comment. What are the key differences between CIL and S106?	Comments are noted.

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Taylor Wimpey UK Ltd	LPRIO746	Question 11	Comment	<u>Land to the north of Stourport - eastern side of Bewdley Road (B4195)</u> Clearly as part of the CIL process it will be necessary to vigorously assess the impact on viability of adopting a charge.	Noted and agreed.
Taylor Wimpey UK Ltd	LPRIO789	Question 11	Comment	<u>Land to the North of Stone Hill - eastern edge of Kidderminster</u> If and when a Community Infrastructure Levy (CIL) is progressed it should be in accordance with paragraph 175 of the NPPF which states that CIL charged should support and incentivise new development. Clearly as part of the CIL process it will be necessary to vigorously assess the impact on viability of adopting a charge	Comments are noted and agreed.
West Midlands HARP	LPRIO1060	Question 11	Comment	If it is felt that the CIL charging schedule is appropriate for the District then it must be backed by an evidence base which fully assesses all the variables surrounding CIL so that the charge does not affect delivery of housing.	Comments are noted and agreed.
Wolverley & Cookley PC	LPRIO1095	Question 11	Support	Support for Question 11	Support is noted.
Upper Arley PC	LPRIO1329	Question 11	Support	Support Q.11	Noted.
Staff & Worcs Canal Society	LPRIO1276	Question 11	Comment	Current S106 payments are to be preferred. Should be used to conserve and improve the environs and infrastructure of the canal where adjacent land is used for development.	Comments are noted.
Warwickshire & West Mercia Police and H&W Fire and Rescue Service	LPRIO638	Question 11	Comment	Will be seeking infrastructure contributions on behalf of the police and fire and rescue services. A standard methodology for calculating police contributions has been developed in conjunction with other Forces. Whilst the emergency services	These comments with regard to S106 contributions are noted. The District Council will work alongside the emergency services to develop future policy in this area through the Plan Review and

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				are not opposed to the introduction of CIL, they would like to see the S106 regime retained and operated alongside it for major developments. Based on the indicative figures of between 4,230 and 5,920 new dwellings proposed in the Issues and Options Paper, this would lead to between 633 and 868 additional crimes, between 446 and 612 anti-social behaviour incidents and between 799 and 1095 public safety/welfare incidents. These levels of increase would require a significant increase in police numbers and the equipment they would require to operate effectively.	welcomes their input.
Telereal Trillium	LPRIO817	Question 11	Comment	The system of using Section 106 obligations provides greater flexibility and enables the Council and the Developer to respond to development needs whilst taking on board matters such as viability issues.	Comments regarding Section 106 Obligations are noted.
Stanmore Properties Ltd	LPRIO1012	Question 11	Comment	If CIL is not introduced the District Council will not be able to claim monies that may be necessary to offset the impact of development in providing new infrastructure. No S106 claim can now be made where, since 2010, more than 5 similar contributions have been claimed on previous developments and 'pooled' towards a joint project. Viability problems in terms of development not coming forward as a result of the burden of CIL need to be considered in setting the levy	Noted. The Council is aware of all of these issues relating to CIL and does have concerns over viability.
Bewdley Civic Society	LPRIO1563	Question 11	Comment	WFDC should adopt CIL in the Local Plan.	Comments are noted.
CPRE	LPRIO1434	Question 11	Comment	A CIL levy may well be useful.	Noted.

LOCAL PLAN REVIEW ISSUES & OPTIONS CONSULTATION (SEPTEMBER 2015)
KEY LOCAL PLAN APPROACHES (SECTION 5) RESPONSES

Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
Shuttes J	LPRIO1137	Question 11	Comment	Yes as long as CIL can be used to enhance Section 106.	Noted. CIL cannot be used to double charge on top of S106.
Taylor Wimpey UK Ltd	LPRIO1039	Question 11	Comment	<u>Land to South West of Stourport, northern edge of Rectory Lane</u> If and when a Community Infrastructure Levy (CIL) is progressed it should be in accordance with paragraph 175 of the NPPF which states that CIL charged should support and incentivise new development. Clearly as part of the CIL process it will be necessary to vigorously assess the impact on viability of adopting a charge.	These comments are noted and agreed.
Environment Agency	LPRIO972	Question 11	Comment	CIL offers the potential to secure water management infrastructure e.g. new flood alleviation schemes or upgrades to existing flood defences; contributions towards flood warning service; and to meet environmental infrastructure requirements including new or improved waste water treatment facilities.	Comments regarding CIL are noted.
Thomas E	LPRIO974	Question 11	Comment	Developers need to provide compensation or monies to communities impacted by developments. Also Developers need to pay for road infrastructure to support any developments not just in the short term for a minimum 5 year period after the build.	Noted. Road Infrastructure is provided alongside new developments through S38 Agreements.
Willsgrove Developments Ltd	LPRIO1202	Question 11	Comment	The system of using Section 106 obligations provides greater flexibility and enables the Council and the Developer to respond to development needs whilst taking on board matters such as viability issues. The CIL process tends to be inflexible and makes it difficult to bring forward certain sites which, whilst desirable in terms of general development requirements and	Comments are noted and agreed.

LOCAL PLAN REVIEW ISSUES & OPTIONS CONSULTATION (SEPTEMBER 2015)
KEY LOCAL PLAN APPROACHES (SECTION 5) RESPONSES

Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
				regeneration, may have difficulty in accommodating CIL contributions.	
Thomas G	LPRIO1497	Question 11	Comment	Could a CIL be implemented on a case by case basis to protect viability in some cases but to secure vital contributions to infrastructure in others due to impact assessment?	If a CIL is adopted by the Council it becomes mandatory. Only certain use classes can be excluded based on viability evidence.
Natural England	LPRIO1624	Question 11	Comment	Yes it should be implemented and will help deliver important infrastructure.	Support for introduction of CIL is noted.

LOCAL PLAN REVIEW ISSUES & OPTIONS CONSULTATION (SEPTEMBER 2015)

WHAT LEVEL OF GROWTH IS NEEDED AND WHAT BROAD OPTIONS CAN BE PERSUED? (SECTION 6) RESPONSES

Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
Pearce J	LPRIO50	Section 6	Comment	Build the houses where there is public transport e.g. early and late buses to get people to work.	Comment is noted and agreed.
Barratt Homes West Midlands	LPRIO84	Section 6	Comment	<p>We fully support The Council in undertaking an objective assessment of housing need based upon the most up to date evidence. It is, however, a concern that a proposed housing target is not available for comment as part of the Issues & Options consultation.</p> <p>It is our view that following the completion of the report work determining the objective assessment of housing need the outcome of this work is subject to separate consultation.</p>	<p>Support for the Objective Assessment of Housing Need is welcome. The Council is undertaking this at an early stage in the Plan Review in conformity with National Planning Policy. This is a technical piece of evidence and as such the OAHN figure is based on robust evidence and fact - it is not open to consultation.</p> <p>The OAHN Report will be in the public domain within the New Year and will be used to develop the Preferred Options. The Council considers it is undertaking this at the earliest possible stages and notes that many other authorities - including Birmingham City and the South Worcestershire authorities did not undertake their OAHN until submission stage in the Plan Review.</p>
Highways England	LPRIO172	Section 6	Comment	<p>The M5 Motorway may be affected by potential transport impacts arising from the plan are considered to occur between Junctions 3 and 6, inclusive.</p> <p>Recognise and support Options 1 and 4 as set out within section 6 of the consultation document as these are likely to offer the greatest opportunity for a reduction in transport impacts of development. Consider the possible allocation of a SUE (Options 2, 3 and 5) to be appropriate if Options 1 and 4 cannot deliver all the required growth. Of these proposals we consider that Option</p>	The comments around the options and the impact on the strategic road network are helpful and are noted.

LOCAL PLAN REVIEW ISSUES & OPTIONS CONSULTATION (SEPTEMBER 2015)

WHAT LEVEL OF GROWTH IS NEEDED AND WHAT BROAD OPTIONS CAN BE PERSUED? (SECTION 6) RESPONSES

Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
				2 located to the North East of Kidderminster Town Centre and Option 5 adjacent to Bewdley would be most suitable on transport grounds rather than Option 3 to the South East however the careful consideration of impacts upon the SRN will be required with either option. Does not generally support the allocation of significant dispersed rural development sites under Options 6 and 7, as these forms of development are often associated with an increase in single occupancy vehicle trips. The potential impacts of future site allocations on the SRN must be considered and assessed. This assessment should be undertaken in consultation with Highways England and consider the cumulative impacts arising from development as well as that development proposed by neighbouring authorities.	
Revelan Group	LPRI0646	Section 6	Comment	Fully support the Council's suggestion that brownfield sites should be a focus for development. As referred to above my Client controls land at Zortech Avenue in Kidderminster that is a sustainable and suitable location for residential development as is the land at Stourport Road/Walter Nash Road West if the proposed employment scheme is not realised.	These comments are noted. Land at Zortech Avenue will be assessed through the Employment Land Review in terms of its long term suitability and this will inform the site allocations in the Plan Review.
Revelan Group	LPRI0647	Section 6	Comment	In accordance with the requirements of Core Principle 8 of the Framework the plan should encourage the effective use of land by reusing land that has been previously developed provided that it is not of high environmental value. As such sustainable and deliverable brownfield sites in the main settlements should be allocated for development.	The comments in relation to the effective reuse of land are noted.

LOCAL PLAN REVIEW ISSUES & OPTIONS CONSULTATION (SEPTEMBER 2015)

WHAT LEVEL OF GROWTH IS NEEDED AND WHAT BROAD OPTIONS CAN BE PERSUED? (SECTION 6) RESPONSES

Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
Hagley Parish Council	LPRIO870	Section 6	Comment	There is an amount of scattered development in Broome, very close to the boundary of Hagley village, along Broome Lane and the A450 (Hagley to Worcester Road). We would be very reluctant to see significant infill around there.	These comments are noted. Service provision in Broome is very limited and therefore it is unlikely to be a focus for development in the Plan Review.
Homes and Community Agency	LPRIO656	Section 6	Comment	Option 2 would include the former Lea Castle Hospital Site owned by the HCA. The HCA would support an option that seeks to bring forward this land for development. However, it is important that the Local Plan allows for the site to be brought forward independently of other sites that may form part of SUE. This is possible given that it is self contained and impendent from neighbouring land.	Support for Option 2 is noted. It is considered that a Site Allocations Policy for the former Lea Castle Site should be further developed through the Plan Review given that it is a vacant Previously Developed Site in the Green Belt. The mix of uses for the site will be subject to viability testing.
Homes and Community Agency	LPRIO657	Section 6	Comment	The HCA considers that a suitable sustainable strategy would be to focus a significant amount of development within the main towns, a proportion could also be met on brownfield sites in rural areas.	Comments are noted regarding the continued emphasis on brownfield sites.
WCC, Planning Economy & Performance	LPRIO1366	Section 6	Comment	The District Council should be aware that the existing urban areas within the Wyre Forest district currently suffer from congestion and certain areas have poor air quality. This should be taken into account when considering the potential locations for future development. Improvements to the Transport Network will be necessary to protect the economic viability of the district. The County Council will work closely with the District Council and provide information on congestion hot spots and also identify the necessary transport improvements to support the growth.	These comments from the Highway Authority are noted. We will need to work closely on the Infrastructure Delivery Plan.
WCC, Planning Economy &	LPRIO1390	Section 6	Comment	The current maximum off-site education contribution in the Wyre Forest area is £4,736 per 2/3 bed open	These comments in relation to education provision and the growth options are noted.

LOCAL PLAN REVIEW ISSUES & OPTIONS CONSULTATION (SEPTEMBER 2015)

WHAT LEVEL OF GROWTH IS NEEDED AND WHAT BROAD OPTIONS CAN BE PERSUED? (SECTION 6) RESPONSES

Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
Performance				market dwelling and £7,104 for 4/5 beds. However, if developments are large enough to require on-site school provision, we would expect the development to fully fund the new school.	We will work closely with WCC on developing the Infrastructure Delivery Plan.
Persimmon Homes Limited	LPRIO1001	Section 6	Comment	Appropriate to use the existing settlement hierarchy set in the 2010 Core Strategy as the baseline position from which to test alternative distribution options. These options could test different approaches to distribution, all of which should include Kidderminster, Stourport-on-Severn and Bewdley as the principal areas for sustainable growth.	Comments with regard to the settlement hierarchy are noted.
SWDP	LPRIO1051	Section 6	Comment	Options 2 to 6 - cannot be given serious consideration until a comprehensive Green Belt Review is carried out. Options 2,3 and 5 - not all land is in the Green Belt so these could form revised options depending on the outcome of the Green Belt Review. Option 5 it would be somewhat illogical not to allocate some development which in any event could be on non Green Belt land to the west of the River Severn. Option 6 - associated villages all lie within the Green Belt. These villages generally are larger and have more local services than those villages in the District's rural west (Option 7). Option 7 the safeguarding of existing services and provision of new local services is probably essential if sustainable development is to be achieved in these relatively remote areas. Neighbourhood Plans could also be an option for delivering some of the required growth but their proposals would have to be in conformity with strategic policies most importantly that pertaining to	The comments in relation to the growth options are noted and agreed.

LOCAL PLAN REVIEW ISSUES & OPTIONS CONSULTATION (SEPTEMBER 2015)

WHAT LEVEL OF GROWTH IS NEEDED AND WHAT BROAD OPTIONS CAN BE PERSUED? (SECTION 6) RESPONSES

Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
				the Green Belt	
Oliver K	LPRIO971	Section 6	Comment	<p>1. brownfield sites should be developed before alternative sites are considered elsewhere,</p> <p>2. If any development sites are proposed for rural villages they should be of a scale proportionate to the existing settlement. Utilise "infill" sites rather than significantly expand the boundaries of the settlement. In Cookley, a site in the south eastern corner of the existing settlement boundary has been identified for development in previous Local Plans and this should be developed before significant new housing is considered to the south of the A449.</p>	These comments are noted.
Environment Agency	LPRIO978	Section 6	Comment	The Water Cycle Strategy should be used to help inform the appropriateness and deliverability of development sites.	Noted and agreed.
Williams H	LPRIO101	6.2	Comment	Brownfield sites should always be the first to be considered.	Comments are noted and agreed.
Cotterill J	LPRIO272	6.2	Support	Support for the continued focus on regeneration.	Support is noted.
Williams H	LPRIO102	6.3	Comment	Greenfield sites should only be used after consultation with any residents living nearby or the community if it is likely to be affected	Comments are noted and agreed. Consultation is crucial in determining future development options.
CPRE	LPRIO1435	6.5	Comment	Housing Need: The document relies on work done in 2013, presumably the county-wide SHMA. The assumptions in the SHMA were found to be defective in the Examinations of the South Worcestershire Development Plan.	The District Council has commissioned its own OAHN which will use all the latest population projections, this will be what informs the Local Plan Review.
Voice E	LPRIO178	6.7	Comment	We should not be even considering greenbelt land for building and development.	Comment is noted. However National Planning Policy requires that we need to

LOCAL PLAN REVIEW ISSUES & OPTIONS CONSULTATION (SEPTEMBER 2015)

WHAT LEVEL OF GROWTH IS NEEDED AND WHAT BROAD OPTIONS CAN BE PERSUED? (SECTION 6) RESPONSES

Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
					meet Objectively Assessed Housing Needs. If these are at a higher level for the District it may be necessary to undertake a Green Belt Boundary Review to allocate additional sites.
Cotterill J	LPRIO273	6.8	Object	Does not consider that the plan should pursue economic growth.	Objection is noted.
Thomas E	LPRIO975	6.8	Comment	How will these Businesses be attracted to the area as there are not good transport links?	Noted. The Hoobrook Link Road will help to improve transport links and also the improvements at Kidderminster Rail Station.
Williams H	LPRIO103	6.9	Support	Support for paragraph 6.9 - Supporting Growth in the Local Economy.	Support is welcome.
Voice E	LPRIO179	6.10	Comment	There is plenty of existing floor space not being used already in Kidderminster. This should be used first - it needs some imagination as to how the existing space could be adapted to 21st century needs.	Comments are welcomed.
Paris R	LPRIO407	6.11	Comment	Is it possible to see the current result of the Call for Sites exercise of Autumn 2014?	This is commercially sensitive information and therefore will not be in the public domain until the Housing and Economic Land Availability Assessment is published in April 2016.
Atkin G	LPRIO16	6.12	Comment	Houses should not be built on floodplains.	Comment is noted and agreed.
Cotterill J	LPRIO274	6.12	Support	Support for consideration of planning constraints such as flooding, Green Belt policy and SSSIs.	Support is noted.
Atkin G	LPRIO17	6.13	Comment	Infrastructure HAS to include reliable public transport.	Comment is noted and agreed.

LOCAL PLAN REVIEW ISSUES & OPTIONS CONSULTATION (SEPTEMBER 2015)

WHAT LEVEL OF GROWTH IS NEEDED AND WHAT BROAD OPTIONS CAN BE PERSUED? (SECTION 6) RESPONSES

Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
Broome Parish Council	LPRIO1109	6.14	Comment	Order of provision should be: 1. Brownfield sites within the major towns 2. Brownfield sites that can accommodate sustainable development in other areas. 3. Urban extensions to Kidderminster, Stourport or Bewdley subject to proven need and Green Belt Review. 4. Modest provision in key villages subject to other policy provisions	These comments on the growth options are noted.
Historic England	LPRIO1075	6.14	Comment	Request that as part of this exercise an analysis into the impact of each option on the historic environment and heritage assets is undertaken. No reference to potential historic environment issues within the tables included in the consultation Plan.	Noted and agreed this will form an essential part of the Sustainability Appraisal.
Smith R	LPRIO511	6.14	Comment	Instead of destroying people's lives and environment, would it not be best to look for and develop land further outside the boundary of Kidderminster that does not impose a negative impact on established residents and their way of life?	Comments are noted. These Options are intended to promote discussion and debate and are certainly not set in stone. The necessity to adopt any of the options around broad areas of growth very much depends on the level of Objectively Assessed Housing Need that we will be required to accommodate within the District. Any future development will need to be sustainably located to reduce the need to travel and have good access to local service provision.
CPRE	LPRIO1436	6.14	Comment	The following should be considered for inclusion in a future SHLAA: <ul style="list-style-type: none"> The previous SHLAA took no account of potential capacity on the former Lea Castle 	Comments are noted.

LOCAL PLAN REVIEW ISSUES & OPTIONS CONSULTATION (SEPTEMBER 2015)

WHAT LEVEL OF GROWTH IS NEEDED AND WHAT BROAD OPTIONS CAN BE PERSUED? (SECTION 6) RESPONSES

Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
				<p>Hospital site.</p> <ul style="list-style-type: none"> • ADRs • Wilden Lane - former settling ponds site 	
Baird Parker S	LPRIO958	6.14	Comment	The dash to infill any green space in the district is a mistake. Taking the West Midlands as a whole there are still hundreds of acres of brownfield sites which could be developed and Kidderminster is no different.	Comments are noted.
Victoria Carpets	LPRIO1105	6.14	Comment	Agree that the best approach would comprise a combination of the options. Over reliance on brownfield regeneration (Option 1) could result in the needs of the District not being met over the plan period. The Council have not considered the options of allocating green field sites in the main towns (other than by way of an urban extension) .the Council should consider allocating a mixture of green field and brownfield sites, focussed on the main towns such as Kidderminster.	Comments are noted. This is an option that could be considered through the Sustainability Appraisal and HELAA process.
Nash I	LPRIO1111	6.14	Comment	Development and regeneration of town centre sites, including unused shop premises etc. should be considered as a priority, in all three Wyre Forest Towns Kidderminster, in particular. is desperate for existing commercial regeneration plans to be accompanied by the reintroduction of a community	Comment is noted and agreed.
Option 1. Brownfield regeneration which focuses on the main towns of Kidderminster and Stourport-on-Severn					
Voice E	LPRIO180	Option 1	Comment	This should always be the preferred option even if it costs more to convert the land to make it useable.	Support for Option 1 is noted.

LOCAL PLAN REVIEW ISSUES & OPTIONS CONSULTATION (SEPTEMBER 2015)

WHAT LEVEL OF GROWTH IS NEEDED AND WHAT BROAD OPTIONS CAN BE PERSUED? (SECTION 6) RESPONSES

Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
British Horse Society	LPRIO483	Option 1	Support	Support for Option 1 as it has minimum impact on rural areas, equestrian businesses and/or public rights of way.	Support for Option 1 is noted.
Upper Arley PC	LPRIO1330	Option 1	Support	Focus new development on the main towns	Comment is noted.
Staff & Worcs Canal Society	LPRIO1277	Option 1	Comment	The Society would wish the District Council to continue its proven record of sensitive development of brownfield sites. Wish to see any necessary developments in villages and hamlets adjacent to the canal have regard to the sensitive needs of the canal environment and have a mind to expanding social inclusion. would wish the canal to be an inclusive, not an excluded, feature of developments	Comments are noted and agreed.
Fyshe F	LPRIO529	Option 1	Support	Support for Option 1	Support for Option 1 is noted.
Bewdley Civic Society	LPRIO1564	Option 1	Support	Support for Option 1	Support is noted.
Nash I	LPRIO1112	Option 1	Support	Brownfield regeneration has to be the first priority. The cost of land reclamation should be considered before other options.	Comment is noted.
Gladman Developments Ltd	LPRIO1250	Option 1	Object	Gladman strongly object to a strategy or approach which places a sole focus on the delivery of brownfield land within the main towns, This would seriously jeopardise the delivery of the necessary scale of housing and completely ignore housing needs across the rest of the district.	Comments are noted. However, the Council has an excellent record of housing delivery on brownfield sites and unlike many authorities has not experienced problems with its Housing Land Supply. The OAHN will establish whether it will be necessary to look at greenfield site allocation at the preferred options stage of the plan review.

LOCAL PLAN REVIEW ISSUES & OPTIONS CONSULTATION (SEPTEMBER 2015)

WHAT LEVEL OF GROWTH IS NEEDED AND WHAT BROAD OPTIONS CAN BE PERSUED? (SECTION 6) RESPONSES

Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
Question 12. Do you think that there will be enough brownfield sites available to accommodate all of the new development required for the 2016-2032 Plan Period? Do you think we should continue to focus all new development on the main towns?					
North Worcestershire Housing & Water Management	LPRIO42	Question 12	Comment	Housing provision should be made in the villages due to constraints on Brownfield Land regarding flood risk and remediation costs.	Comment is noted.
Huizer K	LPRIO64	Question 12	Comment	Considers there are enough Brownfield sites but that there are viability issues which obstruct development. If Greenfield land gets opened up before brownfield they will remain undeveloped. Supports focus on brownfield regeneration in Kidderminster and Stourport.	Comments regarding the continuation of the brownfield regeneration strategy are noted. Viability and deliverability are key areas of concern for the District.
Barratt Homes West Midlands	LPRIO85	Question 12	Comment	Having reviewed the SHLAA 2001 and its various updated reports, it is our view, that the likely capacity of brownfield SHLAA sites is likely to be less than 500 units. Whilst we have no particular concern with the preparation of the plan that seeks to regenerate brownfield sites within the urban area, the available evidence indicates that brownfield capacity is likely to be extremely limited.	The concerns are noted. All existing allocations will be assessed by the Independent HELAA Panel with regard to their deliverability. However we do not agree that the current SHLAA sites are likely to be less than 500. Refer to paragraph 6.6 of the Issues and Options Paper which states: ".we have an existing supply of allocated land that can contribute towards accommodating some growth during the 2015-26 timescale. This could provide a further 1,350 dwellings."
Hallam Land Management	LPRIO239	Question 12	Comment	Doesn't agree that there are enough deliverable brownfield sites available. Agrees that the Plan Review should focus all new development on main towns as the most sustainable locations.	The support for continued focus on development for the main towns is noted.

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WHAT LEVEL OF GROWTH IS NEEDED AND WHAT BROAD OPTIONS CAN BE PERSUED? (SECTION 6) RESPONSES

Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
Richards Mr H	LPRIO198	Question 12	Comment	To ask the public whether they think there will be enough brownfield sites to meet all needs is meaningless when the evidence base for the amount of development needed is not in place.	Noted. However an initial indicative range of potential housing need is included based on work undertaken on housing need assessment during 2014. The Council considers that it is in a fortunate position as the Objective Assessment of Housing Need is currently underway and will be available to fully inform the preferred options development. Many authorities have not undertaken their OAHN until submission stage.
Churchill and Blakedown PC	LPRIO310	Question 12	Comment	Does not know if there will be enough brownfield sites. Considers that the focus for development should remain on the main towns.	These comments are noted.
Chaddesley Corbett PC	LPRIO220	Question 12	Comment	We support continued focusing of new development on the main towns, as this reflects the availability of, and access to, services and infrastructure. The judgment of whether any of the three main towns will need a sustainable urban extension should be based on verifiable needs, and the location of any extension should be determined in close consultation with the relevant Town/Parish Councils.	These comments are noted and agreed.
Cotterill J	LPRIO275	Question 12	Support	Support for continued focus on brownfield regeneration of the main towns.	Support for Option 1 is noted.
Paris R	LPRIO408	Question 12	Support	Support for Option 1.	Support for Option 1 is noted.
Kidderminster Golf Club	LPRIO249	Question 12	Comment	Kidderminster Golf Club presented a case to your planning department for moving our existing club house and developing that area with 8 or 9 new houses. Would like this to be considered through	The reference to this site is noted. It will be considered through the Housing and Economic Land Availability Assessment.

LOCAL PLAN REVIEW ISSUES & OPTIONS CONSULTATION (SEPTEMBER 2015)

WHAT LEVEL OF GROWTH IS NEEDED AND WHAT BROAD OPTIONS CAN BE PERSUED? (SECTION 6) RESPONSES

Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
				the Local Plan Review.	
Mahoney Mr S	LPRI0762	Question 12	Comment	It is not considered that brownfield sites can provide the whole solution to the area's housing needs over the plan period as such sites have issues as to viability and therefore deliverability. Greenfield sites in sustainable locations on the edge of existing settlements will have a key role to play in ensuring the housing needs of the District are met.	Noted. However until the OAHN figures are available this conclusion cannot be reached. All sites will be subject to a deliverability assessment through the HELAA and Viability Appraisal. The respondent is also reminded that all sites must be assessed against the Sustainability Appraisal Framework.
Miller Homes	LPRI0845	Question 12	Comment	Wyre Forest District Council (WFDC) needs to take into account not only the quantum of land available, but also the timescales for delivery, the location of these sites and the suitability and viability of building on these sites. In order to maintain a sufficient supply WFDC should be looking in the first instance at the existing Areas of Development Restraint (ADRs), in particular land on the edge of Kidderminster	Comments are noted with regard to the ADRs.
Persimmon Homes Limited	LPRI0780	Question 12	Comment	Stanklyn Lane Brownfield land will have to accommodate employment, commercial, social infrastructure and that there may be only limited opportunities for residential development. It is likely that greenfield sites will be needed to accommodate a significant proportion of new development.	Comments are noted. This will depend on the outcome of the OAHN and the quantum of development required.
Worcestershire Wildlife Trust	LPRI0903	Question 12	Support	Focussing the majority of development to these areas in the main towns would be a positive mechanism for delivering sustainable development.	Comments are noted and agreed.
Hagley Parish Council	LPRI0869	Question 12	Comment	Raises concern over the volume of traffic using the A456 between Kidderminster and Birmingham. The provision of Park and Ride facilities to encourage	These comments on transport infrastructure and the provision of a park and ride facility are noted and agreed.

LOCAL PLAN REVIEW ISSUES & OPTIONS CONSULTATION (SEPTEMBER 2015)
WHAT LEVEL OF GROWTH IS NEEDED AND WHAT BROAD OPTIONS CAN BE PERSUED? (SECTION 6) RESPONSES

Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
				commuters to travel by rail, rather than by car would be welcome. With competition from free facilities, any Park and Ride facilities at Stations in Wyre Forest District would probably also need to be free; otherwise drivers will prefer to drive through Hagley to Stourbridge Junction and park there.	
WFDC (Strategic Housing Team)	LPRIO692	Question 12	Comment	We don't believe there is sufficient land available and coupled with the viability issues means that wider scale development will be required including on sites to meet specialist housing needs, which is usually more expensive to deliver and in rural locations where there is identifiable housing need.	The comments regarding brownfield land availability are noted.
Associated British Foods Plc	LPRIO841	Question 12	Comment	The main towns should continue to be the focus for new development, particularly Kidderminster.	Noted and agreed.
J & H Evans	LPRIO926	Question 12	Comment	Wyre Forest District Council (WFDC) needs to take into account not only the quantum of land available, but also the timescales for delivery, the location of these sites and the suitability and viability of building on these sites. In order to maintain a sufficient supply of residential land throughout the Plan period, WFDC should be looking to create a balanced portfolio of deliverable land, which is likely to require greenfield sites.	Noted. All sites will be subject to the HELAA, SA Appraisal and Viability Assessment before being allocated in the Plan.
British Horse Society	LPRIO484	Question 12	Comment	The District needs to find a way of encouraging brownfield developments in the first instance, until most brownfield sites have been exhausted.	Comments are noted. Viability issues are an ongoing concern for brownfield sites.
Taylor Wimpey UK Ltd	LPRIO747	Question 12	Comment	<u>Land to north of Stourport - eastern side of Bewdley Road (B4195)</u> Allocation of brownfield land first should not come at the expense of	Comments are noted.

LOCAL PLAN REVIEW ISSUES & OPTIONS CONSULTATION (SEPTEMBER 2015)
WHAT LEVEL OF GROWTH IS NEEDED AND WHAT BROAD OPTIONS CAN BE PERSUED? (SECTION 6) RESPONSES

Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
				delivering the housing and employment needs of the community and meeting the requirements of national policy. Appropriate that all strategic-level growth should be directed towards the main towns; particularly Kidderminster and Stourport-on-Severn as the largest two towns.	
Taylor Wimpey UK Ltd	LPRIO791	Question 12	Comment	<u>Land to the North of Stone Hill, eastern Kidderminster</u> The allocation of brownfield land first should not come at the expense of delivering the housing and employment needs of the community and meeting the requirements of national policy. Appropriate that all strategic-level growth should be directed towards the main towns; particularly Kidderminster and Stourport-on-Severn as the largest two towns.	Comments are noted.
Broome Parish Council	LPRIO1106	Question 12	Comment	Focus new development on the main towns. Modest amounts of housing in key villages could be acceptable as this could help sustain these villages. However villages in "Rural East" in part rely on services in adjacent locations (Hagley) and it is clear infrastructure in terms of transport, schools, doctors, etc need careful thought to ensure adequate provision exist both now and in the future.	The comments on Option 6 are noted.
Fyshe F	LPRIO532	Question 12	Comment	Considers there will be enough brownfield sites to accommodate new development and that we should continue to focus new development on the main towns.	Support for continued regeneration of the main towns is noted.
Warwickshire & West Mercia Police and H&W Fire and	LPRIO639	Question 12	Comment	Brownfield sites within the urban areas are likely to be easier for the emergency services as they would be likely to be closer to existing operational bases.	Support for brownfield regeneration is noted.

LOCAL PLAN REVIEW ISSUES & OPTIONS CONSULTATION (SEPTEMBER 2015)
WHAT LEVEL OF GROWTH IS NEEDED AND WHAT BROAD OPTIONS CAN BE PERSUED? (SECTION 6) RESPONSES

Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
Rescue Service					
Telereal Trillium	LPRIO818	Question 12	Comment	It should be remembered that brownfield land will have to accommodate residential, employment, commercial and social infrastructure. In this context it is likely that greenfield sites will also be needed to accommodate some new development.	Noted. However, this will be dependent upon the level of development that is required to meet the needs identified in the OAHN and the Employment Land Review.
Stanmore Properties Ltd	LPRIO1013	Question 12	Comment	The most sustainable option for growth is to focus new development on the main towns on a mix of brownfield and Greenfield sites. The main towns, particularly Kidderminster offer the most sustainable option for growth. However, whilst focus on brownfield sites is highly sustainable, brownfield sites can be more difficult and costly to deliver than Greenfield. there is now an acute shortfall of affordable housing in the district where brownfield sites have struggled to provide 30% affordable housing. Greenfield sites can help provide necessary infrastructure.	Comments are noted. All sites allocated will be informed by a viability assessment.
Shuttles J	LPRIO1138	Question 12	Comment	Small developments could be considered in outlying villages of viable size. This size would I believe be circa 1 to 15 habitable units.	Comments are noted. This would need to be based on housing need assessment.
Taylor Wimpey UK Ltd	LPRIO1040	Question 12	Comment	<u>Land to SW of Stourport - northern edge of Rectory Lane</u> The allocation of brownfield land first should not come at the expense of delivering the housing and employment needs of the community and meeting the requirements of national policy. Appropriate that all strategic-level growth should be directed towards the main towns; particularly Kidderminster and Stourport-on-Severn as the largest two towns.	Comments are noted.

LOCAL PLAN REVIEW ISSUES & OPTIONS CONSULTATION (SEPTEMBER 2015)

WHAT LEVEL OF GROWTH IS NEEDED AND WHAT BROAD OPTIONS CAN BE PERSUED? (SECTION 6) RESPONSES

Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
Topland Hotels (No. 14) Ltd	LPRIO1235	Question 12	Comment	There are major issues of deliverability of brownfield sites and these need to be considered in detail as part of the Plan preparation process. Development should continue to be focused in areas that use the main towns as hub, but a review of the Green Belt and of unproductive greenfield sites is imperative to ensure that the correct balance of sustainable development is achieved in the long term.	Disagree. Wyre Forest has not experienced delivery problems with its brownfield sites and has consistently demonstrated an excellent 5 year Housing Land Supply. A Green Belt Boundary Review will only be undertaken if the level of OAHN necessitates one. Even then, Sustainability Appraisal will be the key factor in selecting sites.
Thomas E	LPRIO976	Question 12	Comment	I agree that there are enough brownfield sites	Agreement is noted.
Willsgrove Developments Ltd	LPRIO1203	Question 12	Comment	It should be remembered that brownfield land will have to accommodate employment, commercial, social infrastructure and that there may be only limited opportunities for residential development. In this context it is likely that greenfield sites will be needed to accommodate a significant proportion of new development. Agree that the focus on new development should be at and adjoining the main towns.	Comments are noted. All sites will be assessed through the HELAA, SA process and subject to viability assessment before being allocated.
Gladman Developments Ltd	LPRIO1251	Question 12	Comment	The smaller, more rural settlements will also require housing In order to meet needs and furthermore this growth is likely to be beneficial for these settlements in terms of helping to maintain and enhance the existing facilities and services. Growth should be distributed to key settlements with established facilities, services and infrastructure, in accordance with the key theme running through the Framework of promoting sustainable development. However this should not preclude development in lower order sustainable settlements, which could also help to sustain existing facilities and services.	Comments are noted. However this will very much depend on localised housing needs as to focus large amounts of development to the rural areas would be highly unsustainable and encourage trip generation by the private car.

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Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
Thomas G	LPRIO1498	Question 12	Comment	It is vital that all brownfield sites are utilised prior to turning greenfield to brown as the reverse process obviously is not available. Green is lost forever! There would be enough brownfield sites if better planning and land utilisation was pursued for example through consideration of very high quality apartments for single occupancy and younger economically active to limit overall land consumption.	Noted. However the Council must plan to meet all housing needs.
Natural England	LPRIO1625	Question 12	Comment	With regard to there being enough brownfield sites to accommodate development needs, Natural England considers it would be good if there were. We also consider that development is needed in villages as well as main towns. However, this would need to be done carefully to avoid adverse impacts on protected sites.	Comments are noted. Until the overall housing target is known, it is not clear whether brownfield sites will be sufficient in number and viable to develop or whether greenfield sites will be required.
Option 2. Brownfield regeneration focussed on the main towns and expansion of Kidderminster to the north east via a sustainable urban extension.					
Hurcott Land Owners	LPRIO173	Option 2	Comment	Landowners of the site at Hurcott would like to ensure it is considered for Development through the Local Plan Review. This location could be transformed into a development that significantly enhanced access to the area through public open spaces that were part of an overall plan that delivered significant mixed housing stock to the community at large. This is a 'gateway' location into Kidderminster.	Noted. This site has been submitted for consideration through the Housing and Economic Land Availability Assessment (HELAA) and would be considered under Growth Option 2. However, in order to allocate this site a comprehensive Green Belt Boundary Review would be required.
Voice E	LPRIO181	Option 2	Support	Support for Option 2	Support for Option 2 is noted.
Persimmon Homes Limited	LPRIO782	Option 2	Object	Stanklyn Lane Option 2 - We consider that development here would have a significant impact	Objection to Option 2 is noted.

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WHAT LEVEL OF GROWTH IS NEEDED AND WHAT BROAD OPTIONS CAN BE PERSUED? (SECTION 6) RESPONSES

Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
				upon the purpose, appearance and character of the Green Belt to the north east of Kidderminster and would have a significant and demonstrable impact upon the open countryside to the north east of the town with little opportunity to contain development within natural features and contours.	
Wolverley & Cookley PC	LPRIO1096	Option 2	Comment	Support for Option 2. The Parish Council would like to maintain the current policy of the District Council as outlined in the Adopted Site Allocations & Policies Local Plan. This identifies the site for mixed use redevelopment, The Council appreciate dwelling houses are essential for the redevelopment but it must be part of a mixed use. The Parish would also like to comment that access to the site when re developed would need to be carefully considered with due regard shown to existing residents of The Crescent.	The Parish Council's comments in relation to the Lea Castle Site are noted.
Upper Arley PC	LPRIO1331	Option 2	Support	Support for Option 2	Support for Option 2 is noted.
Staff & Worcs Canal Society	LPRIO1278	Option 2	Comment	The Society suggests that the opportunities provided by Option One should be considered first.	Comment is noted.
Fyshe F	LPRIO530	Option 2	Object	Objection to Option 2.	The objection to option 2 is noted.
Hurcott Village Management Committee	LPRIO1409	Option 2	Object	Object to Option 2 - impact of increased traffic on Hurcott Lane, impact on SSSI and nature reserve, impact on Conservation Area.	Objection to Option 2 is noted.
Nash I	LPRIO1113	Option 2	Comment	Sustainable urban extensions should be the second option, with as little Green Belt intrusion as possible. Development of Lea Castle site may be preferable to more rural areas.	Comment is noted. It is likely that a site specific policy for the Lea Castle site will be developed through the Plan Review.
Thomas G	LPRIO1499	Option 2	Support	Of the greenbelt options suggested, the north east	Support for Option 2 is noted.

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Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
				of Kidderminster is the best location for greenfield development due to its proximity to the A449, A456 and is closer to the rail station to encourage commuting by walking for the more able.	
Question 13. Do you think a Sustainable Urban Extension to the north east of Kidderminster is the most sustainable location for the greenfield development? If so, do you have any views or suggestions on appropriate development sites in this area?					
Mrs C Kimber	LPRIO1	Question 13	Comment	Protect the Greenbelt to the North east of Kidderminster to prevent the town merging into the Birmingham sprawl.	Comment on option 2 is noted. This Option would be subject to Green Belt Boundary Review.
Barratt Homes West Midlands	LPRIO86	Question 13	Comment	<p>Concerned that the Council is not consulting on a potential option that would deliver development to the south west of Stourport on Severn on the grounds that the Council considers that this area contains sensitive landscapes, even though this is one of the few options where a non Green Belt urban extension could be delivered.</p> <p>The various urban extension options at Kidderminster will all result in Green Belt land release. Furthermore, Bewdley is partly surrounded by Green Belt and therefore additional development at Bewdley also has the potential for Green Belt land release. The extension of Stourport to the south west is a realistic and suitable development option that has been incorrectly dismissed on landscape sensitivity grounds. Stourport has approximately twice the population of Bewdley. It provides a wide range of services and facilities. It is clearly a location that is suitable for accommodating additional growth.</p> <p>Attached to these representations is a landscape appraisal report prepared by Tyler Grange that</p>	The Issues and Options document has not at this stage ruled out any options. It merely flags up that although there is no Green Belt to the South of Stourport, the area forms part of the previous Landscape Protection Area and that therefore the Landscape is important to the setting of the town. This Option has not been dismissed at this early stage in the plan review and would be subject to a full Sustainability Appraisal. There are other factors to consider for this area, including trip generation and traffic congestion through Stourport to access employment opportunities. The consideration of options very much depends on the level of development that needs to be accommodated.

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Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
				confirms that land to the south west of Stourport is a suitable location for development from a landscape perspective. This development option is a 'reasonable alternative and it is essential that the emerging plan thoroughly explores the land to the south west of Stourport's development potential. It is our view that the emerging plan should allocate this land for development through the plan making process.	
Eriksson-Flegg B	LPRIO126	Question 13	Comment	Expansion north east of Kidderminster would be easier access to M5/M42 than expansion further west.	Comment on Growth Options 2 and 3 are noted.
Hallam Land Management	LPRIO240	Question 13	Comment	There are still suitable development sites & ADR's adjacent to a number of the main settlements which are situated outside of the Greenbelt. These should be prioritised for development before any Greenbelt review is undertaken.	Noted. However in order for the ADRs to be allocated for development a Green Belt Boundary Review will be required as they are currently subject to Green Belt policy.
Richards Mr H	LPRIO199	Question 13	Comment	The location for an SUE at Kidderminster cannot be finally determined without reference to a Sustainability Appraisal. However, it seems likely that, in principle, a SE SUE would have less impact on the purposes of including land in the Green Belt.	The comments relating to Sustainability Appraisal are noted. The respondent does not provide any justification as to why a SUE to the South East of the District would have less impact on the Green Belt purposes?
Churchill and Blakedown PC	LPRIO311	Question 13	Comment	Does not believe Option 2 would be the most sustainable as would put pressure on facilities in surrounding villages. Considers Option 3 to be more sustainable subject to co-operation with Wychavon District Council.	The objection to Option 2 is noted. Support for Option 3 is noted.
Paris R	LPRIO409	Question 13	Comment	Option 1 should be considered first	These comments on Option 2 are noted.
Mahoney Mr S	LPRIO764	Question 13	Comment	Whilst we accept that SUEs can offer an	The comments on SUEs are noted.

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Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
				appropriate and sustainable option for housing development the council need to be realistic when they consider the scale of reliance they place on SUEs through the Local Plan and also the lead in times and delivery rates associated with these large scale developments. The Council should avoid placing an over reliance on these types of sites.	
Miller Homes	LPRIO846	Question 13	Support	the Area of Development Restraint (ADR) to the south of Stourbridge Road is the most appropriate greenfield development site in this area, to be released for housing immediately. Development on this site alone would not require development in, or a review of the boundaries of, the Green Belt and accordingly is considered to represent the most sequentially preferable location for an expansion to the most sustainable settlement in the District. An early planning application submitted by a national housebuilder for land in this ADR would provide further demonstration of market confidence , the confirmed availability of the land, and the deliverability of housing development on this site. Provides detail about their client's ADR site on land off Stourbridge Road.	Support for Option 2 is noted. The comments in relation to the ADR are noted. This site is being assessed through the HELAA and would also require appraisal against the SA Framework.
Worcestershire Wildlife Trust	LPRIO905	Question 13	Comment	Option 2 - there are wetland SSSIs in this area that would need careful consideration and may render parts of this area undevelopable. Should be underpinned by a robust sustainability appraisal for the urban fringes as a whole so that choices are based on a proper understanding of the various issues facing all potential sites.	Comments are noted and agreed.
WFDC	LPRIO693	Question 13	Support	Support for Option 2.	Support for Option 2 is noted.

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Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
(Strategic Housing Team)					
Associated British Foods Plc	LPRIO843	Question 13	Comment	SUEs won't necessarily be the most sustainable option for growth. In addition the delivery of SUEs can be complex and problematic, requiring the co-ordination and assembly of conflicting land interests, the provision of infrastructure and often a scale of development that is significant in order for a development to be viable.	Comments relating to SUEs are noted. All options will be subject to Sustainability Appraisal.
British Horse Society	LPRIO485	Question 13	Object	Objects to Option 2. Any major developments on the NE side of Kidderminster would make serious inroads to the ever diminishing bit of countryside between the town and the south western edge of Birmingham and the Black Country. Equestrian uses and bridleways would be impacted on around Hagley and Blakedown.	The Objection to Option 2 is noted.
Fyshe F	LPRIO531	Question 13	Object	Objection to Option 2 due to loss of Green Belt. More sustainable sites south of Kidderminster.	Objection to Option 2 is noted.
Warwickshire & West Mercia Police and H&W Fire and Rescue Service	LPRIO640	Question 13	Comment	Option 2 could potentially stretch police services beyond their current built up areas and would require expansion of the local Safer Neighbourhood Team(s). it would be sensible to create a new police post within a community building in one of the developments and pay for it by pooling contributions from all developments that make up the Sustainable Urban Extension.	The comments relating to the need for the SUE to include a new police post within a community building are noted.
Stanmore Properties Ltd	LPRIO1014	Question 13	Comment	Development north east of Kidderminster is a sustainable location for Greenfield development and there is land available allocated as Area of Development Restraint (ADR) removed from Green	Support for Option 2 is noted. The ADR site referred to is being assessed through the HELAA process.

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Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
				Belt to meet long term housing needs between A451 and Hurcott Village, Kidderminster. This site could come forward immediately without need for Green Belt review. The site has previously been assessed as sustainable and it is available for development immediately. More detailed assessment is now needed as how the site could be developed with regard to suitable access and ecological appraisal.	
Bewdley Civic Society	LPRIO1566	Question 13	Comment	Focus new development in the main towns Kidderminster & Stourport	Comment is noted.
Shuttles J	LPRIO1139	Question 13	Comment	The answer to this question is Yes but to minimise sprawl developments need to be small if in the greenbelt.	Comments are noted.
Thomas E	LPRIO977	Question 13	Object	No. I do not agree in the need for any development for greenfield sites.	Objection is noted.
Barry Shufflebotham	LPRIO967	Question 13	Object	Object to Option 2. This would represent a potential five-fold increase in the use of Hurcott lane up to A456 Birmingham road. It has been the local council's original plan to retain the rural approach to Kidderminster. New building to the edge of the boundary in any area would destroy this aim. Concerned about the general use of Hurcott Lane as a "rat-run" between the Stourbridge and Birmingham Roads.	The Objection to Option 2 and the potential impacts on Hurcott are noted.
Willsgrove Developments Ltd	LPRIO1204	Question 13	Object	Object to Option 2 - development here would have a significant impact upon the purpose, appearance and character of the Green Belt to the north east of Kidderminster and would have a significant and demonstrable impact upon the open countryside to	Objection to Option 2 is noted.

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Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
				the north east of the town with little opportunity to contain development within natural features and contours.	
Gladman Developments Ltd	LPRIO1252	Question 13	Comment	Council need to be realistic when they consider the scale of reliance they place on SUEs and also the lead in times and delivery rates associated with these large scale developments. SUEs should not be relied upon as an 'easy option' to allocate large numbers of houses without the evidence to demonstrate that the scale proposed is capable of being delivered within the plan period. Using a number of schemes as case studies it finds that an eight-year period should be allowed for from the preparation of an outline/in principle planning application to the delivery of homes	Comments relating to the delivery of SUEs are noted.
Option 3. Brownfield regeneration focussed on the main towns and expansion of Kidderminster to the south east via a sustainable urban extension.					
Atkin G	LPRIO18	Option 3	Comment	Green Belt is important for everyone -should not be reduced.	Comment is noted. A comprehensive Green Belt Boundary Review would be required to take sites out of the Green Belt to allocate them for new development.
Cotterill J	LPRIO267	Option 3	Object	Objects to Option 3.	Objection to Option 3 is noted.
Voice E	LPRIO182	Option 3	Object	Strongly objects to Option 3. No evidence that new residents will take up jobs along the Worcester Road Corridor. Need to undertake a survey of where people live and work.	Objection to Option 3 is noted.
Williams L	LPRIO213	Option 3	Object	Objects to Option 3. The fields, apart from being farmed for crops and vegetables, provide annual nesting ground for declining bird species such as	The objection to Option 3 is noted.

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				skylarks. Countryside views would be changed forever for residents. The Spennells estate is already busy with traffic.	
Graystone A	LPRI0212	Option 3	Object	Objects to Option 3. Will add greater demand to resources on the Spennells Estate. Traffic in the whole area will increase and if an entry onto Stanklyn lane is made it will lead to a rat run through the Spennells estate.	The Objection to Option 3 is noted.
Persimmon Homes Limited	LPRI0783	Option 3	Support	Stanklyn Lane Option 2 - a sustainable urban extension to the south east of Kidderminster is the most sustainable location for greenfield development for the town. Well related to the urban area and in particular the major employment areas to the south east of the town. Land off Stanklyn Lane, identified on the attached plan, could help to form part of this sustainable urban extension.	Support for Option 3 is noted.
Screen Mr C	LPRI0514	Option 3	Object	Objects to Option 3. The area is Green Belt and combines agricultural land with a multitude of footpaths, bridle paths and hedgerows supporting wildlife. The Spennells community is large and further expansion could not be accommodated by the school. Traffic congestion during Spennells School opening and closing times is already high, further housing development would render this intolerable. Building on this elevated area of greenbelt would have a significant visual impact on Spennells and Summerfield alike. Loss of the greenbelt to the south and south east of Spennells would deprive the community of a much used and valued open space.	The Objection to Option 3 is noted.
Upper Arley PC	LPRI01332	Option 3	Support	Support for Option 3	Support for Option 3 is noted.

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Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
Staff & Worcs Canal Society	LPRIO1279	Option 3	Object	Option 3 - The Society suggests that the opportunities provided by Option One should be considered first.	Objection to Option 3 is noted.
Smith R	LPRIO510	Option 3	Object	Objects to Option 3. This area is currently used for agriculture and has a bridleway at the rear of the properties along Sanderling Court. The loss of this lovely countryside to possible housing development would be devastating and have a seriously detrimental effect on all who live in this area.	The objection to Option 3 is noted.
Fyshe F	LPRIO533	Option 3	Object	Objects to Option 3. Loss of Green Belt.	The objection to Option 3 is noted.
Schroders UK Property Fund	LPRIO772	Option 3	Comment	Hartlebury Trading Estate is one of the County's premier employment estates. We therefore welcome development that will reinforce the Trading Estate's role by providing new housing in close proximity to one of the largest employment estates in Worcestershire. There are clear benefits in locating new residential development in close proximity to areas of employment area as it reduces the need to travel.	The comments relating to Hartlebury Trading Estate are noted.
Baird Parker S	LPRIO957	Option 3	Object	Considerable local consternation that the land in question is all the fields between Stanklyn Lane and the Spennells Estate. Includes a list of reasons for the objection including access, education, open space, biodiversity.	The Objection to Option 3 is noted.
Nash I	LPRIO1114	Option 3	Comment	The South East of Kidderminster (A4561 A449) has borne the major brunt of previous urban expansion and Spennells in particular is highly overdeveloped. Further development may well involve significant costs in providing services / utilities / roads etc and these sites are all in the Green Belt.	Comment is noted.

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Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
Holt C	LPRIO1125	Option 3	Object	Objection to Option 3. If this Green Belt land is built on, it will be devastating to all those who chose their homes partly because of the proximity to countryside. Hopefully we can continue to enjoy this amenity for many years to come as we have for many years in the past. Once built on it can never be undone.	The Objection to Option 3 is noted.
Holt J	LPRIO1126	Option 3	Object	Objection to Option 3. The area has already been scarred by the Easter park. Extra traffic should be thought about, with the early morning congestion regularly backing up as far as Spennells Valley road. House values will fall to. Brown field sites should be considered first please.	The objection to Option 3 is noted.
Cantello S	LPRIO1127	Option 3	Object	Objection to Option 3. I am resident on Spennells and I am concerned about reducing the Green Belt on the south side of the town. I support Worcestershire Wildlife. I think we need more trees not housing on greenfield sites.	The objection to Option 3 is noted.
Woodall C	LPRIO1227	Option 3	Comment	Suggests a number of land use mixes for sites allocated in the KCAAP.	The alternative land uses are noted.
Edmunds J	LPRIO1266	Option 3	Object	Objects to Option 3 and highlights a number of issues relating to transportation problems, restricted bridleways, and impact on recreational activities. I wish more consideration could be given to redevelopment	Objection to Option 3 is noted. The respondent is reminded that this is not subject to a planning application, it is merely a broad area of search that has been identified along with several other options to meet future development needs.
Aggborough & Spennells Ward Members	LPRIO1480	Option 3	Object	Objection to Option 3 - Should the area between Easter Park and The Mare and Colt be chosen for any development we would strongly advise against it as in our view it would constitute over	The objection to Option 3 is noted.

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				<p>development of an area already densely populated with very few services for its residents. Any development on this land would require an enormous amount of new infrastructure for what would be such a massive area of housing, there are highway implications and quality of life considerations too.</p> <p>The area is Green Belt and we feel that it should be protected at any cost, it helps areas retain their individuality and not just become one joined up area of urban living.</p>	
Thomas G	LPRIO1500	Option 3	Object	<p>Objection to Option 2 - Evidence from paragraph 2.15 suggests that this is a flawed assumption and low growth should be used for assessment of needs. Kidderminster should not try to develop beyond its natural identity. There is no guarantee that extra housing provision would be taken by existing residents seeking single occupancy. Development of the south east of Kidderminster would produce more congestion through the town by vehicles routing to Wolverhampton area past schools (Comberton Primary, Stourminster Special, King Charles) to access the dual carriageway A456 to Birmingham, affecting safety. There is also the question of capacity of the secondary schools. There is substantial employment opportunity along the Stourport road which could be better accessed from a north east housing development.</p>	Objection to Option 3 is noted.

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Question 14. Do you think a Sustainable Urban Extension to the south east of Kidderminster is the most sustainable location for greenfield development? If so, do you have any views or suggestions on appropriate development sites in this area?					
Eriksson-Flegg B	LPRIO127	Question 14	Comment	Expansion south east of Kidderminster, gives access to A449 south and M5	Comments on Option 3 are noted.
Churchill and Blakedown PC	LPRIO312	Question 14	Comment	Support for Option 3.	Support for Option 3 is noted.
Cotterill J	LPRIO266	Question 14	Comment	Careful consideration needs to be given to access under Option 3. There is one access road from Turnstone Road on Spennells Estate to the field. This will be exacerbated when the Stourport relief road is open and the traffic funnels down to the Wilden Lane/Chester Road island.	The comments with regard to Option 3 are noted. All options would be subject to a sustainability appraisal and their impact on the highway network.
Cotterill J	LPRIO276	Question 14	Object	Objects to Option 3.	Objection to Option 3 is noted.
Blackswan	LPRIO174	Question 14	Support	Support for Option 3. The area ranks highly when assessed against the sustainability criteria proposed by WFDC. Within this area we promote the Captains site to the south of the A448 Bromsgrove Road and to the east of Spennells. At 30dph the developable land could accommodate 135 dwellings. The respondent lists a number of criteria as to why this site is sustainable. This includes accessible open space, reducing the need to travel, complementing the green infrastructure network, easy access to employment opportunities, minimal loss of Greenbelt.	Support for Option 3 is noted. The site will be assessed through the Housing and Economic Land Availability Assessment and will be subject to consideration by an Independent Panel with regards to its deliverability.
Paris R	LPRIO410	Question 14	Comment	Considers Option 3 is more sustainable than Option 2.	The comments on Option 3 are noted.
Rushock PC	LPRIO927	Question 14	Comment	We feel that greenfield development should only be used as a last resort and not an easy option. There	The comments are noted and agreed.

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				is also concern about the effects on villages in the identified area.	
Worcestershire Wildlife Trust	LPRIO907	Question 14	Comment	Option 3 - a number of SSSIs and LWS in this area which would act as considerable constraints on large scale development and seem to make it a poor choice for sustainable growth. However decisions regarding whether this area is more, or less, sustainable than others for urban expansion should be underpinned by a robust sustainability appraisal for the urban fringes as a whole so that choices are based on a proper understanding of the various issues facing all potential sites.	Comments are noted and agreed
WFDC (Strategic Housing Team)	LPRIO694	Question 14	Support	Support for Option 3	Support for Option 3 is noted.
Associated British Foods Plc	LPRIO856	Question 14	Comment	ABF considers that there are other sites that are more appropriate within this general location. ABF is promoting a site closer to the centre of Kidderminster that is well located to existing housing, employment, the town centre and railway station. This land, whilst also in the Green Belt, is more sustainably located than land to the South East of Kidderminster and will not require significant infrastructure to be delivered.	Comment relating to alternative site is noted. However, this site falls within the Green Belt and could only come forward if it were necessary to undertake a Green Belt Boundary Review.
Taylor Wimpey UK Ltd	LPRIO793	Question 14	Support	<u>Land North of Stone Hill, eastern Kidderminster</u> Option 3 - not clear from the Council's documentation where the south-east and north-east separate. It is recognised that the Site does fall within the Green Belt and Taylor Wimpey will be undertaking technical work to identify and assess areas of the site least sensitive in terms of	Comments are noted. The site is being assessed through the HELAA following submission by the agents.

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				landscape and visual impact. The eastern boundary could also be enhanced through an appropriate landscaping scheme that responded sensitively to the Green Belt.	
Richards Mr H	LPRIO1411	Question 14	Comment	The location for an SUE at Kidderminster cannot be finally determined without reference to a Sustainability Appraisal. However, it seems likely that, in principle, a SE SUE would have less impact on the purposes of including land in the Green Belt.	The comments relating to Sustainability Appraisal are noted. The respondent does not provide any justification as to why a SUE to the South East of the District would have less impact on the Green Belt purposes?
Howell D	LPRIO618	Question 14	Object	Objection to Option 3. The Spennells Estate is already large, and an extension in that area would be entirely detrimental to residents, with chronic traffic problems, a loss of amenity countryside and the increased density leading to a much lower quality of life.	The Objection to Option 3 is noted.
Warwickshire & West Mercia Police and H&W Fire and Rescue Service	LPRIO642	Question 14	Comment	Option 3 could potentially stretch police services beyond their current built up areas and would require expansion of the local Safer Neighbourhood Team(s). it would be sensible to create a new police post within a community building in one of the developments and pay for it by pooling contributions from all developments that make up the Sustainable Urban Extension.	The comments relating to the need for the SUE to include a new police post within a community building are noted.
Bewdley Civic Society	LPRIO1567	Question 14	Comment	Focus new development in the main towns Kidderminster & Stourport	Comment is noted.
Shuttes J	LPRIO1140	Question 14	Comment	The answer to this question is Yes but to minimise sprawl developments need to be small if in the greenbelt.	Comments are noted.
Thomas E	LPRIO979	Question 14	Object	Objection to Option 3 - Many of the developments /	Objection to Option 3 is noted.

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				units on the A449 industrial area (by Screwfix) remain empty since it was built and an eyesore.	
Gladman Developments Ltd	LPRIO1253	Question 14	Comment	council need to be realistic when they consider the scale of reliance they place on SUEs and also the lead in times and delivery rates associated with these large scale developments. SUEs should not be relied upon as an 'easy option' to allocate large numbers of houses without the evidence to demonstrate that the scale proposed is capable of being delivered within the plan period. Using a number of schemes as case studies it finds that an eight-year period should be allowed for from the preparation of an outline/in principle planning application to the delivery of homes	Comments in relation to the delivery of SUEs are noted.
Option 4. Brownfield regeneration focus for Stourport-on-Severn.					
Staff & Worcs Canal Society	LPRIO1280	Option 4	Support	The Society is of the opinion that the significant amounts of brownfield land available for development in Stourport-on-Severn should be used before looking at green field sites.	Support for Option 4 is noted.
Fyshe F	LPRIO534	Option 4	Support	Support for Option 4.	Support for Option 4 is noted.
Nash I	LPRIO1115	Option 4	Comment	Brownfield regeneration in Stourport is a realistic and reasonable option. Areley Kings area could accommodate additional housing without impacting on Green Belt. Sensitive landscapes are some distance from the village	Comment is noted. However, Kidderminster is the main town within the District with rail transport links. Some development will need to be accommodated within Kidderminster.
Question 15. Do you think that Stourport-on-Severn will have enough deliverable brownfield sites available to meet its development needs of the new plan period? If not do you think that Stourport-on-Severn will also require a sustainable urban extension to help accommodate its development needs? Where do you think it would be best to locate a Sustain Urban Extension in relation to the town itself?					
Huizer K	LPRIO65	Question 15	Comment	Thinks there are enough brownfield sites available	Comments are noted. It is acknowledged

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Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
				in Stourport and that an urban extension is not required. Loss of open countryside, transport and accessibility to local services should be fully considered.	that there are plenty of brownfield sites left to deliver in Stourport.
Eriksson-Flegg B	LPRIO128	Question 15	Comment	Expansion within Stourport on Severn must take into account the existing traffic problems through the town and over the river Stour.	Comments are noted and agreed.
Hallam Land Management	LPRIO241	Question 15	Comment	We do not agree that there are enough deliverable brownfield sites in Stourport to meet its housing needs over the new Plan Period. The Local Plan Review should seek to boost market and affordable housing delivery by allocating additional Greenfield sites for development.	Noted. However the results of the OAHN will inform the amount of housing needed by Stourport and this in turn will determine whether it will be necessary to allocate further greenfield sites which will then be subject to Sustainability Appraisal.
Sheppard Councillor D	LPRIO261	Question 15	Comment	The Green Belt must be preserved around Stourport town to preserve its historic identity.	Comment is noted. If sites in the Green Belt surrounding Stourport are allocated, then it will be subject to a thorough Green Belt Boundary Review.
Churchill and Blakedown PC	LPRIO313	Question 15	Comment	No comment on Option 4.	Noted.
Paris R	LPRIO411	Question 15	Support	Support for option 4	Support for Option 4 is noted.
Worcestershire Wildlife Trust	LPRIO909	Question 15	Comment	Any requirement for expansion into open countryside or the greenbelt should be underpinned by a robust sustainability appraisal for the urban fringes as a whole so that choices are based on a proper understanding of the various issues facing all potential sites.	Comments are noted and agreed
WFDC (Strategic Housing Team)	LPRIO695	Question 15	Comment	We don't believe there are sufficient sites available in Stourport. The potential to expand on the south east or south west sides on a small scale.	Comments on Stourport's Brownfield Land Availability are noted.

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Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
British Horse Society	LPRIO486	Question 15	Support	Support for Option 4. The British Horse Society would favour any options which focus new housing developments on available brownfield sites.	Support for Option 4 is noted.
Taylor Wimpey UK Ltd	LPRIO748	Question 15	Comment	<u>Land North of Stourport - eastern side of Bewdley Road (B4195)</u> Do not envisage that Stourport-on-Severn will have sufficient brownfield land supply to not require appropriate greenfield releases, including Green Belt. It is recognised that the Site does fall within the Green Belt and Taylor Wimpey will be undertaking technical work to identify and assess areas of the Site least sensitive in terms of landscape and visual impact. However, the site benefits from being surrounded by built form on three aspects and would not extend development into the Green Belt any more so than is the case on Elan Avenue.	Noted. This site could only be considered if a Green Belt Boundary Review were undertaken. It is also located in a sensitive area of the Greenbelt on a very open field which would require careful consideration.
Bewdley Civic Society	LPRIO1568	Question 15	Comment	Focus new development in the main towns Kidderminster & Stourport	Comment is noted.
Shuttes J	LPRIO1141	Question 15	Comment	From information presented and developments in hand, brown field sites should be able to provide the construction required.	Comment is noted.
Taylor Wimpey UK Ltd	LPRIO1041	Question 15	Comment	<u>Land off Rectory Lane, Areley Kings</u> Do not envisage that Stourport-on-Severn will have sufficient brownfield land supply to not require appropriate greenfield releases, including Green Belt. This site provides one of relatively few opportunities to deliver an extension to Stourport-on-Severn without releasing Green Belt land and, whilst Green Belt land may also require release, this site should be treated favourably in this regard. Taylor Wimpey	Comment is noted. The site is being assessed through the HELAA

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Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
				will be undertaking technical work to identify and assess areas of the Site which are least sensitive in terms of landscape and visual impact.	
Topland Hotels (No. 14) Ltd	LPRIO1236	Question 15	Comment	There is insufficient brownfield land in Stourport to support its development needs and the town will require an urban extension. The emerging plan must ensure that an honest and open debate is had on the deliverability of existing brownfield land, the availability of greenfield sites and the potential of development on the latter to assist with the provision of Relief Road. An urban extension is required to re-invigorate Stourport, and to overcome some of the economic and social issues identified elsewhere in the Issues Paper. Such an extension would be ideally located on the eastern fringes of the town, on land which is generally less constrained by environmental designations and has better connectivity with Kidderminster, the A449, and with identified employment areas. The area framed by Hartlebury Road and Wilden Lane offers the opportunity to provide development land that is relatively unconstrained by statutory environmental designations and provide sustainable links with the Town Centre and surrounding settlements.	The respondent does not provide clear evidence to back up their statement. The District has an excellent record of housing delivery and has not experienced problems with its 5 year Housing Land Supply unlike many authorities, despite all allocated sites being brownfield. The area of land the respondent is referring to falls within the Green Belt and therefore is constrained by an environmental designation and one upon which the Government places great emphasis.
Thomas E	LPRIO981	Question 15	Comment	Stourport has enough brownfield sites for development	Comments are noted.
Gladman Developments Ltd	LPRIO1254	Question 15	Comment	Gladman would urge the Council not to rely solely on brownfield land in any given location as this may have severe implications on delivery. The Council should ensure that the Local Plan includes a portfolio of sites, both brownfield and greenfield, to	Comments are noted.

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Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
				help ensure delivery throughout the plan period	
Option 5. Allocate some development to Bewdley through an amendment to the town's settlement boundary to accommodate new development.					
Williams H	LPRIO104	Option 5	Comment	Largely support this but the local community and residents should be consulted prior to any development.	Support for the growth options is noted.
Mahoney Mr S	LPRIO765	Option 5	Comment	A specific allocation in Bewdley would enable the objectives outlined to be achieved in a sustainable way. We would recommend an amendment to Bewdley's settlement boundary to include the site to the north (Land off Dry Mill Lane).	Noted. The site referred to by the respondent is to be assessed under the HELAA process and will also be subject to Sustainability Appraisal against all the alternatives.
Persimmon Homes Limited	LPRIO1002	Option 5	Support	In 2013/14 only 21 dwellings were completed in Bewdley, representing 5.5% of the total District completions. As an identified Market Town, the Council should be doing more to encourage new development in the more sustainable locations in Wyre Forest and the current settlement boundary is not encouraging this to take place. This can only be done by taking a fresh look at the development boundaries of towns such as Bewdley and planning positively for increased levels of growth, in line with the Worcestershire SEP. The Council should give consideration of land to the east of the town, south of existing development at Catchem's End. This land is of a lower landscape value and could be developed in a way to integrate with the existing development and enhance the sustainability of the area. It is considered that Land at Kidderminster Road can be reasonably released from the Green Belt without undermining the functions of the Green Belt and its role in preventing urban sprawl.	These comments with regard to development options for Bewdley are noted.

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Staff & Worcs Canal Society	LPRIO1281	Option 5	Comment	The Society has no direct interest in Bewdley since its remit is limited to matters concerning the Staffordshire and Worcestershire Canal.	Noted.
Bewdley Civic Society	LPRIO1565	Option 5	Comment	As regards Bewdley, the NP should be the authority which decides what level of development is appropriate in Bewdley. However, we would not wish to see any significant building either in the Green Belt or areas of Great Landscape Value. We see no reason for there to be anything but modest new development in Bewdley.	Noted. However, it is likely that Bewdley will need to accommodate a level of housing to meet its own needs. It has seen very little growth in the current Local Plan. The District Council will work with the Town Council to progress the Neighbourhood Development Plan so that this can be used to identify sites for future development to meet Bewdley's needs. However, the Neighbourhood Plan must be in general conformity with the Local Plan and should not be used to prevent development that is needed to meet an identified need from coming forward.
Nash I	LPRIO1116	Option 5	Comment	Greenfield sites in Bewdley should be avoided unless essential to the needs of the town and the Neighbourhood Development Plan. Land to the north of the town is not Green Belt. Brownfield land in the direction of Trimpley could be developed without impacting significantly on landscape value.	Comment is noted. Land in the direction of Trimpley also falls within the Greenbelt.
Gladman Developments Ltd	LPRIO1255	Option 5	Support	We would not support an approach seeking to meet all of Bewdley's development needs through brownfield development. This type of strategy is risky and is likely to come across difficulties in terms of delivery. Gladman believe that the Council should be seeking to allocate residential sites in greenfield locations on the edge of Bewdley.	Comments are noted.
Thomas G	LPRIO1501	Option 5	Support	Clearly, development of the district cannot be absorbed by Kidderminster alone and this should be	Support is noted.

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				shared out amongst the three major towns to balance pressures on all forms of infrastructure.	
<p>Question 16. Do you feel that there is enough opportunity to accommodate Bewdley's development needs to 2032 on brownfield land within the settlement boundary? Are there any brownfield sites available? If not, do you think that Bewdley's settlement boundary should be amended to accommodate further development on greenfield sites in order to meet its future housing and employment needs? If you do feel that new development on greenfield sites is appropriate for Bewdley, then where do you think this would be best located in relation to the town?</p>					
Eriksson-Flegg B	LPRIO129	Question 16	Comment	Expansion in Bewdley would increase traffic through already congested Kidderminster. Access to railway would require efficient transport to and from the railway station. Expansion to the west of the river Severn would require substantial infrastructure such as expanding the bypass to link with the Worcester road to avoid congestion through 30 miles/hour roads through either Kidderminster or Stourport.	Comments are noted.
Churchill and Blakedown PC	LPRIO314	Question 16	Comment	No comment on Option 5.	Noted.
Paris R	LPRIO412	Question 16	Comment	I believe it is vital to protect the quality of Bewdley and its surroundings as a high quality living and leisure area. This will benefit the whole district in attracting highly economically active people and investment to the area.	The comments on the character of Bewdley are noted and the contribution it makes to the District as a whole.
Worcestershire Wildlife Trust	LPRIO912	Question 16	Comment	Bewdley - any requirement for expansion into open countryside or the greenbelt should be underpinned by a robust sustainability appraisal for the urban	Noted and agreed

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Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
				fringes as a whole so that choices are based on a proper understanding of the various issues facing all potential sites.	
WFDC (Strategic Housing Team)	LPRIO696	Question 16	Comment	We don't believe there are sufficient sites available in Bewdley. The potential to expand on the south east or south west sides on a small scale.	The comments relating to brownfield land availability in Bewdley are noted.
WFDC (Strategic Housing Team)	LPRIO697	Question 16	Comment	Opportunities to develop brownfield sites is limited and not necessarily cost effective so would support the settlement boundary being amended. As part of the Neighbourhood Plan we will be undertaking a Housing Needs Survey in 2015 – 16 and this evidence should be considered as part of the process. Potential locations would be Wribbenhall and Hales Park.	Support for a settlement boundary review for Bewdley is noted.
British Horse Society	LPRIO487	Question 16	Object	Objection to option 5. This will impact on adjacent parishes which will potentially have an adverse impact on horse owners and equestrian businesses around the Wyre Forest.	The objection to Option 5 is noted.
Upper Arley PC	LPRIO1333	Question 16	Comment	No more development until transport network is improved	Comment is noted.
Shuttles J	LPRIO1142	Question 16	Comment	Change boundaries and restrict developments to small projects of circa 12 to 15 habitable units	Comments are noted.
Thomas E	LPRIO982	Question 16	Comment	Bewdley development can be accommodated on brownfield sites	Comments are noted.
Willsgrove Developments Ltd	LPRIO1205	Question 16	Comment	There are insufficient sites within Bewdley's settlement boundary to accommodate its development needs, including the need for new housing. Refers to Client's site adjacent to the SVR and Bewdley Bypass off the Stourport	Noted. The site is to be assessed through the HELAA process. However, it could only be considered further if a Green Belt Boundary Review were required.

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				Road. Considers the site represents one of the best opportunities to release a discreet parcel of land which will not intrude upon the wider landscape and which is also able to achieve a high degree of sustainability in terms of its connectivity to the town centre and other important local services, notably schools and the leisure centre.	
Natural England	LPRIO1626	Question 16	Comment	Due to its proximity to the Wyre Forest any expansion to Bewdley should be carefully planned so as not to impact on the Wyre Forest SSSI.	Comments are noted. Any expansion to the west of Bewdley will have to have regard to the Wyre Forest SSSI.
Option 6. Allocate more new development to the villages and settlements within the District's rural east.					
Osborne R	LPRIO43	Option 6	Support	Believes small scale development should be targeted to those villages which have school facilities to maintain a balanced population range.	Comment is noted. Worcestershire County Council (as the LEA) is a statutory consultee and advises on school place capacity to accommodate new development.
Persimmon Homes Limited	LPRIO785	Option 6	Object	These settlements generally function as "dormitory" or "commuter" settlements and that significant expansion of these settlements would not be justified in the terms of sustainability The local plan strategy should focus on identifying land at the three main towns in order to accommodate development at the most sustainable locations	These comments are noted.
Richards Mr H	LPRIO1408	Option 6	Comment	Existing Neighbourhood Plans were brought forward in the context of the current Local Plan. Indeed, all Neighbourhood Plans have to be in general conformity with the adopted local plan and aligned with the strategic needs and priorities of the wider area. a current Neighbourhood Plan should not be allowed to constrain growth that is identified as being needed in the next Local Plan. Once the	Agree with these comments on Neighbourhood Planning. Neighbourhood Plans can't be used to restrain development that is needed within their areas.

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				new LP is adopted, any conflict with an existing NP in a development management decision must be resolved by the most recently adopted taking precedence	
Upper Arley PC	LPRIO1334	Option 6	Object	The Parish Council feels there should be no further development to these settlements as there are inadequate facilities.	The Objection to Option 6 is noted.
Staff & Worcs Canal Society	LPRIO1282	Option 6	Comment	Where such development is thought necessary, and where it is adjacent to the canal or river we would expect the waterways to be incorporated into such developments in ways which enhance them and use them as an open aspect.	Comments are noted.
Fyshe F	LPRIO535	Option 6	Object	Objects to Option 6. Small scale local needs housing may be appropriate, no sites available to accommodate larger development.	The objection to Option 6 is noted.
Nash I	LPRIO1117	Option 6	Comment	Development in villages and settlements in the rural east is desirable, in small pockets (subject to the current Green Belt). Consideration of previous Green Belt development sites should be for sensitive development only.	Comment is noted.
Thomas G	LPRIO1502	Option 6	Support	Support for Option 6. I believe that more should be made of the facility of Blakedown station which can be accessed easily by a number of surrounding settlements. There is easier access to Birmingham from these locations and people in Bewdley and Stourport might wish to relocate here to avoid congestion around Kidderminster.	Support is noted.

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Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
<p>Question 17. Do you think we should be directing further development to these settlements to help sustain rural services and communities to the east of the District? Do you feel the villages to the east of our area have the right capacity of services and facilities to help support their sustainable growth? Should new development in these settlements be relative to their size and if so what proportion should it be? Do you think the current settlement boundaries around villages to the east are correct or do they need to be amended? Are there any brownfield (previously developed) sites located within the Green Belt that we should be considering further for new development?</p>					
Atkin G	LPRIO19	Question 17	Comment	Village development should be proportionate - 20% maximum.	Comment is noted and agreed.
Huizer K	LPRIO66	Question 17	Comment	There are plenty of people who would want to move to these 'less served' villages, which would free up houses in the towns where access to a wide range of services is available.	Noted. However, more services would need to be provided in the villages to support larger populations.
Richards Mr H	LPRIO200	Question 17	Comment	Sufficient development should be added to villages in the rural east to (a) at least maintain current levels of services but (b) to allow them to become more sustainable. Chaddesley Corbett should be 'inset' in the Green Belt and land allocated for housing of all types, ie market (with appropriate housing mix), elderly, live-work, affordable), rural small business units, community facilities.	These comments are noted. Currently the village of Chaddesley Corbett is washed over by Green Belt. If a settlement boundary were to be drawn around the village and an inset created it would be necessary to undertake a Green Belt Boundary Review.
Churchill and Blakedown PC	LPRIO315	Question 17	Comment	<p>Considers that there should be no further development to the villages and rural settlements due to inadequate facilities. Churchill and Blakedown are addressing this through the Neighbourhood Plan.</p> <p>Oppose the supposition that equestrian land is regarded as being previously developed, particularly if forming part of the Green Belt</p>	<p>Noted. However it depends on the scale of housing need within these settlements as evidenced by the OAHN. Is it sustainable to have no further development in the villages for the next 15 years? The Parish Council are reminded that it is not the purpose of the Neighbourhood Plan to block further development that is specifically needed in the area as specified by national policy and within the Localism Act.</p> <p>Equestrian land is not considered to be previously developed it is open countryside.</p>

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Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
Paris R	LPRIO413	Question 17	Comment	Does not consider further development should be targeted towards the rural area.	The objection to Option 6 is noted.
WFDC (Conservation)	LPRIO245	Question 17	Comment	Considers that Chaddesley Corbett needs a settlement boundary. Development at Chaddesley Corbett should be restricted to brownfield or previously developed sites. Further development should not be directed to the villages of Churchill and Broome as it would impact on their special character. Development adjacent to these Conservation Areas could compromise character. Any development at Blakedown should be restricted to brownfield or previously developed sites.	The Conservation Officers comments are noted and any sites allocated in these areas will be subject to full appraisal including their impact on local character and conservation areas.
WFDC (Strategic Housing Team)	LPRIO698	Question 17	Comment	Would support development to Rural East settlements of around 5 – 10% to meet local identified housing needs. This is likely to mean using brownfield land and also amending settlement boundaries	Support for 5-10% additional development to the rural east settlements is noted.
British Horse Society	LPRIO488	Question 17	Object	Objection to Option 6. Any major developments in the villages in the east of the district - which are already effectively satellites of Bromsgrove and Hagley - will erode the Green Belt in this area, which is already under serious pressure in the neighbouring Districts of Bromsgrove, Dudley and Birmingham. There is also a large concentration of horse owners and equestrian businesses, as well as access to quiet lanes and bridleways, which would all be compromised by large scale development in this area.	Objection to Option 6 is noted.
Wolverley & Cookley PC	LPRIO1097	Question 17	Comment	Services and facilities would need to be improved proportionately to any growth.	Comments are noted.

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Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
Telereal Trillium	LPRIO819	Question 17	Comment	We consider that these settlements generally function as “dormitory” or “commuter” settlements and that significant expansion of these settlements would not be justified in the terms of sustainability. The local plan strategy should focus on identifying land at the three main towns in order to accommodate development at the most sustainable locations.	The comments in relation to the future development strategy are noted.
Shuttes J	LPRIO1143	Question 17	Comment	The answer to this question is Yes restricting to increases of 10 to 15% in small developments	Comment is noted.
Topland Hotels (No. 14) Ltd	LPRIO1237	Question 17	Comment	Yes, the area has the capacity to accommodate additional development without compromising the overall objectives of the Green Belt. Consideration of further development within the Rural East should be done so in the context of the Strategic Green Belt review.	Noted. However this appears to be a contradictory statement as it would require the release of land from a strategically important element of the District's Green Belt.
Thomas E	LPRIO984	Question 17	Comment	Chaddesley Corbett - build in the town but not on Green Belt.	Comment is noted.
Willsgrove Developments Ltd	LPRIO1206	Question 17	Comment	We consider that these settlements generally function as “dormitory” or “commuter” settlements and that significant expansion of these settlements would not be justified in the terms of sustainability. The local plan strategy should focus on identifying land at the three main towns in order to accommodate development at the most sustainable locations	The comments on the rural settlements are noted.
Rai A	LPRIO1242	Question 17	Comment	I would like to submit for consideration the grounds/site associated with Wolverley Lodge, Lea Lane, Cookley, DY10 3RL	Noted. The site will be considered through the HELAA assessment.

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Gladman Developments Ltd	LPRIO1256	Question 17	Comment	Each of the districts settlements, both large and small, will have development needs that should be met. Once the OAN has been determined, the settlement boundaries (if they are to remain a feature of the new Local Plan) will need to be amended to reflect this. Gladman would object to the use of settlement boundaries if these would preclude otherwise sustainable development from coming forward	These comments are noted.
Option 7. Allocate more development to the villages and settlements within the District's rural west.					
Walley R	LPRIO47	Option 7	Comment	Concerns about retaining the Green Belt Area in which they live.	Comment is noted. In order for new development to take place in the Green Belt it will be necessary to undertake a comprehensive Green Belt Boundary Review.
Persimmon Homes Limited	LPRIO786	Option 7	Object	Villages to the west of the District are in a principally rural based area and that further development here would not be sustainable. growth should be focused on the three main towns	Comments are noted.
Staff & Worcs Canal Society	LPRIO1283	Option 7	Comment	The Society's remit is limited to development along or by the canal. The previous comments deal with any issues that are likely to arise with developments covered in Option 7.	Noted.
Fyshe F	LPRIO536	Option 7	Support	Support for Option 7.	Support for Option 7 is noted.
Nash I	LPRIO1119	Option 7	Comment	Development of village and settlements in the rural west is desirable in small pockets (subject to the current Green Belt), as the need for local housing, services and regeneration has been identified. Minor allocations could be designated to the smaller	Comment is noted.

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Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
				settlements.	
Thomas G	LPRIO1503	Option 7	Support	Support for Option 7. There is demand to the West of the River Severn and this should be explored further for opportunities.	Comment is noted.
<p>Question 18. Do you think that we should be directing further development to these settlements to help sustain rural services and communities to the west of the District? Do you feel that villages to the west of our District have the right capacity of services and facilities to help support their sustainable growth? Should new developments in these settlements be relative to their size and if so what proportion should it be? Do you think that the current settlement boundaries around villages to the west are correct or do they need to be amended? Are there any settlements in this area which you feel should have a settlement boundary drawn around them? Do you know of any sites in this area which could be suitable to meet local development needs?</p>					
Eriksson-Flegg B	LPRIO130	Question 18	Comment	Expansion to the west must take account of public transport and road access.	Comments are noted and agreed.
hill and town PC	LPRIO316	Question 18	Comment	No comment on Option 7.	Noted.
Paris R	LPRIO414	Question 18	Comment	Does not consider further development should be directed to the District's rural west. If development does go ahead it should be infill only.	Objection to Option 7 is noted.
Mahoney Mr S	LPRIO766	Question 18	Comment	It is considered that Option 5 offers a more sustainable solution to the provision of housing land to the West of Kidderminster, than to direct development into the smaller settlements.	Comment on Option 5 is noted.
WFDC (Strategic Housing Team)	LPRIO699	Question 18	Comment	Would support development to the Rural West but probably on a smaller scale as appropriate to the services / facilities and to meet the housing need.	Comments relating to the rural west are noted.
British Horse Society	LPRIO489	Question 18	Comment	The rural settlements in the west of the District have been most affected by school closures and the loss of other local amenities such as pubs, shops and regular bus services which would make	These comments about loss of services to the west of the District are noted.

LOCAL PLAN REVIEW ISSUES & OPTIONS CONSULTATION (SEPTEMBER 2015)
WHAT LEVEL OF GROWTH IS NEEDED AND WHAT BROAD OPTIONS CAN BE PERSUED? (SECTION 6) RESPONSES

Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
				development sustainable	
Simmonds R	LPRIO509	Question 18	Comment	Support for Option 7. Puts forward a site at Chapel Lane, Callow Hill for consideration. The infrastructure is already in place to sustain more properties along the lane. Planning permission needs to be more relaxed where it is so close to other dwellings but not necessarily within current permitted development. The community needs growth to sustain a healthy population.	Support for Option 7 is noted. The site will be considered through the Housing and Economic Land Availability Assessment.
Scriven G	LPRIO512	Question 18	Comment	Support for Option 7. The respondent puts forward land at Keens Farm, Callow Hill for consideration for future development.	Support for Option 7 is noted. The site will be considered through the Housing and Economic Land Availability Assessment.
Fyshe F	LPRIO537	Question 18	Support	Support for Option 7.	Support for Option 7 is noted.
Telereal Trillium	LPRIO820	Question 18	Comment	We consider that the villages to the west of the district are in a principally rural based area and that further development here would not be sustainable.	Comments are noted.
Hickton J	LPRIO810	Question 18	Comment	Option 7 - The Agents have submitted a site on land to the east of Quarry Road and to the north of The Greenway at Rock for consideration through the HELAA process.	Noted. The site will be considered through the HELAA.
Shuttes J	LPRIO1144	Question 18	Comment	A reassessment of possible housing need is required for young people working locally possibly in agriculture or local diversified uses. This will require infrastructure adjustments/improvements to suit.	Noted. An assessment of local housing needs is being undertaken to inform the Plan Review.
Willsgrove Developments Ltd	LPRIO1207	Question 18	Object	We consider that the villages to the west of the District are in a principally rural based area and that further development here would not be sustainable. We have already commented that growth should be	Objection to Option 7 is noted.

LOCAL PLAN REVIEW ISSUES & OPTIONS CONSULTATION (SEPTEMBER 2015)
WHAT LEVEL OF GROWTH IS NEEDED AND WHAT BROAD OPTIONS CAN BE PERSUED? (SECTION 6) RESPONSES

Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
				focused on the three main towns.	
Gladman Developments Ltd	LPRIO1257	Question 18	Comment	Each of the districts settlements, both large and small, will have development needs that should be met. Once the OAN has been determined, the settlement boundaries (if they are to remain a feature of the new Local Plan) will need to be amended to reflect this. Gladman would object to the use of settlement boundaries if these would preclude otherwise sustainable development from coming forward	Comments are noted.

**LOCAL PLAN REVIEW ISSUES & OPTIONS CONSULTATION (SEPTEMBER 2015)
PROVIDING QUALITY HOMES (SECTION 7) RESPONSES**

Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
Willets K	LPRIO59	Section 7	Comment	Small scale affordable eco homes in green space should be provided. I am setting up community business to provide affordable straw bale homes for rent, eco workshops for rent, landscape gardens, community cafe and allotments. Need site in Cookley area.	Comments are noted.
Williams H	LPRIO105	7.1	Support	Agree that housing should be of high quality, sufficient quantity, affordable and type needed to create successful communities. We need to plan for a mix of homes of different sizes and types to meet housing need.	Support is noted.
Disability Action Wyre Forest	LPRIO508	7.1	Support	A good mix of new dwellings is important.	Support is noted.
Atkin G	LPRIO20	7.2	Comment	A mix of housing is really important - some should be starter homes, but also there needs to be a percentage of any new development which is affordable housing.	Noted and agreed.
Persimmon Homes Limited	LPRIO1003	7.5	Comment	To support a new Local Plan it is therefore expected that an update to the SHMA is prepared, which will sit alongside a document which refines the Objectively Assessed Need (OAN) for the District.	Comments are noted and agreed.
Pearce J	LPRIO51	7.6	Comment	Build more small units so older people can downsize eg. sheltered in Bewdley	Comments are noted. Specific provision will need to be made to cater for increasing elderly population
Simmonds R W	LPRIO119	7.6	Comment	Consider that we cannot continue to build housing in quantities proposed by Government. Brownfield should be used first, but more likely to be for flats. Reconstruction in town centres should include	Comments are noted. The former Brintons Office building did have planning approval for conversion to flats for the elderly but this has lapsed.

**LOCAL PLAN REVIEW ISSUES & OPTIONS CONSULTATION (SEPTEMBER 2015)
PROVIDING QUALITY HOMES (SECTION 7) RESPONSES**

Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
				flats at upper floors. Luxury apartments may be the future. Crown House could have been reused as housing for the elderly as could Brintons offices. Former British Sugar site is progressing well with housing construction. Also welcome developments along Park Lane.	
Option A - Housing Mix. Continue with the current policy of concentrating provision around dwellings to cater for smaller households.					
Atkin G	LPRIO21	Option A	Support	We should provide housing for local people. This is what is needed.	Agree that we should aim to cater for local housing needs.
Atkin G	LPRIO23	Option A	Comment	Option A meets the needs of the majority.	Comment is noted.
Williams H	LPRIO106	Option A	Support	Support for option A - continue current policy of concentrating provision around dwellings to cater for smaller households.	Support is noted.
Churchill and Blakedown PC	LPRIO324	Option A	Support	The Parish Council supports Option A - continue to cater for smaller households	Support is noted
Voice E	LPRIO183	Option A	Support	Providing more smaller dwellings will encourage downsizing and allow young people to form new households. Affordable housing is needed.	Support for provision of smaller homes is noted.
Upper Arley PC	LPRIO1335	Option A	Support	The Parish Council supports Option A	Support for Option A is noted
Fyshe F	LPRIO540	Option A	Support	Support option A	Support is noted
Option B – Housing Mix. Look to provide more housing suitable for families.					
Williams H	LPRIO107	Option B	Support	Support for option B - provide more housing suitable for families.	Support is noted.
Churchill and Blakedown PC	LPRIO325	Option B	Support	The Parish Council supports Option B - provide more family housing.	Support is noted

**LOCAL PLAN REVIEW ISSUES & OPTIONS CONSULTATION (SEPTEMBER 2015)
PROVIDING QUALITY HOMES (SECTION 7) RESPONSES**

Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
Upper Arley PC	LPRIO1336	Option B	Support	The Parish Council supports Option B	Support is noted
Fyshe F	LPRIO541	Option B	Support	Support option B	Support is noted
Option C – Housing Mix. Look to provide more choice of executive homes in Wyre Forest District					
Atkin G	LPRIO22	Option C	Object	Executive housing does nothing for the local area. People buy them and commute to London	Objection to option is noted
Churchill and Blakedown PC	LPRIO327	Option C	Object	The Parish Council does not support option C	Objection is noted
Voice E	LPRIO184	Option C	Object	People who can afford executive homes mostly don't work locally and probably don't shop here either	Your objection is noted.
Upper Arley PC	LPRIO1338	Option C	Object	The Parish Council does not support Option C	Objection is noted
Fyshe F	LPRIO539	Option C	Object	object to option C	Objection is noted
Topland Hotels (No. 14) Ltd	LPRIO1238	Option C	Support	Support for Option C. Evidence to suggest that this approach encourages the freeing up of the housing market elsewhere in the locality, and encourages the activation of an otherwise static population.	Support for Option C is noted.
Rai A	LPRIO1243	Option C	Support	Support Option C	Support for Option C is noted.
Option D – Housing Mix. Look to provide for a mix of house types on all large scale developments.					
Eriksson-Flegg B	LPRIO131	Option D	Comment	Consider that mixed age neighbourhoods work well and should be encouraged.	Comments are noted.
Hallam Land Management	LPRIO242	Option D	Support	This option provides more community benefits and allows for affordable housing.	Support is welcomed.
Churchill and	LPRIO317	Option D	Support	The Parish Council supports option D - providing a	Support is noted.

**LOCAL PLAN REVIEW ISSUES & OPTIONS CONSULTATION (SEPTEMBER 2015)
PROVIDING QUALITY HOMES (SECTION 7) RESPONSES**

Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
Blakedown PC				mix of house types on large-scales developments	
Upper Arley PC	LPRIO1337	Option D	Support	The Parish Council supports Option D	Support is noted
Fyshe F	LPRIO542	Option D	Support	Support option D	Support is noted
Nash I	LPRIO1120	Option D	Comment	Options D & E appear to be the most appropriate.	Support for Options D & E is noted.
Option E - Housing Mix. Specify housing mix on an individual site basis in conjunction with a site size threshold.					
Churchill and Blakedown PC	LPRIO326	Option E	Object	The Parish Council does not support this option	Objection is noted
Bewdley Town Council	LPRIO878	Option E	Support	Favour Option E - individual site basis	Support is noted
Upper Arley PC	LPRIO1339	Option E	Object	The Parish Council does not support Option E	Objection is noted
Staff & Worcs Canal Society	LPRIO1284	Option E	Support	Option E appears to provide a more location/site sensitive approach. The Society recognises amenity value of canal to communities living alongside or close by. Society believes that Option E provides the best opportunity to develop flexible and site sensitive development policies.	Support for option E is noted. The Canal is highly valued by those residents who live nearby.
Fyshe F	LPRIO538	Option E	Object	Object to Option E	Objection is noted
Bewdley Civic Society	LPRIO1569	Option E	Support	Support for Option E	Support for Option E is noted.
Shuttes J	LPRIO1145	Option E	Support	Support Option E	Support for Option E is noted.
Nash I	LPRIO1121	Option E	Comment	Options D & E appear most appropriate as provide for mix of household types. Suggest that smaller sites are used for smaller dwellings which would be sensitive to the local area - potential for	Support for options is noted.

**LOCAL PLAN REVIEW ISSUES & OPTIONS CONSULTATION (SEPTEMBER 2015)
PROVIDING QUALITY HOMES (SECTION 7) RESPONSES**

Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
				community spirit	
Thomas G	LPRIO1504	Option E	Support	Option E would form the most sensible approach according to its location.	Support is noted
Question 19. What are your views on the options set out for housing mix? Are there any other options which should be considered?					
North Worcestershire Housing & Water Management	LPRIO45	Question 19	Comment	Local Plan should recognise potential to regenerate poor quality terraced private rented housing in pre-1919 areas in order to provide better quality and more affordable homes for low income households.	Comments are noted. However, we do not consider that this issue can necessarily be tackled via the local plan.
Barratt Homes West Midlands	LPRIO87	Question 19	Comment	Given length of plan period, we consider that a prescriptive housing mix should not be included. Requirements may well change over time. Suggest that housing mix on sites is informed by market needs at time of planning application.	Comments are noted. However, as a Local Plan is regularly reviewed, policies will be reflective of the latest evidence base including a Housing Needs Assessment.
Chaddesley Corbett PC	LPRIO221	Question 19	Comment	Housing Mix - Seeking to influence balance of population without clear evidence of local need may encourage in-migration and thus out-commuting. Use Census data and housing needs assessments to determine optimum balance of housing mix. Housing sites for the elderly should be close to services and public transport.	Comments on housing mix options are welcomed. Census analysis shows a population imbalance in favour of elderly households with fewer young families. Specifically catering for young families in housing provision could help to reverse this trend. This option would have to go hand-in-hand with a jobs growth policy in order to counteract out-commuting.
Paris R	LPRIO415	Question 19	Comment	Consider that a mix of options would be preferable. A- B+ C++ D+ E+	Comment is noted. Support mix of options, especially Option C to provide more executive homes.
Revelan Group	LPRIO648	Question 19	Comment	Given length of plan period, type of housing mix required is likely to change over time and thus we feel that mix should be informed by market needs and negotiated with officers at time of application.	Comments are noted. However, as a Local Plan is regularly reviewed, policies will be reflective of the latest evidence base including a Housing Needs Assessment.

**LOCAL PLAN REVIEW ISSUES & OPTIONS CONSULTATION (SEPTEMBER 2015)
PROVIDING QUALITY HOMES (SECTION 7) RESPONSES**

Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
Mahoney Mr S	LPRIO767	Question 19	Comment	Option D is sensible starting point and allows some certainty for developers of larger sites. However, site specific considerations are also important so option E would also be needed.	Comments on preference for options D and E are noted
Miller Homes	LPRIO859	Question 19	Comment	Do not consider it the role of the Local Plan to prescribe what housing mix should be on development sites. NPPF requires LPAs to plan for mix of housing based on current and future demographic trends, market trends and needs of different groups as well as identify size, type, tenure and range of housing required. The Local Plan will need to have regards to the latest SHMA. However, the Local Plan should be flexible enough to also take into account viability considerations.	Comments are noted. Once evidence base is updated, this will be used to inform the Local Plan Review.
Persimmon Homes Limited	LPRIO788	Question 19	Comment	Stanklyn Lane Believe plan should not be too prescriptive re housing mix and density. Town centre sites are likely to be of higher density and more likely to be for rental. Larger allocations will provide an appropriate mix suited to market needs. Believe that District required more executive housing - both on smaller high quality sites and as part of larger sites. Businesses require all types of workers including executives and so larger dwellings will be needed as part of mix. Para.47 of NPPF requires housing to meet all parts of the population.	Comments are noted. Agree that housing development should cater for all members of the population.
WFDC (Strategic Housing Team)	LPRIO700	Question 19	Comment	Para. 7.3 should make reference to affordability ratios. Chapter does not recognise role of regenerating / improving existing housing stock. Housing mix should include a mix of options from executive homes to support economic growth to	Comments are noted. Reference will be made to affordability ratios. Agree that majority of households will live in existing stock and much of this needs regenerating but as main issue is with terraced housing

**LOCAL PLAN REVIEW ISSUES & OPTIONS CONSULTATION (SEPTEMBER 2015)
PROVIDING QUALITY HOMES (SECTION 7) RESPONSES**

Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
				smaller units to cater for growing numbers of lone parents and single person households. Local Plan needs to address both housing need and aspiration. Strongly support mixed house types on developments to create sustainable communities. In some areas, housing mix may need to be skewed in order to rebalance the existing housing stock.	in private ownership, unsure how planning policy can help to do this. Agree that housing mix of development sites needs to cater for cross section of population and can also specifically help redress imbalances in some areas.
Homes and Community Agency	LPRIO658	Question 19	Comment	The HCA is supportive of the delivery of a housing mix that would support a sustainable and mixed community and responds to evidence emerging from the Strategic Housing Market Assessment (SHMA).	Comments are noted.
Taylor Wimpey UK Ltd	LPRIO749	Question 19	Comment	Land at Bewdley Road Stourport Believe that developers and land promoters are best placed to judge the best mix of homes to deliver at each site at any time. The wrong housing mix will not sell. The latest information is used at time of application to justify mix. An 'indicative' target in the Local Plan is unhelpful.	Comments are noted.
Taylor Wimpey UK Ltd	LPRIO796	Question 19	Comment	Land at Stone Hill Kidderminster Believe that developers and land promoters are best placed to judge the best mix of homes to deliver at each site at any time. The wrong housing mix will not sell. The latest information is used at time of application to justify mix. An 'indicative' target in the Local Plan is unhelpful.	Comments are noted.
Richards Mr H	LPRIO1412	Question 19	Comment	Sufficient development should be added to villages in the rural east to (a) at least maintain current levels of services but (b) to allow them to become more sustainable. Chaddesley Corbett should be 'inset' in the Green Belt and land	These comments are noted. Currently the village of Chaddesley Corbett is washed over by Green Belt. If a settlement boundary was to be drawn around the village and an inset created it would be

**LOCAL PLAN REVIEW ISSUES & OPTIONS CONSULTATION (SEPTEMBER 2015)
PROVIDING QUALITY HOMES (SECTION 7) RESPONSES**

Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
				allocated for housing of all types, i.e. market (with appropriate housing mix), elderly, live-work, affordable), rural small business units, community facilities.	necessary to undertake a Green Belt Boundary Review.
Telereal Trillium	LPRIO821	Question 19	Comment	We believe that the plan should not take an overly prescriptive approach to the issue of housing mix and housing density	Comment is noted.
Stanmore Properties Ltd	LPRIO1015	Question 19	Comment	The housing mix should reflect the demographic housing need demonstrated by the evidence base in the Strategic Housing Market Assessment which is yet to be prepared.	Comments are noted. Evidence base will be used to inform policy choices.
CPRE	LPRIO1437	Question 19	Comment	Larger developments should be required to provide a proportion of bungalows, and that the new Plan should contain a restriction on replacing bungalows with houses. There may be case for providing a policy for smaller houses in villages, in the hope that some will be affordable for those working locally. Whatever is done needs to be flexible so that WFDC can negotiate an appropriate housing mix with developers.	These comments are noted, particularly with regard to flexibility.
SWDP	LPRIO1052	Question 19	Comment	Developers prefer to build larger dwellings. Only if evidence points to a lack of supply should the local plan promote these.	Comments are noted. Await results of housing needs study to see what requirements are.
J & H Evans	LPRIO933	Question 19	Comment	Could argue that it is not the role of the Local Plan to prescribe housing mix. NPPF requires LPAs to plan for a mix of housing and to prepare a Strategic Housing Market Assessment to inform the Local Plan. Once SHMA has been updated, we would wish to comment further. Local Plan should be flexible enough to allow housing mix to be considered on	Comments are noted. Findings of latest SHMA will be used to inform Local Plan policies.

**LOCAL PLAN REVIEW ISSUES & OPTIONS CONSULTATION (SEPTEMBER 2015)
PROVIDING QUALITY HOMES (SECTION 7) RESPONSES**

Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
				site by site basis to reflect location and site context, giving regard to latest SHMA and taking into account demographic and market trends, community needs and viability considerations.	
Taylor Wimpey UK Ltd	LPRIO1042	Question 19	Comment	Land at Rectory Lane Stourport Believe that developers and land promoters are best placed to judge the best mix of homes to deliver at each site at any time. The wrong housing mix will not sell. The latest information is used at time of application to justify mix. An 'indicative' target in the Local Plan is unhelpful.	Comments are noted.
Thomas E	LPRIO985	Question 19	Comment	Kidderminster has above average social housing. If more housing is built it should be for executives and families. The town and schools would need to be improved to attract such types.	Comments are noted.
Willsgrove Developments Ltd	LPRIO1208	Question 19	Comment	Plan should not take overly prescriptive approach to issues of housing mix and density. Town centre development is likely to be of higher density with smaller units appropriate to rental sector. Larger allocations will have a mix suited to market needs. Agree District needs more executive housing - perhaps suitable for smaller sites in high quality locations as well as specific areas of larger allocations. Businesses need to attract a cross section of workers. This would be in line with NPPF para.47.	Comments are noted. Housing development needs to cater for all potential residents.
Gladman Developments Ltd	LPRIO1258	Question 19	Comment	Gladman urge the Council to ensure that any proposed housing mix policy is not overly prescriptive and that it is capable of responding to the identified needs in the district and also any specific local needs. Site and location specific considerations will also be relevant when	Comments are noted and agreed.

**LOCAL PLAN REVIEW ISSUES & OPTIONS CONSULTATION (SEPTEMBER 2015)
PROVIDING QUALITY HOMES (SECTION 7) RESPONSES**

Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
				determining housing mix.	
Thomas G	LPRIO1505	Question 19	Comment	Consider that executive housing and 1 bed units do not mix well together in terms of neighbourhood character	Comments are noted.
Option A - Housing Land Allocations. Seek to take existing unimplemented residential allocations forward (including mixed use)					
Williams H	LPRIO108	Option A	Comment	Brownfield sites should be brought forward first.	Support for this option is noted.
Chaddesley Corbett PC	LPRIO222	Option A	Support	Option A should be a priority.	Support for option A is noted.
Fyshe F	LPRIO543	Option	Support	Support option A	Support is noted
Stanmore Properties Ltd	LPRIO1016	Option A	Comment	A mix of Options A and B is most likely to ensure delivery of the housing required. Some allocated sites may still be worthy of taking forward if deliverable or developable in terms of para.47 footnotes 11 & 12 of NPPF. However, they must be viable.	Comments on option A are noted.
Bewdley Civic Society	LPRIO1571	Option	Support	Support Option A	Support for Option A is noted
Nash I	LPRIO1122	Option A	Support	Implementation of existing brownfield allocations should be a priority.	Support for option A is noted.
Thomas G	LPRIO1506	Option A	Support	Option A should be taken forward.	Support is noted
Option B - Housing Land Allocations. Seek to allocate alternative sites.					
Hallam Land Management	LPRIO243	Option B	Support	Many of existing allocations are not viable owing to high development costs and low land values. Brownfield sites which have been developed have often provided lower numbers of affordable dwellings owing to viability issues. New Local Plan should allocate some greenfield sites in order to	Support for Option B is noted.

**LOCAL PLAN REVIEW ISSUES & OPTIONS CONSULTATION (SEPTEMBER 2015)
PROVIDING QUALITY HOMES (SECTION 7) RESPONSES**

Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
				boost number of market and affordable homes delivered.	
Churchill and Blakedown PC	LPRIO331	Option B	Comment	We are unable to comment on this option until the Call for Sites information is published.	Comment is noted. The Strategic Housing and Economic Land Availability Assessment will be published prior to the Preferred Options consultation next summer. An independent panel is meeting during November to discuss the sites put forward for consideration.
Chaddesley Corbett PC	LPRIO330	Option B	Comment	Any sites put forward by landowners and agents (Option B) should only be considered if they are supported by their local Parish/community, or are identified in a Neighbourhood Plan.	Comments are noted. Wyre Forest DC will work closely with the Parish Council. However, the emerging Local Plan will take precedent over any allocations in the Neighbourhood Plan.
Barratt Homes West Midlands	LPRIO328	Option B	Support	Support for option B as additional sites will need to be allocated. Quantum of development will be informed by emerging housing requirement but lack of brownfield capacity means an urban extension will be required.	Support for Option B is noted. Until the housing requirement is known and the Housing and Economic Land Availability Assessment Site Assessment Panel has finished its deliberations no decisions can be taken on whether urban extensions will be needed during the plan period.
Persimmon Homes Limited	LPRIO790	Option B	Support	Land at Stanklyn Lane Important to ensure any unimplemented allocations are viable and will come forward in plan period otherwise their continued allocation will block future supply. Further land needs to be identified to accommodate future needs.	Support for further allocations is noted. All existing allocations will be assessed through the HELAA together with any other sites which have been put forward.
Fyshe F	LPRIO544	Option B	Object	Object to Option B	Objection is noted
Stanmore Properties Ltd	LPRIO1017	Option B	Comment	Alternative sites will be needed as initial assessment of housing need shows a significant	Comments are noted. An Objective Assessment of Housing Need is being

**LOCAL PLAN REVIEW ISSUES & OPTIONS CONSULTATION (SEPTEMBER 2015)
PROVIDING QUALITY HOMES (SECTION 7) RESPONSES**

Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
				increase in delivery is required.	undertaken and the results will feed into the Preferred Options of the Local Plan Review.
Taylor Wimpey UK Ltd	LPRIO1043	Option B	Comment	Land at Rectory Lane Stourport Our preference is for Option B. The SHELAA should establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified housing need over the Plan Period. (Para 159 NPPF). The Local Plan Review must ensure that land allocated for housing is sufficient and economically viable. Many brownfield sites will have high remediation costs whereas greenfield sites do not.	Comments are noted. All existing unimplemented allocations as well as other potential sites put forward will be assessed through the SHELAA as per Para 159 NPPF.
Nash I	LPRIO1123	Option B	Comment	Alternative sites put forward by landowners / agents are less likely to be ideal as will not necessarily be in suitable locations.	Comments are noted
Thomas G	LPRIO1508	Option B	Comment	There is insufficient evidence to show that Option B is necessary as the projections are based simply on a standard forecast of development needs and historical evidence suggests that demand for housing is low.	Comments are noted. Work is still underway to determine how many homes will be required over the course of the plan period.
Option C - Housing Land Allocations. Consider proposals for residential development on larger areas of garden land with strict conditions relating to impact on neighbourhood character.					
Barratt Homes West Midlands	LPRIO88	Option C	Comment	We consider Option C to be inappropriate as any development on garden land would constitute windfall development and should not be explicitly planned for. Although residential gardens are no longer classed as previously developed, this does not prevent windfall developments coming forward within residential curtilages. A policy will be required that acknowledges that any such	Comments are noted. We will need to consider carefully whether we still want to preclude garden land coming forward for development.

**LOCAL PLAN REVIEW ISSUES & OPTIONS CONSULTATION (SEPTEMBER 2015)
PROVIDING QUALITY HOMES (SECTION 7) RESPONSES**

Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
				development will have to reflect local character.	
Persimmon Homes Limited	LPRIO792	Option C	Comment	Stanklyn Lane Assembly of garden land is difficult and should not be relied upon for allocations. Impact on existing character needs to be taken into account.	Comments are noted.
Fyshe F	LPRIO545	Option C	Object	Object to Option C	Objection is noted
Stanmore Properties Ltd	LPRIO1018	Option	Comment	Option C – development of garden land if it falls within the built up area of settlements should be considered as windfall.	Comments are noted. Current policy would need to be amended to allow small greenfield sites to come forward as windfalls with strict conditions to minimise impact on local character.
Shuttes J	LPRIO1146	Option C	Support	Support Option C	Support is noted
Thomas E	LPRIO987	Option C	Object	Do not support option C as affects neighbourhood. Developers like Green Belt as is easier and cheaper to develop.	Objection to Option C is noted. This option considers potential allocation of some garden sites (which are greenfield) and does not refer to Green Belt.
Nash I	LPRIO1124	Option C	Support	Garden sites should be used, where appropriate, for sensitive development.	Support for use of gardens sites for sensitive development is noted.
Thomas G	LPRIO1507	Option C	Support	Option C should be taken forward	Support is noted
Question 20. What are your views on the housing land allocation options? Are there other options which you feel the council should consider?					
Churchill and Blakedown PC	LPRIO318	Question 20	Comment	Emerging policy in the Neighbourhood Plan should be taken into account and ensure that housing design conforms to local character.	Comment is noted.
Barratt Homes West Midlands	LPRIO329	Question 20	Comment	We are concerned with suggestion that unimplemented residential allocations will be taken forward into a new plan. We would question their suitability for development. There must be	Concerns are noted. Many of the sites which have yet to come forward were phased for the latter phases of the plan period.

**LOCAL PLAN REVIEW ISSUES & OPTIONS CONSULTATION (SEPTEMBER 2015)
PROVIDING QUALITY HOMES (SECTION 7) RESPONSES**

Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
				clear evidence that they can come forward in the future. If there are viability issues that have prevented their development to date, these may continue into the new plan period. Such sites should be removed from the emerging plan. Alternatively, the plan should over allocate to allow for non-delivery on some sites.	
Paris R	LPRIO416	Question 20	Comment	Support a mix of options A++ B+ C+ Especially keen to see existing unimplemented allocations taken forward.	Comments are noted.
Revelan Group	LPRIO649	Question 20	Comment	Concerned about unimplemented residential allocations being taken forward without restricting suitability for development. Question their suitability if they haven't yet come forward. Need clear evidence that sites can come forward if they are to be carried forward into new plan. Sites with existing viability issues should be removed from plan. Or alternatively, the plan should over allocate to allow for some sites not coming forward. It is likely that option B will need to be implemented in order to meet quantum of development needed. This may require releasing land outside of existing settlement boundaries. However, brownfield sites within settlements should be considered before greenfield land release takes place. However, we consider that there are few brownfield sites that are suitable within settlements.	Concerns are noted. An analysis of existing unimplemented sites will be undertaken as part of the HELAA process.
Mahoney Mr S	LPRIO768	Question 20	Comment	Option A is not appropriate as may be reasons for sites not coming forward as planned. Favour option B. Until results of OAHN are known it is not possible to suggest that remaining allocations and	Comments are noted. Results of OAHN together with HELAA panel deliberations are awaited.

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Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
				<p>brownfield sites will be sufficient or deliverable to meet identified need. The SHLAA sites are yet to be fully assessed and those which are considered suitable, achievable and deliverable should be considered for allocation. Land off Dry Mill Lane Bewdley should be considered for residential development.</p> <p>Progressing with existing Local Plan strategy is not effective nor is it in conformity with national policy. There may be delivery and viability issues with existing allocations. The Local Plan needs a portfolio of sites to enable delivery throughout the plan period.</p>	
Miller Homes	LPRIO860	Question 20	Comment	<p>Consider that options A & B are not mutually exclusive. The Council should review reasons why existing allocations have not been implemented. If they are unlikely to come forward in next plan period they should be removed from supply. Additional sites should then be allocated to help meet remaining need and ensure there is sufficient choice of deliverable housing land to meet NPPF requirements.</p> <p>Although amount of land required is dependant on outcome of OAHN work, the Council should also pay regard to sites submitted via Call for Sites. WFDC should be identifying greenfield sites for new allocations and this should not be restricted to garden land.</p>	Comments are noted. If OAHN shows an increased requirement, then it is likely that greenfield sites will be required. The results of the HELAA process will be taken into account when allocating sites for the next Local Plan.
Worcestershire Wildlife Trust	LPRIO915	Question 20	Comment	<p>Option A is preferable but recognise the problems with pursuing this option alone. Therefore suggest a mix of options is most sustainable solution. Decisions on new allocations will need to be underpinned with environmental information in</p>	Comments are noted. A full sustainability appraisal will be undertaken of any potential allocations.

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				order to determine the most sustainable locations.	
WFDC (Strategic Housing Team)	LPRIO701	Question 20	Comment	We would support a combination of options A and B but wouldn't support Option C as this has a negative impact on green infrastructure.	Comments are noted.
Associated British Foods Plc	LPRIO857	Question 20	Comment	ABF favour option B which will be needed for both qualitative and quantitative reasons. Option A is unlikely to be enough. Option C is unlikely to provide the quantity and quality of housing needed.	Comments on options are noted.
Horsefair Traders Partnership	LPRIO830	Question 20	Comment	Horsefair Traders Partnership support brownfield regeneration of Churchfields area which would help to deliver additional housing needed in the town in line with NPPF objectives. Additional population would help to support local businesses.	Comments are noted. Outline application for part of the Churchfields site has recently been received.
British Horse Society	LPRIO490	Question 20	Comment	Hard to comment as no specific allocations put forward at this stage. Will need an overall strategy supported by County and parishes to promote shared access for horse riders, cyclists and walkers. This will help to tap into any S106 monies.	Comments on need for overall bridle path strategy is noted.
Homes and Community Agency	LPRIO659	Question 20	Comment	HCA considers that housing site allocations should be based on review of availability, deliverability and suitability of sites as outlined in NPPF. Lea Castle Hospital site meets these tests and therefore request that site is reallocated as residential site in emerging Local Plan.	Request for allocation of former Lea Castle Hospital site for residential uses is noted.
Taylor Wimpey UK Ltd	LPRIO751	Question 20	Comment	Land at Bewdley Road Stourport Our preferred approach is Option B. The SHELAA should establish realistic assumptions about availability, suitability and viability of land to meet identified	Comments are noted. The results of the SHELAA panel will be used to inform the preferred option site allocations.

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				housing need. Whilst we acknowledge the regeneration role of current Local Plan, the new Local Plan must ensure that housing land allocations are sufficient and viable.	
Taylor Wimpey UK Ltd	LPRIO802	Question 20	Comment	Land at Stone Hill Kidderminster Our preferred approach is option B. The SHELAA should establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified housing need over the Plan Period. The new Local Plan must ensure that land allocated for housing is sufficient and economically viable. Brownfield land is often less viable whereas greenfield sites do not have these issues.	Comments are noted. Outcome of deliberations of HELAA Panel are awaited.
Bewdley Town Council	LPRIO879	Question 20	Comment	Favour options A and B in that existing un-implemented schemes should be taken forward, and only once these sites have been fully assessed for viability should new sites (identified through call for sites) be considered.	Comments are noted.
Persimmon Homes Limited	LPRIO1004	Question 20	Comment	Whilst several sites have been identified in Site Allocations and Policies Local Plan, it is not robust position to assume that undeveloped sites will come forward. Council should rely instead on SHLAA to understand deliverability of sites to inform a phasing strategy. Need to consider whether a policy approach advocating existing allocations first would prevent development and stop Council from meeting its housing need.	Comments on issues around existing allocations are noted.
Upper Arley PC	LPRIO1340	Question 20	Comment	The Parish Council would wish to ensure the Neighbourhood Plan was taken into account and ensure the designs conform to the character of the neighbourhood.	Comments are noted. However, the Local Plan will take precedent over a Neighbourhood Plan where there is a policy conflict. Design policies will require

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					that developments reflect local character.
Staff & Worcs Canal Society	LPRIO1285	Question 20	Comment	The Society believes that viability issues should not be given priority when determining policy. If available, brownfield sites should be used. Developments have long life so short term expediency is inappropriate. Recognise that some greenfield development will be needed and is confident that due regard will be given to heritage, valued landscape and ecology when taking residential allocations forward. The Canal has a value in raising profit margins for developers and S106 or CIL revenues should be maximised to benefit public amenity of canal.	Comments are noted. Residential developments alongside the Canal are popular places to live and can often add a small premium on house prices. Monies should be ploughed back into upgrading canal where possible.
Historic England	LPRIO1078	Question 20	Comment	In relation to housing site allocations, Historic England would require additional detail on how they may impact on historical environment and how this has been considered as part of the plan preparation process. See draft guidance note (supporting document)	Comments are welcomed. Guidance note will be used to assess potential allocations.
Fyshe F	LPRIO546	Question 20	Comment	Housing land allocations should have regard to Neighbourhood Plans.	Comment is noted. However, any allocations put forward through the Local Plan Review do not have to conform to existing Neighbourhood Plans. The Local Plan takes precedent.
Telereal Trillium	LPRIO822	Question 20	Comment	Existing unimplemented allocations need to be tested to see if they are viable and will come forward in plan period. Alternative sites should be considered in order to accommodate development needs. Consider that assembling garden sites is difficult and should not be relied on for allocations.	Comments are noted.

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Bewdley Civic Society	LPRIO1570	Question 20	Comment	Refer to Neighbourhood Plan	Noted.
CPRE	LPRIO1438	Question 20	Comment	All three options probably need to be pursued to some extent.	Comments are noted.
J & H Evans	LPRIO951	Question 20	Comment	Our clients consider that Option A and Option B are considerations that require serious review. NPPF is all about availability and deliverability. WFDC should look into why certain sites haven't come forward, assess their viability and likelihood/timescales for delivery. If it looks likely that they won't come forward in next plan period they should be removed and additional sites allocated. Consultation document acknowledges that additional sites will be required to provide housing for next plan period. This is dependent on OAHN figure but WFDC should pay regard to sites submitted via Call for Sites and identify greenfield sites for new allocations and not restrict focus to existing garden land.	Comments are noted. Until OAHN figure is known, we will not know how much land is required for new housing. All existing allocations together with those received through the Call for Sites will be assessed by the independent HELAA panel.
Topland Hotels (No. 14) Ltd	LPRIO1239	Question 20	Comment	A plan should seek to achieve a balance between Option A (delivering brownfield schemes) and Option B (alternative sites).	Comments are noted.
Victoria Carpets	LPRIO1107	Question 20	Comment	Our client supports the allocation of alternative sites (option B). Unimplemented allocations should be taken forward (option A), but only where they are considered to be suitable and deliverable. Refer to paragraph 47 of the NPPF and footnote 11. We take this opportunity to remind the Council that Victoria Carpets PLC submitted a response to the Call for Sites exercise during autumn 2014.	The preference for option B is noted together with option A where sites can be shown to be suitable and deliverable. The request to allocate the former Victoria Carpets sports ground is noted.

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Willsgrove Developments Ltd	LPRIO1209	Question 20	Comment	Existing unimplemented residential allocations need to be tested to see if they are viable and will come forward during plan period. They should not continue to be allocated if they will not come forward. We believe that additional sites should be identified to accommodate the district's development needs. Assembling garden sites is difficult and uncertain and should not be relied on. Impact of local character must be taken into account.	Comments are noted. Until OAHN work is completed, we will not know how much land we need to allocate. The HELAA will revisit all existing unimplemented allocations to check for viability and deliverability within the plan period.
Gladman Developments Ltd	LPRIO1259	Question 20	Comment	A hybrid option, combining A and B would be more appropriate, which would involve the Council reviewing the existing allocations along with looking at alternative site options through a call for sites exercise. Gladman recommend that the Council 'over allocate' residential sites as this would provide for a degree of flexibility and contingency for any instances when sites do not come forward as planned. This would be likely to result in choice and competition in the market.	Noted. The Council is already undertaking a combination of these options. The OAHN will undertake an assessment of market signals to inform the plan review.
Richards Mr H	LPRIO201	7.10	Comment	Redevelopment of Weavers Wharf has shifted town centre away from Worcester Street area and a masterplan should be drawn up for the area and CPO powers used if necessary.	Comments are noted. Work is underway to draw up a masterplan for this area. It is likely to suggest a residential led regeneration is most viable option.
Option A - Sustainable Communities. Seek to provide housing as part of a mixed use scheme.					
Shuttes J	LPRIO1147	Option A	Support	Support Option A	Support is noted
Option B - Sustainable Communities. Provide more housing within Kidderminster Town centre and inside of the ring road.					
Voice E	LPRIO185	Option B	Support	If housing for older population was built within Kidderminster Town Centre they could readily	Support for this option is noted.

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				access services there.	
Richards Mr H	LPRIO1415	Option B	Comment	Redevelopment of Weavers Wharf has shifted town centre away from Worcester Street area and a masterplan should be drawn up for the area and CPO powers used if necessary.	Comments are noted. Work is underway to draw up a masterplan for this area. It is likely to suggest a residential led regeneration is most viable option.
Fyshe F	LPRIO547	Option B	Support	Support for option to provide more housing within Kidderminster Town Centre is noted.	Support is welcomed
Option C - Sustainable Communities. Retain current density policy.					
Churchill and Blakedown PC	LPRIO319	Option C	Comment	Option C should be changed to make rural densities a maximum of 20 dph - see NPPF.	Comment on rural housing density is noted.
Upper Arley PC	LPRIO1341	Option C	Comment	Option C should be changed. Site densities should be appropriate for rural development - a maximum of 20dph. The Parish Council makes reference to the NPPF	Comments are noted. The current density policy is not in conformity with NPPF. Suggestion that rural schemes have a maximum density of 20 dph is noted.
Fyshe F	LPRIO548	Option C	Support	Site densities in rural areas/villages to reflect existing nature of area. Density not to exceed 20 per ha	Support for retention of existing density policy is noted. However, in rural areas this is 30 dph not 20 as stated in response.
Option D - Sustainable Communities. Determine housing density on a site by site basis through the development management process to achieve the optimum density appropriate to the site's location, context, infrastructure and public transport accessibility.					
Atkin G	LPRIO24	Option D	Support	Sensible option	Support for option to determine housing density based on location, context, infrastructure and public transport availability is noted.
Williams H	LPRIO109	Option D	Support	Support Option D which looks to determine housing density on a site by site basis.	Support for Option D is noted.
Shuttes J	LPRIO1148	Option D	Support	Support Option D	Support is noted

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Option E - Sustainable Communities. Set out specific density requirements for each allocated site within planning policy.					
Persimmon Homes Limited	LPRIO794	Option E	Object	Stanklyn Lane Would not favour policy which set out specific density requirements for each allocation. Each site has different characteristics and requires different design response.	Comments are noted
Staff & Worcs Canal Society	LPRIO1286	Option E	Support	Society believes option E will best safeguard variety of local opportunities provided by Canal. Agree that 'each allocated site will have different characteristics and viability issues'. These issues should 'dictate the density and type of development'.	Support for option E and comments are noted.
Question 21. What are your views on the options for creating sustainable communities? Are there other options which you feel the council should consider?					
Barratt Homes West Midlands	LPRIO89	Question 21	Comment	Believe a flexible approach should be taken towards density. Density is dependent on several factors including locality and nature of housing market. Suggest that local plan does not include prescriptive density policy, but suggest that most efficient use of site is made. Also believe that detailed development criteria are not needed for all sites, only specific requirements need to be detailed within the policy text.	Comments are noted.
Chaddesley Corbett PC	LPRIO223	Question 21	Comment	Housing density - blanket targets for housing density lead to developments that may not align with local need nor fit with location. Favour option D (site by site basis) supported by option F (broad criteria)	Comments are noted. If option D was implemented, option F would not be required.
Paris R	LPRIO417	Question 21	Comment	Mix of options is preferable. Especially keen to see more housing within Kidderminster Town Centre and for density to be determined on a site	Comments are noted.

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				by site basis. A+ B++ C- D++ E+ F+	
Revelan Group	LPRIO650	Question 21	Comment	A flexible approach to housing density is advised as it is dependent on a range of factors including location and nature of housing development. Suggest that plan advises that density should make best and most efficient use of site. Also for allocations, suggest that where there are specific requirements for a site such as providing a school, then this should be confirmed in policy text.	Comments on density are noted.
Miller Homes	LPRIO861	Question 21	Comment	Consider that option D would be most effective approach for determining housing density. This would best reflect NPPF requirements for policies to respond to local character, reflect identity of local surroundings, avoid unnecessary detail and allow development to be guided by neighbouring buildings and local area. Density will be guided by housing mix which will relate to 'market signals'. (see NPPF) Density policy should be flexible.	Comments on density are noted.
Persimmon Homes Limited	LPRIO795	Question 21	Comment	Stanklyn Lane Should not adopt option of identifying specific densities for sites. Schemes in or adjoining town centres are likely to be at higher densities, those in other areas are likely to reflect character of area where they are situated.	Comments on density are noted.
Worcestershire Wildlife Trust	LPRIO917	Question 21	Comment	Housing density should be influenced by several issues including impact on nearby features of ecological interest, SuDS and wider GI requirements, so options D, E and F appear to have more merit. It seems that a blend of specific guidance designed to help developers and the public understand the likely density range and flexibility sufficient to meet local requirements	Comments are noted.

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				would be a good way forward.	
WFDC (Strategic Housing Team)	LPRIO702	Question 21	Comment	Support mixed use and mixed tenure schemes and thus support option B. In terms of density, option C would reduce protracted negotiations around land values. This section should also refer to mixed tenure sites.	Comments are noted
Taylor Wimpey UK Ltd	LPRIO753	Question 21	Comment	Land at Bewdley Road Stourport In terms of forming a preferred approach to the aim of creating sustainable communities, we recommend a mixture of 'Option D' and 'Option E'. (see NPPF para.59). We recommend a general density requirement be noted for each allocated site as this will help with viability assessment and provide a benchmark. However, there should also be the flexibility of determining housing density on a site-by-site basis through the development management process, with developers provided with the opportunity to discuss and negotiate the optimum density appropriate for a site at that time - keeping in mind the viability, character and location of a site.	Comments are noted.
Taylor Wimpey UK Ltd	LPRIO804	Question 21	Comment	Land at Stone Hill Kidderminster In terms of forming a preferred approach to the aim of creating sustainable communities, we recommend a mixture of 'Option D' and 'Option E'. (see NPPF para.59). We recommend a general density requirement be noted for each allocated site as this will help with viability assessment and provide a benchmark. However, there should also be the flexibility of determining housing density on a site-by-site basis through the development management process, with developers provided	Comments are noted

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				with the opportunity to discuss and negotiate the optimum density appropriate for a site at that time - keeping in mind the viability, character and location of a site.	
Bewdley Town Council	LPRIO880	Question 21	Comment	<i>Favour options A and D in that housing should be provided as part of mixed use schemes, but the density of such schemes should be looked at on an individual basis in order to assess the impact on the distinctiveness and character of the area.</i>	Comments are noted.
WCC, Planning Economy & Performance	LPRIO1394	Question 21	Comment	We would encourage any policies relating to housing design and masterplanning to take into account the health and wellbeing of local residents. Ensure age-friendly environments – built and natural environments which cater for the needs of all people	Comments are noted
Upper Arley PC	LPRIO1342	Question 21	Comment	Agree but add limit on size of properties	Comment is noted.
Telereal Trillium	LPRIO823	Question 21	Comment	Should not adopt option of identifying specific densities for sites. Schemes in or adjoining town centres are likely to be at higher densities, those in other areas are likely to reflect character of area where they are situated. Each site will have own characteristics - density will be result of good design and should not drive the design solution.	Comments on density are noted.
Historic England	LPRIO1080	Question 21	Comment	When considering housing density the Council should consider impact on historic environment in terms of building height or character of area.	Comments are noted.
CPRE	LPRIO1439	Question 21	Comment	Larger sites may well need new roads and open space, so that a lower gross dph produces a similar result to a higher dph on a smaller site. The	Comments are noted.

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				high densities of WFCS may still be appropriate to the town centres and station, but are probably less appropriate in other parts of these towns.	
J & H Evans	LPRIO955	Question 21	Comment	Consider that Option D would best reflect NPPF requirements. Density will also be guided by housing mix which relates to 'market signals'. NPPF requires LPAs to take full account of relevant market signals. Our client's land at Rock should be made immediately available.	Comments are noted.
Taylor Wimpey UK Ltd	LPRIO1044	Question 21	Comment	Land at Rectory Lane Stourport In terms of forming a preferred approach to the aim of creating sustainable communities, we recommend a mixture of 'Option D' and 'Option E'. (see NPPF para.59). We recommend a general density requirement be noted for each allocated site as this will help with viability assessment and provide a benchmark. However, there should also be the flexibility of determining housing density on a site-by-site basis through the development management process, with developers provided with the opportunity to discuss and negotiate the optimum density appropriate for a site at that time - keeping in mind the viability, character and location of a site.	Comments are noted.
Willsgrove Developments Ltd	LPRIO1210	Question 21	Comment	Local Plan should not try to identify specific densities for schemes. Developments nearer town centres will automatically have higher densities whilst more suburban schemes will have a density which reflects local character of the area. Density should be the result of good design and not the driver of a design solution.	Comments are noted.

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Gladman Developments Ltd	LPRIO1260	Question 21	Comment	If the Council are intent on including a housing density policy, this needs to be flexible and should be in the form of guidance or a 'rule of thumb' rather than a stringent policy requirement.	Comments are noted.
Thomas G	LPRIO1509	Question 21	Comment	Option B produces most benefits as creates a vibrant mix with occupation over 24 hours. Also combine with mix of options C as a starting point with flexibility of option D to suit the location.	Comments are noted. Agree that moving homes back into the town centre will help with vibrancy issues.
Homes and Community Agency	LPRIO660	7.12	Comment	Affordable housing delivery needs to be based on approach set out in NPPF and emerging case law. Emerging context for delivery of starter homes also needs to be considered. HCA would welcome reference in supporting text of Local Plan of potential HCA funding streams for affordable housing schemes subject to availability.	Comments on affordable housing delivery are noted. Reference to potential HCA funding streams will be made in supporting text.
Victoria Carpets	LPRIO1118	7.12	Comment	Council will need to undertake OAHN to inform housing target for market and affordable homes. Since 2006 29% of homes have been affordable against target of 30%, thus where is evidence to back up increasing requirement on greenfield sites and reducing requirement on brownfield? Suggest a blanket target plus a viability clause is used to allow a reduced requirement where this would impact deliverability of scheme.	Comments are noted. Although we have achieved 29% affordable housing provision since 2006, most of this has come through 100% affordable sites with some large brownfield sites only managing 12% owing to viability issues.
Option A - Affordable Housing. Seek to reduce affordable housing requirement to minimum of 25% on brownfield sites subject to viability.					
Chaddesley Corbett PC	LPRIO224	Option A	Support	Affordable Housing needs to reflect the economic realities faced by developers; Options A and B both have merit (reducing the requirement to 25% on brownfield sites and increasing it to 40% on greenfield sites).	Support is noted.

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Upper Arley PC	LPRIO1343	Option A	Support	Agree with option A	Support is noted.
Fyshe F	LPRIO549	Option A	Support	Support for option A	Support is noted
Bewdley Civic Society	LPRIO1572	Option A	Support	Support Option A	Support for Option A is noted
Shuttes J	LPRIO1149	Option A	Support	Support Option A	Support is noted
Thomas G	LPRIO1510	Option A	Support	Option A is preferable. Evidence suggests growth forecasts are excessive and greenfield should be avoided. Shared ownership should be promoted. Flats are cheaper to build than houses.	Support for option A is noted.
Option B - Affordable Housing. Seek to increase affordable housing requirement to minimum of 40% on greenfield sites.					
Eriksson-Flegg B	LPRIO132	Option B	Support	If development costs are lower on greenfield sites, then option B should be considered.	Comments are noted.
Chaddesley Corbett PC	LPRIO609	Option B	Support	Affordable Housing needs to reflect the economic realities faced by developers; Options A and B both have merit (reducing the requirement to 25% on brownfield sites and increasing it to 40% on greenfield sites).	Support is noted.
Shuttes J	LPRIO1150	Option B	Support	Support option B	Support is noted
Thomas E	LPRIO989	Option B	Object	Do not agree with Option B	Objection is noted
Gladman Developments Ltd	LPRIO1262	Option B	Object	Object to Option B. The Council do not have the necessary evidence to justify the proposal	The Objection to Option B is noted.
Option C - Affordable Housing. Seek to retain current affordable housing threshold of 6 units in rural areas.					
Churchill and Blakedown PC	LPRIO320	Option C	Comment	Affordable housing threshold in rural areas should be reduced to 5 units.	Comment is noted.

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Chaddesley Corbett PC	LPRIO613	Option C	Comment	We acknowledge that rural sites are often small, but seeking to retain the threshold of 6 properties for rural sites may adversely affect the character or even the feasibility of their development.	Comments are noted.
Fyshe F	LPRIO550	Option C	Object	Suggest 5 units more appropriate given that such sites will be small	Objection to suggested threshold is noted.
Option D - Affordable Housing. Seek to provide affordable housing on rural exception sites and allow market housing to cross subsidise affordable provision.					
Williams H	LPRIO110	Option D	Support	Support for option to provide affordable housing on rural exception sites and allow market housing to cross subsidise.	Support is noted.
Persimmon Homes Limited	LPRIO797	Option D	Object	Stanklyn Lane We do not favour cross subsidy of rural exception sites by market sites as is suggested in Option D.	Objection to Option D is noted
Churchill and Blakedown PC	LPRIO624	Option D	Comment	Agree with policy as long as sites brought forward by parish council and used for small sites only. Should not be used to facilitate larger developments.	Comments on rural exception sites are noted.
Chaddesley Corbett PC	LPRIO614	Option D	Comment	Rural exception sites need careful treatment on a site by site basis, and should only be brought forward where they meet identified local need and are supported by the local Parish/community.	Comments are noted.
West Midlands HARP	LPRIO1063	Option D	Support	Support option D. Rural exception sites are important way of delivering affordable housing to rural settlements, Allowing cross subsidy will increase deliverability where viability issues would prevent schemes coming forward. Other options - support maximum provision of affordable housing that is viable. Our comments to	Comments are noted.

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				question 3 show WFDC is not supplying adequate number of affordable homes. Any decision to alter the affordable housing target threshold has to be based on a robust evidence base.	
Wolverley & Cookley PC	LPRIO1098	Option D	Support	Prefer option D	Preference for Option D is noted
Fyshe F	LPRIO551	Option D	Object	Object to Option D	Objection is noted
Shuttes J	LPRIO1194	Option D	Support	Support Option D	Support is noted
Question 22. What are your views on affordable housing options? Are there any other options which you feel should be considered?					
Atkin G	LPRIO25	Question 22	Comment	Consider that Options A and C are viable	Comments are noted.
Barratt Homes West Midlands	LPRIO90	Question 22	Comment	Consider it inappropriate to require 40% minimum affordable housing on greenfield sites. A specific affordable housing target should be set based on need and viability. % of affordable housing required should be informed by total housing requirement for plan period and site viability.	Comments are noted.
Paris R	LPRIO418	Question 22	Comment	Mix of options is preferable. A+ B- C+ D-	Comments are noted.
Mahoney Mr S	LPRIO769	Question 22	Comment	Affordable housing requirement should be based on robust evidence of need and viability. Option B is not appropriate as current market is challenging even for greenfield developments.	Comments are noted.
Miller Homes	LPRIO862	Question 22	Comment	Any affordable housing policy should be supported by evidence and include a viability clause. Policy should take into account fact that every site is different. Refer to NPPF para.174	Comments are noted. Affordable housing policies will be underpinned by latest evidence on housing need.
Persimmon Homes Limited	LPRIO798	Question 22	Comment	Land at Stanklyn Lane Kidderminster Consider target for affordable housing should be	Comments on preference for blanket 30% target are noted as are reference to low

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Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
				30% across all sites. Greenfield sites have to provide new infrastructure, especially highways and drainage. Additional costs of affordable housing may make even greenfield sites unattractive to developers. Wyre Forest has relative low market values so need policies to attract investment.	market values in District and ability to attract investment.
WFDC (Strategic Housing Team)	LPRIO703	Question 22	Comment	We would disagree with the reduction to 25% on Brownfield sites as our current policy allows for viability tests to take place to reduce if required. We would otherwise support option B,C and D.	Comments are noted
British Horse Society	LPRIO491	Question 22	Comment	Not sure that 'affordable housing' exists. Option D looks to be most sustainable option as it will be attractive to developers and may help bring forward difficult brownfield sites.	Comments are noted.
Taylor Wimpey UK Ltd	LPRIO754	Question 22	Comment	Land at Bewdley Road Stourport In general, affordable housing delivery on greenfield sites is much higher and this should be weighed up against loss of greenfield land. Any affordable housing target must be supported by robust up-to-date evidence.	Comments are noted
Taylor Wimpey UK Ltd	LPRIO805	Question 22	Comment	Stone Hill Kidderminster In general, affordable housing delivery on greenfield sites is much higher and this should be weighed up against loss of greenfield land. Any affordable housing target must be supported by robust up-to-date evidence.	Comments are noted
Bewdley Town Council	LPRIO881	Question 22	Comment	Favour Options A & C - thresholds should encourage provision of affordable housing. Threshold of 6 dwellings in rural areas should remain.	Comments are noted.

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Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
Persimmon Homes Limited	LPRIO1005	Question 22	Comment	Affordable housing target should be guided by level of need (from SHMA) and financial capability of schemes. Current options lack sufficient detail to inform affordable housing strategy.	Comments are noted. Await findings on housing need to inform policy.
Staff & Worcs Canal Society	LPRIO1287	Question 22	Comment	Beyond stating that the canal's value as an amenity for the District's communities is most likely to be furthered by social inclusiveness the Society does not have a view on the proportion of affordable housing that should be provided in any development.	Comments are noted.
Fyshe F	LPRIO552	Question 22	Comment	Rural exception sites should be based on local need and identified by Apish Councils. They should not be a facilitator for larger developments.	Comments are noted.
Stanmore Properties Ltd	LPRIO1019	Question 22	Comment	Focus on brownfield sites has suppressed affordable housing delivery due to viability issues. Allocation of greenfield sites will increase affordable housing delivery. Furthermore, as the definition of affordable housing may now include low cost homes for sale it may be possible to increase delivery still further.	Comments are noted. Regeneration of former industrial sites may have suppressed affordable housing delivery but it has created new communities in sustainable locations in close proximity to services.
CPRE	LPRIO1440	Question 22	Comment	As long as affordable rents stand at a discount to market rents, there will always be an incentive for market-rent tenants to want to move into cheaper and probably more secure affordable housing. The discount creates a false market. Robust evidence should be sought into the nature of net demand and its distribution. Thresholds are likely to be counter-productive. They generate schemes designed to be just below the threshold. It would be better to make a levy on all schemes for more than a single house, where the builder paid a sum for every house or fraction of one short of the	Comments are noted. Viability is a key consideration for the Wyre Forest District.

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Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
				target	
SWDP	LPRIO1053	Question 22	Comment	Affordable housing delivery may be harder to achieve now 'starter homes' can be offset against it. taking into account land reclamation costs and selling prices, a 30% affordable housing target should not compromise viability on greenfield sites in rural areas but may be an issue on brownfield ones in urban areas.	Comments are noted. Agree that introduction of starter home initiative will affect delivery of affordable housing as currently defined. Viability has been main factor in reduced affordable housing numbers on our key brownfield sites which have come forward in recent years.
J & H Evans	LPRIO959	Question 22	Comment	Local Plan should take evidence and viability into consideration when setting affordable housing policies (NPPF para 174 refers). Wyre Forest has a drastic shortage of affordable homes - allocation of land at Rock could provide at least 60.	Comments are noted.
Taylor Wimpey UK Ltd	LPRIO1045	Question 22	Comment	Rectory Lane, Stourport In general, affordable housing delivery on greenfield sites is much higher and this should be weighed up against loss of greenfield land. Any affordable housing target must be supported by robust up-to-date evidence.	Comments are noted
Willsgrove Developments Ltd	LPRIO1211	Question 22	Comment	We do not support option D. Suggest a 30% target across all sites. Greenfield sites have to provide new infrastructure, especially highways and drainage. Additional costs of affordable housing may make even greenfield sites unattractive to developers. Wyre Forest has relative low market values so need policies to attract investment.	Comments on preference for blanket 30% target are noted as are reference to low market values in District and ability to attract investment.
Gladman Developments Ltd	LPRIO1261	Question 22	Comment	Affordable housing requirements should be based on robust up-to-date evidence of need and viability	Noted and agreed.
Williams H	LPRIO111	7.16	Support	Support for Government Starter Home programme and setting up of statutory register of brownfield	Support is noted.

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Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
				land.	
Option A - Facilitating Specialist Housing Delivery. Provide specific serviced plots on larger residential schemes specifically for self builders.					
Churchill and Blakedown PC	LPRIO321	Option A	Support	Nothing wrong with this option	Support for option is noted
Taylor Wimpey UK Ltd	LPRIO756	Option A	Comment	Bewdley Road Stourport Guard against option A as this can have adverse effects on rest of site - delay build rate, complicate streetscene and come forward outside of natural development phases. Suggest that if Council wish to have self-build plots, then these are stand-alone sites.	Comments on self-build plots are noted.
Taylor Wimpey UK Ltd	LPRIO806	Option A	Comment	Stone Hill Kidderminster Guard against option A as this can have adverse effects on rest of site - delay build rate, complicate streetscene and come forward outside of natural development phases. Suggest that if Council wish to have self-build plots, then these are stand-alone sites.	Comments on self-build plots are noted.
Upper Arley PC	LPRIO1345	Option A	Support	nothing wrong with this option	Support is noted
Fyshe F	LPRIO553	Option A	Support	Support Option A	Support is noted
Bewdley Civic Society	LPRIO1573	Option A	Support	Support for Option A	Support is noted
Shuttles J	LPRIO1151	Option A	Support	Support Option A	Support is noted.
Taylor Wimpey UK Ltd	LPRIO1046	Option A	Object	Rectory Lane Stourport Guard against option A as this can have adverse effects on rest of site - delay build rate, complicate streetscene and come forward outside of natural development phases. Suggest that if Council wish to have self-build plots, then these are stand-alone sites.	Comments on self-build plots are noted.

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Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
Option B - Facilitating Specialist Housing Delivery. Set up register of local authority land available specifically to self builders.					
Eriksson-Flegg B	LPRIO133	Option B	Support	Options B	Views are noted.
Churchill and Blakedown PC	LPRIO322	Option B	Support	Fine	Support for setting up register of local authority land available for self builders is welcomed
Upper Arley PC	LPRIO1346	Option B	Support	Fine	Support is noted
Fyshe F	LPRIO554	Option B	Support	Support option B	Support is noted
Gladman Developments Ltd	LPRIO1264	Option B	Support	Support for Option B. This is a more appropriate option than requiring large scale developments to provide a certain amount of serviced plots for this purpose	Support is noted.
Thomas G	LPRIO1511	Option B	Support	Option B is preferable but land earmarked for self-build should not increase pressure on the ability to satisfy other targets.	Support and comments are noted.
Option C – Facilitating Specialist Housing Delivery. Promote the provision of starter homes via a housing Local Development Order.					
Churchill and Blakedown PC	LPRIO323	Option C	Comment	No objection to promotion of provision of starter homes via LDO	Comment is noted
Eriksson-Flegg B	LPRIO389	Option C	Support	Option C	Support for option to provide starter homes via a housing LDO is welcomed.
Upper Arley PC	LPRIO1347	Option C	Comment	No objection	Noted.
Shuttes J	LPRIO1152	Option C	Support	Support option C	Support is noted

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Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
Question 23. What are your view on the different options for facilitating specialist housing delivery? Are there any other options which you feel the council should consider?					
Paris R	LPRIO419	Question 23	Comment	Support for all options, especially option C to promote provision of starter homes via a housing Local Development Order	Comments are noted.
WFDC (Strategic Housing Team)	LPRIO704	Question 23	Comment	Option A - further work needs to be undertaken to develop an evidence base for this type of provision but in principal we would support the proposal. Option C - most young people would be unable to afford starter homes in some parts of District and it would be for 5 years. Could potentially push employment sites to other areas which may be less favourable.	Comments are noted. Potential adverse impact on employment sites of Option C is of concern.
Bewdley Town Council	LPRIO882	Question 23	Comment	Favour options A & C - self-build houses on larger developments would encourage mix of styles and add to distinctiveness. Use of LDOs for housing on brownfield sites should be encouraged, balanced against need for employment sites.	Comments are noted.
Upper Arley PC	LPRIO1344	Question 23	Comment	Should take into account specialist housing delivery for ex armed forces	Comment is noted.
Staff & Worcs Canal Society	LPRIO1288	Question 23	Comment	The Society believes the canal has a great amenity value for any development and community if landscaping and architecture are used sympathetically in a manner that enhances that value.	Comments are noted.
CPRE	LPRIO1441	Question 23	Comment	The objectives are laudable, but I seriously wonder whether they require specific policies in a Local Plan.	Comments are noted.
Gladman	LPRIO1263	Question 23	Comment	Gladman recommends that the Council, through	Comments are noted.

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Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
Developments Ltd				the new Local Plan encourage rather than require specific plots for this within developments. The council should avoid a prescriptive policy requirement in relation to this.	
Simmonds R W	LPRIO118	7.19	Comment	If possible elderly should remain in own homes with support where needed. More care homes should be provided to allow discharge of elderly from hospitals.	Comments are noted.
Option A - Housing Provision for the Elderly. Allocate specific sites for housing schemes for the elderly or those requiring extra care					
Williams H	LPRIO112	Option A	Support	Support for option A - allocate specific sites for the elderly or those requiring extra care.	Support for this option is noted is noted.
Eriksson-Flegg B	LPRIO134	Option A	Support	Option A	Support for Option A noted.
Churchill and Blakedown PC	LPRIO332	Option A	Support	This is the preferred option	Support is noted.
Rushock PC	LPRIO930	Option A	Comment	Option A: We are concerned about the availability of suitable housing for older, independent village residents wanting to downsize locally. Possibly infill areas within the village envelope could be used for this where there is a demand.	Comments are noted. Suitable housing for elderly residents wishing to stay in smaller villages is a key issue.
Taylor Wimpey UK Ltd	LPRIO757	Option A	Support	Bewdley Road Stourport Preference would be for Option A as there are issues incorporating specialist house types within general housing schemes as their needs are difficult to cater for.	Issues are noted.
Taylor Wimpey UK Ltd	LPRIO807	Option A	Comment	Stone Hill Kidderminster Prefer option A as there are issues when incorporating this specialist housing within normal residential schemes.	Preference is noted.
Upper Arley	LPRIO1348	Option A	Support	The Parish Council supports Option A if suitable	Support is noted.

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Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
PC				locations can be found. Make sure services are there to stay in own home as long as possible.	
Fyshe F	LPRIO555	Option A	Support	Support Option A	Support is noted
Bewdley Civic Society	LPRIO1574	Option A	Support	Support for Option A	Support for Option A is noted
Taylor Wimpey UK Ltd	LPRIO1047	Option A	Support	Rectory Lane Stourport Preference would be for Option A as there are issues incorporating specialist house types within general housing schemes as their needs are difficult to cater for.	Issues are noted.
Thomas G	LPRIO1512	Option A	Support	Option A is preferable with easy access to facilities and the company of other similar residents increases comfort.	Support is noted.
Option B - Housing Provision for the Elderly. Provide retirement flats as part of larger schemes to encourage people to downsize and release larger houses onto the market.					
Atkin G	LPRIO26	Option B	Comment	Not everyone downsizing wants to live in a flat.	Comment is noted.
Williams H	LPRIO113	Option B	Support	Downsizing into a new-build retirement property would make it a worthwhile option as no refurbishment would be required.	Support for option to provide retirement homes as part of larger schemes to encourage release of larger houses onto the housing market is welcomed.
Churchill and Blakedown PC	LPRIO333	Option B	Support	The Parish Council supports Options A & B if suitable locations can be found.	Support for this option is noted
Persimmon Homes Limited	LPRIO799	Option B	Object	Stanklyn Lane We would not support a policy which sought to provide retirement flats as part of larger schemes in principle. This would not necessarily be appropriate for a Sustainable Urban Extension. Specialist providers are best placed to cater for this provision.	Comments are noted.
Bewdley Town	LPRIO883	Option B	Support	Favour option B. Would encourage downsizing	Support for option is noted.

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Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
Council				and release of larger properties as well as encouraging a mixed population potential of service provision as part of development.	
Upper Arley PC	LPRIO1349	Option B	Support	Parish Council support Option B if suitable locations can be found. Make sure services are there to stay in own home as long as possible.	Support is noted.
Fyshe F	LPRIO556	Option B	Support	Support option B	Support is noted
Stanmore Properties Ltd	LPRIO1020	Option B	Comment	If provision for the elderly were to be a requirement of larger schemes (Option B), it should offset the provision of affordable housing as specialist housing restricts the market and may create a viability issue that affects delivery.	Comments are noted.
Bewdley Civic Society	LPRIO1575	Option B	Support	Support for Option B	Support for Option B is noted
Question 24. What are your views on the different options for providing housing for the elderly? Are there any other options which need to be considered?					
Chaddesley Corbett PC	LPRIO225	Question 24	Comment	The 2 options are not mutually exclusive and both should be pursued. Option B targets the older independent person whereas option A targets those with additional care needs. Option A sites should be identified working with health and social care agencies.	Comments are noted.
Paris R	LPRIO420	Question 24	Support	Fully supportive of both options. A++ B++	Support for both options is welcomed.
Mahoney Mr S	LPRIO770	Question 24	Comment	Housing needs of elderly population should be planned for. Need detailed evidence of needs and positive policy approach to deliver necessary accommodation in right locations. We have no specific comments in relation to either option at this time. It is important that this element of	Comments are noted.

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Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
				housing need is catered for.	
Homes and Community Agency	LPRIO661	Question 24	Comment	HCA would welcome a reference to the Care and Support Specialised Housing Fund in the supporting text.	Request is noted and a reference will be added in the supporting text.
West Midlands HARP	LPRIO1072	Question 24	Comment	Though we are in full agreement that housing provision for the elderly is important, especially considering the rise in life expectancy nationally, we feel more evidence needs to come forwards on actual need before any comment can be made. Please see our response to Question 1. (LPRIO1054)	Comments are noted.
Richards Mr H	LPRIO1413	Question 24	Comment	Sufficient development should be added to villages in the rural east to (a) at least maintain current levels of services but (b) to allow them to become more sustainable. Chaddesley Corbett should be 'inset' in the Green Belt and land allocated for housing of all types, ie market (with appropriate housing mix), elderly, live-work, affordable), rural small business units, community facilities.	These comments are noted. Currently the village of Chaddesley Corbett is washed over by Green Belt. If a settlement boundary were to be drawn around the village and an inset created it will be necessary to undertake a Green Belt Boundary Review.
WCC, Planning Economy & Performance	LPRIO1397	Question 24	Comment	Raises the concept of dementia friendly communities. The Public Health team would encourage Wyre Forest District Council to reflect some basic principles for planning and designing dementia-friendly environments in the Local Plan policies.	Comments are noted and agreed.
Staff & Worcs Canal Society	LPRIO1289	Question 24	Comment	The Society restates the view it expresses in answer to Question 22 and 23.	Comments noted
WFDC (Strategic)	LPRIO1226	Question 24	Comment	Section also needs to recognise the needs of young people requiring support, people with	Comments are noted. Policy will be expanded to include all these groups.

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Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
Housing Team)				learning and physical disabilities and those with other supported accommodation requirements. Would support option B - gives a better mix of residents, dwelling type and tenure. Please note Residential Care Homes are experiencing revenue funding issues. Extra Care is currently preferred but needs to be considered in the context of existing provision so that we don't create blocks of hard to let stock	
CPRE	LPRIO1442	Question 24	Comment	Anecdotal evidence suggests that the active elderly are finding that it takes a very long time to find a bungalow that they can buy, suggesting a gross shortage.	Comments are noted.
Shuttes J	LPRIO1153	Question 24	Comment	Costs of downsizing reduce the numbers able to do so. However, both options are required, particularly option B where adjacent to well-established residential areas.	Comment are noted.
SWDP	LPRIO1055	Question 24	Comment	With increasing numbers of elderly it is entirely appropriate to plan for suitable C2 and C3 accommodation.	Comments are noted.
Willsgrove Developments Ltd	LPRIO1216	Question 24	Comment	We would not support a policy which sought to provide retirement flats as part of larger schemes in principle. This would not necessarily be appropriate in terms of sustainable urban extensions. The provision of elderly housing is generally well catered for by the specialist providers	Comments are noted.
Gladman Developments Ltd	LPRIO1265	Question 24	Comment	It is crucial that the Council consider this element of housing need in sufficient detail and provide a deliverable solution for meeting this element of housing need. Given the national strategy in	Comments are noted.

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Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
				relation to housing for older people, a specific policy should be included within the Local Plan in relation to the provision of specialist accommodation for older people.	
Simmonds R W	LPRIO117	7.21	Comment	Gypsies and travellers are their own worst enemy. However their needs must be met with least upset to rest of community. Increasing numbers of sites is not the answer. Propose a large area of land is laid out as a caravan park with services in place to cater for future needs. This may well impact on open countryside but would stop more sites continually being put forward and causing upset.	Comments are noted. However, a single large serviced site is not considered to be in the best interests of the gypsy and traveller community.
Jennings N	LPRIO166	7.21	Comment	Requirement for a permanent replacement Showman's site needs to be considered through the Local Plan. I would request that our land be taken out of the Green Belt to enable permission to be granted.	Your request is noted. Under national guidance, a local authority can make exceptional limited alterations to the Green Belt boundary to meet a specified need for a traveller site. A sequential test would have to be done to demonstrate that there were no more suitable sites available.
National Federation of Gypsy Liaison Groups	LPRIO386	7.21	Object	Do not agree with findings of GTAA - additional pitches are required pre 2019 and requirements should be reviewed annually.	Objection to GTAA's findings is noted.
National Federation of Gypsy Liaison Groups	LPRIO387	7.22	Object	Do not consider options A and C to be actual options.	Comments are noted but disagree. Options are not meant to be mutually exclusive. Option A refers to key findings coming out of the GTAA and option C reiterates existing locational policy. Other options can be suggested.

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Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
Option A - Gypsy and Traveller Accommodation. Limit new sites to a maximum of 10 pitches.					
Atkin G	LPRIO27	Option A	Support	The preferences of travellers and gypsies should be heard.	Support for option to limit new gypsy and traveller sites to maximum of 10 pitches.
Eriksson-Flegg B	LPRIO135	Option A	Support	Support provision of sites with maximum of 10 pitches.	Support for Option A is noted.
Churchill and Blakedown PC	LPRIO334	Option A	Support	The Parish Council supports Option A	Support is noted.
Richards Mr H	LPRIO623	Option A	Comment	This is most deliverable option - if close to existing settled community provides opportunity for integration. May need to use CPO.	Comments are noted.
National Federation of Gypsy Liaison Groups	LPRIO388	Option A	Comment	The plan should not set arbitrary size limits. Smaller sites should be encouraged but policy should be flexible to allow for other options.	Comments are noted.
Bewdley Town Council	LPRIO884	Option A	Comment	Favour Option A	Preference for Option A noted
Upper Arley PC	LPRIO1350	Option A	Support	The Parish Council supports Option A	Support is noted
Fyshe F	LPRIO559	Option A	Support	Support option A	Support is welcomed.
Bewdley Civic Society	LPRIO1576	Option A	Support	Support for Option A	Support for Option A is noted
Thomas G	LPRIO1513	Option A	Support	Option C with implementation of A where possible is preferable.	Support is noted.
Option B - Gypsy and Traveller Accommodation. Allocate sites as part of residential allocations					
Atkin G	LPRIO28	Option B	Object	This does not make for a happy community.	Objection to integration of gypsy sites with new residential allocations is noted.

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Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
Richards Mr H	LPRIO202	Option B	Comment	Option B would be most aligned with national policy but need to be realistic. Large housebuilders may claim this option would make sites unviable and thus S106 contributions could be used to make off-site provision. This however would need sites to be allocated, so argument becomes circular.	Comments are noted.
Churchill and Blakedown PC	LPRIO336	Option B	Comment	The Parish Council believes that evidence shows gypsy families prefer to live grouped together and not alongside other housing.	Comment is noted.
Persimmon Homes Limited	LPRIO801	Option B	Object	Stanklyn Lane Sites should not be included in main residential allocations	Objection is noted.
National Federation of Gypsy Liaison Groups	LPRIO390	Option B	Object	This option has proved very hard to deliver as developers and residents oppose such allocations. No alternative option for pitch provision is offered.	Objection is noted. Current planning policy allows for pitches to be brought forward via the development control process but this has not proved fruitful as all the sites suggested have been within the Green Belt.
Upper Arley PC	LPRIO1352	Option B	Comment	The Parish Council doesn't have enough information to comment on Option B but believes that gypsy families prefer to live grouped together.	Comments are noted. Research appears to back up your view.
Fyshe F	LPRIO558	Option B	Object	Object to Option B	Objection is noted
Thomas G	LPRIO1514	Option B	Object	Integration suggested by option B simply does not work in practise and changes the character of the area.	Comments are noted.
Option C - Gypsy and Traveller Accommodation. Allocate sites in areas other than Sandy Lane Industrial Estate, Stourport-on-Severn					
Atkin G	LPRIO29	Option C	Support	If Sandy Lane is too popular then this needs addressing.	Support is noted.

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Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
Churchill and Blakedown PC	LPRIO335	Option C	Support	The Parish Council supports Option C	support is noted
Allen T	LPRIO262	Option C	Support	Support Option C - travellers should be integrated into other areas of the district.	Support is noted.
National Federation of Gypsy Liaison Groups	LPRIO391	Option C	Object	This is not an option for delivery it is a potential restriction on delivery. Nothing should be ruled out at this stage.	Objection is noted.
Upper Arley PC	LPRIO1351	Option C	Support	Parish Council support option C	Support is noted.
Fyshe F	LPRIO557	Option C	Object	Object to Option C	Objection to existing policy is noted.
Shuttes J	LPRIO1154	Option C	Support	Other authorities in Worcestershire should be required to match provision in Wyre Forest	Comment is noted. Wychavon provides a higher number of pitches.
Question 25. What are your views on the different options for providing gypsy and traveller accommodation? Are there any other options which need consideration?					
North Worcestershire Housing & Water Management	LPRIO46	Question 25	Comment	Support all 3 options. Existing sites mostly occupied by extended families making it easier for external agencies to deal with any problems. Smaller sites with commercial vehicle parking provided nearby should be considered. Change in ownership of an existing site has resulted in current housing need arising and the Council needs to look at delivering new sites or integrating sites into forthcoming development locations.	Support for a mix of all 3 options is noted.
Williams H	LPRIO114	Question 25	Comment	Traveller sites need to be kept separate from other residential developments and tourist attractions.	Comment is noted.
Sheppard	LPRIO259	Question 25	Comment	Stourport has its full share of gypsy and traveller	Comment is noted.

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Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
Councillor D				sites.	
Paris R	LPRIO421	Question 25	Comment	Preference for option A. A+ B- C-	Preference for Option A is noted.
Persimmon Homes Limited	LPRIO800	Question 25	Comment	Stanklyn Lane We would favour an option which identified specific sites for gypsy and traveller accommodation but they should not be included in main residential allocations.	Comments are noted.
WFDC (Strategic Housing Team)	LPRIO705	Question 25	Comment	We would support all three options. It has not been possible to identify appropriate sites for G&T / Travelling Showpeople families through the usual process and therefore it should form part of residential site allocations	Comments are noted. Support for option B is noted. However, this option is not welcomed by developers.
National Federation of Gypsy Liaison Groups	LPRIO392	Question 25	Comment	Allocations should not be relied upon as sole means of provision. Planning applications should be considered irrespective of need. Criteria for dealing with applications should be set out in Local Plan.	Comments on pitches coming forward via the planning application process are noted.
Homes and Community Agency	LPRIO662	Question 25	Comment	The HCA wishes to confirm that funding is available for delivery of new permanent or transit gypsy pitches on an affordable rent basis. Recommend a review of DCLG guidance ' <i>Designing Gypsy and Traveller Sites Good Practice Guide</i> ' in considering the location for new allocations/developments.	Comments are noted. Potential funding streams for affordable rent pitches is welcomed and will be referenced in emerging Local Plan.
Staff & Worcs Canal Society	LPRIO1290	Question 25	Comment	The Society wishes to add another group of travellers to those identified - 'continuous cruisers'. They live on their boats all year, often moored up over winter but forced to continuously move on at other times of year. Society requests that some funds are obtained via S.106 or CIL to provide private moorings and facilities at appropriate	Comments on needs of these members of the boating community are noted. Concerns will be passed onto our housing team.

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PROVIDING QUALITY HOMES (SECTION 7) RESPONSES**

Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
				locations. There are also families who live on boats for financial reasons and CRT has a Social Welfare Officer to help with their needs. Council will be aware of issues encountered by such groups and may wish to consider provision of an offline mooring place much as they do for gypsies.	
CPRE	LPRIO1443	Question 25	Comment	The large population of travellers in one place, at Sandy Lane should not be enlarged. The problem ultimately is that the cost (and availability) of development land is liable to make it difficult for travellers to buy their own sites. Ideally, this should be part of the land allocated for housing, possibly by persuading developers that they should provide land for travellers, perhaps in lieu of providing affordable housing.	Comments relating to travellers are noted.
SWDP	LPRIO1056	Question 25	Comment	Needs are set out in latest GTAA which may need a refresh in light of changes to Government policy. Larger sites can be more problematic as associated families tend to prefer living in small groups so further sites at Sandy Lane may not be best way forward.	Comments re GTAA and potential impact of Government policy changes are noted.
Environment Agency	LPRIO980	Question 25	Comment	Notwithstanding the 3 proposed options, it is important that all sites are supported by evidence as for any other proposals, including flood risk (using SFRA update) as a Sequential Test should be undertaken (NPPF para.100-104). Caravans and mobile homes are at greater risk of flooding. NPPG (section 25) considers non-permanent caravans to be 'highly vulnerable'. This is an important consideration when locating such developments. Also need to consider foul water and drainage linked to Water Cycle Study.	Comments are noted. Foul drainage assessment form will be referred to for advice.

**LOCAL PLAN REVIEW ISSUES & OPTIONS CONSULTATION (SEPTEMBER 2015)
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Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
				Wherever possible sites should be connected to main sewer or use a package treatment plant. Foul drainage assessment form contents to be noted.	
Thomas E	LPRIO990	Question 25	Comment	No further development for Gypsies - Wyre Forest should not expand any development here.	Comments are noted. However, we have a statutory duty to meet housing need.
Willsgrove Developments Ltd	LPRIO1217	Question 25	Comment	We would favour an option which identified specific sites for gypsy and traveller accommodation but they should not be included in main residential allocations.	Comments are noted
Option A - Housing Design Issues. Adopt the national minimum space standards for new housing.					
Eriksson-Flegg B	LPRIO136	Option A	Support	Support adoption of minimum space standards	Support is welcomed.
Churchill and Blakedown PC	LPRIO337	Option A	Support	Agree with Option A to adopt national minimum space standards.	Support is noted.
Chaddesley Corbett PC	LPRIO226	Option A	Support	Support Option A to adopt national minimum space standards.	Support is noted.
West Midlands HARP	LPRIO1076	Option A	Support	Option A is preferred. Only adopt if thoroughly evidenced and assessed as per NPPG as part of viability assessment of Local Plan	Comments are noted.
Upper Arley PC	LPRIO1353	Option A	Support	The Parish Council agrees with Option A	Support is noted
Staff & Worcs Canal Society	LPRIO1291	Option A	Support	Support option A. Fits with guidelines set out at para. 7.23 - how development integrates into the neighbourhood, whether the scheme creates a place with a distinctive character and developing streets and homes which are both functional and attractive.	Support for these higher standards is noted.

**LOCAL PLAN REVIEW ISSUES & OPTIONS CONSULTATION (SEPTEMBER 2015)
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Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
Fyshe F	LPRIO560	Option A	Support	Support option A	Support for adoption of national minimum space standards.
Bewdley Civic Society	LPRIO1577	Option A	Support	Support for Option A	Support for Option A is noted
Shuttes J	LPRIO1155	Option A	Support	option A is essential	Support is noted
Option B - Housing Design Issues. Leave space and storage standards up to individual housing developers to decide.					
Churchill and Blakedown PC	LPRIO338	Option B	Object	The Parish Council disagrees with Option B	Objection is noted.
Taylor Wimpey UK Ltd	LPRIO758	Option B	Support	Bewdley Road Stourport Option B is most appropriate. If however the Council opt for Option A, then evidence of need, viability and timing specific to Wyre Forest will be required.	Comments are noted.
Upper Arley PC	LPRIO1354	Option B	Object	Parish Council disagrees with Option B	Objection is noted.
Staff & Worcs Canal Society	LPRIO1292	Option B	Object	Do not believe that design should be left to individual developers. Developments play essential part in deciding character and look of a place for generations to come.	Comments are noted. However, these options refer to space standards within housing and not the overall design of a development.
Fyshe F	LPRIO561	Option B	Object	Object to option B	Objection is noted
Stanmore Properties Ltd	LPRIO1021	Option B	Support	Option B where space and storage is left to individual developers is the only realistic option to ensure delivery	Comments are noted
Shuttes J	LPRIO1156	Option B	Comment	Option B leaves developers to squeeze space to the detriment of users who are required to accept the situation as there is little alternative.	Comments are noted
Thomas G	LPRIO1516	Option B	Object	Option B should be avoided as this allows standards to be based upon profit by developers	Objection is noted.

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Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
				who then move away from the area leaving the Council with future problems.	
Option C - Housing Design Issues. Adopt higher wheelchair accessibility standards for new housing.					
Churchill and Blakedown PC	LPRIO339	Option C	Support	The Parish Council agrees with Option C but believed this to be standard practice	Support is welcomed. Under revised Building Regulations Part M all dwellings should be visitable by all people and step-free where possible. In order to adopt higher standards and make some dwellings fully adaptable for wheelchair users, evidence of an increased need for this in the district, would have to underpin a local plan policy
Chaddesley Corbett PC	LPRIO617	Option C	Support	We support Option A and Option C. They are mutually supportive, as wheelchair users will also benefit from the minimum space standards. Both options recognise the needs of an increasingly elderly population	Support for Option C is noted.
Disability Action Wyre Forest	LPRIO520	Option C	Comment	Should ensure that all new dwellings meet new Part M of the Building Regulations which came into force October 2015 and provide level thresholds. Many recent developments have not been fully accessible to all.	Comments are noted.
West Midlands HARP	LPRIO1079	Option C	Comment	Implications of option C must be thought through. There is natural turnover in the lifetime of a home and people do not necessarily look to live in a single dwelling all their life. Even if made wheelchair accessible, an older household may not wish to stay in a larger family home. Applying this policy could mean that many dwellings could be fitted with expensive facilities that are not needed or else force residents to stay	Comments are noted. If pursued, this will be on the back of detailed evidence of need for such adaptations.

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Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
				in dwellings that are not the right size for them. If option C is pursued, then evidence of local need will be required in line with NPPG.	
Upper Arley PC	LPRIO1355	Option C	Support	The Parish Council agrees with Option C but believed this to be standard practice	Support is noted. Revised Building Regulations came into force October 1st 2015 which means all dwellings should be 'accessible' if possible. This requires level thresholds and a usable downstairs toilet.
Staff & Worcs Canal Society	LPRIO1293	Option C	Comment	Within scope of Option C, the Society wishes to work with CRT to improve wheelchair access along towpaths in conjunction with signs and barriers to deter motorbikes and encourage safe cycling.	Comments are noted. However, the option related to design of dwellings.
Fyshe F	LPRIO562	Option C	Support	Support option C	Support is noted
Stanmore Properties Ltd	LPRIO1022	Option C	Comment	Option C would conflict with national guidance as such issues are now dealt with through other legislation and it should not be repeated in planning. This change has come about in an effort to simplify the planning burden.	Comments noted. However, if evidence supports it, a Local Plan can contain a policy to provide enhanced accessibility or adaptability by reference to M4(2) or M4(3) of the optional Building Regulations. The policy will need to state what proportion of new dwellings need to comply.
Bewdley Civic Society	LPRIO1578	Option C	Support	Support for Option C	Support for Option C is noted
Question 26. What are your views on the Housing Design options? Are there any other options which you feel should be considered?					
Barratt Homes West Midlands	LPRIO91	Question 26	Comment	It is not appropriate for the plan to set minimum space requirements for new housing as this would replicate guidance already set out in the Technical Housing Standard — Nationally Describe Spatial Strategy (March 2015) document. The emerging plan should, therefore, be silent on this matter.	Comments are noted. However, in order to adopt the new minimum space standards a specific local plan policy is required.

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Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
Churchill and Blakedown PC	LPRIO340	Question 26	Comment	Housing design should be sympathetic to the local area.	Comment is noted.
Paris R	LPRIO422	Question 26	Comment	A mix of options is preferred with adoption of national minimum space standards seen as the most preferred option. Not keen on option B	Views are noted.
Revelan Group	LPRIO651	Question 26	Comment	It is not appropriate for the plan to set minimum space requirements for the housing. This would replicate guidance already set out in the Technical Housing Standard — The Nationally Prescribed Spatial Strategy (March 2015).	Comments are noted.
Miller Homes	LPRIO863	Question 26	Comment	Our client considers that space and storage standards should be market driven by developers to determine within their portfolio (Option B). National housebuilders have a vested interest in building products that meet market needs, which will sell and which are viable to build.	Comments are noted.
Persimmon Homes Limited	LPRIO803	Question 26	Comment	Whilst new housing design should seek to reflect the local vernacular, the Council should allow individual developers to provide units to suit their sector of the market and should not seek to impose any particular regime as successful design is both subjective and emerges and changes over time.	Comments are noted.
WFDC (Strategic Housing Team)	LPRIO706	Question 26	Comment	We wouldn't support option B as this has previously resulted in very limited storage and impractical sizes and layouts. We would like to be able to influence layouts so they are practical and take account of modern day living and furniture. We believe there are a range of mobility issues beyond those of wheelchair users e.g. people with sensory impairments or profoundly autistic people	Comments are noted.

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Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
				whose housing requirements need to be taken into consideration.	
Taylor Wimpey UK Ltd	LPRIO808	Question 26	Comment	Land North of Stone Hill, Kidderminster We would suggest that 'Option B' is the most appropriate option, meaning that developers determine the design of specific units. If the Council opts for 'Option A' and seeks to implement the national minimum space standards for new housing, then as set out in the Planning Practice Guidance, it is necessary to provide evidence of; need, viability and timing – linked to the specific local circumstances of Wyre Forest.	Comments on space standards are noted.
Bewdley Town Council	LPRIO885	Question 26	Support	Favour option A in that the national minimum space standards for new dwellings be adopted.	Support for Option A is noted.
Disability Action Wyre Forest	LPRIO521	Question 26	Comment	To ensure all new dwellings in Wyre Forest are as accessible as possible for disabled people	Comment is noted.
Upper Arley PC	LPRIO1356	Question 26	Comment	Eco new designs and insulation and modern building reduce carbon footprint and also to try on new build to decrease areas covered with block paving and tarmac which encourages flooding	Comments are noted.
Staff & Worcs Canal Society	LPRIO1294	Question 26	Comment	The Society wishes to reiterate its view that housing and other development design adjacent to the canal should not 'turn its back on the canal' but rather it should seek to overlook it in an open aspect and inclusive manner.	Comments are noted. Officers agree that development should not turn its back on canals.
Fyshe F	LPRIO563	Question 26	Comment	Design to reflect existing local neighbourhoods	Comment is noted.
Warwickshire & West Mercia Police and	LPRIO643	Question 26	Comment	Much of Secured By Design is now included within Part Q of the Building Regulations.SBD provides further detail re doors and windows. Police	Comments on referencing Secured By Design in emerging Local Plan are noted.

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Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
H&W Fire and Rescue Service				consider that Secured By Design should be referenced within design policies of emerging Local Plan.	
CPRE	LPRIO1444	Question 26	Comment	Some standards are probably desirable, but are there not national ones? It may be better to cite the current standards, and to allude generally to such standards as may replace them.	Comments are noted.
Shuttles J	LPRIO1157	Question 26	Comment	Careful design of staircases able to accept chair lift and improved general circulation can provide the opportunity for less intrusive adjustments	These specific comments are noted.
Taylor Wimpey UK Ltd	LPRIO1048	Question 26	Comment	<u>Land to the South West of Stourport, Rectory Lane</u> We would suggest that 'Option B' is the most appropriate option, meaning that if the Council opts for 'Option A' and seeks to implement the national minimum space standards for new housing, then as set out in the Planning Practice Guidance, it is necessary to provide evidence of need, viability and timing – linked to the specific local circumstances of Wyre Forest. developers determine the design of specific units.	Comments are noted.
Willsgrove Developments Ltd	LPRIO1218	Question 26	Comment	The Council should allow individual developers to provide units to suit their sector of the market and should not seek to impose minimum standards.	Comments are noted.
Thomas G	LPRIO1515	Question 26	Comment	I believe that the council should have the flexibility to decide standards based upon specific site location together with its policy on zoning and planned intent for each specific area	Comments are noted.

**LOCAL PLAN REVIEW ISSUES & OPTIONS CONSULTATION (SEPTEMBER 2015)
PROVIDING EMPLOYMENT OPPORTUNITIES AND RETAIL SERVICES (SECTION 8) RESPONSES**

Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
Revelan Group	LPRIO652	Section 8	Comment	Option A - not realistic, the Council should not retain all currently allocated employment sites. Framework paragraph 22 makes it clear existing employment sites should be regularly reviewed, where no reasonable prospect of site being used for employment applications for other uses should be considered. If sites not likely to come forward should be reallocated for alternative use. Option C - no concern of additional employment sites allocated. Council must ensure any new employment allocations are market facing and in the right location. This must be informed by a detailed assessment of the demand for employment floorspace in Wyre Forest based upon local market requirements.	Comments are noted.
Simmonds R W	LPRIO120	8.7	Comment	Make areas of parking free, this may increase revenue in shops. Sufficient number of commercial buildings available for use and ground to build on for foreseeable future. Need to promote Kidderminster to encourage manufacturing to the area.	Agree that manufacturing industry coming to the area would be a hugely beneficial. Currently some free parking on different days in all three towns.
Option A - Employment Sites. Continue to retain all existing employment sites.					
Churchill and Blakedown PC	LPRIO477	Option A	Support	Support option A and other options which will consolidate and promote existing sustainable employment areas and allow proper transport networks to be developed e.g. lorry routes. This will need cooperation with Councils and Agencies to provide appropriate routes to these employment sites from the main arterial routes and motorways.	Agree that employment sites should take into account transport accessibility.
Fyshe F	LPRIO564	Option A	Support	Support - Option A Employment sites.	Comments noted.

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Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
Option B - Employment Sites. Consider alternative uses on some of the sites which are currently allocated for employment.					
Churchill and Blakedown PC	LPRIO478	Option B	Support	Support option B, will support the other options which will consolidate and promote sustainable employment areas and in doing so allow proper transport networks to be developed e.g. lorry routes. Cooperation needed with various Councils and Agencies to provide most appropriate routes to such employment sites from main martial routes and motorways.	Agree that employment sites need to be accessible.
Staff & Worcs Canal Society	LPRIO1295	Option B	Support	Option B preferable. Need results of ELR. Balance needs to be struck between the Government's increased housing requirement and the need for such employment sites as will be necessary to provide sustainability. Any development, whatever its purpose, adjacent or close to the canal or rivers, whether brownfield or greenfield, should be undertaken in a manner that enhances the many qualities of those amenities. Experience of many planning applications for housing, retail and industrial development sites finds that all too often industrial sites face away from the canals and line them with featureless back walls of metal sheeting thereby denying their value to townscape and landscape. Developments should be positioned, designed and landscaped so as to improve and enhance the public amenity of the environs of canals and rivers. As a good example it recommends the approach taken at the i54 site on the boarder of Wolverhampton and South Staffordshire Option B recommended as it would appear to provide the flexibility the District Council may require to meet its needs and enable it to meet its	Agree that development should enhance the area around waterways.

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Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
				stated aim, '... to provide and develop prospects for the District and make it an attractive place to live, work, visit and invest in.'	
Fyshe F	LPRIO566	Option B	Support	Support Option B Employment Sites	Comments noted.
Option C - Employment Sites. Allocate new sites for employment uses within the District.					
Churchill and Blakedown PC	LPRIO341	Option C	Object	Object to option C allocate new sites for employment uses in the District. Support the aim to promote sustainable employment options as long as doesn't impinge on Green Belt.	Comments noted.
Fyshe F	LPRIO565	Option C	Object	Support - Option C Employment Sites.	Comments noted.
Question 27. How do you think the above options could be developed to encourage investment and job creation within the District? Are there any other options we should consider?					
Huizer K	LPRIO67	Question 27	Comment	Greenfield land should not be used unless to relocate an existing business that moves out of town centre location to make way for residential (closer to services). If greenfield land developed it will never be greenfield again.	Comments noted.
Pound Green Group	LPRIO296	Question 27	Comment	Street lights on all night in rural areas particularly the forest and surrounding countryside, and in caravan parks.	Most rural areas do not have street lights so it seems likely that the lights are on private property and not under the control of the Local Authority.
Richards Mr H	LPRIO203	Question 27	Comment	All options should be looked at focusing on outcomes and deliverability. Want efficient use of brownfield land during plan period, sites not left undeveloped at end of it. The LEP should be closely involved in selecting employment allocations.	Comments noted.

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Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
Eriksson-Flegg B	LPRIO137	Question 27	Comment	Employment sites - need to be able to access them from housing, public transport and have parking.	Agree employment sites do need to be accessible from the local area and have suitable public transport.
Paris R	LPRIO423	Question 27	Comment	Employment Sites, options not mutually exclusive, mixture would be possible and preferable. Option A ++, Option B +, Option C -.	Agree that a combination of the options would be possible and may be preferable.
Worcestershire Wildlife Trust	LPRIO920	Question 27	Comment	No strong views on the options proposed, decisions regarding any new allocations, especially on greenfield sites, will need to be underpinned with environmental information so as to determine which are the most sustainable locations.	Comments noted.
WFDC (Strategic Housing Team)	LPRIO707	Question 27	Comment	Option B consider alternative uses on some sites which are currently allocated for employment where there is not a realistic chance of the site being brought forward over the next 5 years.	Comments noted.
Bewdley Town Council	LPRIO893	Question 27	Comment	Favour Option B	Noted.
Upper Arley PC	LPRIO1357	Question 27	Comment	No objections to any of the options, support the aim to promote sustainable employment options where possible, so long as it doesn't impinge on greenbelt land.	Comments noted.
Historic England	LPRIO1083	Question 27	Comment	Gypsy, Traveller and Travelling Showpeople Accommodation - impact on heritage assets and the historic environment should be assessed.	Comments are noted.
Historic England	LPRIO1084	Question 27	Comment	Employment sites - impact on heritage assets and the historic environment should be assessed.	Comments noted.
Bewdley Civic Society	LPRIO1579	Question 27	Comment	Option D - suggest which would be craft-based workshops.	Comments noted.

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PROVIDING EMPLOYMENT OPPORTUNITIES AND RETAIL SERVICES (SECTION 8) RESPONSES**

Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
CPRE	LPRIO1445	Question 27	Comment	Comments difficult before Employment Land Review findings. Fundamentally opposed to use of green field sites unless absolutely necessary. If evidence that some employment sites redundant they should be used for other purposes e.g housing. British sugar site mixed development not just employment.	Agree once ELR findings are available we will know how much employment land is required.
Shuttes J	LPRIO1158	Question 27	Comment	When employment is based on service industries mixed developments will work. Generally industrial employers require smaller units these days. Sensitive design could allow mixing with residential but noise is a potential problem. Small units can be linked to provide larger spaces but again noise and material storage can be an issue.	Comments are noted.
SWDP	LPRIO1058	Question 27	Comment	Employment sites - Government Policy does not support long term retention if no longer fit for purpose. It is acknowledged that employment land review is being undertaken to inform future land requirements. Any new employment land should be located and be readily accessible to housing growth areas.	Agree that employment sites should be accessible to local workers.
Topland Hotels (No. 14) Ltd	LPRIO1240	Question 27	Comment	Options associated with employment sites need to be part of a fundamental overview of the relationship between greenfield and brownfield land, and its deliverability. The onus on housing on brownfield sites is an unrealistic objective if it is the case that economic development on these sites is more viable and likely to be realised. The potential arises that neither brownfield nor greenfield development takes places in either residential or employment sectors, and this situation is not conducive to the growth of the District.	Comments noted.

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PROVIDING EMPLOYMENT OPPORTUNITIES AND RETAIL SERVICES (SECTION 8) RESPONSES**

Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
Thomas G	LPRIO1517	Question 27	Comment	May be misinterpretation here with Government policy. I do not believe that it was intended to suggest that employment brownfield sites should be developed for housing and then to put industrial sheds onto greenfield. If reduced demand is such that employment sites remain undeveloped, then Option B should be implemented but not at the later expense of cheating the system for an excuse to develop greenfield at cheaper cost for employment. Greenfield development good for one off profit, bad for enduring life quality.	Disagree. Current Government Policy does mean if housing built on employment sites then employment sites must be found elsewhere.
Option A - Small Scale Start Up Units. Identify specific sites for small scale units aimed at business start ups and the creative industries.					
Fyshe F	LPRIO569	Option A	Support	Support Option A Small scale start up units.	Noted.
Option B - Small Scale Start Up Units. Continue to designate employment sites for a mix of B1, B2 and B8 uses.					
Fyshe F	LPRIO568	Option B	Support	Support Option B Small scale start up units	Noted.
Shuttes J	LPRIO1159	Option B	Comment	Option B - flexible design to allow opt B in conjunction with training/educational facilities.	Comments noted.
CPRE	LPRIO1446	Option B	Support	Option B appropriate. It may be necessary to require developers to provide a mix of sizes of unit, so that smaller units are available, whether for starters or businesses that remain small.	Comments are noted.
Option C - Small Scale Start Up Units. Support educational and training facilities that will develop a skilled workforce.					
Fyshe F	LPRIO567	Option C	Support	Support Option C Develop Educational and Training Facilities	Comments noted.
CPRE	LPRIO1447	Option C.	Comment	Option C appropriate. It may be necessary to require developers to provide a mix of sizes of unit, so that smaller units are available, whether for starters or businesses that remain small.	Comments noted.

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Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
Question 28. What are your views on the options above? Are there any other options that should be considered?					
Atkin G	LPRIO30	Question 28	Comment	B (Small scale start up units) and C (Develop educational and training facilities) together seem practical options.	Comments noted.
Churchill and Blakedown PC	LPRIO342	Question 28	Support	Support sustainable development opportunities where possible.	Comments noted.
Paris R	LPRIO424	Question 28	Comment	Options not mutually exclusive and a mixture would be possible and preferable. Option A (Small scale start up units) ++ Option B (Small scale start up units) + Option C (Develop educational and training facilities that will develop a skilled workforce) +	Agree that it would be possible for a combination of options.
Rushock PC	LPRIO931	Question 28	Comment	All options needed to ensure job opportunities.	Comments noted.
WFDC (Strategic Housing Team)	LPRIO708	Question 28	Comment	Combination of Options B and C would widen opportunities to support a skilled workforce and provide job opportunities.	Comments noted.
Upper Arley PC	LPRIO1358	Question 28	Comment	No objections to any of the options and supports sustainable employment opportunities where possible	Comments noted.
Staff & Worcs Canal Society	LPRIO1296	Question 28	Comment	Options B and C - a mix of both would meet the potential needs of the District. Canal and rivers are amenities which already do and could provide employment opportunities relating to their uses for boating, angling and other recreational uses.	Comments noted.
Thomas G	LPRIO1518	Question 28	Comment	Examination of competition from other areas needs to be undertaken to assess District's unique characteristics. To provide sites not whole answer	Disagree - Wyre Forest District is cheaper than neighbouring districts.

**LOCAL PLAN REVIEW ISSUES & OPTIONS CONSULTATION (SEPTEMBER 2015)
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Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
				as cheaper sites served with better transport in neighbouring districts. Options provided can simply be copied in other areas or have been copied from other areas with little chance of successful competition. Focus should be on boutique or bespoke light industry which does not need to compete directly with what is on offer elsewhere, however, these are unlikely to be large employers and much of economically active residents will continue to be employed outside the area.	
British Horse Society	LPRIO492	8.11	Comment	Generally support farm diversification, highest demand for horse livery will be in north and east of District as closest to built up areas. It will be these areas that also have most pressure to build on greenfield sites.	Comments noted.
Option A - Creating Rural Employment Opportunities. Support and encourage genuine proposals for live/work units within the District's rural areas.					
Atkin G	LPRIO31	Option A	Comment	If needed good idea	Comments noted.
Rushock PC	LPRIO934	Option A	Support	Live/work units are a good option for business start-ups but needs control to ensure not converted to solely housing after a few years	Agree they should be retained as live/work units.
Fyshe F	LPRIO570	Option A	Support	Support Option A Creating rural employment opportunities subject to not creating conflict with existing residential uses.	Comments noted.
Thomas G	LPRIO1519	Option A	Support	Option A preferable.	Noted.
Option B - Creating Rural Employment Opportunities. Allocate sites for small scale rural employment opportunities.					
Fyshe F	LPRIO571	Option B	Object	Object - Option B Creating rural employment opportunities. What sites?	At this stage of the local plan review there are no specific sites, this is just broadly looking at the District.

**LOCAL PLAN REVIEW ISSUES & OPTIONS CONSULTATION (SEPTEMBER 2015)
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Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
Thomas G	LPRIO1520	Option B	Comment	Option B - more information needed. Risk that this could lead to pockets of rural development that will destroy landscape value. Cottage style industry within an existing building would be fine.	Comments noted.
Question 29. Do you think these options will help to increase the number of rural jobs within the District? Are there other options we should be considering to enhance rural employment opportunities?					
Richards Mr H	LPRIO204	Question 29	Comment	Options A and B should be encouraged. The Local Plan should require neighbourhood plans to support live/work units and small scale allocated sites for employment opportunities to be made. Equine development in the countryside should be supported.	Comments noted.
Churchill and Blakedown PC	LPRIO343	Question 29	Comment	Creating rural employment opportunities - No objection as long as doesn't affect neighbours amenity.	Comments noted.
Chaddesley Corbett PC	LPRIO227	Question 29	Comment	Farm diversification is important for employment and the future of farming. Support genuine proposals for live/work units on brownfield sites. Importance of access to broadband. Many working from home do not need a live/work unit as just need desk and PC.	Comments noted.
Paris R	LPRIO425	Question 29	Support	Strongly support both options.	Comments noted.
WFDC (Strategic Housing Team)	LPRIO709	Question 29	Comment	We believe Option B would be most likely to allow for small scale employment opportunities and reduce commuting in rural areas.	Comments noted.
Richards Mr H	LPRIO1414	Question 29	Comment	Sufficient development should be added to villages in the rural east to (a) at least maintain current levels of services but (b) to allow them to become more sustainable. Chaddesley Corbett should be	These comments are noted. Currently the village of Chaddesley Corbett is washed over by Green Belt. If a settlement boundary were to be drawn around the village and an

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				'inset' in the Green Belt and land allocated for housing of all types, ie market (with appropriate housing mix), elderly, live-work, affordable), rural small business units, community facilities.	inset created it will be necessary to undertake a Green Belt Boundary Review.
Upper Arley PC	LPRIO1359	Question 29	Comment	No objections to the options as long as neighbours amenity e.g. parking, is not affected.	Comments noted.
Staff & Worcs Canal Society	LPRIO1297	Question 29	Comment	Canal and rivers are amenities which do and could provide employment opportunities relating to their uses for boating, angling and other recreational purposes. Some rural businesses, especially where access to and from the canal is provided could benefit from canal users.	Agree that canals and rivers are valuable amenities for employment.
British Horse Society	LPRIO493	Question 29	Support	Support (Creating rural employment opportunities) as long as impact on bridleways and public rights of way are considered on case by case basis.	Comments noted.
CPRE	LPRIO1448	Question 29	Comment	Modest increase in rural employment unobjectionable but restrictions should apply as other kinds of rural development. Should not override the general restriction on development in the Green Belt or the value placed by NPPF on open countryside. Purpose-built live-work houses may make an appropriate contribution to rural housing. Extension to the home of a smallholder for office/workshop to augment an inadequate income from agriculture whilst still working agricultural holding difficult to object to.	Comments noted.
Shuttles J	LPRIO1160	Question 29	Comment	Both options are practical solutions. Live/work units need to be based around stable self employed occupations that are not subject to financial fluctuations such as accountants, dentists, and	Live/work units require the person working there to also live there such as for animals. Occupations such as those listed do not require an on site presence and so would

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				other healthcare providers and lawyers.	not fir the criteria.
Historic England	LPRIO1085	8.13	Comment	8.13 historic environment and its role in tourism should be acknowledged.	Comments noted.
Option A - Ensuring viable tourist attractions. Concentrate on our existing tourist sectors.					
Churchill and Blakedown PC	LPRIO344	Option A	Support	Support Option A concentrate on our existing tourist sectors, need coordinated approach to developing new tourism alongside existing. WFDC should promote more diverse, wider scope to tourism needed e.g. walking, rambling, cycling, riding, historic buildings, and arboretums. Intensification of major tourism should have regard to wider area, measured against loss of amenity, additional traffic etc.	Comments noted.
Option B - Ensuring viable tourist attractions. Develop new tourist attractions.					
Williams H	LPRIO115	Option B	Comment	Bewdley has many tourist attractions and excellent events throughout the year. If more can be added without detracting those already existing it is to be welcomed.	Comments noted.
Churchill and Blakedown PC	LPRIO480	Option B	Support	Support option B - develop new tourist attractions. Needs coordinated approach to developing new tourism alongside existing. Wider scope needed. Support in principle existing tourist attractions. WFDC should promote walking, rambling, cycling, riding, historic buildings, arboretums etc this should allow local businesses to benefit. Intensification of major tourist attractions should be measured against loss of amenity, additional traffic etc.	Comments noted.

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Question 30. How should we encourage a wider range of tourist attractions and accommodation to Wyre Forest District?					
Huizer K	LPRIO68	Question 30	Comment	River Severn underrated asset could be centred around much more tourism e.g. canoeists, walkers etc who use accommodation in local area. Promoting canal boat holidays, encouraging holiday makers to spend more time in the District by providing more moorings and making the existing ones more inviting.	Valuable ideas to increase tourism.
Pound Green Group	LPRIO297	Question 30	Comment	Great that we have tourism but the Wyre Forest will be wrecked by bicycles/mountain bikes in the day and night. Animals disturbed, flora/fauna wrecked by over use. Over use of forest from people coming from towns and cities.	Question 30 relates to how we can encourage more tourism not stop the existing.
Paris R	LPRIO426	Question 30	Support	Strongly support both options. Encourage cafe culture along riverside natural amenity. Make Bewdley a food centre with fine dining. More centres like Wyre Forest Visitor Centre.	Valuable ideas for encouraging additional tourism.
WFDC (Strategic Housing Team)	LPRIO710	Question 30	Comment	Support - Options A and B.	Noted.
Bewdley Town Council	LPRIO895	Question 30	Comment	The enhancement of existing attractions is important, but any proposals must include or encourage visitors to our town centres rather than out of town theme parks or peripheral activities. Enhancement of town centre green spaces, parks and other central locations should be developed to attract more visitors into the town centres.	Comments noted.
Upper Arley PC	LPRIO1360	Question 30	Comment	Need to concentrate on the ones we have at the	Comments noted.

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				moment	
Staff & Worcs Canal Society	LPRIO1298	Question 30	Comment	The canal and the rivers as have great and often untapped potential for tourism which, '...makes a vital contribution to the economy of Wyre Forest District via direct spending and in creating jobs.' The value of both the Staffordshire and Worcestershire canal and the River Severn and their heritage features define and contribute greatly to the character of Stourport on Severn. The new economic potential of the canal in Kidderminster is being realised and its value to local tourism and retail will be recognised within the decade and will play an increasing part in the local economy further into the future. The potential value of the canal to tourism in the rural economy should also be recognised.	Agree that the canal and rivers are important for tourism within the District.
British Horse Society	LPRIO494	Question 30	Support	Support (Develop new tourist attractions) Promote equestrian tourism in the Wyre Forest and develop similar schemes elsewhere in the District e.g. Severn Valley Riding Route could be shared with pedestrians and cyclists and encourage landowners to dedicate new public bridleways which would provide additional links in local off road riding network.	Valuable ideas for additional tourism.
Fyshe F	LPRIO572	Question 30	Support	Support Question 30 should promote existing attractions but also smaller scale tourism e.g. rambling, cycling, horse riding. Concern over dominance and increased traffic from continued expansion of major sites and loss of amenity.	Comments noted.
Bewdley Civic Society	LPRIO1580	Question 30	Comment	Agree with Town Council comment; Park & Stride at the School at weekends; Car Parking & Traffic	Comments noted.

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				Management; Encourage local activities; encourage artistic and creative ventures, e.g. Bewdley Festival, Bewdley in Bloom, Bewdley Open Studios and Discover Bewdley.	
CPRE	LPRIO1449	Question 30	Comment	Tourist development two kinds - tourist attractions and tourist accommodation. Not feasible for tourist attractions policy, each should be judged on its merits. Hotels are essentially an urban use, town centres or suburban which including a pub/restaurant may be acceptable.	Many hotels are found in rural locations, they are not just found in urban areas.
Shuttes J	LPRIO1161	Question 30	Comment	Both options are required. Urgent development of opportunities planned for and paid for by local taxpayers should be brought forward. Facilities for tourism must be safeguarded e.g. parking and toilets etc.	Comments noted.
SWDP	LPRIO1067	Question 30	Comment	Tourism - in the absence of a site specific policy there should be a positive generic policy which is supportive of additional investment in tourism be it on an existing site or an entirely new one.	Agree, comments noted.
West Midland Safari Park	LPRIO1049	Question 30	Comment	Investment and planning framework key to improving tourism and for existing tourist attractions to grow. New facilities at Safari Park aim to get visitors to stay in area longer, the longer they stay more likely that they will visit other attractions, pubs and restaurants in wider area. Recent approval at Safari Park is estimated to increase visits by 193,798 per annum by year 4 with millions added to local economy. Area lacks good quality hotels especially branded hotels. Hotel necessary to improve local hotel stock and support the conference centre. Concentrating on existing tourist sectors key to	Agree a variety of tourist attractions both existing and new that encourage visitors to stay in the area should be encouraged.

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				developing tourism, policy critical to supporting the long term viability of attractions and should be main focus of Local Plan tourism. Encouraging a wider range of tourist attractions in the District is not as simple as focusing on existing or new attractions. Expansion of tourism to create a Wyre Forest District destination is supported provided variety and not competing for same customer. Needed a mix of accommodation, eating/drinking, wide variety of attractions from nature, culture, activity, thrills. Focusing on developing new tourist attractions is welcomed but not at expense of reducing appeal of existing attractions.	
Thomas G	LPRIO1521	Question 30	Comment	Both options should be pursued as more viable than trying to compete with West Midlands industry.	Comments noted.
Pearce J	LPRIO53	8.14	Comment	Wish for facilities such as council offices and leisure centre to remain in Kidderminster town centre.	Comments noted. Moving council offices to a more central location in District has saved money and makes easier access for Stourport, Bewdley and rural west and is on regular bus route. Hub is located in Kidderminster.
Fyshe F	LPRIO573	8.14	Support	Support paragraph 8.14.	Noted.
Williams H	LPRIO152	8.15	Support	Support for demolition of Crown House.	Agree - Crown House will make way for the redevelopment of Kidderminster town centre to make a pleasant shopping experience.
Richards Mr H	LPRIO1416	8.15	Comment	Redevelopment of Weavers Wharf has shifted town centre away from Worcester Street area and a masterplan should be drawn up for the area and CPO powers used if necessary.	Comments are noted. Work is underway to draw up a masterplan for this area. It is likely to suggest a residential led regeneration is most viable option.
Atkin G	LPRIO32	8.16	Comment	In Kidderminster need a mix of shops small	Comments noted, market forces determine

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				specialist and larger stores. In regeneration one small specialist successful shop leaving district.	retailers moving in but smaller shop units may be more suitable for smaller independent shops.
Williams H	LPRIO153	8.17	Support	Support - town centres as heart of community should have a variety of uses.	Comments noted.
	LPRIO49	8.20	Comment	<p>Unhappy with Kidderminster town centre shops and pavements. Shops too far away on outskirts of town, too many charity shops. Visitors cannot find shops on Weavers Wharf.</p> <p>Council offices too far out of Kidderminster.</p>	<p>Disagree with these comments, visitors find and access Weavers Wharf easier than the existing town centre. Public realm work will make more pleasant shopping areas.</p> <p>Council office location has saved money and may not be as convenient for Kidderminster residents but by having it sited more centrally in district is easier to access for residents of Stourport and Bewdley. Hub is located in Kidderminster.</p>
Option B - Ensuring a Viable Kidderminster Town Centre. Amend the primary shopping area in Kidderminster and remove Worcester Street and Bromsgrove Street to enable them to be developed for alternative uses.					
Williams H	LPRIO154	Option B	Support	Amend primary shopping area in Kidderminster, develop Worcester street and Bromsgrove Street for alternative uses.	Comments noted.
Staff & Worcs Canal Society	LPRIO1299	Option B	Comment	Option B - will provide more flexibility for planning policy and its need to respond to changes in shopping patterns. The Canal would play a greater role in providing opportunities for attractive waterside townscapes which could have a transformative effect on both the quality and income value of the retail experience.	Comments noted.
Fyshe F	LPRIO574	Option B	Support	Support Option B Ensuring a viable Kidderminster Town Centre.	Comments noted.

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Fyshe F	LPRIO616	Option B	Support	Support Option B Ensuring a viable Kidderminster Town Centre.	Comments noted.
Shuttles J	LPRIO1162	Option B	Support	Support Option B, this is the only solution. Free or longer free parking essential.	Comments noted.
Thomas G	LPRIO1522	Option B	Support	Option B should be explored. The Primary area should be made smaller but of better quality and attractiveness. Worcester Street and Bromsgrove Street should be considered for apartments with interspaced secondary shops mix.	Comments noted.
Question 31. Do you think the primary shopping area should change to reflect more recent changes to Kidderminster town centre or do you think we should retain the existing allocation to encourage retail back to the Worcester Street area? What alternative land uses would contribute to the overall vitality of the town centre?					
Mrs C Kimber	LPRIO2	Question 31	Comment	Retail areas in Kidderminster have moved. Considers that Worcester Street is no longer retail frontage and should be considered for housing development.	Agree with comments. Worcester Street does need to be redeveloped and other uses will be considered.
Pound Green Group	LPRIO298	Question 31	Comment	People do not shop in Kidderminster as unattractive, needs more shops and places where people can sit and children can play, decent toilets. Streets need to be made more attractive, clean with good quality street furniture. Get local schools involved with children designing bins or painting like the bears in Birmingham. Parking needs to be easy and accessible and street entertainment. The white tower needs to come down it would immediately improve Kidderminster.	Agree, the white tower I think referred to is Crown House which will be demolished. Flooring and street furniture is already being replaced in the town centre and the proposals are for sitting areas, trees and cafes which will all make Kidderminster a much more enjoyable place to shop.
Tweedale Mr J S	LPRIO294	Question 31	Comment	Area around old Woolworths should be demolished and reused for parking or recreation.	The redevelopment of Kidderminster town centre will improve the town centre and the area around the old Woolworths building will be considered for other uses.

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Churchill and Blakedown PC	LPRIO345	Question 31	Comment	No comment.	Noted.
Paris R	LPRIO427	Question 31	Comment	Options are not mutually exclusive and a mixture would be possible and preferable. Ensuring a viable Kidderminster Town Centre Option A + Option B++ Part of Kidderminster town centre could be used for housing rather than retail and would keep it alive in the evenings.	Agree some housing in Kidderminster town centre may bring life after shops have closed in the evenings.
WFDC (Conservation)	LPRIO246	Question 31	Comment	Worcester Street and Bromsgrove Street are suitable for alternative uses.	Agreed redevelopment of this area for other uses would be beneficial for the town centre
Richards Mr H	LPRIO621	Question 31	Comment	Weavers Wharf has resulted in shift of functioning town centre. Worcester Street a wasted resource. Doubt Kidderminster has commercial ability to maintain functional and vibrant town centre over traditional and new area. Study needed to determine (a) what size town centre the catchment area can be expected to sustain, and (b) where the boundary of the primary shopping area should now be drawn. The time has come to recognise that the Weavers Wharf area has the best potential to attract custom and trade. The regeneration of the Worcester St areas should be determined by what is viable. It would be a waste to see it lie un-regenerated because the local plan allocates it for uses that are simply not deliverable in the short term. A masterplan should be drawn up and CPO powers used if necessary to assemble a site for regeneration.	Agree that the retail area has moved and so alternative uses are needed within the traditional retail area.
WFDC (Strategic)	LPRIO711	Question 31	Comment	Option B would better support the vision for 2032. Areas that no longer seem viable for retail could	Comments noted.

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Housing Team)				provide for a mixed use including housing, leisure, retail etc.	
Richards Mr H	LPRIO1417	Question 31	Comment	Redevelopment of Weavers Wharf has shifted town centre away from Worcester Street area and a masterplan should be drawn up for the area and CPO powers used if necessary.	Comments are noted. Work is underway to draw up a masterplan for this area. It is likely to suggest a residential led regeneration is most viable option.
Fyshe F	LPRIO575	Question 31	Comment	Policy should reflect the actual changes that have taken place over the past 10 years.	Comments noted.
Bewdley Civic Society	LPRIO1581	Question 31	Comment	Kidderminster only	Comments noted.
CPRE	LPRIO1450	Question 31	Comment	Rise of internet-based retailing the need for physical shops is potentially in decline. The Plan accordingly needs polices able to cope with retail decline.	Agree that retail outlets may be required less due to the rise in internet retailing.
SWDP	LPRIO1064	Question 31	Comment	Town centres will need more of a mix of uses, including housing, which keep them viable and vibrant.	Agree with this comment
Thomas E	LPRIO991	Question 31	Comment	More retail should move into empty shops. Charity shops should be moved around so not all together.	Comments noted.
Option A - Ensuring Stourport-on-Severn town centre remains viable. Retain the primary shopping area as it currently exists.					
Atkin G	LPRIO33	Option A	Support	Support for retaining the existing primary shopping area in Stourport-on-Severn.	Comments noted.
Option B - Ensuring Stourport-on-Severn town centre remains viable. Extend or amend the primary shopping area to allow for a mix of town centre uses within the area.					
Staff & Worcs Canal Society	LPRIO1300	Option B.	Comment	Option B - will provide greater flexibility in Stourport on Severn. The Canal could thereby play a greater role in providing opportunities for attractive waterside townscapes especially in the area	Comments noted.

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				fronting onto both sides of the canal in the Lichfield Street localities.	
Thomas G	LPRIO1523	Option B	Support	Option B should be explored to reduce the primary area and enhance the quality releasing development for apartments outside of this.	Comments noted.
Question 32. Do you think Stourport-on-Severn's town centre primary shopping area should be amended? Do you have any further options for consideration?					
Churchill and Blakedown PC	LPRIO346	Question 32	Comment	No comment.	Noted.
Paris R	LPRIO428	Question 32	Comment	Mixture of options may be possible and preferable. Ensuring Stourport-on-Severn town centre remains viable Option A - Option B ++	Comments noted.
WFDC (Conservation)	LPRIO247	Question 32	Comment	Ensure Bewdley town centre remains viable as this reinforces the traditional shopping streets within the historic town and conservation area.	Comments noted.
Bettridge P	LPRIO513	Question 32	Comment	The Stourport High Street retail area suffers from the congestion of through traffic and although a ring road has been mooted for some years it would seem very unlikely that this will be possible in the present financial climate. Possible alternative - create a small shop 'village', if feasible next to the Tesco supermarket and relocate the High Street shops to that. Bus routes could be changed and car parks provided so all shoppers could have easy access. The High Street	Interesting idea, comments are noted.

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				<p>properties could then be converted to residential flats on the upper floors with the ground floor (currently shop units) providing parking spaces or garages for the residents above. The High Street could then become a two lane through route thus obviating the need for a new road.</p> <p>I realise this would be a very expensive project but perhaps no more than the cost of a ring road and associated new river crossing. Whereas a new road would (presumably) have to be funded from public money the creation of a retail village could possibly be provided by a property developer. A concentration of small shops in an all-weather closed environment may also encourage specialist shops which have deserted the High Street in the last few years. The idea of relocating was canvassed to occupiers approximately 20 years ago and idea was supported, in recent years developers have shown a willingness to invest in retail schemes so perhaps it would be possible.</p>	
Bewdley Civic Society	LPRIO1582	Question 32	Comment	Stourport only	Comments noted.
CPRE	LPRIO1451	Question 32	Comment	Unlikely that there is scope for significant expansion in the other two town centres. Should be general policies allowing new retail development immediately adjacent to town centres, where no suitable town centre site can be found. Objective should be to retain viability of present area and manage decline by allowing secondary central uses.	Comments noted.
Shuttes J	LPRIO1163	Question 32	Comment	Pedestrian areas required to stop retail failures also free parking and a bypass.	Comments noted.

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Option A - Ensuring Bewdley Town Centre remains viable. Retain the existing primary shopping area as it currently exists.					
Atkin G	LPRIO34	Option A	Support	Support retaining the existing primary shopping area in Bewdley.	Comments noted.
Williams H	LPRIO155	Option A	Support	Support retaining existing primary shopping area as currently exists in Bewdley.	Comments noted.
Bewdley Civic Society	LPRIO1583	Option A	Support	Support Option A and refer to Neighbourhood Plan.	Neighbourhood Plan is in the very early stages and if taken forward will not be adopted for approximately 3 years.
Option B - Ensuring Bewdley Town Centre remains viable. Extend or amend the primary shopping area to allow for a mix of town centre uses within the area.					
Shuttes J	LPRIO1164	Option B viable	Comment	Option B - provide tourism requirements toilets, parking.	Comments noted.
Question 33. Do you think Bewdley's Primary Shopping Area should be amended? Do you have any further options for consideration?					
Eriksson-Flegg B	LPRIO138	Question 33	Comment	Continue to protect and enhance local retail services in Bewdley especially as new medical centre is close to shopping area.	Comments noted.
Churchill and Blakedown PC	LPRIO347	Question 33	Comment	No comment.	Noted.
Paris R	LPRIO429	Question 33	Comment	Options not mutually exclusive a mixture would be possible and preferable. Additional parking should be provided if possible. Option A ++ Option B -	Comments noted.
WFDC (Conservation)	LPRIO248	Question 33	Comment	Retain existing primary shopping area as extending it could put development pressures on the historic buildings in Bewdley Conservation Area.	Comments noted.
Mahoney Mr S	LPRIO771	Question 33	Comment	To ensure Bewdley remains a thriving market	Agree that additional housing is likely to

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				town, strong retail is essential to ensure a thriving economy and community is supported in accordance with the objectives and principles in the framework. Additional housing allocation in Bewdley as proposed under Option 5 will provide an economic boost and will ensure that the retail centre is supported for the benefit of the community and surrounding areas. At this stage we have no specific comments in relation to whether Option A or B is most appropriate, however it is important that the Council considers carefully options to ensure that necessary facilities and services required by the community going forward can be provided.	have a beneficial impact on retail and services.
WFDC (Strategic Housing Team)	LPRIO712	Question 33	Support	Support option B	Noted.
Bewdley Town Council	LPRIO900	Question 33	Comment	Favour Option B review primary shopping area, favour pedestrians and safe shopping but provide adequate car parking.	Comments noted.
CPRE	LPRIO1452	Question 33	Comment	Unlikely that there is scope for significant expansion in the other two town centres. Should be general policies allowing new retail development immediately adjacent to town centres, where no suitable town centre site can be found. The objective should be to retain the viability of the present area and (if necessary) manage decline, by allowing secondary central uses.	Comments noted.
Thomas G	LPRIO1524	Question 33	Comment	Option A - primary shopping area should not be amended otherwise will lose street character.	Comments noted.

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Option A - Retaining local shops and services. Continue to protect and enhance local retail services.					
Fyshe F	LPRIO576	Option A	Support	Support Option B Retaining local shops and services	Comments noted.
Shuttes J	LPRIO1165	Option A	Support	Support Option A	Noted.
Thomas G	LPRIO1525	Option A	Support	Option A preferable as there is a purpose for local shops.	Comments noted.
Option B - Retaining local shops and services. Provide more flexibility for conversions and extensions for retail purposes within neighbourhood and village centres.					
Thomas G	LPRIO1526	Option B	Object	Option B - Object as could lead to development that is likely to change the character of the area and compete with town centre.	Comments noted.
Question 34. Do you think it is important to safeguard and enhance local retail services? Are there any further options that should be considered?					
Atkin G	LPRIO35	Question 34	Comment	Important to safeguard and enhance local retail services.	Comments noted.
Churchill and Blakedown PC	LPRIO348	Question 34	Comment	Need to retain local shops and services, expand or secure them wherever possible.	Comments noted.
Chaddesley Corbett PC	LPRIO228	Question 34	Comment	Highly important that local services are protected, retained and enhanced. Development proposals should not result in a reduction of retail convenience uses within a settlement. This should be extended to include change of use. This may offer protection to shops and services. Parish Council using right to bid towards same aim. Unsure of merits of option B may have some merit across wider parish and district but may be a	Comments are noted.

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				problem for Chaddesley Corbett conservation Area.	
Paris R	LPRIO430	Question 34	Comment	Options not mutually exclusive, mixture would be possible and preferable. Option A ++ Option B -	Comments noted.
WFDC (Strategic Housing Team)	LPRIO713	Question 34	Comment	Yes safeguard and enhance local services, no further options.	Comments noted.
Horsefair Traders Partnership	LPRIO831	Question 34	Comment	<p>Imperative that local and neighbourhood centres including the Horsefair should be maintained and enhanced. Paragraph 23 (NPPF) encourages authorities to define a network and hierarchy of centres that is resilient to anticipated future economic changes, and a strong network of vibrant local and neighbourhood centres, performing a complementary role to the higher order centres, form a key component of such a hierarchy. Local and Neighbourhood Centres provide a range of local shops, services and community facilities that provide a vital role in meeting the day-to-day needs of the local community and therefore enhance the sustainability of communities and residential environments, as acknowledged by NPPF Paragraph 70.</p> <p>The Horsefair lies at the periphery of the town centre and accommodates a range of local shops and services, as well as a number of specialist and niche retailers. It is noted that Policy kca.ch8 of the KCAAP suggests that new retail development within the Horsefair Neighbourhood Centre will be supported provided that the development does not exceed 280 Esq. and the HTP would request that a</p>	Comments are noted.

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				similar provision is made in the new Local Plan. It is evident that the retention of such a policy will have positive implications in helping to maintain and enhance Horsefair in its important role as a service centre for the local community, in line with the overriding objective in the NPPF.	
Upper Arley PC	LPRIO1361	Question 34	Comment	Retain local shops and services and expand or secure wherever possible.	Comments noted.
Staff & Worcs Canal Society	LPRIO1301	Question 34	Support	It is important to safeguard and enhance local retail services.	Comments noted.
Fyshe F	LPRIO577	Question 34	Support	Question 34 Support and agree	Comments noted.
Bewdley Civic Society	LPRIO1584	Question 34	Comment	Refer to the Neighbourhood Plan	The Neighbourhood Plan is in the very early stages and will not be adopted for approximately 3 years.
CPRE	LPRIO1453	Question 34	Comment	Important to retain small shops in neighbourhood and village centres. Change use away from retail, should require evidence of unsuccessful marketing. New shops should be encouraged, particularly in neighbourhood and village centres, subject to an assessment that they will not have an adverse impact on the area e.g. parking on a busy main road where it would significantly obstruct the flow of traffic	Agree that village and neighbourhood areas shops are important for local community.

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Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
Mardon P	LPRIO678	Section 9	Comment	Highlights a number of problems with rat running and traffic along Hurcott Lane and the impact on the area and the SSSI. Something has to be done to alleviate the traffic if further development takes place on the eastern side of Kidderminster.	Comments are noted and agreed.
Natural England	LPRIO1632	Section 9	Comment	The Town and Country Planning (Development Management Procedure) (England) Order 2015 requires local planning authorities to consult Natural England on "Development in or likely to affect a Site of Special Scientific Interest" (Schedule 4, w). Our SSSI Impact Risk Zones are a GIS dataset designed to be used during the planning application validation process and can be accessed from the data.gov.uk website.	Comments on use of SSSI Impact Risk Zones GIS dataset are noted,
WCC, Planning Economy & Performance	LPRIO1370	9.1	Comment	We recommend that the wording in paragraph 9.1 be amended as follows: "The local environment, be it natural, <u>historic</u> or built, is one of Wyre Forest's strengths. The District contains a rich variety of assets <u>from historic landscapes, settlements</u> , historical buildings and conservation areas, to the Staffordshire and Worcestershire Canal and the Rivers Severn and Stour and their tributaries together with <u>the ancient Wyre Forest and</u> several regionally important habitats".	Comments are noted and accepted. Additional references to historic landscapes, settlements and ancient Wyre Forest will be included in text.
Fyshe F	LPRIO578	9.2	Support	Support for paragraph 9.2	Support is noted
What approach do you think should be taken to protect the landscape in Wyre Forest District? Should we have different policies for each Landscape Character type?					
Churchill and Blakedown PC	LPRIO349	Question 35	Comment	The Parish Council feels the greenbelt should be maintained	Comments re protection of Green Belt are noted

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Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
Chaddesley Corbett PC	LPRIO229	Question 35	Comment	Protection of landscape is best served by protecting Green Belt. Worcestershire Landscape Character Assessment SPD is also useful.	Comments are noted.
Williams H	LPRIO156	Question 35	Support	Support for landscape designations	Support is noted
Eriksson-Flegg B	LPRIO139	Question 35	Comment	The forest must be protected.	Comment is noted. The Wyre Forest itself is protected by national designations.
Paris R	LPRIO431	Question 35	Comment	It is important to preserve the rural landscape to counterbalance expansion of the towns.	Comments are noted
Bewdley Town Council	LPRIO902	Question 35	Comment	Landscape character types should continue to be identified and specific policies about the management of each type be used when determining planning applications and enforcement.	Comments are noted.
WCC, Planning Economy & Performance	LPRIO1372	Question 35	Comment	Approach should recognise that landscape is integral to all other development and environmental policies. Therefore we do not recommend having a policy for each landscape type. Broad landscape types provide useful framework for understanding baseline character, but there are many common attributes as well as distinctions. Is risk of lack of recognition of key landscape diversities such as rare lowland heath and small enclosed ancient woodlands and sunken lanes with high hedgerows.	Comments are noted. It is very important that the distinctive landscapes of the district are recognised and safeguarded such as the rare lowland heath.
Upper Arley PC	LPRIO1362	Question 35	Comment	The Parish Council feels the greenbelt should be maintained	Comment is noted. Alterations to the Green Belt boundary can only be made through the Local Plan and would require a complete review of the Green Belt.
Worcestershire Wildlife Trust	LPRIO922	Question 35	Comment	It would seem sensible to have bespoke area-based policy to match the landscape character areas. This would help to implement commentary in the	Agree with comments. Look to include area-based policies to match different landscape character areas.

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				Worcestershire LCA SPD and would take account of the significant landscape differences felt across the district.	
Staff & Worcs Canal Society	LPRIO1302	Question 35	Comment	The Society believes the District Council should develop and apply different planning policies tailored to the needs of the rich 'variety of assets from historical buildings and conservation areas to the Staffordshire and Worcestershire Canal and the Rivers Severn and Stour and their tributaries together with several regionally important habitats.'	Support for opening paragraph of chapter is welcomed.
Fyshe F	LPRIO579	Question 35	Comment	Safeguard Green Belt	Comment noted
Walters	LPRIO675	Question 35	Comment	Existing character and distinctiveness of best of district should continue to be protected and enhanced wherever possible. Sympathetic development is needed without overloading existing transport links. Current development at former British Sugar site will provide much needed housing and commercial development but will also cause more congestion in south of town. No more development should take place in this area once this is completed or area will become clogged with traffic and air quality will suffer. Spennells Estate is already developed and should not be expanded since local services are fully stretched.	Comments are noted. Agree that best parts of district should continue to be protected and enhanced wherever possible. As part of the development on the former British Sugar site, a new link road is being built which will connect the Stourport Road with Worcester Road and will thus hopefully alleviate some of the congestion issues along the Stourport Road.
Bewdley Civic Society	LPRIO1586	Question 35	Comment	Agree with different policies for each Landscape Character type.	Comment is noted
Bewdley Civic Society	LPRIO1585	Question 35	Comment	The protection of the landscape should be policed and enforced.	Comment is noted

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Shuttes J	LPRIO1166	Question 35	Comment	This overcomplicates things. Green Belt should be protected except where it projects into conurbations when development could be considered under stated criteria. The areas in the Green Belt suitable for tourism should be sensitively developed.	Comments are noted. However, only part of the district falls within Green Belt. The rural areas to the west of the River Severn lie outside of the Green Belt. Specific landscape protection policies will need to be included in the Local Plan.
SWDP	LPRIO1069	Question 35	Comment	With respect to character and local distinctiveness the plan should include robust policies to protect the best elements and require new investment in GI etc	Comments are noted. Look to include robust policies to protect character and local distinctiveness and require investment in Green Infrastructure.
CPRE	LPRIO1454	Question 35	Comment	<p>The statement in 9.3 is not wholly accurate. The six items listed are the main types, not the only ones. It omits riverside meadows and unenclosed common, which probably do not need specific treatment as such in a planning document.</p> <ul style="list-style-type: none"> • It might be useful to have a policy that discouraged the conversion of woodland to agriculture or other uses, but I suspect that this does not require planning consent. • The Timbered Plateau Farmland and Forest Small Holdings west of the Severn are certainly distinctive, but the general presumption in NPPF against development in open countryside is probably sufficient protection. • Much the same applies east of the Severn, where additional protection is provided by the Green Belt designation. 	Comments are noted.
Thomas G	LPRIO1527	Question 35	Comment	Do this by improving access and safety eg prevent	Comments are noted.

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				motorbikes and scramblers on pathways. Encourage rare plants and wildlife that could add to the attraction of visitors to see them and control litter and fly-tipping	
Natural England	LPRIO1627	Question 35	Comment	Although landscape is not protected one, it is still of high importance. Proactive approach should be taken to ensure new developments do not negatively impact on different landscape areas. Do not consider that different policies are needed for each landscape type, but policy must be comprehensive and defensible against inappropriate development.	Comments are noted. landscape policy will be worded to ensure that it is comprehensive and defensible against inappropriate development.
Option A - Chalet Provision. Continue to strictly control any expansion of chalets and mobile homes.					
Williams H	LPRIO157	Option A	Support	Support for Option A	Support is noted
Pound Green Group	LPRIO295	Option A	Support	Current policy of restricting caravan sites is excellent. However, some sites have old caravans stored on them and this impacts negatively on views from Severn Valley Railway.	Comments on negative impacts of sites are noted.
Tweeddale Mr J S	LPRIO293	Option A	Support	Support strict controls on mobile home sites with no expansion permitted. Licences for touring caravans also needs strict control to stop changes to 11 month agreements. Regular site checks needed to stop licences being violated. Against any new sites as already blight countryside.	Comments are noted.
Churchill and	LPRIO350	Option A	Support	Support option providing development is kept under	Support is noted.

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Blakedown PC				control	
Eriksson-Flegg B	LPRIO140	Option A	Support	Support option A but also support option C	Support is noted.
WFDC (Strategic Housing Team)	LPRIO714	Option A	Comment	Support option A. Chalet style accommodation is not appropriate form of long-term accommodation and impacts on landscape	Support is noted.
Staff & Worcs Canal Society	LPRIO1303	Option A	Support	Society believes that option A (current policy) offers best opportunity to control and limit proliferation of chalet and mobile home developments in rural areas. Character and quality of canal has been compromised in several locations and we do not wish to see amenity diminished still further.	Support for option and concerns are noted.
Jones G	LPRIO625	Option A	Support	Support option A as I am against the provision of any more chalet/caravan sites in the district. Concerned that some sites have been operating without correct permission for several years. Tighter control required of existing sites to ensure they comply with permission and site licence.	Support is noted. Concerns also noted.
Bewdley Civic Society	LPRIO1587	Option A	Support	Support for Option A	Support for Option A is noted.
Shuttes J	LPRIO1167	Option A	Support	Option A should be the default.	Support for Option A is noted.
Thomas G	LPRIO1528	Option A	Support	Option A should be followed with flexibility for Option C where the site cannot be seen such as surrounded by trees and hedgerow or as part of a farm building complex.	Comments on Options A and C are noted.
Option B – Chalet Provision. Allow small extensions to existing sites for future provision.					
Churchill and	LPRIO351	Option B	Support	Support option B providing development is kept	Support is noted.

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Blakedown PC				under control	
Option C – Chalet Provision. Allow development of small sites for holiday purposes only.					
Churchill and Blakedown PC	LPRIO352	Option C	Support	Support option C providing development is kept under control	Support is noted.
Chaddesley Corbett PC	LPRIO666	Option C	Object	Object to Option C	Objection is noted.
Bewdley Town Council	LPRIO904	Option C	Support	Favour option C as will encourage visitors to area with potential low cost accommodation on farms and other suitable sites.	Comments and support for option C are noted
Shuttles J	LPRIO1168	Option C	Comment	However option C should be considered when it could improve tourism or provide affordable housing when carefully designed	Comments are noted. However, chalets and mobile homes are not considered suitable for permanent occupation.
Question 36. What are your views on the options set out for chalet provision. Are there any other options which should be considered?					
Paris R	LPRIO432	Question 36	Comment	Especially supportive of option A, not keen on option B. A++ B- C+	Comments are noted.
Worcestershire Wildlife Trust	LPRIO924	Question 36	Comment	Would recommend a restrictive policy as many sites would be in areas of high landscape value and near ecological features. Aware of importance of rural diversification so a mix of options may be acceptable.	Comments are noted.
WCC, Planning Economy & Performance	LPRIO1374	Question 36	Comment	Chalets have been feature of Severn Valley landscape since early 20th Century, with greatest growth in last 50 years. Early developments were more scattered and close to river, with later	Views are noted. Suggestions for criteria if option C is introduced are noted. Landscape impact together with use of such non-permanent dwellings as housing are the key

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				developments more dense as in static caravan sites. Chalet developments are mostly single storey and located within field boundaries so landscape impact is not generally significant unless on sloping ground. Getting balance right between landscape impact and leisure development is difficult. Option A offers comprehensive control but restricts opportunities to generate economic benefits. Option B offers scope for expansion within existing sites. Option C offers best solution in terms of allowing leisure development that will encourage economic activity whilst controlling impact through restriction of scale. Grid base mobile developments are at odds with dispersed settlement character. If option C is chosen, suggest limit scale, control density and layout, landscaping and construction materials. This would encourage more sympathetic chalet developments and reduce pressure on local infrastructure.	issues to overcome.
Upper Arley PC	LPRIO1363	Question 36	Comment	The Parish Council supports all 3 options providing development is kept under control.	Support for all 3 options is noted.
Walters	LPRIO676	Question 36	Comment	Suggest that some of existing static caravan sites in Stourport and Bewdley areas could become potential sites for development of permanent housing.	Comments are noted. One of the caravan sites on the edge of Stourport (Four Acres) is allocated as an Area of Development Restraint, meaning it could be used as a future housing site. Many of the other sites are not in suitable areas for permanent housing.
Environment Agency	LPRIO983	Question 36	Comment	Notwithstanding the three proposed options for providing chalet provision, where sites are proposed for chalets, consideration of the flood risk	Comments noted, flood risk Sequential Test will be considered against proposals. Removing chalets from

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				Sequential Test, which seeks to avoid locating development in flood risk locations, is particularly important in this instance as flood risk can present particular problems and greater risk for developments of a less permanent nature, such as chalets and mobile homes. A reference to this in the policy wording would be welcomed. We would recommend that you consider an option for 'managed retreat' i.e. to help remove existing chalets from unsustainable locations within the floodplain to lower risk sites, in accordance with paragraph 100 of the NPPF.	floodplains would be beneficial.
CPRE	LPRIO1455	Question 36	Comment	Welcome the present policy and will welcome its continuation. If anything we would like to see a reduction in the extent of this use of what should be agricultural land, but it is difficult to terminate existing rights. Planning control means that the park can <i>only</i> be occupied for 11 months of the year. However the residents get around this by taking a month's holiday during the winter month when they are not allowed to occupy their home. This practice is an abuse, resulting from a past loophole, but one where it is not feasible to back-track on. The existing policy should be maintained or even strengthened.	Comments are noted.
Natural England	LPRIO1628	Question 36	Comment	We would like to see continued strict control over any expansion of chalets and mobile homes.	Support for continuation of strict control of chalet developments is noted.
British Horse Society	LPRIO495	9.6	Object	Surely market will dictate viability of farm diversification into equestrian businesses. Impact of horse keeping on rural landscape is minor in relation to large housing developments or	objection to wording is noted

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Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
				renewable energy schemes.	
Fyshe F	LPRIO580	9.6	Support	Agree with statement fully	Support is noted
Option A – Horsiculture. Continue with current policy.					
Huizer K	LPRIO69	Option A	Support	Given impact on rural landscape and natural environment of even small scale development, consider current policy should be kept in order to minimise impact of development.	Support for retention of existing horsiculture policy is noted.
Churchill and Blakedown PC	LPRIO353	Option A	Support	Support option A	Support is noted
Rushock PC	LPRIO935	Option A	Support	Option A should be retained to keep control of equine developments	Support for retention of policy is noted
British Horse Society	LPRIO498	Option A	Comment	Whilst not advocating a free for all in terms of new equestrian development, there will be demand for equestrian properties, especially around urban fringes and the Wyre Forest where an off-road riding permit scheme operates. Horses have minimal adverse impact on environment.	Comments are noted.
Upper Arley PC	LPRIO1364	Option A	Support	The Parish Council supports option A	Support is noted
Staff & Worcs Canal Society	LPRIO1304	Option A	Support	The Society believes that Option A provides the best opportunity for the District Council to respond to planning applications on a case by case basis	Support for continuation of existing policy is noted
Bewdley Civic Society	LPRIO1588	Option A	Support	Support for Option A	Support for Option A is noted
Thomas G	LPRIO1529	Option A	Support	Support for Option A	Support for Option A is noted.

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Option B – Horsiculture. Tighten controls still further by only allowing commercial developments within existing converted buildings.					
Churchill and Blakedown PC	LPRIO354	Option B	Support	Support for option B	Support is noted
WFDC (Conservation)	LPRIO250	Option B	Support	Support option B as isolated stable buildings can harm setting of conservation areas and listed buildings.	Support is noted.
Chaddesley Corbett PC	LPRIO667	Option B	Support	Support option B	Support for tightening of controls is noted.
British Horse Society	LPRIO497	Option B	Object	Object to tighter controls but think that policy of encouraging re-use of buildings without ruling out new build is a sensible one. However, not all agricultural buildings lend themselves to stable conversions as they could not meet British Horse Society guidelines of a minimum of 12 x 12 feet per horse.	Objection and comments are noted.
Wolverley & Cookley PC	LPRIO1099	Option B	Support	Preferred option	Preference noted
Upper Arley PC	LPRIO1365	Option B	Support	Parish Council supports Option B	Support is noted.
Fyshe F	LPRIO581	Option B	Support	Support option B	Support is noted
Jones G	LPRIO626	Option B	Support	Support option B as existing equestrian businesses exert high pressures on the Wyre Forest with creation of new tracks through parts of forest which are designated SSSI.	Support for this option is noted
Option C – Horsiculture. Relax policy and rely on general policies for rural development instead.					
Churchill and Blakedown PC	LPRIO355	Option C	Object	Object to Option C. Policies need to be tightened to safeguard residential amenity and open fields against incremental development of equestrian	Objection is noted.

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				uses and its associated retail and commercial uses.	
British Horse Society	LPRIO496	Option C	Support	Support option C to enable further diversification into horse related businesses and livery stables. Consider this preferable to factories or noisy diversification schemes and heavy lorries on rural roads. Also of health benefits.	Comments are noted.
Upper Arley PC	LPRIO1367	Option C	Object	Parish Council does not support option C	Objection is noted.
Fyshe F	LPRIO582	Option C	Object	Object to option C	Objection is noted
Question 37. Do you consider that any of these proposals are the correct approach or is planning policy too restrictive on equine development?					
Paris R	LPRIO433	Question 37	Comment	Very supportive of option A but not keen on other options. A++ B- C-	Comments are noted
Worcestershire Wildlife Trust	LPRIO925	Question 37	Comment	Recommend restrictive policy as sites often in areas of high landscape and ecological value. Equine industry is important for rural diversification but any applications for expansion need to be backed by environmental assessment.	Comments are noted.
WCC, Planning Economy & Performance	LPRIO1376	Question 37	Comment	Should be possible to promote more appropriate design guidance so that stables etc. respect landscape with lower impact lighting to reduce light pollution and impact on light-sensitive species. A mix of Options A & B with design guidance offers flexibility but will create more sustainable outcome.	Comments are noted. Suggestions as to how design guidance may lessen impact of such developments are welcomed.
Upper Arley PC	LPRIO1368	Question 37	Comment	Policies need to be tightened to safeguard against incremental development	Comments are noted.
Fyshe F	LPRIO583	Question 37	Comment	Support options A & B	Support for these options is noted
CPRE	LPRIO1456	Question 37	Comment	Floodlighting for example to enable horses to be ridden at night is intrusive and should only be	Comments are noted.

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				allowed in very special circumstances.	
Shuttles J	LPRIO1169	Question 37	Comment	This should be considered on a business case basis. Will it improve tourism or is there a proven need to expand.	Comments are noted.
Environment Agency	LPRIO986	Question 37	Comment	The SA Scoping report acknowledged the pressure from horsiculture on the biodiversity of the district. Can lead to soil compaction with increased surface water run-off, sedimentation of watercourses and pollution. Policy should safeguard locally and nationally valuable habitats and protect watercourses (Water Framework Directive). Rural Sustainable Drainage Systems (RSuDS) should be referred to as design guidance for these schemes https://www.gov.UK/government/publications/rural-sustainable-drainage-systems	Comments are noted. RSuDS will be referenced in Local Plan.
Natural England	LPRIO1629	Question 37	Comment	Current equestrian policy is good but could be tightened. Impacts of developments on environment and landscape are often underestimated.	Comments are noted. Impact on environment and landscape is a key concern.
Option A - Biodiversity and Geodiversity. Continue to protect all designated sites and priority species from development and, where development is proposed on an adjacent site, require a buffer zone around the site.					
Churchill and Blakedown PC	LPRIO356	Option A	Support	Support for option A	Support is noted
Upper Arley PC	LPRIO1369	Option A	Support	The Parish council agrees with option A	Support for option A is noted.
Fyshe F	LPRIO584	Option A	Support	Support option A	Support is noted
Stanmore Properties Ltd	LPRIO1024	Option A	Comment	Option A is useful starting point, but it needs to recognise hierarchy of protection. Impact of development needs to be assessed to ensure suitable mitigation and enhancement. Development	Comments are noted.

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				can bring benefits - biodiversity enhancements and management of designated areas to protect species.	
Shuttles J	LPRIO1170	Option A	Support	Option A	Support is noted
Option B - Biodiversity and Geodiversity. Encourage the enhancement of existing biodiversity of watercourses through development of adjacent sites.					
Churchill and Blakedown PC	LPRIO357	Option B	Support	Support for option B	Support is noted
Upper Arley PC	LPRIO1371	Option B	Support	The Parish council agrees with option B	Support is noted.
Staff & Worcs Canal Society	LPRIO1305	Option B	Support	Society agrees with para. 9.11 that, '...the local plan needs to maintain and improve the natural environment and should include policies to ensure development proposals minimise the negative impacts on biodiversity and, if possible, provide a net gain'. Believe that option B provides the best opportunity to accomplish these aims and will provide sufficiently robust safeguards.	Support for option B is noted.
Fyshe F	LPRIO585	Option B	Support	support for option B	support is noted
Stanmore Properties Ltd	LPRIO1025	Option B	Support	Option B is a positive approach providing enhancement and active management and should be commended	Support for option is noted.
Shuttles J	LPRIO1171	Option B	Comment	Option B is an urbanisation in these examples not a protection	Comments are noted. The examples mentioned are all in urban areas. The schemes at Morrisons and Tesco in Kidderminster have opened up what was previously an industrialised watercourse into a small green lung with public access alongside.

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Thomas G	LPRIO1530	Option B	Support	Support for Option B	Support for Option B is noted
Question 38. How can planning policy encourage increased usage of these natural assets and thus minimise anti-social behaviour issues? Do you consider that existing policy is robust enough to safeguard the natural environment?					
Huizer K	LPRIO70	Question 38	Comment	Consider existing policy is robust enough. Early discussion between council officers, developers and stakeholders is vital.	Comments are noted.
Paris R	LPRIO434	Question 38	Support	Support both options, especially option B	Support is noted
British Horse Society	LPRIO499	Question 38	Comment	Recent initiatives on Merseyside to open up access to council owned land for shared use by walkers, cyclists and horse riders has increased access to open space, reduced anti-social behaviour and discouraged criminal activity.	Comments on positive outcomes of opening up access to both walkers, cyclists and horse riders are noted.
Woodland Trust	LPRIO382	Question 38	Object	<p>Believe there should be a separate Trees and Woodland Policy:-</p> <ol style="list-style-type: none"> 1. absolute protection of ancient woodland 2. expansion of native woodland habitat for green infrastructure benefits 3. commitment to produce Trees & Woodlands SPD <p>1. It is critical that the irreplaceable semi natural habitats of ancient woodland and ancient trees are absolutely protected. Every ancient wood is a unique habitat that has evolved over centuries. With Wyre Forest DC showing an above average ancient woodland resource at 9.24% of land area compared to a UK average of 2.5%, it is critical that Wyre Forest's valuable natural resource is absolutely protected in the Local Plan. It is also important that</p>	Objection and suggested policy is noted. Further research will be undertaken in conjunction with the tree officer.

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				<p>there is no further avoidable loss of ancient trees through development pressure, mismanagement or poor practice. We would like to see all such trees scheduled as TPOs. There is also a need for policies ensuring good management of ancient trees, the development of a succession of future ancient trees through new street tree planting and new wood pasture creation, and to raise awareness and understanding of the value and importance of ancient trees. NPPF does not currently provide sufficient protection for ancient woodland. Examples of local plans supporting absolute protection of ancient woodlands include North Somerset Core Strategy (2012), Stafford Borough, Bristol (Site Allocations and Development Management Policies (2014).</p> <p>We would therefore like to see a bullet point in a Trees & Woodland policy read as follows - <u>“Development which would result in the loss of Ancient Woodland or Ancient trees will not be permitted”.</u></p> <p>2. Woodland expansion - Woodland Trust believes that trees and woods can deliver wide range of benefits for communities including landscape and biodiversity, quality of life, climate change and local economy. We consider that the Council has a statutory duty to protect trees and promote tree planting in an Open Space Study. Section 197 of the Planning Act (1990) states: Planning permission to include appropriate provision for preservation and planting of trees. NPPF also supports need for more habitat creation. Expansion</p>	

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				<p>of priority habitats like native woodland is a key aim of the England Biodiversity Strategy. Woodland creation also forms a significant element of the Government Forestry Policy Statement (Defra Jan 2013). Other benefits of tree planting include - urban heat island effect reduction, improved air quality and reduced surface water flooding. A good example of Local Plan policy in this regard is provided by the East Hants DC Local Plan: Joint Core Strategy– adopted June 2014.</p> <p>3. We would like to see a commitment to deliver a Trees & Woodland Strategy SPD. Good examples include Solihull MBC and Somerset CC.</p>	
Woodland Trust	LPRIO383	Question 38	Comment	see LPRIO382	see LPRIO382
Worcestershire Wildlife Trust	LPRIO928	Question 38	Comment	<p>NPPF promotes more visionary approach than existing local plan policy - calls for more positive enhancement - so policy should not only protect existing assets but seek to relink them into wider Green Infrastructure network.</p> <p>Enhancement can take many forms - from installation of nesting boxes to long term management of open space. There may be scope for planning policy to reduce anti-social behaviour through building in natural surveillance to site layouts, integrate SuDS into site designs from start, and fronting development onto any retained features to reduce fly-tipping.</p> <p>Increased access to natural open space may have role to play but it is essential to avoid potential adverse effects. Would like open space policy requirements to be met within new developments</p>	Comments are noted. Agree that biodiversity assets need to be linked into wider GI network.

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Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
				rather than increasing existing pressures on best wildlife sites.	
The Canal and River Trust	LPRIO515	Question 38	Comment	Support option B - only way to secure funding. See advice note Unlocking the Potential and Securing the Future of Inland Waterways through the Planning System.	Comments are noted
Warwickshire & West Mercia Police and H&W Fire and Rescue Service	LPRIO644	Question 38	Comment	Whilst we note reference to minimising anti-social behaviour, some of the statements appear to state that increased access will increase anti-social behaviour.	Comments are noted. A fine balance needs to be struck. If enough people use a site it becomes self-policing to some extent and anti-social behaviour issues decrease. However, initially, allowing access can bring with it a number of problems.
Stanmore Properties Ltd	LPRIO1023	Question 38	Comment	Protection should correspond to status. Nature conservation has to be balanced against other interests such as protecting Green Belt, high value agricultural land, landscape character, heritage assets etc. Protection and enhancement of natural, built and historic environment and improving biodiversity is key thread in environmental sustainability.	Comments are noted.
Bewdley Civic Society	LPRIO1589	Question 38	Comment	Bewdley forms part of the Abberley and Malvern Hills Geopark which should be included in the Plan.	Noted. This will be included in the Plan.
CPRE	LPRIO1457	Question 38	Comment	It is desirable that polices should encourage the enhancement of wildlife corridors, not only in the main river valleys, but also in lesser valleys, such as the western tributaries of the river Stour, the Honey and Horse Brooks and the eastern ones, the Wannerton and Bell Brooks. As in the present WFCS, it is probably sufficient merely to have warm words about encouraging geo- and bio-diversity.	Comments are noted.

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Natural England	LPRIO1630	Question 38	Comment	Increased usage needs to be well managed. Providing information explaining the importance of an area and encouraging local community groups to help with management can be successful in minimising anti-social behaviour issues. Suggest that current policies should be strengthened.	Comments are noted. Agree that local community involvement is key to tackling many of the issues.
Simmonds R W	LPRIO121	9.12	Comment	Safeguarding green space is important but harder as population grows. Could Severn Valley Railway not introduce station at Safari Park with road trains running between the 3 towns?	Comments are noted. Provision of station halt at Safari Park is included in masterplan for development.
British Horse Society	LPRIO500	9.12	Support	Support this statement as long as horse riders' needs are considered.	Support is noted
Option A - Green Infrastructure. Continue to safeguard the existing green infrastructure network as set out in the Green Infrastructure Study and Strategy.					
Churchill and Blakedown PC	LPRIO358	Option A	Support	Parish Council supports option A and the work being done by the Countryside Conservation Officer	Support is noted
British Horse Society	LPRIO501	Option A	Support	Support for option A	Support is noted
Upper Arley PC	LPRIO1373	Option A	Support	Parish Council supports option A	Support is noted.
Staff & Worcs Canal Society	LPRIO1306	Option A	Support	Agree that it is important to build on opportunities provided by River Stour and the canal to link a number of development sites and enhance existing provision. Also support refresh of GI Strategy. Option A will provide best way of achieving GI Strategy aims and objectives. Also wish to see site of proposed Stour Valley Country Park safeguarded.	Support for Options A & C is noted.
Fyshe F	LPRIO586	Option A	Support	Support option A	Support is noted

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Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
Bewdley Civic Society	LPRIO1590	Option A	Support	Support for Option A	Support for Option A is noted
Option B - Green Infrastructure. Identify specific opportunities for major development proposals to provide additional green infrastructure to help provide the missing links in the network.					
Churchill and Blakedown PC	LPRIO359	Option B	Support	Support for option B and work of Countryside Conservation Officer.	Support is noted.
Bewdley Town Council	LPRIO906	Option B	Support	Favour Option B. Bewdley's riverside and links to Wyre Forest should be made more accessible. Will encourage residents to make most of recreational space and improve wellbeing.	Comments are noted. Agree that links between town centre and Forest need improving to encourage use by both locals and visitors.
Upper Arley PC	LPRIO1375	Option B	Support	Parish Council supports Option B	Support is noted.
Fyshe F	LPRIO588	Option B	Support	support option B	support is noted
Option C - Green Infrastructure. Continue to safeguard the site of the proposed Stour Valley Country Park.					
British Horse Society	LPRIO502	Option C	Support	Support safeguarding of proposed Stour Valley Country Park providing access for horse riders is considered particularly the links from adjoining quiet lanes and bridleways.	Support is noted together with comments on access links to surrounding network
Question 39. Do you consider more could be made of the green infrastructure network? Where do you think the key gaps are? How can we best protect and enhance existing green infrastructure? Do you agree that the planning authority should continue to safeguard the site of the proposed Stour Valley Country Park?					
Paris R	LPRIO435	Question 39	Support	Support for all 3 options. A+ B+C+	Support is noted
Associated British Foods Plc	LPRIO858	Question 39	Comment	More could be made of Green Infrastructure Network in Kidderminster. ABF proposals for Wilden Lane can include high quality green infrastructure design that retains and enhances ecology of site,	Comments are noted. Agree that GI network in Kidderminster needs enhancement.

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Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
				whilst protecting the ecology of land adjoining the Wilden Marsh SSSI. It could also be designed to improve the amenity and interpretative value of parts of the site, making it available to a wider audience, whilst avoiding increased disturbance to the SSSI.	
Woodland Trust	LPRIO384	Question 39	Object	<p>Would like to see Green Infrastructure section prioritise natural environment to deliver health and well-being benefits. It is now widely accepted that GI can contribute to both preventative and restorative wellbeing solutions. This linkage between woodland and health is now firmly embedded in national Government policy for health, planning and forestry. Woods and trees can be a cost effective solution for reducing negative climate change impacts like poor air quality and for supporting local economic growth, as well as promoting healthy lifestyles. There are also great opportunities for physical exercise with local community woodland projects.</p> <p>Research by the Woodland Trust shows that less than 17% of the population of England has access to local woodland within 500m of their home. Woodland Trust has developed the Woodland Access Standard (WAS_t) for public bodies and local authorities to aim for (see Space for People)</p> <p>We would therefore like to see a policy point for green infrastructure to read <i>“Protection, enhancement and creation of native woodland will be supported for the benefits it can bring to green infrastructure including for health & wellbeing”</i>.</p>	Objection is noted together with suggested policy. This will be explored further at Preferred Options stage.

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Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
Worcestershire Wildlife Trust	LPRIO929	Question 39	Comment	More could be made of GI network within District but consider that GI strategies (WFDC & WCC) already sets out potential future policy. Opportunities should be taken to enhance strategic corridors through major development. A mix of the 3 options should be sought with a bespoke GI policy (linked to strategies) would help to identify and plug gaps. Suggest using policy in SWDP as a basis.	Comments are noted. Look to use SWDP policy as a good example to follow with links to our GI Strategy.
The Canal and River Trust	LPRIO516	Question 39	Comment	Welcome recognition given to Staffordshire & Worcestershire Canal as multi-functional green infrastructure. Need to ensure that development doesn't have adverse impact through increased litter, graffiti or anti-social behaviour with resultant increased maintenance costs.	Comments are noted. Need to ensure the positive benefits of development aren't outweighed by the negatives.
Shuttles J	LPRIO1172	Question 39	Comment	Urban areas are surrounded by rural open spaces but need to increase amount of green space within urban areas. A chain of smaller areas could link development areas together.	Comments are noted. A network of small green spaces within urban areas is important for both people and wildlife and the Green Infrastructure Strategy looks to promote this.
Thomas E	LPRIO993	Question 39	Comment	Protect Green infrastructure and no development on Green Belt unless it enhances and expands Green Belt and open areas	Comments are noted.
CPRE	LPRIO1458	Question 39	Comment	I would suggest that some minor action should be possible to enable the public to appreciate Wilden Marshes more, possibly merely a couple of public hides.	Comments are noted.
Natural England	LPRIO1631	Question 39	Comment	Green Infrastructure should continue to be a key priority. An increase in green infrastructure should encourage more use of the natural assets which would hopefully reduce impacts of anti-social	Comments are noted. Agree that green infrastructure needs to underpin a number of policies.

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Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
				behaviour. Green Infrastructure should play a part in several policies.	
Historic England	LPRIO1086	9.14	Comment	Support inclusion of section on Built Heritage under Safeguarding Character and Local Distinctiveness Chapter. Suggest that definition is widened to include all areas of historic environment including non-designated archaeology as well as historic character and local distinctiveness. Welcome reference to HER and acknowledgement of need to protect both designated and non-designated assets and look for enhancement opportunities. Also support inclusion of local lists. We are keen to see how the Council intends to protect and where possible, enhance heritage assets both through the identification of policy/ies for the historic environment within the Local Plan and through the assessment work to inform the allocation of development sites.	Comments are noted. Suggestion to widen definition to include all areas of historic environment will be taken on board.
WCC, Planning Economy & Performance	LPRIO1482	9.14	Comment	We suggest amending the title before section 9.14 to "Historic Environment and Built Heritage", and amending the wording at the start of section 9.14 to read "Wyre Forest contains large numbers of designated and undesignated heritage assets including..."	Comments are noted and agreed.
Option A - Built Heritage. Provide site specific policies to safeguard historic landscapes, archaeological sites, Listed Buildings and Conservation Areas together with non-designated heritage assets.					
Williams H	LPRIO158	Option A	Support	support for Option A is noted	Support is noted
Churchill and Blakedown PC	LPRIO360	Option A	Support	Support for option A - provision of site specific policies	Support is noted

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Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
WFDC (Strategic Housing Team)	LPRIO715	Option A	Support	Support option A	Support is noted.
Bewdley Town Council	LPRIO911	Option A	Comment	Favour Option A. Bewdley should have specific design standards owing to its riverside location, market town identity and historical character. Green Belt should be protected to ensure town remains distinctive and known for green spaces and surrounding countryside.	Comments are noted.
Upper Arley PC	LPRIO1377	Option A	Support	The Parish Council agrees each case should be site specific and agrees with Option A	Support is noted.
Broome Parish Council	LPRIO1110	Option A	Support	Option A is preferable. Site specific or area specific policies to safeguard historic landscapes, Conservation Areas. etc with an overarching general policy is much better than reliance on the NPPF.	Support for option A is noted.
Fyshe F	LPRIO587	Option A	Support	Support option A	Support is noted.
Bewdley Civic Society	LPRIO1591	Option A	Support	Option A to be prescribed by the Neighbourhood Plan	Support for Option A is noted.
Shuttes J	LPRIO1173	Option A	Support	Option A based on potential uses	Support is noted.
Option B - Built Heritage. Have an overarching development management policy to protect all heritage assets and retain conservation areas.					
Churchill and Blakedown PC	LPRIO361	Option B	Support	Support for option B	Support is noted.
WFDC (Strategic Housing Team)	LPRIO737	Option B	Support	Support option B	Support is noted.
Wolverley &	LPRIO1100	Option B	Comment	Option B is preferred	Preference is noted.

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Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
Cookley PC					
Upper Arley PC	LPRIO1379	Option B	Support	The Parish Council agrees each case should be site specific and agrees with Option B	Support is noted.
Staff & Worcs Canal Society	LPRIO1307	Option B	Support	Options A & B provide greatest element of control and safeguarding. Option B is favoured owing to overarching level of control it offers.	Support for Option B is noted.
Fyshe F	LPRIO589	Option B	Support	support option B	Support is noted.
Option C - Built Heritage. Simply rely on national guidance contained in National Planning Policy Framework and National Planning Policy Guidance.					
Richards Mr H	LPRIO205	Option C	Support	Council should apply NPPF policies to built heritage. Neighbourhood Forums should include list of non-designated heritage assets in Neighbourhood Plans. Local Plan could include examples of schemes in town centres where public benefit of a development proposal has outweighed harm to a heritage asset.	Comments are noted.
Churchill and Blakedown PC	LPRIO362	Option C	Object	Parish Council does not agree with this option. The Local List should have reference made.	Objection is noted.
Upper Arley PC	LPRIO1381	Option C	Object	The Parish Council does not agree with option C as it is reliant on national guidance	Objection is noted.
Fyshe F	LPRIO590	Option C	Object	object to option C	Objection noted.
Question 40. How do you think the Council should weigh the balance between harm to designated heritage assets against the public benefits of a development proposal including securing the optimum viable use?					
Chaddesley Corbett PC	LPRIO230	Question 40	Comment	Support option B. Currently working with Conservation Officer to draw up Local Heritage List and propose boundary changes to Conservation Areas.	Support for option B is noted.

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Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
Paris R	LPRIO436	Question 40	Comment	Fully supportive of option A, together with option B but object to option C. A++ B+ C-	Comments are noted.
WFDC (Conservation)	LPRIO251	Question 40	Comment	Support option A. Option C could lead to a serious depletion of non-designated heritage assets within the District.	Comments are noted.
Bewdley Town Council	LPRIO908	Question 40	Comment	Heritage assets and conservation areas should be protected and any development proposals in these areas be carefully managed.	Comments are noted.
Betterton I	LPRIO739	Question 40		Are there any plans to designate The Horsefair area as a Conservation Area? If not, could it be considered? It is a greatly overlooked but important area.	Comments are noted. Agree that the Horsefair is an important area in the town's history. Any proposals for new conservation areas in the district would need the full support of local councillors and be backed up by detailed evidence to justify their designation.
WCC, Planning Economy & Performance	LPRIO1378	Question 40	Comment	Should cover both designated and non-designated assets as non-designated heritage assets outnumber designated ones and make major contribution to character of landscape, settlement and place. Option B broadly gives correct approach. Site specific policies will be too complex and are likely to focus on designated assets. An overarching policy for the historic environment and built heritage can address district-specific issues sufficiently to avoid repeating national policy. Site specific issues can be covered in Neighbourhood Plans and via site specific assessment.	Comments are noted. Agree that an overarching policy that recognises role of non-designated heritage assets as well as designated ones would be more appropriate for the Local Plan.
CPRE	LPRIO1459	Question 40	Comment	The historic environment also includes below-	Comments are noted and agreed.

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Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
				ground archaeological sites. The policy of the former PPG16 and its successors in NPPF and the new PPG seem to work reasonably well. Policy should encourage the sympathetic reuse of redundant buildings, which no longer have a viable economic use, such as water mills, but any policy on this needs to be carefully prepared, so that insubstantial (usually post WWII) structures such as chicken sheds, covered yards, and barns covered in steel or asbestos sheeting should not be able to piggyback on a policy designed to preserve historic structures.	
Thomas G	LPRIO1531	Question 40	Comment	Heritage should be protected as without this, the district will lose its identity, distinctiveness and overall value.	Comment is noted and agreed.
Option A - Reinforcing Local Distinctiveness. Provide specific design guidance for specific locations and specify design criteria for each allocated site.					
Churchill and Blakedown PC	LPRIO363	Option A	Support	The Parish Council agrees with Option A which should include reference to local communities, including Neighbourhood Plans and the Local List	Support is welcomed. Where relevant, reference will be made to Neighbourhood Plans and the Local List.
WFDC (Strategic Housing Team)	LPRIO716	Option A	Support	Support option A	Support is noted.
Upper Arley PC	LPRIO1382	Option A	Support	The Parish Council agrees with Option A which should include reference to local communities, including Neighbourhood Plans.	Support and comments are noted.
Fyshe F	LPRIO591	Option A	Support	support option A	Support is noted.
Bewdley Civic Society	LPRIO1592	Option A	Support	Support for Option A	Support for Option A is noted.

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Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
<p>Option B - Reinforcing Local Distinctiveness. In areas with little or no particular character, raise the design quality through innovative and high quality design approaches and the provision of specific development guidelines via a masterplan if appropriate.</p>					
Hereford and Worcester Gardens Trust	LPRIO92	Option B	Comment	Under Option B, we would like to see enhanced protection of historic parks and gardens identified in 'Survey of Historic Parks and Gardens in Worcestershire' by R Lockett (1997). We suggest that all such sites are incorporated into local lists with the provision in the Local Plan that any development proposals should only be approved where there is no adverse effect on the site's character, setting and aesthetic and historic value.	Comments are noted. As Local Lists are rolled out across the District, it is proposed to look at including all such sites.
Williams H	LPRIO159	Option B	Support	Support for option B is welcomed.	Support is welcomed.
WFDC (Conservation)	LPRIO252	Option B	Support	Support option B as this frees developers to investigate novel and innovative design solutions in areas which have little or no particular character at present.	Support is welcomed.
WFDC (Strategic Housing Team)	LPRIO738	Option B	Support	Support option B	Support is noted.
Staff & Worcs Canal Society	LPRIO1308	Option B	Support	Options A and B offer similar site specific opportunities to protect and enhance local diversity in design but the Society believes that Option B provides rather more potential to improve such values.	Support for option B is noted.
Bewdley Civic Society	LPRIO1593	Option B	Support	Support for Option B	Support for Option B is noted.

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Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
Shuttles J	LPRIO1174	Option B	Support	Option B	Support is noted.
Thomas G	LPRIO1532	Option B	Support	Support for Option B	Support for Option B is noted.
Question 41. How should the local plan ensure that Local Distinctiveness is reinforced? Are there other potential options that need to be considered?					
Paris R	LPRIO437	Question 41	Support	Supportive of both options especially option A. A++ B+	Support is noted.
Persimmon Homes Limited	LPRIO847	Question 41	Comment	Stanklyn Lane Design guidance for specific locations is unlikely to be justified in most cases. May well be appropriate in areas of heritage value but for urban extensions, design will be negotiated between developer and LPA and determined via Design and Access statements.	Comments are noted.
Chaddesley Corbett PC	LPRIO668	Question 41	Support	Support for both options on reinforcing local distinctiveness.	Support is noted.
WCC, Planning Economy & Performance	LPRIO1380	Question 41	Comment	Option A would promote a responsive approach to local distinctiveness. Could suggest that developers commission appropriate assessments of site in its local environmental context to inform design that responds to inherited character. This would set parameters whereby site masterplanning, landscaping to meet GI objectives and material choice can reflect existing character and help to reinforce local distinctiveness.	Comments are noted and will be taken into account when formulating Preferred Option policy.
Staff & Worcs Canal Society	LPRIO1309	Question 41	Comment	Wish to highlight issue of cyclists using towpaths in dangerous manner. Suggest LPA consults with CRT and Sustrans in order to encourage responsible cycling on canal towpaths.	Comments are noted.
Historic	LPRIO1087	Question 41	Comment	Support inclusion of Local Distinctiveness policy.	Comments are noted.

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Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
England				Would also support inclusion of site specific policies that incorporate design principles or mitigation measures where heritage assets may be affected by development.	
The Canal and River Trust	LPRIO517	Question 41	Support	Support for both options	Support is welcomed.
Willsgrove Developments Ltd	LPRIO1219	Question 41	Comment	Design guidance for specific locations is unlikely to be justified in most cases. May well be appropriate in areas of heritage value but for urban extensions, design will be negotiated between developer and LPA and determined via Design and Access statements.	Comments are noted.
CPRE	LPRIO1460	Question 41	Comment	Both options are to be welcomed, but this is a topic that might usefully be left to neighbourhood plans. A district-wide approach, included in the Plan, ought to be explicitly a fall-back position which NPs are free to depart from.	Comments are noted.

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A WELL SERVED DISTRICT (SECTION 10) RESPONSES**

Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
Pearce J	LPRIO52	Section 10	Comment	Park and ride for railway at Burlish needed.	Comments noted.
Mobile Operators Association	LPRIO54	Section 10	Comment	<p>Consider it important that there is a specific telecommunications policy within the emerging Local Plan. We consider that the vital role that telecommunications play in both the economic and social fabric of communities merit the inclusion of a policy which refers specifically to telecommunications developments. National guidance recognises this through Section 5: "Supporting high quality communications infrastructure" of National Planning Policy Framework (March 2012) which provides clear guidance as to the main issues surrounding telecommunications development.</p> <p>The National Planning Policy Framework (NPPF) at paragraph 42 confirms that; <i>"advanced, high quality communications infrastructure is essential for sustainable economic growth and play a vital role in enhancing the provision of local community facilities and services."</i></p> <p>Paragraph 43 of NPPF confirms that; <i>"in preparing local plans, local planning authorities should support the expansion of telecommunications networks"</i> , but should also; <i>"aim to keep the numbers of radio telecommunications masts and sites for such installations to a minimum consistent with the efficient operation of the network. Existing masts, buildings and other structures should be used, unless the need for a new site has been justified."</i></p> <p>As indicated above, the formulation of policy does</p>	Comments noted; the inclusion of a telecommunications policy will be investigated.

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A WELL SERVED DISTRICT (SECTION 10) RESPONSES**

Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
				<p>not exist in isolation and there are numerous documents which will affect the formulation of any telecommunications policy, the most important of these being NPPF. On this basis we would suggest that a concise and flexible telecommunications policy should be included within the emerging Local Plan. Such a policy should give all stakeholders a clear indication of the issues that telecommunications development will be assessed against.</p> <p>We would suggest a policy which reads; <i>“Proposals for telecommunications development will be permitted provided that the following criteria are met:</i> <i>i) the siting and appearance of the proposed apparatus and associated structures should seek to minimise impact on the visual amenity, character or appearance of the surrounding area;</i> <i>(ii) if on a building, apparatus and associated structures should be sited and designed in order to seek to minimise impact to the external appearance of the host building;</i> <i>(iii) if proposing a new mast, it should be demonstrated that the applicant has explored the possibility of erecting apparatus on existing buildings, masts or other structures. Such evidence should accompany any application made to the (local) planning authority.</i> <i>(iv) If proposing development in a sensitive area, the development should not have an unacceptable effect on areas of ecological</i></p>	

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A WELL SERVED DISTRICT (SECTION 10) RESPONSES**

Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
				<p><i>interest, areas of landscape importance, archaeological sites, conservation areas or buildings of architectural or historic interest. When considering applications for telecommunications development, the (local) planning authority will have regard to the operational requirements of telecommunications networks and the technical limitations of the technology.”</i></p> <p>We would consider it appropriate to introduce the policy and we would suggest the following; <i>“ Mobile communications are now considered an integral part of the success of most business operations and individual lifestyles. With the growth of services such as mobile internet access, demand for new telecommunications infrastructure is continuing to grow. The authority is keen to facilitate this expansion whilst at the same time minimising any environmental impacts. It is our policy to reduce the proliferation of new masts by encouraging mast sharing and siting equipment on existing tall structures and buildings.”</i></p>	
Angell Mr G	LPRIO60	Section 10	Comment	<p>Transport / Character / Climate Change</p> <p>Any policy that fails to reduce able bodied car traffic is acquiescence in environmental degradation. Human propulsion/bus/train are enormously more land use efficient; vigorous reversal of feather bedded able bodied motoring and parking policies is required to counteract the dominant parasite on the face of the district - i.e. able bodied private car. Too much tarmacadam! Where is the promised re-opened Foley Park</p>	Comments are noted but many of these points are not under the jurisdiction of Wyre Forest District Council.

**LOCAL PLAN REVIEW ISSUES & OPTIONS CONSULTATION (SEPTEMBER 2015)
A WELL SERVED DISTRICT (SECTION 10) RESPONSES**

Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
				<p>Station? Public Green Space offering much needed character and human dimension is conspicuously lacking. Enforcement of antisocial behaviour - cars parked on pavements - laws needed. Public safety: Does this not require cameras on all traffic lights, which criminal types currently drive through with impunity?</p>	
The Theatres Trust	LPRIO95	Section 10	Comment	<p>Local Plan should address community and cultural facilities. This is emphasised in NPPF as a core planning principle (item 17). Supported by guidance in item 70 of NPPF which states that to deliver the social, recreational and cultural facilities and services that the community needs, planning policies and decisions should guard against unnecessary loss of valued facilities. Also to ensure that established facilities and services are retained and able to develop for the benefit of the community.</p> <p>The Planning Practice Guidance notes that a range of issues could be considered through the plan-making and decision-making processes including social and cultural well-being. This takes the matter further than just access to doctors and playing fields. 'Well-being' is having a sense of satisfaction with life. Social and cultural well-being includes the un-measurable personal experiences that make us happy and content. Such experiences are intangible, not financially rewarding, and can either be active (sports) or passive (theatre). The provision of a variety of community infrastructure and cultural facilities are</p>	Comments raised will be investigated.

**LOCAL PLAN REVIEW ISSUES & OPTIONS CONSULTATION (SEPTEMBER 2015)
A WELL SERVED DISTRICT (SECTION 10) RESPONSES**

Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
				<p>vital for their contribution to residents and visitors life satisfaction and this should be promoted in this document.</p> <p>It is vital for the local plan to safeguard and protect existing cultural & community facilities which benefit and support sustainable communities which might otherwise be traded in for more commercially lucrative developments. To support the objectives and reflect item 70 of the NPPF, we recommend a policy along the lines of:</p> <p><i>Community and Cultural Facilities</i> <i>The council will resist the loss or change of use of existing community and cultural facilities unless replacement facilities are provided on site or within the vicinity which meet the need of the local population, or necessary services can be delivered from other facilities without leading to, or increasing, any shortfall in provision, and it has been demonstrated that there is no community need for the facility or demand for another community use on site.</i></p> <p>The Policy should also contain criteria for encouraging the provision of new facilities to serve the growing population in the District.</p>	
Pearson I	LPRIO171	Section 10	Comment	<p>No acknowledgement in the plan that there is much of a wider environment within which Wyre Forest sits. In particular the West Midlands Conurbation is so close to the district that it cannot be ignored.</p> <p>While there is some suggestion of the importance of transport links to the conurbation should there be consideration of joining with the new combined</p>	Comments noted.

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Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
				<p>authority being planned for the West Midlands. The district is already a member of a wider Local Enterprise Plan. Should it not at least consider whether there is advantage in joining the wider community and accessing the benefits which those other authorities see? There must be advantages, particularly in respect of improved transport links.</p>	
Symons P	LPRI0670	Section 10	Comment	<p>Very disappointed to learn that in your opinion there seems to be no realistic prospect of a by-pass for Kidderminster. I realise that a case has to be made for such a costly but necessary project to relieve the constant daily pressure on the roads in the area.</p> <p>The District Council, in partnership with Worcestershire County Council has an aspiration to improve the area and bring much needed prosperity to The West Midlands. The demise of the carpet industry and closure of factories making chains and motor vehicles has made this difficult.</p> <p>This beautiful area is more suited as a tourist attraction for the inner city but it needs vital roads and housing for its population that seems to commute into Birmingham every day. The Wyre Forest area has parks, navigable rivers, canals, a heritage railway and a main line rail link. These assets should be fully developed to enhance the area. My favourite would be a canal basin and marina similar to Stourport.</p> <p>We visited the consultation meetings held at Spring Grove House and asked how the planners would deal with the increased traffic flows into the</p>	<p>Comments are noted. Norwich and Oxford are both large cities with park and ride. Worcester did have one but no longer does.</p>

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				<p>area. The answer was to bring many of the visitors into the area by rail to a new station at the park.</p> <p>Very commendable, but how will the developers get the public to leave their cars and use public transport, or even cycle to the venue. One answer is to build several Park and Ride facilities as done in other tourism areas. The first priority is to site one on land near the Land Oak close to the railway, Severn Valley station and Harriers ground where parking is a problem. Tickets for the Safari Park could only be collected or obtained at these parking sites.</p> <p>Shrewsbury, Worcester, Norwich and Oxford to name but a few have park and ride facilities, Malvern is thinking of having a cable railway. Wyre Forest could have a tramway operated on the Severn Valley Line with suitable improvements and partnering with SVR. The town centre should embrace the River Stour and Staffs Canal as in Wychavon's Droitwich Spa Town. Everyone must recognise that heavy haulage and logistics are not using the Motorways around Kidderminster.</p> <p>There is little sign of a much needed bypass around and not through Kidderminster. Bromsgrove, Redditch, Alcester, Evesham, Shrewsbury, Ludlow, Bewdley and Telford are all towns of similar size with a By-pass. Why has Kidderminster been overlooked?</p> <p>There will be a ground swell of opposition to the Safari Park expansion, from the residents living in the town, unless the developers can be</p>	

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				persuaded to fund the much needed road improvements on the A456. An additional entrance road will not be sufficient to ensure the smooth flow of traffic through the area and more traffic lights at the Sutton Park Road junction could cause further delays. I hope that these concerns will not be ignored and a robust action plan will be implemented during the current planning period	
Historic England	LPRIO1088	Section 10	Comment	The route of the Stourport Relief Road and the access improvements to the motorway network would need to consider any impact upon the historic environment and Historic England would expect to be involved at an early stage and the need to protect and conserve the historic environment to be considered as a key objective	Comments are noted. Historic England will be a key stakeholder in future planning for infrastructure schemes.
Atkin G	LPRIO36	10.1	Comment	Public transport in District deteriorating; flat fares would improve the service. Loss of bus station great loss to people and town. Transport information needs to be available and accessible and public need to know where to access the transport.	Comments noted.
Option A - Sustainable Transport. Require new developments to demonstrate within a Transport Statement how they facilitate walking and cycling and the use of public transport.					
Churchill and Blakedown PC	LPRIO364	Option A	Support	Question 42 sustainable transport - Support Option A	Comments noted.
Fyshe F	LPRIO592	Option A	Support	Support for Option A	Support for Option A is noted.
Bewdley Civic Society	LPRIO1594	Option A	Support	Support Option A	Support for Option A noted.

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Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
Thomas G	LPRIO1533	Option A	Support	Option A preferable. The Council should identify sites within the confines of the existing towns for development rather than greenfield. This can easily be achieved by re-zoning primary retail areas and to construct apartment style living close to the centre and rail stations.	Preference for Option A noted.
Option B - Sustainable Transport. Require that new developments make available information on walking, cycling and public transport links to all new residents.					
Churchill and Blakedown PC	LPRIO365	Option B	Support	Support Option B	Comments noted.
Fyshe F	LPRIO593	Option B	Support	Support for Option B	Support for Option B is noted.
Bewdley Civic Society	LPRIO1595	Option B	Support	Support Option B	Support for Option B noted.
Shuttes J	LPRIO1175	Option B	Support	Option B should be the default position. This is particularly relevant as the frequency of some services means protracted travel times in comparison with personal transport.	Support for Option B is noted.
Option C - Sustainable Transport. Seek contributions to infrastructure to support sustainable transport choices through S106 agreements.					
Churchill and Blakedown PC	LPRIO366	Option C	Support	Support Option C	Comments noted.
British Horse Society	LPRIO503	Option C	Comment	Horse riding should be included in the provision of sustainable transport measures alongside walking and cycling. Section 106 funding should be considered for footpath upgrades and bridleway diversions	Comments are noted, although development viability issues often limit what can be achieved through S106. Horse riding tends to be viewed as recreational rather than a sustainable mode of transport.
Wolverley &	LPRIO1101	Option C	Comment	Support for Option C	Support for Option C is noted.

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Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
Cookley PC					
Staff & Worcs Canal Society	LPRIO1310	Option C	Support	Support for Option C.	Support for Option C is noted.
Fyshe F	LPRIO594	Option C	Support	Support for Option C	Support for Option C is noted.
Bewdley Civic Society	LPRIO1596	Option C	Support	Support Option C	Support for Option C noted.
Question 42. What are your views on the options set out for sustainable transport? Are there any other options that should also be considered?					
Mrs C Kimber	LPRIO3	Question 42	Comment	More safe cycling routes around Kidderminster especially to help school children get to school by bike on the east of the town.	Comments noted.
Atkin G	LPRIO37	Question 42	Comment	Option C best option.	Comments noted.
Huizer K	LPRIO71	Question 42	Comment	Option C Sustainable transport best option: Would benefit existing and new residents of developments. Section 106 money should be used to create better cycling routes. I believe people do not cycle as afraid of the traffic. Canal towpath is a good example of a car free route. Cycle paths could be developed that provide a dedicated space for cyclists or separate cars and cyclists like the one alongside Stourport Road into Kidderminster. This will encourage not just leisure cycling but also as a means of transport. All new roads should have a dedicated cycle lane.	Important points made which will be investigated.
Richards Mr H	LPRIO206	Question 42	Comment	All options A to C should be pursued. Option B is not potentially difficult to enforce – if a condition requiring a travel plan including such	This proposal can be discussed and investigated.

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				information is attached to the grant of planning permission. Developers have offered to provide bicycles on first occupation of new dwellings as an encouragement to cycling; there is no reason why this could not be required as part of local plan policy. Option C Wyre Forest District Council should implement CIL.	
Chaddesley Corbett PC	LPRIO231	Question 42	Comment	Option C Sustainable Transport, Offers the best chance of providing an integrated and joined-up solution, rather than relying on the fragmented actions of developers.	Comments noted.
Paris R	LPRIO438	Question 42	Comment	I believe the options are not mutually exclusive and a mixture would be possible and preferable. Positive response to all the options. Consider also bicycle hire	Comments are noted.
Persimmon Homes Limited	LPRIO848	Question 42	Comment	We consider that the production of travel plans is widely accepted by developers and provides an appropriate means of assessing the needs for individual developments. Transport packages and contributions will be developed on a site by site basis with mitigation measures designed in accordance with good practice and CIL regulations.	Comments are noted.
WFDC (Strategic Housing Team)	LPRIO717	Question 42	Comment	Genuinely safe and user-friendly sustainable transport infrastructure and facilities should be integrated as standard into all new development.	Comments are noted.
Bewdley Town Council	LPRIO913	Question 42	Comment	All three options can be achieved within the LDF. Developer contributions should be sought more robustly to ensure Bewdley benefits from more	Noted. However viability concerns can be an issue and limit what can be achieved through S106 contributions.

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				complex developments.	
Upper Arley PC	LPRIO1395	Question 42	Support	The Parish Council supports all three Options	Support for the options is noted.
Worcestershire Wildlife Trust	LPRIO940	Question 42	Comment	Support the intent of all three options and it seems that a blend of them would form the basis of helpful policy in this area.	Comments are noted.
The Canal and River Trust	LPRIO518	Question 42	Support	Support for all three options. The importance of the canal towpath as a sustainable transport route should be recognised. It may be necessary to secure S106 funding to allow improvements to help mitigate against the negative impacts of an increase in usage and make the towpath fit for purpose for both existing and new users	The comments with regard to canal towpaths are noted.
Telereal Trillium	LPRIO825	Question 42	Comment	The production of travel plans is widely accepted by developers and provides an appropriate means of assessing the needs for individual developments. Transport packages and contributions will be developed on a site by site basis with mitigation measures designed in accordance with good practice and CIL regulations.	Comments are noted.
Stanmore Properties Ltd	LPRIO1026	Question 42	Comment	Option A goes over and above national requirements. Options B and C are already in place. Option C contributions towards public transport, this could be considered along with Q43 about encouraging rail travel and the potential to enhance bus frequency and routing to Kidderminster.	The comments on the options are noted.
SWDP	LPRIO1071	Question 42	Comment	New growth will inevitably lead to more traffic and in some locations could compromise an air quality	Comments are noted and agreed.

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				management area. The emphasis should be on promoting allocations which score highly in terms of accessibility to local services by foot/cycle/public transport. Should be a generic policy setting out infrastructure requirements for new transport infrastructure necessary to make development acceptable in planning terms. Must be able to demonstrate schemes are necessary and deliverable within the plan period.	
Willsgrove Developments Ltd	LPRIO1220	Question 42	Comment	We consider that the production of travel plans is widely accepted by developers and provides an appropriate means of assessing the needs for individual developments. Transport packages and contributions will be developed on a site by site basis with mitigation measures designed in accordance with good practice and CIL regulations.	The comments relating to travel plans are noted.
CPRE	LPRIO1461	Question 42	Comment	Options A and C are to be encouraged. Mere information campaign a waste of time. Observed tokenism elsewhere, bus shelter where bus service too poor to merit it.	Encouragement for Options A and C noted.
Thomas G	LPRIO1534	10.8	Comment	Kidderminster station is the second busiest in the country, Birmingham stations are far busier.	Kidderminster station is the second busiest in the County.
Option A - Encouraging Rail Travel. Build at higher densities on sites within 15 minutes walk of Kidderminster Rail Station to concentrate more residents within easy access of the station.					
Churchill and Blakedown PC	LPRIO367	Option A	Support	Support Option A (question 43)	Comments noted.
Option B - Encouraging Rail Travel. Improve parking at Blakedown Rail Station to increase use of the station.					
Atkin G	LPRIO38	Option B	Support	Support Option B	Comments noted.

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Churchill and Blakedown PC	LPRIO368	Option B	Comment	Option B (question 43) Need to improve parking at Blakedown Railway station before any increase in rail travel. In favour of sustainable transport providing it does not impinge on residents, as stakeholders, who live close to the Station as their amenity is already being affected by current traffic/parking by commuters. Future policies should support travel to the nearest Station rather than creating a Parkway type Station. This requires WFDC to communicate better with service providers, eg Centro and buses and neighbouring authorities. WCC Highways should also be concerned by the increase in vehicle movements from Station Drive onto the A456. IS THIS OUR OPPORTUNITY TO CALL FOR PARKING MEASURES?	Agree that parking needs to be improved at Blakedown station for a greater number of people to commute.
Fyshe F	LPRIO595	Option B	Support	Support but not at the risk of creating a "Parkway" type facility. This could encourage increased car use to travel to Blakedown rather than Kidderminster or Hagley - existing road network/layout unsuitable for this	The comments relating to parkway facilities and the impact on Blakedown Station are noted.
Shuttes J	LPRIO1176	Option B	Support	Support for Option B	Support for Option B is noted.
Question 43. What are your views on the options set out for encouraging rail travel? Are there any other options that should also be considered?					
Mrs C Kimber	LPRIO4	Question 43	Comment	Install a free car park to Blakedown station to encourage commuters from the east of Kidderminster to use this station.	Would need to investigate ownership of land around the station, if in private ownership it is unlikely that free parking could be achieved.
Eriksson-Flegg	LPRIO141	Question 43	Comment	Option A ideal.	Comments noted.

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B				Development west of River Severn (questions 16 and 18). Option - Bewdley station commuter train (modern) morning and evening for commuters.	
Richards Mr H	LPRIO207	Question 43	Comment	The promotion of Blakedown would be very welcome and would reduce congestion at Kidderminster and encourage commuters to Birmingham to use rail.	Comments noted.
Paris R	LPRIO439	Question 43	Comment	I believe the options are not mutually exclusive and a mixture would be possible and preferable. Positive response to options A and B. Are there any opportunities for a town periphery new (Parkway) station near Kidderminster with large parking facilities?	The comments with regard to the Parkway Station are noted and have previously been discussed.
WFDC (Conservation)	LPRIO253	Question 43	Comment	Other options - <ul style="list-style-type: none"> liaise with Wychavon to improve parking provision at Hartlebury Station which with a vastly increased service now presents a more convenient rail head for Stourport-on-Severn and villages to the west of the River Severn. The amount of traffic within Bewdley is contributing to damage to the environment (in Welch Gate), to the road infrastructure and to the historic buildings in its centre. The character of the Bewdley Conservation Area is being adversely affected by the volume of traffic: noise, smell, pollution and physical damage to structures. 	Interesting solutions that we need to investigate further.

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				<ul style="list-style-type: none"> To reduce the amount of vehicular traffic between Bewdley and Kidderminster at morning and evening peaks a half-hourly service using a Parry People Mover to serve Bewdley and Kidderminster via the existing SVR infrastructure should be considered. This form of transport already exists between Stourbridge Junction and Stourbridge Town. With a journey time of 10 minutes, less than half that of an equivalent bus service, this would be a very attractive proposition for Birmingham and Worcester rail commuters, remove road traffic, reduce congestion in Bewdley and Kidderminster, relieve parking congestion at Kidderminster Station and be more environmentally friendly. In future this could serve the safari park too. 	
WFDC (Strategic Housing Team)	LPRIO718	Question 43	Comment	Improve station access/ facilities for walking, cycling, public transport as well as car parking.	Comments are noted.
West Midlands Safari Park	LPRIO1061	Question 43	Comment	There is a new train station being built at Kidderminster and it should be considered as the main tourism and transport hub for Wyre Forest, which should include better bus and taxi ranks.	Comment is noted. It is also hoped that further rail links will benefit from this across the District in the longer term.
Worcestershire Wildlife Trust	LPRIO942	Question 43	Comment	No comments but please see question 42	Noted.
Stanmore	LPRIO1027	Question 43	Comment	Frequency and routing of buses to Kidderminster	Comments are noted.

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Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
Properties Ltd				station needs consideration and contributions towards a structured project can be costed and implemented through CIL.	
Bewdley Civic Society	LPRIO1597	Question 43	Comment	Possibility of SVR for commuter transport connection to Kidderminster.	Comments regarding SVR commuter transport noted.
Thomas E	LPRIO994	Question 43	Comment	Is the ambition to be a commuter town to Birmingham? I believe Kidderminster should be more than that. The rail station is not big enough and would need to be developed. The car park is not big enough.	Comment is noted. No it is not the ambition to make Kidderminster a commuter town; however the rail station is extremely well used.
CPRE	LPRIO1462	Question 43	Comment	Agree that Kidderminster Station is second busiest in County. Option A and B viable. Option A - 10 minutes is more appropriate. Option B - merits of car park which would need to be free to compete with Stourbridge Junction, to enhance Blakedown Station likely to be related to extent people will commute to conurbation.	Comments regarding reduced walking time for Option A and free car for Option B are noted.
Thomas G	LPRIO1535	Question 43	Comment	Both options should be pursued. Car parking charges at Kidderminster station are a huge disincentive to commuters and there is not enough of it. This is another example that there is a ceiling on growth forecasts to which the towns' infrastructure can accommodate.	Comments noted that both Options should be pursued.
Richards Mr H	LPRIO1418	10.10	Comment	Redevelopment of Weavers Wharf has shifted town centre away from Worcester Street area and a masterplan should be drawn up for the area and CPO powers used if necessary.	Comments are noted. Work is underway to draw up a masterplan for this area. It is likely to suggest a residential led regeneration is most viable option.

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Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
Option A - Car Parking. Ensure that the town centres in particular have parking facilities of sufficient quality and quantity to ensure their vitality and viability without compromising the need to encourage people to use alternatives to the private car.					
Williams H	LPRIO160	Option A	Support	Support Option A	Comments noted.
Churchill and Blakedown PC	LPRIO369	Option A	Support	Support Option A (question 44) Should attract not discourage people to go into towns. Consider a free bus service from Kidderminster railway station to town centre so people could travel to Kidderminster by rail to shop.	Comments are noted.
Wolverley & Cookley PC	LPRIO1102	Option A	Comment	Preferred Option A - car parking	Support for Option A is noted.
Upper Arley PC	LPRIO1396	Option A	Support	Support for Option A. Should consider a free bus service from Kidderminster Railway Station to the town centre	Support for Option A.
Rushock PC	LPRIO936	Option A	Support	Support for Option A	Support for Option A is noted
Fyshe F	LPRIO596	Option A	Support	Support for Option A	Support for Option A is noted
Shuttes J	LPRIO1177	Option A	Support	Support for Option A	Support for Option A is noted
Option B - Car Parking. Plan to reduce car-parking within the town centre to force people to consider alternatives to the private car.					
Cotterill J	LPRIO277	Option B	Comment	This will only be obtainable if the bus system was reliable and more frequent.	Comment is noted
Staff & Worcs Canal Society	LPRIO1311	Option B	Support	Support for Option B.	Support for Option B is noted.
Fyshe F	LPRIO597	Option B	Object	Object to Option b	Objection to Option B is noted
Shuttes J	LPRIO1178	Option B	Object	Object to Option B. Stourport is dying and lack of parking and poor enforcement of rogue parking is	Objection to Option B is noted.

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				part of the cause. This together with the lack of toilet provision	
Question 44. What are your views on the options set out for car-parking? Are there any other options that should also be considered?					
Atkin G	LPRIO39	Question 44	Comment	Option B (reduce car parking) will not work, just more congested car parks. Increasing car parking charges puts people off visiting the town. Put back park and ride, clearly signposted.	Comments noted.
Huizer K	LPRIO72	Question 44	Comment	From the canal car parks in Kidderminster are too prominent in the town centre; this does not invite people to come into the town. Something should be done to either reduce the car parking spaces and promote other ways of accessing the town or introduce more greenery and have prominent walkways through them. Encourage users of the canal and towpath into town.	Comments noted.
Eriksson-Flegg B	LPRIO142	Question 44	Comment	Option A as reducing car parking would make people drive further.	Comments noted.
Chaddesley Corbett PC	LPRIO232	Question 44	Comment	Option A is essential to the vitality and viability of the District's retail centres. Paragraph 2.3 of the Issues and Option paper notes that "The District is largely rural...", and so for many residents, car travel is the only realistic option.	Comments noted.
Pearson I	LPRIO167	Question 44	Comment	Option A If car parking availability reduced it will kill town centre.	Comments noted.

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Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
Paris R	LPRIO440	Question 44	Comment	Positive response to Option A. the options are not mutually exclusive and a mixture would be possible and preferable	Comments are noted
Richards Mr H	LPRIO622	Question 44	Comment	Car parking is a difficult issue; reduction will simply cause people to shop elsewhere where parking is easier and would harm the vitality and viability of the town. I urge a pragmatic approach. Parking to serve the Weavers Wharf / Crossley Retail Park area needs revisiting. An option worth considering would be a new multi-storey car park in the area of the Matalan site.	Comments noted.
WFDC (Strategic Housing Team)	LPRIO719	Question 44	Comment	To facilitate car park reduction there needs to be good infrastructure in place to support the alternatives.	Comments are noted.
Bewdley Town Council	LPRIO914	Question 44	Comment	<i>Car parking should be retained in the town centre to ensure the town centre economy remains buoyant. Locations of alternative car parking to alleviate town centre congestion are favoured but still within easy walking distance of the centre. Multi use developments which include car parking should be encouraged in more complex developments near the town centre.</i>	Comments relating to car parking are noted.
West Midlands Safari Park	LPRIO1066	Question 44	Comment	WMSP consider that a Kidderminster ring road or relief road is essential for the long term development of the area as that, and other businesses are currently restricted in growth by the current infrastructure. The A456 through Kidderminster must be improved especially at the bottleneck at the main islands and the narrow section between the hospital and the roundabout. This should be made free of all car parking to	Noted. WMSP has a responsibility to promote sustainable travel to prevent congestion on the A456 in holidays and peak times.

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Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
				assist traffic flows.	
Richards Mr H	LPRIO1419	Question 44	Comment	Redevelopment of Weavers Wharf has shifted town centre away from Worcester Street area and a masterplan should be drawn up for the area and CPO powers used if necessary.	Comments are noted. Work is underway to draw up a masterplan for this area. It is likely to suggest a residential led regeneration is most viable option.
Worcestershire Wildlife Trust	LPRIO943	Question 44	Comment	No comments but please see question 42	Noted.
Staff & Worcs Canal Society	LPRIO1312	Question 44	Comment	The Society wishes to see canal side land developed as suitably planned public spaces providing opportunities for rest and recreation. It is totally against the provision of car parking lots adjacent to the canal.	Comments are noted.
Bewdley Civic Society	LPRIO1598	Question 44	Comment	Suggest School Park and Stride every weekend and/or out of term time.	Noted.
CPRE	LPRIO1463	Question 44	Comment	Shopping has changed over the years. People shop less frequently and in larger bulk so need to park. Option B likely to be counter productive; will not encourage use of public transport but will encourage shoppers to go to other shopping centres where they can park. To achieve anything else in a market town (including Kidderminster) would require draconian powers which are unlikely to be acceptable in a democracy.	Comments regarding Option B are noted.
Thomas G	LPRIO1536	Question 44	Comment	Town centre car parking spaces should be reduced to free up development land but made free for the initial 2hrs with a high charge thereafter (higher than equivalent average bus fares). This will encourage the use of public transport for those needing more time but	Comments regarding reduction in parking spaces and changes to charging are noted.

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				enhance viability of retail for 'click and collect' and other shorter duration shops.	
Vale Road Residents	LPRIO1616	Question 44	Object	Petition objecting to the redevelopment of Vale Road Car Park received.	Objection by petition to Vale Road Car Park proposed redevelopment noted.
Option A - Stourport Relief Road. Continue to safeguard the line of the Stourport Relief Road in its entirety.					
Rushock PC	LPRIO937	Option A	Support	Support for Option A. If the land is not safeguarded substantial improvements to traffic flow in Stourport will not be possible	Support for Option A is noted.
Schroders UK Property Fund	LPRIO763	Option A	Support	Support for Option A. The delivery of the Stourport Relief Road will also assist the Hartlebury Trading Estate by improving access to the estate from the west.	Support for Option A is noted.
Shuttes J	LPRIO1179	Option A	Support	Support for Option A. It will improve air quality, congestion for workers and tourists and permit pedestrianisation to be expanded making a better experience for shoppers and tourists.	Support for Option A is noted.
CPRE	LPRIO1464	Option A	Support	Aspiration of a new bridge over the River Severn and a relief road is important. The whole length of potential relief road should be protected even if a long term prospect. Option A should be the only one considered.	Support for Option A noted.
Option C - Stourport Relief Road. Do not continue to safeguard the line of the Stourport Relief Road.					
Cotterill J	LPRIO278	Option C	Support	Support Option C	Support for Option C noted

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Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
Question 45. What are your views on the options set out for the Stourport Relief Road? Are there any other options that should also be considered?					
Huizer K	LPRIO73	Question 45	Comment	Option B best option. More realistic to get road completed as optimises sections that are already completed.	Comments noted.
Eriksson-Flegg B	LPRIO143	Question 45	Comment	Option A – continue to safeguard.	Comments noted.
Hallam Land Management	LPRIO244	Question 45	Comment	Support Option A - route should be safeguarded until funding available. The relief road is essential to support the future growth of Stourport. It will reduce the number of cars passing through the town centre, reducing congestion and improving the quality of the environment for pedestrians.	Comments are noted.
Sheppard Councillor D	LPRIO258	Question 45	Comment	Option A - The route for the Stourport Relief Road should be preserved in full.	Comments noted.
Chaddesley Corbett PC	LPRIO233	Question 45	Comment	Support Option A; continue to safeguard the entire line of the relief road.	Comments noted.
Allen T	LPRIO263	Question 45	Comment	Option A is the only option that should be considered because this single project when it happens will have the most impact for business and communications on the whole of the Wyre Forest. At the moment, Stourport suffers from being a central hub for cross-County travel. Residents west of the Severn going east and to Birmingham use S-on-S as the crossing point (because Kidderminster is gridlocked). Residents on the west side of Kidderminster use S-on-S going	Comments are noted.

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				south because of similar problems accessing the A449. This will be better when the Stourport Road-Worcester Road link is complete. When there are any road incidents in S-on-S or on surrounding routes (A449, Bewdley by-pass) the impact is immediate. Any option other than A will not deliver the benefits necessary to sustain the required road infrastructure for the new riverside/basin developments in S-on S and the expansion at the Safari Park	
Paris R	LPRIO441	Question 45	Comment	Positive response to Option A	Support for Option A is noted.
Churchill and Blakedown PC	LPRIO370	Question 45	Comment	No comment	Noted.
WFDC (Strategic Housing Team)	LPRIO720	Question 45	Support	Support for Option A	Support for Option A is noted.
Staff & Worcs Canal Society	LPRIO1313	Question 45	Comment	Does not wish to take a position regarding the Stourport Relief Road	Noted.
Bewdley Civic Society	LPRIO1599	Question 45	Comment	Stourport only.	Do not understand response as the question related to safeguarding the line of the Stourport relief road and the response did not answer this question.
Topland Hotels (No. 14) Ltd	LPRIO1241	Question 45	Comment	Based on the evidence collated as part of the Plan process, and the viability of implementing the Relief Road, the Plan should identify either: a) the implementation of the majority of the Road by 2020 in tandem with the delivery of housing and employment on identified sites; or b) the deletion of the scheme in order that	The comments with regard to delivery of the Stourport Relief Road are noted and will be discussed with Worcestershire County Council as the Highway Authority.

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				certainly can be established for future development on or around the safeguarded route.	
CPRE	LPRIO1465	Question 45	Comment	East to West communications within the district are poor. Traffic inevitably focussed on river crossings at Bewdley and Stourport, which are major routes for holiday and commercial traffic to the central Marches and mid-Wales. The Bewdley Bypass has relieved traffic through that town but access to that route is either through the midst of Kidderminster or by the B-road through Wolverley and Franche. Access to roads beyond Stourport remains poor. At present it is necessary to use very congested roads through Kidderminster or an unsatisfactory route through Hartlebury, both leading into Stourport centre. The Hoobrook link road will in due course make access to Stourport Road easier. This is likely to increase the traffic entering Stourport from that direction.	Comments relating to road congestion and safeguarding the line of Stourport relief road are noted.
Symons P	LPRIO116	10.14	Comment	This year and especially in September traffic congestion in Kidderminster intolerable. Temporary traffic lights and road closures every where. Road network operating on a knife edge. Understand importance of work but seems to cause greater congestion. The roads and footpaths are shared by vehicles, pedestrians and utility companies but they were not designed to take heavy rail freight on 40 Tonne lorries. With major developments approved at the Safari park which is good for employment but brings a heavy burden on local residents due to further traffic chaos. During the very poor consultation process held at Spring Grove House, the planners	Most o the comments relate to Highways which is the jurisdiction of Worcestershire County Council but comments will be noted.

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				<p>stated that the increased numbers of visitors will travel to the venue from Birmingham via a rail link. I do not believe this will happen in the future. I have raised this with M.P and Leader of the Council but worried Kidderminster will be overlooked compared with other areas of the country.</p> <p>Bypass around not through Kidderminster is needed.</p> <p>The NRSW Act was implemented to minimise the effect of works on Traffic Sensitive Routes however common practice of automatic temporary unmanned traffic lights.</p> <p>I will be considering sending a copy of this letter to Worcestershire County Council and Mark Gamier.</p> <p>I hope that these concerns will not be ignored and a robust action plan will be implemented during the current planning period.</p>	
Cotterill J	LPRIO279	10.15	Support	Support for para 10.15	Support is noted
Option A - Improving Access to the Strategic Motorway Network. Work with Worcestershire County Council to return the A449 to a two lane dual carriageway between Kidderminster and Claines island.					
Cotterill J	LPRIO280	Option A	Support	Support for Option A	Support is noted
Persimmon Homes Limited	LPRIO849	Option A	Comment	We would support in principle the return of the A449 to a two-lane dual carriageway between Kidderminster and Claines Island	Support for dualling of the A449 is noted.
Churchill and Blakedown PC	LPRIO371	Option A	Support	Support Option A (question 46)	Comments noted.
Rushock PC	LPRIO938	Option A	Support	Support for Option A	Support for Option A is noted

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Fyshe F	LPRIO598	Option A	Support	Support for Option A	Support for Option A is noted
Schroders UK Property Fund	LPRIO750	Option A	Support	Support for Option A. Reinstating the road as a dual carriageway will assist in increasing capacity on the road, reducing journey times and improving access to businesses located in the district including those at the Hartlebury Trading Estate.	Support for Option A is noted.
Stanmore Properties Ltd	LPRIO1028	Option A	Object	Objection to Option A	Objection to Option A is noted.
Shuttes J	LPRIO1180	Option A	Support	Option A with a safety audit not unjustifiable constrictions. The new road from Kidderminster to the A449 will help but consideration needs to be given to the shortest route from Bewdley to Stourport and from Stourport to the A449.	Support for Option A is noted.
Thomas G	LPRIO1537	Option A	Support	Option A preferable. Obvious that reducing to single lane would be grossly detrimental to the viability of business and residents of the town reducing its economical attractiveness. The dualing should be reinstated with local improvement for side road access where there is a strong case or was a primary cause of safety for the original change.	Preference for Option A noted.
Option B - Improving Access to the Strategic Motorway Network. Consider the implementation of a Kidderminster Eastern Bypass					
Persimmon Homes Limited	LPRIO850	Option B Network	Support	Support, in principle, the implementation of a Kidderminster Eastern By-Pass which we consider would improve accessibility to the benefit of the local economy providing better connections between Kidderminster and Worcester and Kidderminster and the West Midlands conurbation. This is a particularly important	Support for the implementation of a Kidderminster Eastern By Pass is noted.

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				consideration given the potential implications of West Midlands housing overspill which will have to be accommodated in the shire areas near to the conurbation	
Churchill and Blakedown PC	LPRIO372	Option B	Comment	Option B (question 46) Encourage traffic from south to get off at junction 5 to bypass town centres. This would assist the development of existing commercial areas as previously identified and avoid existing residential areas/villages but needs cross boundary cooperation between Councils and other Agencies.	Comments noted.
Fyshe F	LPRIO599	Option B	Object	Object to Option B	Objection to Option B is noted.
Stanmore Properties Ltd	LPRIO1029	Option B	Comment	Provision of significant new road infrastructure is unlikely to be a sustainable solution. Money should be put into public transport improvements.	Comments are noted.
Thomas G	LPRIO1538	Option B	Comment	The Eastern bypass will do little to improve transport connections along the A456 to travel north on the M5 at Quinton. Most of the A456 is outside the boundary of Worcestershire and there is a missed opportunity to have worked closely with West Midlands neighbours to retain the transport links for Kidderminster along the whole corridor.	Comments noted.
Question 46. What are your views on the options set out for improving access to the strategic motorway network? Are there other options which should be considered through the Plan Review?					
Eriksson-Flegg B	LPRIO144	Question 46	Comment	Option B - consider implementation of a Kidderminster Eastern Bypass.	Comments noted.
Chaddesley Corbett PC	LPRIO234	Question 46	Comment	Support Option A - return A449 to a two lane dual carriageway, and suggest that consideration	Comments noted.

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				should also be given to links/access to the proposed Worcester Parkway rail station.	
Pearson I	LPRIO168	Question 46	Comment	<p>Improved access to the motorway network seems to focus on Junction 6 of the M5. It seems to ignore access to Junction 3 via the A456 which also serves the road route to Birmingham and the conurbation.</p> <p>A456 has similar issues to A449 with withdrawn sections of dual carriageway and is subject to bottlenecks. It is important that the Council works with adjacent Authorities to open up this route. However opening up routes to J3 or J6 of the M5 are not much help if the main problem is within Wyre Forest itself. There are significant bottlenecks before you leave Kidderminster – as well as more on the A456 outside the district. This will not help develop the district's future.</p> <p>Extra traffic from the safari park in particular means the A456 is like a car park until the other side of Hagley. This will surely get worse after the further development of the safari park and I personally doubt the investment will prove to be viable without further work on the main approach to the park, through to the east of Kidderminster and beyond to the motorway network.</p>	Comments are noted. Some of the comments relate to road networks outside Wyre Forest District which have an impact within the District. Worcestershire County Council have jurisdiction over Highways within Worcestershire.
Paris R	LPRIO442	Question 46	Comment	Positive response to options a and b. I believe the options are not mutually exclusive and a mixture would be possible and preferable.	Support for options a and b is noted.
WFDC (Strategic Housing Team)	LPRIO721	Question 46	Support	Support for Option A	Support for Option A is noted.

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Symons P	LPRIO671	Question 46	Comment	Suggest proposed link road to the Blackstone Island. This suggestion may not be in line with your current thinking but at least it's a start to review the future road network for Wyre Forest. Cannot understand why the proposed expansion at Spring Grove does not attract some investment from developers, the Minister may see things differently. Lord Adonis is going to head up a National Infrastructure Task Force and may be some funding will be available for this area of the West Midlands.	Comments noted; more funding for improved road network would be welcome.
British Horse Society	LPRIO504	Question 46	Object	Concerned about loss of safe crossing points for equestrians.	Objection is noted and comments agreed.
Fyshe F	LPRIO600	Question 46	Comment	Improving access to the south of the district by reinstating the A449 would enhance the existing services in this most sustainable area. Would encourage use of Junction 5 of M5 rather than J's 3 & 4 and reduce goods traffic from villages and Kidderminster ring road	Comments regarding strategic road access are noted.
Walters	LPRIO677	Question 46	Comment	I agree that the existing A449 Worcester Road should be improved into a dual carriageway again, which would provide a much better link onto the motorway network via the M5, without the necessary expense of building new links, which would harm the environment and gobble up yet more of the precious Green Belt land which surrounds our cities, towns and villages. This would also mean that rather than build a whole new Stourport Relief Road the existing road could largely be improved to meet the foreseeable	Comments are noted.

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				needs of the local area	
Telereal Trillium	LPRIO827	Question 46	Comment	Support in principle the return of the A449 to a two-lane dual carriageway between Kidderminster and Claines Island and we would also support, in principle, the implementation of a Kidderminster Eastern By-Pass which we consider would improve accessibility to the benefit of the local economy.	Support for transport infrastructure is noted.
CPRE	LPRIO1422	Question 46	Comment	Degradation of A449 and A456 has been a retrograde step. Some 50 mph limits are desirable because of the number of turnings including right turns. The Hartlebury bypass should be restored to 70mph at least southbound until just before Waresley turn where a 50 mph becomes appropriate. Some improvements would be desirable north of the dual carriageway. An eastern bypass will perhaps never happen, but there is at times severe congestion from the northern end of the present dual carriageway to the fork where the road to Hagley and Stourbridge goes off. However, this is a change not in the gift of WFDC.	Comments regarding proposals put forward for alterations to road network are noted
Willsgrove Developments Ltd	LPRIO1215	Question 46	Support	support in principle the return of the A449 to a two-lane dual carriageway between Kidderminster and Claines Island and we would also support, in principle, the implementation of a Kidderminster Eastern By-Pass which we consider would improve accessibility to the benefit of the local economy	Support for transport infrastructure is noted.

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Question 47. Is the current Lorry Route Network still the most appropriate network of roads for lorries to be directed towards? If not, where and how should it be amended?					
Eriksson-Flegg B	LPRIO145	Question 47	Comment	Alternative routes for lorry traffic that go past Kidderminster hospital must be found.	Comments noted.
Pearson I	LPRIO169	Question 47	Comment	Lorry Routes at Appendix B are not entirely clear but appear that they are restricted to the major routes. If so this is acceptable. However if it includes Sutton Park Road (which isn't clear on the resolution I can access) it is not acceptable. Assuming Sutton Park Road is not an acceptable lorry route the question which arises is how can the correct routes be enforced. At present there are a significant number of lorries using Sutton Park Road. Damage is caused to overhanging trees, and can result in broken branches on road and footpaths. Road surfaces damaged. Positioning of mini roundabout (Carter's Gardens/Hazelwood Close) causes extra noise of deceleration and braking then acceleration, others fail to acknowledge it. During the night there are few lorries. A no lorry rule needs to be enforced in Sutton Park Road either unsuitable for HGV or a weight limit of 7.5 tonnes subject to access of course. Connected with enforcement of the lorry routes is general access along Bewdley Hill from the ring road.	Comments noted, we will look at appendix B to see how clearly routes are shown.
Churchill and Blakedown PC	LPRIO373	Question 47	Comment	Remove A456 from list and divert lorries down A450. This will allow HGV's to reach the industrial areas south of Kidderminster without using the Ring Road, alleviating congestion at the known	Comments are noted.

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				pinch points	
Rushock PC	LPRIO939	Question 47	Comment	Current Lorry Route Network is the best that can be achieved at present as long as lorries keep to the designated route and unsuitable routes are also clearly signed. Promotion of lorry specific sat navs would also help towards this. As a parish we are concerned that vehicles accessing the new Energy from Waste facility at Hartlebury will use unsuitable lanes as short-cuts.	The concerns relating to the proliferation of lorries in the District's rural areas are noted.
Fyshe F	LPRIO602	Question 47	Comment	Remove A456 and increase usage of A450	Comments are noted.
Bewdley Civic Society	LPRIO1600	Question 47	Comment	Inappropriate for Bewdley to be included in National Lorry Network, restrictions should be applied as part of the Traffic Management Plan.	Concern regarding lorry network noted.
Shuttes J	LPRIO1181	Question 47	Comment	This needs to be reviewed once a solution to Q46 is resolved	Comment is noted.
Paris R	LPRIO1421	Question 47	Support	Support for the current Lorry Route Network.	Support is noted.
CPRE	LPRIO1466	Question 47	Comment	The lorry route is appropriate, but the Hoobrook Link Road should become a lorry route when completed, to relieve congestion on the northern part of Stourport Road.	Comments regarding lorry routes are noted.
Thomas G	LPRIO1539	Question 47	Support	I think this is fine as it is.	Noted.
Sheppard Councillor D	LPRIO260	10.19	Comment	Bus services should be improved in Stourport on the Lickhill/Mitton side of the Severn, when funds allow. Bus services need to be advertised!!	Bus services are provided by private bus companies, WFDC therefore cannot ensure that additional buses are provided.
Question 48. Is the current bus route network still reflective of strategic bus routes within the District. If not, how and where should it be amended?					
Atkin G	LPRIO40	Question 48	Comment	Bus network not what is required.	Comments noted.

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				Offer realistic bus routes, listen to local residents. Central bus station needed, currently buses departing from different locations so people do not know where to access buses.	
Paris R	LPRIO443	Question 48	Comment	I believe this should be subject to continuous review as a result of new developments	Comment is noted
Churchill and Blakedown PC	LPRIO374	Question 48	Comment	No, Parish Council feel that the current bus route network is not reflective of strategic bus routes. The issue needs looking at in more detail.	Comments are noted to review existing bus routes however buses are run by private companies who determine routes.
Bewdley Town Council	LPRIO916	Question 48	Comment	<i>Evening buses serving Bewdley should be considered reducing the need for private cars to access the vibrant night time economy.</i>	Noted and agreed
Wolverley & Cookley PC	LPRIO1103	Question 48	Comment	The current Cookley Bus Service does not call at Kidderminster Railway Station causing great inconvenience to Students and other commuters, bearing in mind the redevelopment of the Railway Station it should be part of a linked up strategy to promote its use.	Comments relating to the Cookley bus service are noted.
Upper Arley PC	LPRIO950	Question 48	Comment	The Parish Council feels they are well served and would wish to retain the services it has.	Comments are noted.
Fyshe F	LPRIO603	Question 48	Comment	Poor provision to villages encourages car use	Noted and agreed.
Bewdley Civic Society	LPRIO1601	Question 48	Comment	Enhanced bus service to encourage/increase use. Refer to Neighbourhood Plan.	The Neighbourhood Plan is in the very early stages, if it is progressed it will not be adopted for years so inappropriate to refer to a plan that has not even been written.
Shuttes J	LPRIO1182	Question 48	Comment	Reliable and regular bus services between major conurbations are very necessary. However, these need to be supported by joined up reliable local	Comments are noted.

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				services across the district.	
CPRE	LPRIO1467	Question 48	Comment	The bus route is appropriate	Comments regarding bus route are noted.
Thomas G	LPRIO1540	Question 48	Support	I think this is fine as it is.	Noted.
Option B - Horsefair AQMA. Seek to provide a second vehicular canal crossing linking Churchfields to Crossley Park (Lime Kiln Bridge) as part of the regeneration of Churchfields.					
The Canal and River Trust	LPRIO519	Option B	Comment	Early discussions should take place with the Canal & River Trust if an additional bridge is proposed.	Comment is noted and agreed.
Fyshe F	LPRIO601	Option B	Support	Support for Option B	Support for Option B is noted
Shuttes J	LPRIO1183	Option B	Support	Support for Option B	Support for Option B is noted.
Option C - Horsefair AQMA. Seek to provide an additional access to the ring road from Churchfields as part of the comprehensive redevelopment of the area. This could then lead to the implementation of a one-way system in the Horsefair.					
Thomas G	LPRIO1542	Option C	Object	Option C will cause problems on the Ring Road for vehicles negotiating the incline together with merging traffic that this option would bring.	Objection to Option C noted.
Question 49. What are your views on the options set out for the Horsefair AQMA? Are there any other options that should also be considered?					
Mrs C Kimber	LPRIO5	Question 49	Comment	Option B - proposed canal crossing would cause unacceptable congestion at Crossley Park. Option D - Demolish Horsefair and improve air quality, housing and traffic flow.	Comments noted.
Pearson I	LPRIO170	Question 49	Comment	Option C or D is suitable. The area appears very shabby and demolition would be beneficial. Amazed that AQMA is restricted to Horsefair within Kidderminster. Major issue is congestion in	Comments noted.

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				<p>Kidderminster.</p> <p>The key issue seems to be the congestion where Horsefair joins the ring road. The roundabout access is too narrow there. Exacerbated by traffic from the right failing to indicate correctly. However improving congestion issues through Horsefair would not solve the main issues; there are too many bottlenecks through Kidderminster. Unfortunately there is not enough room to make it move quickly causing congestion and air quality issues.</p> <p>A particular concern is Bewdley Hill and the area around the hospital. This area is far too narrow to accommodate lorries and buses in both directions while there is parking in the street. If there was not a bus stop layby there we would have gridlock. Withdrawing on street parking on the main road outside the hospital has to be a major priority. Next widening the road by reducing the width of the footpath. Hopefully this would allow traffic to move more often in both directions at the same time. However the roundabout with the Bridgnorth Road and the traffic lights would also need to be considered as it really is a major bottleneck in the area.</p>	
Paris R	LPRIO444	Question 49	Comment	Positive response to options a, b and c. I believe the options are not mutually exclusive and a mixture would be possible and preferable.	Support for options a, b and c is noted
WFDC (Conservation)	LPRIO254	Question 49	Comment	Strongly support Option C to create a more pedestrian friendly environment within The Horsefair and to encourage economic development within the small individual premises	Comments are noted.

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				lining Blackwell Street. <i>Strongly oppose Option D which will result in the loss of heritage assets and destroy the character of one of the remaining historic routes into the town.</i>	
Churchill and Blakedown PC	LPRIO375	Question 49	Comment	No comment.	Noted.
WFDC (Strategic Housing Team)	LPRIO722	Question 49	Comment	Maximise sustainable transport facilities as part of these options.	Comments noted.
Horsefair Traders Partnership	LPRIO833	Question 49	Comment	The HTP would therefore be broadly supportive of measures that would tackle poor air quality and traffic congestion in and around the Horsefair, although it is imperative that any such measures do not have an adverse impact on existing businesses within the area. It is important to ensure that this passing trade is not compromised by changes to the configuration of the local highway network designed to tackle air quality issues. The HTP are firmly in favour of Options A and B and are firmly of the believe that a combination of these options would deliver the most effective and comprehensive solution the local area. have concerns that the potential introduction of a one way system on Horsefair as part of any scheme would have an adverse impact on the ability of local businesses to attract passing trade due to a reduction in total volume of traffic through Horsefair following the implementation of a one-way system. In order to compensate for this, the HTP would request that	The comments are noted and will be referred on to Worcestershire County Council as the Highway Authority.

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				the provision of additional on street parking and associated public realm improvements are incorporated into any future scheme	
Upper Arley PC	LPRIO1398	Question 49	Comment	Knock down the Weavers Cottages and re-construct elsewhere, widen the road	Comment is noted. However Weavers Cottages are listed.
Worcestershire Wildlife Trust	LPRIO944	Question 49	Comment	The canal is a local Wildlife Site and consider that Option b) would therefore require particularly careful implementation so as not to cause undue harm.	Noted and agreed.
Thomas G	LPRIO1541	Question 49	Comment	Solution could lie with remodelling the signalled junction, stopping up Radford Avenue and having just three arms at the junction. This will reduce inter-green time of the signal cycle and increase efficiency of the junction. This idea would not cost much to implement and the benefits would far outweigh this	Comments noted.
Option A - Welch Gate, Bewdley AQMA. Work with Worcestershire County Council through the Local Transport Plan process to look at the road layout and amend it to alleviate the AQMA.					
Williams H	LPRIO161	Option A	Support	Support option A	Comments noted.
Bewdley Civic Society	LPRIO1603	Option A	Support	Support Option A	Support for Option A noted.
Option B - Welch Gate, Bewdley AQMA. Rely on the diversion of traffic onto the bypass to alleviate the AQMA issue.					
Bewdley Civic Society	LPRIO1604	Option B	Support	Support Option B	Support for Option B noted.
Shuttes J	LPRIO1184	Option B	Support	Option B should be tried as the most cost effective solution.	Support for Option B is noted

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Option C - Welch Gate, Bewdley AQMA. Provide parking on the Wribbenhall side of the river either as part of a park and ride or park and walk scheme to reduce the number of vehicles driving through WelchGate.					
Bewdley Civic Society	LPRIO1605	Option C	Support	Support Option C	Support for Option C noted.
Shuttes J	LPRIO1185	Option C	Comment	Option C would be the fall back and should include an improvement to the riverside walk in to the town as this is a shorter route to encourage walkers to use.	Comment is noted.
Question 50. What are your views on the options set out for the Welch Gate, Bewdley AQMA? Are there any other options that should also be considered?					
Eriksson-Flegg B	LPRIO146	Question 50	Comment	Option A should be pursued. Option B - better chance of success if link road constructed from end of bypass to Worcester Road.	Comments noted.
Paris R	LPRIO445	Question 50	Comment	Support for Options a and b. I believe the options are not mutually exclusive and a mixture would be possible and preferable.	Support for options a and b is noted
WFDC (Conservation)	LPRIO255	Question 50	Comment	Support Option C and encourage park and ride. Ideally Welch Gate would be access only during 8am to 7pm which would divert through traffic via the by-pass. This reduction in traffic will have benefits for the historic structures lining Welch Gate which at present get very dirty very quickly, and are often hit by vehicles as they attempt to pass on this bottleneck. Suggest that what is needed is a through town park and ride "hoppa bus", with one car park near	Very interesting innovative ideas which could have a huge impact on the air quality and traffic in Welch Gate.

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				<p>the A456 by Wharton Park Golf Club and another at Catchem's End. This will allow people to access the town from both directions, and will not put pressure on a single facility. A simple flat rate parking fee, of say £2 per vehicle would encourage take-up of a free bus service. Other park and ride schemes have failed because the buses run only to and from one car park. A service which links two car parks and stops in between will provide a very frequent convenient service for locals too, and this should ensure its viability.</p> <p>A low emissions bus would contribute to an improvement in air quality in Welch Gate, thus improving the Conservation Area.</p>	
Churchill and Blakedown PC	LPRIO376	Question 50	Comment	No comment.	Noted.
Bewdley Town Council	LPRIO918	Question 50	Comment	<i>All three options should be pursued and are now being considered by WCC as part of a multi-agency review of the AQMA for Bewdley.</i>	The comments relating to the Welch Gate AQMA are noted.
Upper Arley PC	LPRIO1399	Question 50	Comment	The road should be widened and priorities changed, traffic congestion is polluting the air quality	Comments are noted.
Bewdley Civic Society	LPRIO1602	Question 50	Comment	Agree with Bromyard Town Council suggest Park and Stride at weekends and/or out of term time.	Suggestion noted.
CPRE	LPRIO1468	Question 50	Comment	Do not see how any changes can usefully be made to improve things. Few people will chose to go through the congested centre of Bewdley, when the bypass is available. I would question whether this needs to be dealt with in a Planning	Comments are noted.

**LOCAL PLAN REVIEW ISSUES & OPTIONS CONSULTATION (SEPTEMBER 2015)
A WELL SERVED DISTRICT (SECTION 10) RESPONSES**

Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
				document.	
Cotterill J	LPRIO281	10.25	Support	10.25 Support	Noted
Paris R	LPRIO446	10.25	Comment	there should be more specific discussion and recommendation of the future health care provision for the district	Noted. However this would be down to the Strategic Health Authority who are a key stakeholder in the process.
Fyshe F	LPRIO604	10.25	Support	Support for paragraph 10.25	Support is noted.
Question 51. How can the Local Pan Review ensure that adequate education infrastructure is provided to meet the needs of the District's population?					
Richards Mr H	LPRIO208	Question 51	Comment	The amount of land needed should be explored with WCC and providers under the Duty to Cooperate. Developer contributions should be obtained through CIL where not provided as part of a development proposal	At present Wyre Forest District does not have an implemented CIL policy.
Paris R	LPRIO447	Question 51	Comment	The plan should insist on developments to include improvements whenever possible through the use of S106 agreements and funding from local levies.	Noted. This is already the case through the planning system of S106 agreements.
Miller Homes	LPRIO864	Question 51	Comment	The Local Plan should approach the need for providing education facilities on a strategic basis, assessing through the evidence base. Whilst larger development sites may be shown to be the most appropriate location for new education facilities, they should not be required to contribute more than is required to meet the needs of the needs of the development in terms of financial contributions and / or land.	Comments are noted with regard to education provision.
Churchill and Blakedown PC	LPRIO377	Question 51	Comment	This is a matter for WCC as the Education Authority. Any development should provide for an appropriate education provision. Continued	Comments noted

**LOCAL PLAN REVIEW ISSUES & OPTIONS CONSULTATION (SEPTEMBER 2015)
A WELL SERVED DISTRICT (SECTION 10) RESPONSES**

Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
				expansion of services simply to accommodate new development should not be presumed to be acceptable	
WFDC (Strategic Housing Team)	LPRIO723	Question 51	Comment	This needs to be done in conjunction with County Council.	Comments are noted.
WCC, Planning Economy & Performance	LPRIO1391	Question 51	Comment	the authority retains the responsibility for ensuring sufficiency of places and works in partnership with all schools to meet this duty. Section 106 funding currently forms an important part of the capital funds available to the Education Authority to invest in ensuring that there are sufficient school places available. Average yield in Wyre Forest district as calculated from the 2011 census is 2.4 children per year group for every 100 households. This is lower than the average across Worcestershire as a whole and reflects the older population profile. Urban extensions in areas where there is little existing infrastructure will need to have good viability to support the contributions required to deliver new infrastructure.	These comments in relation to education provision are noted. The District Council will work closely with WCC in developing the options for future development.
Stanmore Properties Ltd	LPRIO1030	Question 51	Comment	Funding by CIL should ensure adequate provision is made for new infrastructure to offset new development.	Comments are noted.
CPRE	LPRIO1469	Question 51	Comment	The existing arrangements whereby developers are required to make contributions under s.106 seem to work adequately. If very large development proposed, likely to generate an appropriate number of pupils, or if education planning showed a deficit in a particular area, it	Comments are noted.

**LOCAL PLAN REVIEW ISSUES & OPTIONS CONSULTATION (SEPTEMBER 2015)
A WELL SERVED DISTRICT (SECTION 10) RESPONSES**

Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
				might be appropriate to allocate part of a housing site for a primary school, rather than housing.	
Thomas G	LPRIO1543	Question 51	Comment	There is a parallel to question 43 and others that infrastructure cannot support the growth forecasts assumed in this report. This is another example that there is a ceiling on growth forecasts to which the towns' infrastructure can accommodate and the town should not seek to become larger than its identity naturally allows given its location.	Comments noted.
Question 52. Should larger developments be required to provide new educational facilities?					
Paris R	LPRIO448	Question 52	Support	Support for Question 52	Support is noted.
Miller Homes	LPRIO865	Question 52	Comment	The Local Plan should approach the need for providing education facilities on a strategic basis, assessing through the evidence base. Whilst larger development sites may be shown to be the most appropriate location for new education facilities, they should not be required to contribute more than is required to meet the needs of the needs of the development in terms of financial contributions and / or land.	Comments are noted.
Persimmon Homes Limited	LPRIO851	Question 52	Comment	We suggest that further work needs to be undertaken in respect of this matter and to determine whether or not an expansion of existing school sites, which would be a more cost effective sustainable solution should be considered first with financial contributions being sought from individual developments.	Comments with regard to education provision are noted. Worcestershire County Council is a statutory consultee in the Local Plan Review process.
Churchill and Blakedown PC	LPRIO378	Question 52	Comment	No comment	Noted

**LOCAL PLAN REVIEW ISSUES & OPTIONS CONSULTATION (SEPTEMBER 2015)
A WELL SERVED DISTRICT (SECTION 10) RESPONSES**

Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
WFDC (Strategic Housing Team)	LPRIO724	Question 52	Support	Support for Q.52	Support is noted.
Richards Mr H	LPRIO1420	Question 52	Comment	The amount of land needed should be explored with WCC and providers under the Duty to Cooperate. Developer contributions should be obtained through CIL where not provided as part of a development proposal	At present Wyre Forest District does not have an implemented CIL policy.
Fyshe F	LPRIO605	Question 52	Comment	Yes	Comment noted
Shuttes J	LPRIO1186	Question 52	Comment	Whether a large enough development is possible in the District to justify this will require investigation based on increased need. Healthcare provision needs to be part of the local services provision to reduce load on the already busy surgeries. Pressure by WFDC to reintroduce services in to Kidderminster Hospital should also be applied when considered against the dire press Worcester Hospital has had recently due to staffing and lack of space.	The comments relating to Healthcare provision are noted.
J & H Evans	LPRIO961	Question 52	Comment	Local Plan should approach the need for providing education facilities on a strategic basis, assessing through the evidence base: the need for such facilities; the capacity of existing facilities; the ability of existing facilities to expand; the amount of new facilities required; the potential location of new facilities; and the cost of new facilities. our clients are willing to provide land to serve this purpose as set out above in order to create a sustainable community that could be self sufficient.	Noted. However, it is questionable whether such a rural settlement as Rock is a sustainable location for a significant amount of development.

**LOCAL PLAN REVIEW ISSUES & OPTIONS CONSULTATION (SEPTEMBER 2015)
A WELL SERVED DISTRICT (SECTION 10) RESPONSES**

Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
Willsgrove Developments Ltd	LPRIO1213	Question 52	Comment	Suggest that further work needs to be undertaken in respect of this matter and to determine whether or not an expansion of existing school sites, which would be a more cost effective sustainable solution should be considered first with financial contributions being sought from individual developments. Sustainable urban extensions may be able to accommodate some education facilities as part of a local centre	Comments with regard to education provision are noted.
CPRE	LPRIO1470	Question 52	Comment	The existing arrangements whereby developers are required to make contributions under s.106 seem to work adequately. If very large development proposed, likely to generate an appropriate number of pupils, or if education planning showed a deficit in a particular area, it might be appropriate to allocate part of a housing site for a primary school, rather than housing.	Comments are noted.
Thomas G	LPRIO1544	Question 52	Comment	This in theory is never ending and is completely unrealistic to develop to infinitum and install infrastructure to match. There is a natural ceiling for the size and location of the town. Where is the limit for the town – grow to the size of Birmingham for example? There has to be an eventual limit and its identity, purpose and location dictates this.	Comments noted.
Option A - Open Space, Sport and Recreation. Continue to safeguard all designated areas of open space.					
Cotterill J	LPRIO282	Option A	Support	Support for Option A	Support is noted.
Churchill and Blakedown PC	LPRIO379	Option A	Support	Support for Option A	Support for Option A

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A WELL SERVED DISTRICT (SECTION 10) RESPONSES**

Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
Fyshe F	LPRIO606	Option A	Support	Support for Option A	Support for Option A is noted
Bewdley Civic Society	LPRIO1606	Option A	Support	Support Option A	Support for Option A noted.
Shuttes J	LPRIO1187	Option A	Support	Support for Option A. safeguarding is essential	Support for Option A is noted
Thomas G	LPRIO1545	Option A	Support	Option A is the only sustainable option	Support for Option A noted.
Option B - Open Space, Sport and Recreation. Promote some areas as development sites.					
Persimmon Homes Limited	LPRIO852	Option B	Object	We do not consider that existing open space, sport and recreation facilities should be allocated for development unless it can be clearly demonstrated that the facilities no longer fulfil a need.	Noted. All recreational space will be subject to a PPG17 Audit review.
Churchill and Blakedown PC	LPRIO380	Option B	Support	Support for Option B	Support for Option B is noted
Upper Arley PC	LPRIO1400	Option B	Object	Object to Option B	Objection to Option B is noted.
Fyshe F	LPRIO607	Option B	Object	Object to Option B	Objection to Option B is noted
Victoria Carpets	LPRIO1108	Option B	Support	Recognise that there is an opportunity to use some areas of open space to meet the need for new development, rather than safeguarding all open space, particularly where it may be of poor quality. Fully supports 'Option B' which would allow for some areas of open space, sport and recreation to be promoted for allocation for development. Refers to the Victoria Sports	Support for Option B is noted.

**LOCAL PLAN REVIEW ISSUES & OPTIONS CONSULTATION (SEPTEMBER 2015)
A WELL SERVED DISTRICT (SECTION 10) RESPONSES**

Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
				Ground at Spennells Valley Road.	
Option C - Open Space, Sport and Recreation. Require all apartment schemes to provide communal garden space for food production.					
Cotterill J	LPRIO283	Option C	Object	Object to Option C	Objection to Option C is noted.
Churchill and Blakedown PC	LPRIO381	Option C	Support	Support for Option C	Support for Option C is noted.
Worcestershire Wildlife Trust	LPRIO946	Option C	Support	Support for Option 3	Support for Option 3 is noted.
Fyshe F	LPRIO608	Option C	Support	Support for Option C	Support for Option C is noted.
Bewdley Civic Society	LPRIO1607	Option C	Comment	Option C needs clarification	Note comments regarding clarification of Option C.
Question 53. What are your views on the options set out for the provision of open space, sport and recreation? Are there any other options that should also be considered?					
Richards Mr H	LPRIO209	Question 53	Comment	The Council should be clear what is needed and how it can be delivered. Option B should be explored particularly in respect of Kidderminster golf course as a potential site for an 'SUE' which might well be within a reasonable walking / cycling distance of the railway station. Land for a replacement golf course could be allocated on the edge of the town.	Comments noted.
Allen T	LPRIO264	Question 53	Comment	My preferred option is A but the poorer quality sites offered to the community or parish/town councils to bring into a better condition. No designated open space should be offered for development. Residential development must be considered on all brown field sites first.	Current policy is for residential development to be considered on brownfield sites first.
Eriksson-Flegg	LPRIO147	Question 53	Comment	Option A - mentioned "regardless of quality" these	Comments noted.

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A WELL SERVED DISTRICT (SECTION 10) RESPONSES**

Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
B				can be safeguarded and improved.	
Paris R	LPRIO449	Question 53	Comment	Support for Options A and C. I believe the options are not mutually exclusive and a mixture would be possible and preferable.	Support for Options A and C is noted.
WFDC (Strategic Housing Team)	LPRIO725	Question 53	Comment	Access to green/ open space is linked to life expectancy, physical activity/obesity levels. Reducing health inequalities is vital for the economy (consider productivity loss, treatment costs etc) as well as wellbeing.	Comments are noted and agreed.
Bewdley Town Council	LPRIO919	Question 53	Comment	<i>Option B favoured in that underused or unsafe play or recreational areas should be looked at for redevelopment which should include an enhanced facility or alternative location.</i>	Comments are noted.
Sport England	LPRIO664	Question 53	Comment	Updated Open Space, Sport and Recreation Assessment (once completed) and the Playing Pitch Strategy 2012 should help to inform which sporting facilities should be protected, what new facilities are required to meet demand from the population growth and which facilities should be replaced or are no longer required.	Noted. This will be undertaken as part of the evidence base to inform the preferred options.
Worcestershire Wildlife Trust	LPRIO945	Question 53	Comment	A blend of the three options seems sensible to us. We are particularly keen to support option 3, which we feel has significant potential to deliver benefits for local communities.	Support for a blend of the options is noted.
Thomas E	LPRIO995	Question 53	Comment	Open space must be preserved and increased.	Comment is noted
Willsgrove Developments Ltd	LPRIO1221	Question 53	Comment	We do not consider that existing open space, sport and recreation facilities should be allocated for development unless it can be clearly demonstrated that the facilities no longer fulfil a	Comments are noted

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A WELL SERVED DISTRICT (SECTION 10) RESPONSES**

Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
				need.	
CPRE	LPRIO1471	Question 53	Comment	<p>Open Space is important. Very small parcels of it are liable only to serve a cosmetic purpose or constitute tokenism. Aim should be to provide space on a scale and of a kind that people can make some practical use of, for example for sport or as a linear space where they can walk. The provision of a park bench on a well-walked street may be useful; something taking very little space indeed.</p> <p>If an area of open space is of little value, it may be appropriate to allow its development by being replaced by something better (though probably not smaller). Indoor sports facilities are not an adequate replacement. The objective should always be to provide more and better open space. Lack of allotments is worrying. The provision of allotments with flats is an interesting idea, but not sure if it would work, providing some allotment space with flats is certainly worth pursuing. Residents of the flats should certainly be given a preference but if residents did not want all the plots made available, they should fall into the general pool of allotment land, available to all local applicants.</p>	Interesting ideas which are noted.
Thomas G	LPRIO1546	Question 53	Comment	<p>It is completely unrealistic to develop to infinitum and install infrastructure to match. There is a natural ceiling for the size of town. Where is the limit for the town – grow to the size of Birmingham for example? There has to be an eventual limit and its identity, purpose and location dictates this. Open space is always of value including</p>	Comments noted.

**LOCAL PLAN REVIEW ISSUES & OPTIONS CONSULTATION (SEPTEMBER 2015)
A WELL SERVED DISTRICT (SECTION 10) RESPONSES**

Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
				biodiversity, health and fitness etc, etc ...the list is endless.	
Option A - Funding Infrastructure. Continue to use Section 106 agreements to fund all of the types of infrastructure it currently funds.					
Churchill and Blakedown PC	LPRIO462	Option A	Support	Question 54 funding infrastructure Option A support Options A and C would work.	Comments noted.
Upper Arley PC	LPRIO1401	Option A	Support	Support for Option A	Support for Option A is noted
Worcestershire Wildlife Trust	LPRIO947	Option A	Support	Strongly endorse option A until such time as CIL is implemented. Accordingly we would not support reductions in S106 unless CIL is available and being implemented to replace any shortfalls.	Comments are noted.
Staff & Worcs Canal Society	LPRIO1314	Option A	Support	Support for Option A	Support for Option A is noted.
Fyshe F	LPRIO610	Option A	Support	Support for Option A	Support for Option A is noted
Option B - Funding Infrastructure. Reduce the use of Section 106 agreements.					
Cotterill J	LPRIO284	Option B	Support	Support for Option B.	Support for Option B is noted.
Persimmon Homes Limited	LPRIO854	Option B	Comment	Clear that CIL payments and Section 106 agreements should only be required to deliver infrastructure required to make development acceptable in planning terms, to do otherwise would be unlawful.	Noted and agreed.
Churchill and Blakedown PC	LPRIO464	Option B	Object	Object to Option B funding infrastructure (question 54)	Comments noted.

**LOCAL PLAN REVIEW ISSUES & OPTIONS CONSULTATION (SEPTEMBER 2015)
A WELL SERVED DISTRICT (SECTION 10) RESPONSES**

Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
Upper Arley PC	LPRIO1403	Option B	Object	Object Option B	Objection to Option B noted.
British Horse Society	LPRIO506	Option B	Object	Object to Option B	Objection to Option B is noted.
Fyshe F	LPRIO611	Option B	Object	Object to Option B	Objection to Option B is noted
Option C - Funding Infrastructure. Implement the Community Infrastructure Levy alongside the Local Plan Review.					
Persimmon Homes Limited	LPRIO855	Option C	Comment	Difficult to use CIL payments to justify the provision of all types of highway infrastructure since it will not be possible to ensure that CIL payments will be used to fund improvements which are directly related to individual developments and, therefore, the use of Section 106 agreements may be more appropriate in this regard.	Comments regarding CIL are noted.
Churchill and Blakedown PC	LPRIO463	Option C	Support	Support Option C (question 54 funding infrastructure) Option A or C would work.	Comments noted.
Upper Arley PC	LPRIO1402	Option C	Support	Support for Option C	Support for Option C is noted.
Fyshe F	LPRIO612	Option C	Support	Support for Option C	Support for Option C is noted.
Stanmore Properties Ltd	LPRIO1032	Option C	Support	Support for Option C	Support for Option C is noted.
Question 54. What are your views on the options set out for funding infrastructure? Are there any other options that should also be considered?					
Chaddesley Corbett PC	LPRIO235	Question 54	Comment	Funding Infrastructure .The Parish Council would welcome the potential receipts from a Community Infrastructure Levy (CIL), but we are unsure whether the apparent complexity of implementing	Comments noted.

**LOCAL PLAN REVIEW ISSUES & OPTIONS CONSULTATION (SEPTEMBER 2015)
A WELL SERVED DISTRICT (SECTION 10) RESPONSES**

Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
				such a scheme would outweigh the potential benefits.	
Paris R	LPRIO450	Question 54	Comment	Support for Options A and C. I believe the options are not mutually exclusive and a mixture would be possible and preferable.	Support for Options A and C is noted.
Miller Homes	LPRIO866	Question 54	Comment	WFDC should be focussing on the requirements of the CIL Regulations instead of seeking to differentiate between using S106 agreements to fund all the types of infrastructure it currently funds. At the point the viability of a particular development is reviewed, the WFDC can prioritise the apportionment of the available S106 funds to the infrastructure identified as being necessary for the development.	Comments relating to CIL and a S106 are noted.
Persimmon Homes Limited	LPRIO853	Question 54	Comment	Proper consideration be given to the funding mechanisms required to deliver necessary infrastructure	Noted and agreed. This will be undertaken as part of the Infrastructure Delivery Planning process.
WFDC (Strategic Housing Team)	LPRIO726	Question 54	Support	Support for Option A	Support for Option A is noted.
Bewdley Town Council	LPRIO921	Question 54	Comment	<i>CIL will manage the expectations of both developer and WFDC and will require less negotiation which can be costly in time and resources. CIL will potentially benefit town/parish councils in the future. It is noted that S106 will still be used for housing developments</i>	The favourable comments with regard to CIL are noted.
Sport England	LPRIO665	Question 54	Comment	It is likely that a combination of CIL and Section 106 contributions will be the most effective	Comments are noted.
Richards Mr H	LPRIO1410	Question 54	Comment	It is absolutely vital that WFDC adopts a charging	Noted. However, given resourcing issues

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A WELL SERVED DISTRICT (SECTION 10) RESPONSES**

Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
				schedule given the end of the interim arrangements in April 2015 and the effects of reg 122 and 123. Without a CIL schedule developer contributions to infrastructure will reduce over time as the '5 pooled contributions limit' kicks in.	the Council is unable to bring forward CIL ahead of the Local Plan Review. This would also not allow us to take into account the potential higher viability ratios on any greenfield sites that could come forward through the Plan Review as it would need to be based on our current site allocations which are all brownfield land. Therefore CIL contributions would be lower.
British Horse Society	LPRIO505	Question 54	Comment	Broad support for Options A and C. Clarity about how S106 agreements would co-exist with CIL. Strong Objection to Option B.	The comments with regard to the options are noted.
Warwickshire & West Mercia Police and H&W Fire and Rescue Service	LPRIO645	Question 54	Comment	As developments come forward, the police and fire services will seek contributions from developers towards extending police infrastructure in those areas. The most appropriate mechanism for providing such contributions is Section 106. We would favour Option A.	Support for Option A is noted.
Telereal Trillium	LPRIO828	Question 54	Comment	Proper consideration be given to the funding mechanisms required to deliver necessary infrastructure. Clear that CIL payments and Section 106 agreements should only be required to deliver infrastructure required to make development acceptable in planning terms.	Comments are noted.
Stanmore Properties Ltd	LPRIO1031	Question 54	Comment	Contributions through Options A and B still need to be CIL compliant and can only be sought where they pass the three statutory tests of section 122 of CIL Regulations	Comments are noted.

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A WELL SERVED DISTRICT (SECTION 10) RESPONSES**

Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
Bewdley Civic Society	LPRIO1608	Question 54	Comment	Agree with Bewdley Town Council CIL should be adopted.	Support for adoption of CIL noted.
Shuttes J	LPRIO1188	Question 54	Comment	However, the adoption of CIL will need some method of review to keep costs appropriate and encompassing all requirements. How this would be achieved is not stated. It therefore seems to be a major task to create something that doesn't lack flexibility.	The comments relating to CIL monitoring are noted.
Willsgrove Developments Ltd	LPRIO1212	Question 54	Comment	Proper consideration be given to the funding mechanisms required to deliver necessary infrastructure.	Comments are noted.
CPRE	LPRIO1472	Question 54	Comment	CIL is a district-wide levy and may be useful for funding larger projects. Priority ought to be on making good infrastructure deficits where they arise. These may be facilities specifically necessary because of a development, but they may consist of improving existing facilities that would be stretched beyond their limit. This kind of provision ought to be identified through local surveys in individual settlements, whether through a Neighbourhood Plan or an Area Action Plan. Because it involves a district-wide plan and a long bureaucratic procedure to adopt (or vary) CIL, this is likely to prove a blunt instrument for meeting specific needs as they arise. S.106 funding is far more capable of being focused on the particular stresses that arise in a settlement where major developments are planned. For example, in Hagley, the addition of some hundreds of new dwellings was going to over-stretch the local GPs practice, an issue of which	Comments noted.

**LOCAL PLAN REVIEW ISSUES & OPTIONS CONSULTATION (SEPTEMBER 2015)
A WELL SERVED DISTRICT (SECTION 10) RESPONSES**

Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
				<p>the LPA was wholly unaware. The solution was for S.106 funding to be provided to NHS England for them to fund an extension. If the only mechanism available was a predetermined list of CIL projects that did not include the surgery extension, there would be no mechanism for funding it. In consequence, the medical practice would have become grossly overburdened.</p>	

**LOCAL PLAN REVIEW ISSUES & OPTIONS CONSULTATION (SEPTEMBER 2015)
TACKLING CLIMATE CHANGE AND ITS IMPACTS (SECTION 11) RESPONSES**

Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
Simmonds R W	LPRIO122	Section 11	Comment	River Severn flows through district - is it not possible to introduce water turbines to produce electricity? This would require a dam to be built - will also cater for water needs.	Comments re using river to generate electricity are noted.
Historic England	LPRIO1089	Section 11	Comment	Request that the Council consider how this objective could have an impact upon the historic environment. The erection of renewable energy measures such as solar panels may not be appropriate on listed buildings or within conservation areas etc.	Comments are noted and agreed
Environment Agency	LPRIO988	11.6	Comment	Local Plans should be prepared in accordance with the flood risk policy set out in the NPPF and NPPG. In particular, paragraphs 17,94,99-104 of the NPPF and the Flood Risk and Coastal Change section of the NPPG. Would expect Local Plan policies to ensure no inappropriate development in areas of high flood risk and that development in areas of flood risk do not increase flood risk elsewhere. SFRA should identify all flood risk and under Duty to Cooperate manage and resolve any cross-boundary risks. Local Plans should use opportunities from new development to reduce causes and impacts of flooding (NPPF para.100). Where climate change is expected to increase flood risk so that some existing development may not be sustainable, then opportunities should be taken to relocate development as suggested by option C. The EA would welcome discussion on local flood risk policy and whether a guidance document will be produced.	Comments are noted. Meeting will be arranged jointly with NWWM and EA.
Option A - Flood Risk. Continue to permit the redevelopment of available sites within the floodplain.					
Cotterill J	LPRIO285	Option A	Object	Object to Option A	Objection is noted
Churchill and	LPRIO465	Option A	Support	Support for option A	Support is noted

**LOCAL PLAN REVIEW ISSUES & OPTIONS CONSULTATION (SEPTEMBER 2015)
TACKLING CLIMATE CHANGE AND ITS IMPACTS (SECTION 11) RESPONSES**

Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
Blakedown PC					
Upper Arley PC	LPRIO1404	Option A	Support	The Parish Council approves of Option A.	Support for option is noted
Staff & Worcs Canal Society	LPRIO1315	Option A	Support	Canal is in danger of being compromised by river flooding at some places. Support option A as provides more opportunities for prevention and control. LPA should consult with Canal and River Trust.	Concerns are noted. Canal and River Trust have been consulted on the Local Plan.
Thomas G	LPRIO1547	Option A	Support	Support for Option A.	Support is noted.
Option B – Flood Risk. Prevent the redevelopment of sites within the floodplain and use land instead for flood prevention or other non built land uses.					
Cotterill J	LPRIO286	Option B	Support	Support option B	Support is noted
Wolverley & Cookley PC	LPRIO1104	Option B	Support	Preference for Option B	Preference is noted
Worcestershire Wildlife Trust	LPRIO948	Option B	Support	Support this option. Taking opportunities to use the floodplain for wetland creation that helps to reduce flooding elsewhere would be a positive option. However we note that where development can demonstrate enhancement to floodplain function it may be realistic to allow it	Support and comments are noted.
Option C – Flood Risk. Relocate vulnerable uses in areas outside of the floodplain.					
Cotterill J	LPRIO287	Option C	Support	Support option C	Support is noted
Worcestershire Wildlife Trust	LPRIO949	Option C	Support	Support this option. Taking opportunities to use the floodplain for wetland creation that helps to reduce flooding elsewhere would be a positive option. However we note that where development can demonstrate enhancement to floodplain function it may be realistic to allow it	Support and comments are noted

**LOCAL PLAN REVIEW ISSUES & OPTIONS CONSULTATION (SEPTEMBER 2015)
TACKLING CLIMATE CHANGE AND ITS IMPACTS (SECTION 11) RESPONSES**

Reporting Name	ID	Para / Question	Type of Response	Summary	Officer Response
Question 55. What are your views on the options set out for managing flood risk? Are there any other options that should also be considered?					
Huizer K	LPRIO74	Question 55	Comment	Option A - only allow where uses are water compatible (ok if flood) or where risk can be mitigated completely. Important that flood risk elsewhere is not made worse. Development may lead to change in flood flows or storage. Refer to NPPF and accompanying technical guidance document.	Comments are noted. We will work closely with NWWM when considering potential allocations.
Eriksson-Flegg B	LPRIO148	Question 55	Comment	Support options B & C as building on floodplains may affect other areas not previously at risk of flooding.	Comments are noted.
Cotterill J	LPRIO288	Question 55	Comment	Build up river banks to minimise flooding	Comments are noted.
Paris R	LPRIO451	Question 55	Comment	Options not mutually exclusive A++ B- C+	Comments are noted
WFDC (Conservation)	LPRIO256	Question 55	Comment	In order to protect historic buildings in Wribbenhall from flood damage, the only effective method is a barrier as used on other side of River Severn. PLP is only effective at flood depths up to 1 metre.	Comments are noted.
Persimmon Homes Limited	LPRIO877	Question 55	Comment	Stanklyn Lane Wherever possible, new development should not be on floodplains. Whilst some redevelopment within floodplains may be necessary to encourage regeneration, existing floodplains should be kept free of development.	Comments are noted
WFDC (Strategic Housing Team)	LPRIO727	Question 55	Comment	Option A should only be implemented for uses that are water compatible or when risk can be fully mitigated. Important that flood risk is not worsened elsewhere. Refer to NPPF and associated technical guidance.	Comments noted
Woodland Trust	LPRIO385	Question 55	Object	Believe that trees and woodlands can contribute to resolving water management issues, particularly flooding.	Objections to options are noted. Support suggestion that trees and

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				<p>Offer opportunities to make positive water use change and also contribute to biodiversity, timber and green infrastructure. Woodland actions for biodiversity and their role in water management(pdf) - https://www.woodlandtrust.org.UK/mediafile/100263208/rr-wt-71014-woodland-actions-for-biodiversity-and-their-role-in-water-management.pdf? And http://www.forestry.gov.UK/fr/woodlandforwater)</p> <p>Woodland can help adaptation strategies cope with the high profile threats to water quality and volume resulting from climate change. Trees can reduce surface water flooding in urban areas, by regulating the rate at which rainfall reaches the ground and contributes to run off. The Woodland Trust has also produced a policy paper illustrating the benefits of trees for urban flooding – Trees in Our Towns – the role of trees and woods in managing urban water quality and quantity.</p> <p>The National Flood Forum is supporting community action for flooding that can link in to community tree planting schemes.</p> <p>We would therefore like to see a bullet point included in this section of the Local Plan to read:- “Riparian tree planting to be carried out to protect watercourse banks, improve water quality and slow down excessive flow”.</p>	woodlands can contribute to resolving water management issues. Further research will be undertaken into this option.
Telereal Trillium	LPRIO829	Question 55	Comment	We acknowledge that some redevelopment within flood plains may be necessary to ensure that sites are regenerated.	Comments are noted.
Bewdley Civic Society	LPRIO1609	Question 55	Comment	Build housing on stilts in flood plain	Noted.
SWDP	LPRIO1077	Question	Comment	No growth should be advocated outside Flood Zone 1.	Comments are noted.

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		55		There should be a policy on SUDs such that surface water runoff rates are better post development.	
Willsgrove Developments Ltd	LPRIO1222	Question 55	Comment	Wherever possible, new development should not be on floodplains. Whilst some redevelopment within floodplains may be necessary to encourage regeneration, existing floodplains should be kept free of development.	Comments are noted.
CPRE	LPRIO1473	Question 55	Comment	It is necessary that there should be an unrestricted floodable area sufficient to enable river-spates to pass downstream. There may be ways of designing buildings, so that habitable space (homes, offices, workshops, shops, etc.) is located on upper storeys above the likely flood level and with foot access direct from higher ground.	Comments are noted.
Question 56. How should the Plan ensure that flood risk is adequately managed and that new development both within and outside of the flood plain does not increase flood risk to new or existing properties and assets?					
Huizer K	LPRIO75	Question 56	Comment	Flood flows should be fully assessed to ensure existing development is not negatively impacted and loss of flood storage is compensated for locally. There should be no increased run-off and any excess water will need to be dealt with on site. Current policy is for all development to use Sustainable Drainage Systems. Local Plan policy should endorse this. Ideally, would like to see SPD issued to endorse non statutory national SuDS standards and specify additional local standards. Believe that Local Plan should promote use of green SuDS.	Comments are noted. Look to include specific SuDS policy.
Cotterill J	LPRIO289	Question 56	Comment	Return flood plains to their original use by increasing plant life.	Comments are noted.
Paris R	LPRIO452	Question 56	Comment	An up to date flood risk plan and assessment should be commissioned for each new development within the flood risk area.	Comments noted. Any planning application in an area of flood risk would require a full flood risk

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					assessment to be undertaken.
Churchill and Blakedown PC	LPRIO467	Question 56	Comment	No comments	Noted.
WFDC (Strategic Housing Team)	LPRIO728	Question 56	Comment	Flood flows should be fully assessed to ensure existing development is not negatively impacted and loss of flood storage is compensated for locally. There should be no increased run-off and any excess water will need to be dealt with on site. Current policy is for all development to use Sustainable Drainage Systems. Local Plan policy should endorse this. Ideally, would like to see SPD issued to endorse non statutory national SuDS standards and specify additional local standards. Believe that Local Plan should promote use of green SuDS.	Comments are noted. Look to include SuDS policy in Local Plan Review
Bewdley Town Council	LPRIO923	Question 56	Comment	Development in flood plain could be allowed if it would reduce flood risk. Vulnerable types of development should be refused e.g. retirement flats, where danger of vital services being cut off by floods.	Comments are noted.
Worcestershire Wildlife Trust	LPRIO952	Question 56	Comment	A strong SuDS implementation policy is central to dealing with flood risk and water quality issues. See draft SWDP policy and WWT/RSPB guide to SuDS (Dec.2012)	Comments are noted.
Staff & Worcs Canal Society	LPRIO1316	Question 56	Comment	Society recommends any view expressed by CRT engineers.	Comment is noted.
Bewdley Civic Society	LPRIO1610	Question 56	Comment	Environment Agency should look at permanent measures of flood protection on East side of Bewdley.	Noted. This is within the remit of the Environment Agency not the Local Plan Review.
Shuttes J	LPRIO1189	Question 56	Comment	Flood management has local benefits but can cause issues further downstream as 2014 flooding showed. Suggest option B as at next plan review global warming or other actions could make areas unusable.	Comments are noted.

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CPRE	LPRIO1479	Question 56	Comment	In general built development within the floodplain is undesirable. It is necessary that there should be an unrestricted floodable area sufficient to enable river-spates to pass downstream	Comment is noted.
Thomas G	LPRIO1548	Question 56	Comment	A full river reach assessment should be carried out including assessment of backwater curves as to the modelled effect of alternative proposed development solutions.	Noted. Modelling is undertaken through the SFRA which is produced in partnership with the EA to inform the Local Plan Review.
Option A - Water Efficiency. Implement the higher water efficiency standard of 110 litres per person per day through the Local Plan Review.					
Huizer K	LPRIO76	Option A	Support	Believe Local Plan should aim for Option A as ground water abstraction makes water table unnaturally low in areas with some watercourses have little flow in periods of low rainfall.	Support for option A is noted.
WFDC (Strategic Housing Team)	LPRIO729	Option A	Comment	Believe Local Plan should aim for Option A as ground water abstraction makes water table unnaturally low in areas with some watercourses have little flow in periods of low rainfall.	Support for option A is noted.
Worcestershire Wildlife Trust	LPRIO953	Option A	Support	Support option A as it better reflects water deficit faced in District - we consider that local circumstances justify this approach.	Support for this option is noted. Robust evidence will be required to back it.
Option B - Water Efficiency. This option would not require a policy within the Local Plan as it is the minimum standard required by the Building Regulations.					
Cotterill J	LPRIO290	Option B	Support	Support option B	Support is noted
Persimmon Homes Limited	LPRIO887	Option B	Support	Stanklyn Lane Advise that higher standard of 125l per person per day should be used. it is not appropriate for the planning system to alter other regulatory systems.	Comments are noted. However, if there is robust evidence to show water shortage locally, then the higher efficiency standard can be introduced.

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Churchill and Blakedown PC	LPRIO468	Option B	Support	Support for option B	Support is noted
Upper Arley PC	LPRIO1405	Option B	Support	The Parish Council supports option B	Support is noted.
Bewdley Civic Society	LPRIO1611	Option B	Support	Support for Option B	Support for Option B is noted.
Cotterill J	LPRIO291	Option B	Support	Support option B	Support is noted
Willsgrove Developments Ltd	LPRIO1223	Option B	Support	Advise that higher standard of 125l per person per day should be used. it is not appropriate for the planning system to alter other regulatory systems.	Comments are noted. However, if there is robust evidence to show water shortage locally, then the higher efficiency standard can be introduced.
Question 57. What are your views on the options set out for water efficiency? Are there any other options that should also be considered?					
Eriksson-Flegg B	LPRIO149	Question 57	Comment	Option B coupled with expansion of water meters to discourage hosepipe usage for watering gardens!	Comments are noted. Installation of water meters is outside scope of the local plan.
Paris R	LPRIO453	Question 57	Comment	A mix of options would be preferable. A-, B++. Pressure should be put on water authority to provide infrastructure as a priority.	Comments are noted.
Miller Homes	LPRIO867	Question 57	Comment	Consider that approach to water efficiency should reflect outcome of Housing Standards Review (Option B) as implemented via Building Regulations.	Comments are noted.
Shuttes J	LPRIO1190	Question 57	Comment	Links back to open space providing source for aquifers. Option A is good if backed by need to recycle rainwater either individually or collectively.	Comments are noted.
Environment Agency	LPRIO992	Question 57	Comment	Recommend that higher water stress areas are identified in order to inform whether optional higher target is appropriate. Primary evidence sources include: Water Stressed Areas Classification (2013) EA	Comments are noted. Research will be undertaken using sources suggested.

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				Water resources management plans (water companies) River Basin Management Plans - include information on water bodies at risk or probably at risk of failing to achieve good ecological status due to low flows or reduced water availability. Locally specific evidence - Water Cycle Study and River Basin Management Plan https://www.gov.UK/government/publications/cams-worcestershire-middlesevernabstraction-licensing-strategy Catchment Data Explorer Tool contains local data.	
CPRE	LPRIO1474	Question 57	Comment	The use of the word “higher” is potentially confusing. It would be better to refer to 110 litres as a “stricter” standard.	Comments are noted and agreed.
Thomas G	LPRIO1549	Question 57	Comment	Pressure upon water resources is yet another example of limitations to infrastructure associated with identity and location of the town.	Comments are noted.
Option A - Renewable Energy. Require new developments to provide 10% of their forecast energy needs from on-site renewable energy technologies.					
Allen T	LPRIO265	Option A	Support	Support option A - installation of solar roof panels hold be compulsory on new dwellings	Comments are noted
Williams H	LPRIO162	Option A	Object	Object to wind turbines or solar farms as not cost effective and blot on landscape.	Objection is noted.
Persimmon Homes Limited	LPRIO888	Option A	Object	Stanklyn Lane We do not support a policy which seeks to provide 10% of forecast energy needs from on-site technologies in new development.	Objection is noted.
Churchill and Blakedown PC	LPRIO469	Option A	Support	Support for option A	Support is noted
Upper Arley PC	LPRIO1406	Option A	Support	The Parish Council supports Option A. All new houses	Support is noted.

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				should have solar panels or tiles	
Worcestershire Wildlife Trust	LPRIO954	Option A	Support	Support option A	Support is noted.
Bewdley Civic Society	LPRIO1612	Option A	Support	Support for Option A	Support for Option A is noted.
Willsgrove Developments Ltd	LPRIO1214	Option A	Object	Object to this option - this is rarely financially viable, especially for residential development with reduced tariffs on solar installations. New dwellings are now extremely efficient in terms of energy usage, insulation etc.	Objection is noted.
Thomas G	LPRIO1550	Option A	Support	Support for Option a. I cannot believe that a brownfield site cannot be re-developed because of the cost of installing solar panels on a roof for instance.	Support for Option A is noted.
Option B - Renewable Energy. Do not seek a proportion of the energy requirements in new development to come from on-site renewable sources.					
Williams H	LPRIO163	Option B	Comment	Do not object to solar roof panels on new dwellings. Any renewable technologies which are cost effective, low maintenance, not an eyesore and quiet would be supported.	Comments are noted
Cotterill J	LPRIO292	Option B	Support	Support option B	Support is noted
Question 58. What are your views on the options set out for renewable energy? Are there any other options that should also be considered?					
Eriksson-Flegg B	LPRIO150	Question 58	Comment	Prefer option A. PV panels on south facing roofs shown to reduce electricity bills by over 25%	Comments are noted.
Paris R	LPRIO454	Question 58	Comment	Preference for Option A (++) where financially viable to do so. Consider allocating land for solar farms or install solar panels on top of high rise developments.	Comments are noted.
Miller Homes	LPRIO868	Question	Comment	Approach to renewable energy should reflect relevant	Concerns are noted.

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		58		national standards. As per NPPF para.95 - local requirements should be consistent with zero carbon policy and nationally prescribed standards. Current policy seeks 10% of energy requirements from renewables in major new developments. This has proved problematic mainly due to viability issues. Would therefore question whether it would be effective in future if included in emerging local plan.	
Persimmon Homes Limited	LPRIO889	Question 58	Comment	Energy efficiencies should be targeted from the fabric of the building, rather than from energy savings from 'bolt on' technologies. New dwellings are now extremely efficient in terms of built fabric and energy efficient systems and appliances within. Government advises that energy efficiency standards should be controlled via building regulations nationally set standards and not via planning.	Comments are noted.
WFDC (Strategic Housing Team)	LPRIO730	Question 58	Comment	UK has target of 15% of energy demand to come from renewables by 2020. The current Local Plan target of 10% should be kept as a minimum. Plan should also encourage high energy efficiency standards. Should reference grid expansion, tackling fuel poverty etc.	Comments are noted. Reference to energy efficiency standards will also be made in Local Plan.
Rushock PC	LPRIO941	Question 58	Comment	All new development must include renewable energy technologies such as solar panels. This must be enforced with residential developers despite their pleas that it will render the development unviable. They are unlikely to walk away from a site!	Comments are noted.
J & H Evans	LPRIO962	Question 58	Comment	Clients are willing to assist wherever they can with energy saving methods.	Comments are noted.
CPRE	LPRIO1475	Question 58	Comment	Very supportive of renewable energy projects undertaken in an appropriate way. The higher the standards applied to be houses they more expensive they are likely to be.	Comments are noted.

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Question 59. How best can we ensure that the Local Plan provides the correct opportunities for increasing the proportion of energy which is generated from renewable sources?					
Paris R	LPRIO455	Question 59	Comment	Lobby national government for grants for subsidies for renewable energy schemes. Encourage developers to provide with new build through S106 agreements.	Comments are noted
Persimmon Homes Limited	LPRIO890	Question 59	Comment	Energy efficiencies should be targeted from the fabric of the building, rather than from energy savings from 'bolt on' technologies. New dwellings are now extremely efficient in terms of built fabric and energy efficient systems and appliances within. Government advises that energy efficiency standards should be controlled via building regulations nationally set standards and not via planning.	Comments are noted.
Churchill and Blakedown PC	LPRIO470	Question 59	Comment	No comment	Noted
Upper Arley PC	LPRIO1407	Question 59	Comment	Hydroelectric options where possible	Comments are noted.
Bewdley Civic Society	LPRIO1613	Question 59	Comment	Refer to Neighbourhood Plan	Noted. However there has not been a Neighbourhood Plan produced for Bewdley as yet and this should be in general conformity with the Local Plan.
Shuttes J	LPRIO1191	Question 59	Comment	Option A should be encouraged despite subsidy reductions - but only solar. WFDC could try partnering/supporting the developing battery technology.	Comments are noted.
SWDP	LPRIO1081	Question 59	Comment	Is very unfortunate that Government policy is likely to lead to reduced investment in renewable energy. Also Planning inspectors seem reluctant to support any policy that goes beyond latest building regulations unless there is clear evidence to back them up.	Concerns are noted.

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Willsgrove Developments Ltd	LPRIO1224	Question 59	Comment	Encourage renewable energy projects such as wind turbines, larger solar farms and the installation of solar panels on larger commercial buildings where economies of scale are more easily achieved.	Comments are noted.
CPRE	LPRIO1476	Question 59	Comment	We are very supportive of renewable energy projects undertaken in an appropriate way, if this can be done without undue cost	Comments are noted.
Thomas G	LPRIO1551	Question 59	Comment	I cannot believe that a brownfield site cannot be re-developed because of the cost of installing solar panels on a roof for instance.	Comments are noted.
Question 60. Can the plan provide a framework for encouraging and facilitating the development and use of combined heat and power systems?					
Paris R	LPRIO456	Question 60	Comment	The plan should encourage combined heat and power systems on new developments whenever possible. Consider using private investment to build CHP for existing communities.	Comments are noted
Persimmon Homes Limited	LPRIO892	Question 60	Comment	Stanklyn Lane This is a matter for individual developments depending on very localised factors. A blanket policy across the district would be meaningless.	Comments are noted.
Churchill and Blakedown PC	LPRIO472	Question 60	Comment	No comment	Noted
WFDC (Strategic Housing Team)	LPRIO731	Question 60	Comment	A Worcestershire-wide heat mapping end energy master planning study is currently underway to identify potential district heating opportunities. The findings of this study (expected early 2016) should feed into the Local Plan.	Noted. Await findings of this study.
Bewdley Civic Society	LPRIO1614	Question 60	Comment	Change Building Regulations to accommodate renewable energy.	Comments are noted.
Shuttes J	LPRIO1192	Question	Comment	District heating for high density development is feasible.	Comments are noted.

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		60		Heat to power also requires compact development. Biomass still produces similar amount of CO2 although trees will absorb it back very slowly. If a large service facility such as a hospital is developed along with housing it can be viable.	
Willsgrove Developments Ltd	LPRIO1225	Question 60	Comment	It is our experience that providing combined heat and power systems is not appropriate.	Comments are noted.
CPRE	LPRIO1477	Question 60	Comment	Unless the district has plants where there is waste heat to use, district heating schemes are unlikely to be useful. The appropriate course is to provide warm words supporting such schemes if viable, but not requiring them.	Comments are noted. This would also be a matter for consideration through the Worcestershire Waste Core Strategy.
Thomas G	LPRIO1552	Question 60	Comment	This is very much specialist area but greater housing density lends itself to district or at least local heating and this supports the view that town apartments should be provided.	Comments are noted.
Williams H	LPRIO164	11.13	Object	Object strongly to renewable energy schemes – wind turbines are noisy, solar farms appear as fields of black glass – returns are very poor.	Objections are noted
Question 61. Should the Plan identify specific areas for renewable energy development? If so, are there any areas which are particularly suitable for a specific type of renewable energy development (evidence must be provided)?					
Eriksson-Flegg B	LPRIO151	Question 61	Comment	In favour of identifying specific areas for renewable energy development. Suggest siting alongside noisy dual carriageways.	Comments are noted
Paris R	LPRIO457	Question 61	Support	Support suggestion but know of no suitable locations.	Support is noted
WFDC (Conservation)	LPRIO257	Question 61	Comment	Agree that specific areas should be identified. Perhaps Local Plan could identify areas where installation is NOT	Comments are noted.

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				permitted, including Conservation Areas, curtilage of Listed Buildings and where setting of heritage assets would be compromised.	
Churchill and Blakedown PC	LPRIO474	Question 61	Comment	No comment	Noted
WFDC (Strategic Housing Team)	LPRIO732	Question 61	Support	Support allocation of sites for renewable energy development	Support is noted
Worcestershire Wildlife Trust	LPRIO956	Question 61	Comment	No particular comments. Decisions taken to identify locations will need to be backed by environmental information to determine which are most suitable.	Comments are noted.
British Horse Society	LPRIO507	Question 61	Object	Object to suggestion. No consideration of impact on existing rights of way network in applications elsewhere in country.	Objection is noted.
Fyshe F	LPRIO615	Question 61	Object	Object to identification of specific areas for renewable energy development	Objection noted
Bewdley Civic Society	LPRIO1615	Question 61	Comment	Yes to Question 61	Noted.
Shuttes J	LPRIO1193	Question 61	Comment	Yes but it would need to be limited to areas where there is easy new or existing access to the national grid or local power infrastructure.	Comments are noted.
CPRE	LPRIO1478	Question 61	Comment	However, we consider that all agricultural land (not only the best and most versatile) should be used for growing food. A solar farm may easily have an expected life of 50 years: that is too long a period to allow for it to be taken out of food production.	Comments are noted.
Thomas G	LPRIO1553	Question	Comment	Wind farms risk harming the strategic strengths of the	Comments are noted.

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		61		district in the value of its landscape and would need to be selected to harness a prevailing wind. Solar farms have more potential, but as you have suggested, the council will need to work with investors to identify suitable locations. However they have a potential to be sighted on Green Belt if the ground around them could be protected for habitat or wildlife.	
Williams H	LPRIO165	11.14	Support	Supports Worcestershire Waste Core Strategy	Support is noted
WCC, Planning Economy & Performance	LPRIO1383	11.14	Comment	<p>Policy WCS 6 (Waste Core Strategy) identifies types of land considered to be compatible for waste management development. Some land is likely to be required for waste management development, particularly within the Kidderminster Zone (around Kidderminster and Stourport), and this needs to be factored in to any calculations of land requirements for industrial or employment uses.</p> <p>The Waste Core Strategy does not identify need for new landfill capacity. If proposals come forward a key factor would be geological suitability.</p>	Comments are noted. We will factor in requirement for waste management facility in the Kidderminster area when calculating employment land requirements.
WCC, Planning Economy & Performance	LPRIO1384	11.14	Comment	<p>Safeguarding Waste Management Capacity There are a number of existing waste management facilities in Kidderminster and Stourport (refer to Waste Core Strategy). These need safeguarding from redevelopment for other uses Policy WCS 16). Currently WCC does not have enough capacity to manage its waste.</p>	Comments are noted.
WCC, Planning Economy & Performance	LPRIO1385	11.14	Comment	<p>Making provision for waste in all new development Local Plan should provide opportunities for communities and businesses to reduce, re-use and recycle waste. Policy WCS17 is often not considered by applicants for</p>	Comments on provision of waste facilities in new developments are noted.

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				non-waste developments. Request that Local Plan could perhaps include requirements of WCS17 for developments to incorporate facilities to separate and store waste for recycling and recovery, make contributions where it is more appropriate than provision of on-site facilities, or show that existing provision is adequate. In addition, the ADEPT report "Making Space for Waste" (2010) sets out minimum standards for facilities and vehicle manoeuvrability. Would be useful to refer to this in Local Plan.	
WCC, Planning Economy & Performance	LPRIO1386	11.14	Comment	Inappropriate disposal of waste Excavation activities as part of construction process need to be considered against Policy WCS 5: Landfill and Disposal. Most applications including the use of sub-soils on site are decided by District Council, so would wish to see policies in Wyre Forest Local Plan to manage this type of waste in order to ensure the sustainable management of subsoils and prevent inappropriate disposal in artificial mounds.	Comments are noted. Consider including policy to ensure sustainable management of subsoils and prevent inappropriate disposal in artificial mounds.
WCC, Planning Economy & Performance	LPRIO1387	11.15	Comment	Geology of the District Wyre Forest District is underlain by the solid sands of the Kidderminster Formation and the Wildmoor Formation, as well as several types of clay, and some surface deposits of terrace and glacial sand and gravel. There are several Local Geological Sites and also a few SSSIs designated for their geological interest in the district which will need to be protected by policy in the Local Plan. HWHT have recently undertaken project 'A Thousand Years of Building Stone'. The building stones which occur in the Wyre Forest District contribute towards the character of the area, and we would recommend that you consider the findings of this project in developing the Wyre	Comments are noted. Geological sites will be safeguarded by policy. Building Stone project will be referenced. Design Guidance SPD already references this piece of work.

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				Forest Local Plan.	
WCC, Planning Economy & Performance	LPRIO1388	11.15	Comment	<p>The saved policies of the County of Hereford and Worcester Minerals Local Plan 1997 form part of the current Development Plan for the county, and the proposals map identifies minerals deposits. Work is progressing on new Minerals Local Plan. An interactive webmap has been produced which identifies sold sands around Stourport, Kidderminster and up to County boundary in north as key resources, with some significant terrace and glacial sand and gravel and mercia mudstone clay also being considered important.</p> <p>We are seeking to integrate green infrastructure considerations and restoration. Our 'call for sites' response has included sites to north of Kidderminster. We will need to work jointly to ascertain whether proposed mineral working sites are also potential development allocations.</p>	Noted. Potential mineral workings will be cross-checked with HELAA call for sites responses.
WCC, Planning Economy & Performance	LPRIO1389	11.15	Comment	<p>Importance of mineral resource safeguarding is recognised in NPPF. Resources which are identified as nationally or locally important should be safeguarded from other forms of development which could sterilise the resource. Where development is proposed within area of identified mineral resource, a Minerals Resource Assessment should be undertaken.</p> <p>Existing quarries and mineral site allocations should be safeguarded from other development that may conflict with their operation. Minerals infrastructure will also need to be safeguarded from conflict with new land uses. Currently these types of minerals infrastructure do not exist in Wyre Forest.</p>	Comments are noted. Relevant policy will be put in place through the Local Plan.
Historic	LPRIO1090	11.15	Comment	Any proposed mineral sites will need to consider impact	Comments are noted.

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England				on historic environment and any specific heritage assets.	
Historic England	LPRIO1091	Appendix A	Comment	We would recommend either the inclusion of a definition for the term non- designated heritage asset within the glossary or a generic definition that relates to both designated and non-designated heritage assets.	Glossary will be amended to take comments into account