

**Sustainability appraisal of the  
Pre-Submission Publication Draft  
Wyre Forest District Local Plan  
October 2018**

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# Chapter 1. The Wyre Forest District Local Plan

## 1.1 Introduction

This Sustainability Appraisal Report forms part of Wyre Forest District Council's documents for its Local Plan Review. This chapter briefly describes the Local Plan. Chapter 2 describes the sustainability appraisal process. Chapter 3 summarises and updates the SA scoping report. Chapters 4, 5 and 6 appraise, respectively, the plan objectives, alternatives, and the proposed plan. Chapter 7 discusses mitigation measures for the plan, and Chapter 8 proposes monitoring measures. Chapter 9 discusses next steps.

## 1.2 The Local Plan Review

The Local Plan Review (from here on 'Local Plan') will replace the existing Core Strategy which was adopted in December 2010, and the Site Allocations and Policies and Kidderminster Central Area Action Plan, both of which were adopted in July 2013. The Local Plan will form part of the Development Plan for Wyre Forest District, against which all planning applications are assessed.

The Local Plan sets out a long-term vision and objectives for how the Wyre Forest District area will develop in the period up to 2036. This has been strongly influenced by the Wyre Forest District Council's Corporate Plan (2014/19). The vision, values, priorities and actions in the Corporate Plan, some of which are shown at Table 1.1, are the golden thread that runs through District Council policy, plans and programmes.

**Table 1.1 Wyre Forest Vision, Priorities and Actions**

<b>Vision</b> Where people have the opportunity to enjoy a good quality of life and want to live, work, visit and invest.
<b>Priorities</b> <ul style="list-style-type: none"><li>• Support you to contribute to a successful local economy.</li><li>• Support you to live in clean, green and safe communities.</li></ul>
<b>Strategic Actions</b> (list not in full): <ul style="list-style-type: none"><li>• Working with partners to create the conditions and certainty to foster a growing sustainable local economy.</li><li>• Bringing forward regeneration and development opportunities and the infrastructure to support them.</li><li>• Creating new job opportunities and improving skills.</li><li>• Helping new businesses to start up and existing businesses to grow.</li><li>• Promoting the District as a great place to invest in, live in and visit.</li><li>• Creating a greener and cleaner local environment.</li><li>• Working towards meeting current and future housing needs, with an up-to-date local development plan that provides for growth in the number of houses.</li></ul>

**Our Actions** will support (list not in full):

- A diverse and well connected economy with vibrant and successful town centres.
- Successful and sustained business growth.
- Redevelopment of redundant and under-used land and buildings.
- Improved infrastructure.
- Increased visitor opportunities.
- An increased supply of good quality and decent homes that are affordable to individuals and families.

The Local Plan aim is that, by 2036, Wyre Forest District will be a place where people want to live and work and fulfil their potential without the need for excessive travel. The plan has 11 objectives, which are shown at Table 1.2.

**Table 1.2 Wyre Forest District Local Plan objectives**

1. To encourage the long term sustainable development of Wyre Forest District and its communities.
2. To address the key challenges facing the District especially in terms of housing, employment, and transport.
3. To address housing needs in order that the existing and future residents' requirements are met and the economic development of the area is supported.
4. To recognise the changing nature of employment, encourage economic diversification and make sufficient high quality employment sites available.
5. To maximise the use of previously developed land in order to ensure the best use is made of available land both within and beyond the main towns.
6. To protect and support the role of the Green Belt through a strategic review and to identify limited strategic Green Belt release to enable the delivery of the Plan whilst reinforcing the role and integrity of the Green Belt for future Plan periods.
7. To maximise opportunities for the inclusion of green infrastructure into high quality development in order to provide a good quality of life and maximise the benefits of walking and cycling. Safeguard and enhance the District's biodiversity and geodiversity assets.
8. To promote the historic environment and landscape and conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations.
9. To increase provision and to facilitate greater access to sport, recreational and other community facilities in order to encourage healthier lifestyles and improve the health and wellbeing of the District's population.
10. To improve connectivity within the District and achieve more sustainable travel patterns and reduce the need to use the private car through improved public transport services (bus and rail), and new and enhanced cycleways and footpaths. These actions will contribute to an improvement in air quality.
11. To protect the District's water supply and quality, and reduce the risk of flooding.

The Local Plan has been designed to achieve sustainable economic growth, including appropriate infrastructure enhancements to support the proposed development, in accordance with the requirements of the National Planning Policy Framework. It sets out proposals for how Wyre Forest District will grow and become a more desirable place to live, work and visit. It aims to provide 5,520 homes, 487 care home/institutional spaces, and at least 29 ha of employment land until 2036, and it sets out where these should go. It also considers what infrastructure is required to support proposed development such as roads and schools. Residential sites allocations include a site for Travelling Showpeople.

The Local Plan also sets out policies which will guide the determination of planning applications. These policies cover the same type of issues as in the existing planning policy documents such as sustainable development, providing and protecting open space, Green Belt, managing flood risk and design quality. The Local Plan is structured as follows:

- The strategic element and policies (Part A).
- The development management policies (Part B).
- The allocations policies (Part C).
- The proposed approach to monitoring and implementation (Part D).

Table 1.3 shows the chapter titles for the policies that are appraised in this sustainability appraisal.

**Table 1.3 Structure of the Wyre Forest District Local Plan**

<b>Part</b>	<b>Policy</b>
A. Strategic policies	5. Overarching sustainable development principles 6. A sustainable future – Development strategy 7. Strategic Green Belt Review 8. A desirable place to live 9. Health and wellbeing 10. A good place to do business 11. A unique place 12. Strategic infrastructure 13. Transport and accessibility 14. Strategic green infrastructure 15. Water management 16. Pollution, minerals and waste
B. Development management policies	18. A desirable place to live 19. Providing accommodation for Gypsies, Travellers and Travelling Show-people 20. Community facilities 21. Employment land 22. Town centre development and retail 23. Sustainable tourism 24. Telecommunications and renewable energy 25. Safeguarding the Green Belt 26. Safeguarding the historic environment 27. Quality design and local distinctiveness 28. Rural Development
C. Site allocations	30. Kidderminster Town 31. Lea Castle Village 32. Kidderminster Eastern Extension 33. Stourport-on-Severn 34. Bewdley 35. Previously developed sites in the Green Belt 36. Rural Wyre Forest

# Chapter 2. The sustainability appraisal process

## 2.1 Introduction

Sustainability Appraisal (SA) incorporating strategic environmental assessment (SEA) is a systematic process that must be carried out during the preparation of a Local Plan. The purpose of SA is to promote sustainable development by identifying the emerging Local Plan's likely significant economic, environmental and social effects, and suggesting measures to minimise any negative effects and maximise the positive ones. The SA process provides the opportunity to consider reasonable alternatives for how the plan can contribute to improving environmental, social and economic conditions. SA helps to produce a more integrated Local Plan which has gone through an inclusive, transparent process.

This chapter explains the legal requirements for SA and SEA; how the SA/SEA has helped to inform the development of the Local Plan; and difficulties faced in compiling this report.

## 2.2 Legal requirements

The European Strategic Environmental Assessment (SEA) Directive requires European Member States to carry out an environmental assessment as part of the preparation of land-use plans (e.g. Local Plans). The Directive was transposed into English law through the Environmental Assessment of Plans and Programmes Regulations 2004 SI No 1633.

The SEA regulations state that SEA must assess the likely significant effects of the plan or programme on the environment, namely:

- Biodiversity
- Population
- Human health
- Fauna
- Flora
- Soil
- Water
- Air
- Climatic factors
- Material assets
- Cultural heritage, including architectural and archaeological heritage
- Landscape
- The inter-relationship between the above

Table 2.1 shows the requirements of the SEA Directive, and where they are fulfilled in this report.


In addition, the Planning and Compulsory Purchase Act 2004 requires all local planning authorities to carry out a sustainability appraisal (SA) of their Local Plans. Sustainability Appraisal is an iterative process which appraises emerging plan options, policies and sites against the three elements of sustainability; the social, environmental and economic dimensions. It assists in selecting the options deemed to be the most sustainable for the area, and in fine-tuning the plan policies.

Table 2.2 shows the requirements for SA. This SA report also fulfils the legal requirements for SEA; where reference is made within this document to sustainability appraisal, it also implies where appropriate strategic environmental assessment.

**Table 2.1 The requirements of the SEA Directive and where they are covered in the SA/SEA for the Wyre Forest District Local Plan**

<b>Stages of Environmental Report</b>	<b>Where this is covered</b>
1. An outline of the contents and main objectives of the plan or programme	Chapter 1
and of its relationship with other relevant plans and programmes.	App. A of the 2015 scoping report; Sec. 3.2 of this report
2. The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.	App. B of the 2015 scoping report; Sec. 3.3 of this report
3. The environmental characteristics of areas likely to be significantly affected.	HELAA reports for individual sites
4. Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Council Directive 79/409/EEC on the conservation of wild birds and the Habitats Directive.	Sec. 3.4
5. The environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.	App. A of the 2015 scoping report; Sec. 3.2 of this report
6. The likely significant effects on the environment, including short, medium and long-term effects, permanent and temporary effects, positive and negative effects, and secondary, cumulative and synergistic effects, on issues including (a) biodiversity; (b) population; (c) human health; (d) fauna; (e) flora; (f) soil; (g) water; (h) air; (i) climatic factors; (j) material assets; (k) cultural heritage, including architectural and archaeological heritage; (l) landscape; and (m) the inter-relationship between the issues referred to in sub-paragraphs (a) to (l).	Chapter 4 (plan objectives) Chapter 6 (sites) Chapter 7 (plan policies) Chapter 8 (overall plan)
7. The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.	
<b>8. An outline of the reasons for selecting the alternatives dealt with</b>	Chapter 5
and a description of how the assessment was undertaken including any difficulties encountered in compiling the required information.	Sec. 2.6
9. A description of the measures envisaged concerning monitoring in accordance with regulation 17.	Chapter 9
10. A non-technical summary of the information provided under paragraphs 1 to 9.	Separate non technical summary

**Table 2.2 The sustainability appraisal (SA) process**

<p><i>Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope</i></p> <p>Task A1: Identify other relevant policies, plans and programmes and sustainability objectives</p> <p>Task A2: Collect baseline information</p> <p>Task A3: Identify sustainability issues and problems</p> <p>Task A4: Develop the SA Framework</p> <p>Task A5: Consult the consultation bodies on the scope of the SA report</p> <p><i>Stage B: Developing and refining alternatives and assessing effects</i></p> <p>Task B1: Test the Local Plan objectives against the SA framework</p> <p>Task B2: Develop the Local Plan options including reasonable alternatives</p> <p>Task B3: Evaluate the likely effects of the Local Plan and alternatives</p> <p>Task B4: Consider ways of mitigating adverse effects and maximising beneficial effects</p> <p>Task B5: Propose measures to monitor significant effects of implementing the Local Plan</p> <p><i>Stage C: Prepare the SA report</i></p> <p><i>Stage D: Seek representations on the SA report from Consultation bodies and the public</i></p> <p><i>Stage E: Post adoption reporting and monitoring</i></p> <p>Task E1: Prepare and publish post-adoption statement</p> <p>Task E2: Monitor significant effects of implementing the Local Plan</p> <p>Task E3: Respond to adverse effects</p>	 <p>Current state of Wyre Forest District Local Plan SA/SEA</p>
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### 2.3 Development of the Local Plan and SA

The Local Plan has been drawn up in consultation with the community and has been informed by many evidence-based studies, which are discussed at Chapter 3. Table 1.3 shows the consultation stages for the plan, including web-links to the relevant SA/SEA reports.

**Table 1.3 Consultation stages and reports**

Local Plan stage	SA/SEA stage	Consultation dates	SA/SEA reports
Initial studies, and development of issues and options	SA Scoping Report	18 May – 22 June 2015 (5 weeks)	<a href="http://www.wyreforestdc.gov.uk/media/1233990/Final-Scoping-Report-May-2015.pdf">www.wyreforestdc.gov.uk/media/1233990/Final-Scoping-Report-May-2015.pdf</a>
Issues and Options	SA Revised Scoping Report	1 September – 16 October 2015 (6 weeks)	<a href="http://www.wyreforestdc.gov.uk/media/1468164/Revised-SA-Scoping-Report-for-web.pdf">www.wyreforestdc.gov.uk/media/1468164/Revised-SA-Scoping-Report-for-web.pdf</a>
Preferred Options	SA Preferred Options Report	15 June – 14 August 2017 (8 weeks)	<a href="http://www.wyreforestdc.gov.uk/media/3012059/PO-Complete-SA.pdf">www.wyreforestdc.gov.uk/media/3012059/PO-Complete-SA.pdf</a>
Pre-Submission publication Draft Local Plan	SA Report		This report



A SA scoping report went out to public consultation in May/June 2015 and received 46 consultation responses.

The first consultation stage of the emerging Local Plan was the Issues and Options consultation which took place in Autumn 2016. This stage considered the issues that Wyre Forest District faced, and suggested seven options to deal with these issues: these are discussed in Chapter 5. At the same time, a revised SA scoping report was consulted on: 8 comments were received from one consultee. This consultation, together with the evidence-based studies, informed the Preferred Options document.

Further consultation took place at the Preferred Options stage for eight weeks in Summer 2017. The preferred options are also discussed at Chapter 5. Alongside this, a draft SA report was consulted on for eight weeks.

This SA accompanies the Pre-Submission Publication draft of the Local Plan. Chapter 10 explains how to comment on this report and the Local Plan.

## **2.4 Habitats Directive**

The European Habitats Directive requires an assessment to be made of the possible effects of a plan on the integrity of European sites<sup>1</sup> before the plan is adopted. The overall process of determining whether a plan complies with the requirements of the Habitats Directive is referred to as 'Appropriate Assessment'. There are no Ramsar sites, Special Protection Areas or Special Areas of Conservation within Wyre Forest District's boundary. Wyre Forest District has also been screened to identify any impacts on the integrity of nearby European Sites: it has been confirmed by Natural England that no appropriate assessment is required.

## **2.5 Difficulties faced**

The SEA Directive requires a description of "how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information" (Annex 1h)

The Local Authority has undertaken the SA process for its emerging Local Plan, with support from Levett-Therivel sustainability consultants. When plans are considered at the strategic stage it is not always possible to accurately predict sustainability effects. This SA has been informed by the best available information and data. However, data gaps and uncertainties exist – notably around the effects of Brexit - and it is not always possible to accurately predict effects, particularly at a strategic level of assessment. A precautionary approach has been adopted that seeks to deliver best practice avoidance and mitigation as the most appropriate response to these uncertainties.

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<sup>1</sup> Special Protection Areas for birds, Special Areas of Conservation for habitats and species, or Ramsar wetland sites.

## Chapter 3. Task A scoping: summary and update

### 3.1 Introduction

The aim of the SA scoping stage is to provide background evidence for use at subsequent stages of assessment. It comprises five steps:

- Task A1: “Policy context”: Analysis of other policies, plans, programmes and objectives to provide information on the relationship between the Local Plan and these other plans.
- Task A2: “Sustainability context”: Collection of relevant environmental, social and economic baseline information for the District and cross boundary issues; identification of likely future trends; and description of the characteristics of areas likely to be significantly affected.
- Task A3: “Sustainability issues and problems”: Identification of existing sustainability issues and problems relevant to the Local Plan.
- Task A4: “SA/SEA Framework”: Development of a framework of sustainability objectives for assessing the sustainability of the emerging Local Plan. This provides a way of checking whether the policies proposed and that sites allocated are the best possible ones in terms of their sustainability and can be seen as a methodological yardstick against which the sustainability effects of a plan can be tested.
- Task A5: Consulting on the scope of the SA/SEA: Consultation of the statutory environmental consultation bodies (Environment Agency, Natural England, English Heritage) on the scope and level of detail of the environmental information to be included in the SA report. This allows gaps or inaccuracies in the data to be addressed early in the process.

A detailed scoping report for the Wyre Forest District Local Plan 2036 was prepared in May 2015, and is available at [www.wyreforestdc.gov.uk/media/1233990/Final-Scoping-Report-May-2015.pdf](http://www.wyreforestdc.gov.uk/media/1233990/Final-Scoping-Report-May-2015.pdf). This chapter updates the scoping report findings to 2018 where appropriate.

### 3.2 Task A1. Policy context

The SEA Directive requires a description of “[the plan’s] relationship with other plans or programmes” and “The environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation” (Annex Ia and e)

Appendix 1 of the Scoping Report included a detailed analysis of the plans, policies and programmes that were reviewed as part of this SA to 2015. Additional studies carried out to support the development of the plan since 2015 include several studies of objectively assessed housing need, a residential land availability report, an employment land review, several Green Belt reviews, an infrastructure delivery plan, a water cycle study, a strategic flood risk assessment, and an ecological appraisal of sites.

The revised National Planning Policy Framework (NPPF) of July 2018 includes new requirements for determining the required housing figures; encourages the use of small and medium-sized sites to accommodate at least 10% of housing requirements; supports new settlements; and supports high quality buildings and places. It expects local authorities to carry out viability assessments for affordable housing, and for developer contributions to

then be made in accordance with the plan policies. The NPPF continues the government's commitment to protecting the Green Belt.

In terms of Duty to Cooperate, Wyre Forest District Council has been in discussions with the neighbouring authorities – notably the Black Country local authorities and Birmingham City Council - about their shortfall in housing and employment sites. However, Wyre Forest is not providing any housing or employment sites to meet the needs of other local authorities in this Local Plan Review. Wyre Forest District Council have also met with Bromsgrove District Council to discuss transport issues; and other local authorities as part of the plan making process.

The policy context review identified the following issues that need to be taken into account in the preparation of the Local Plan:

- Adapting to climate change and mitigation
- Renewable energy and reducing greenhouse gas emissions
- Reducing waste and increasing recycling
- Ensuring a range of homes are provided to meet the needs of all people
- Safeguarding best and most versatile agricultural land
- Protecting and enhancing biodiversity and designated sites
- Reducing need to travel and encouraging modal shift
- Producing employment opportunities
- Protecting the District's landscapes and safeguarding the Green Belt
- Regenerating the town centres
- Delivering infrastructure

### **3.3 Task A2. Sustainability context**

The SEA Directive requires a description of “the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme” (Annex Ib) and “the environmental characteristics of the areas likely to be affected” (Annex Ic).

Wyre Forest District is named after one of the largest ancient semi-natural woodlands in the country and is situated in north-west Worcestershire. The local authority area covers 75 sq. miles and has a population of about 100,715 (2017). Figure 3.1 shows key characteristics of the district. Appendix B of the SA Scoping Report includes a detailed record of baseline data.

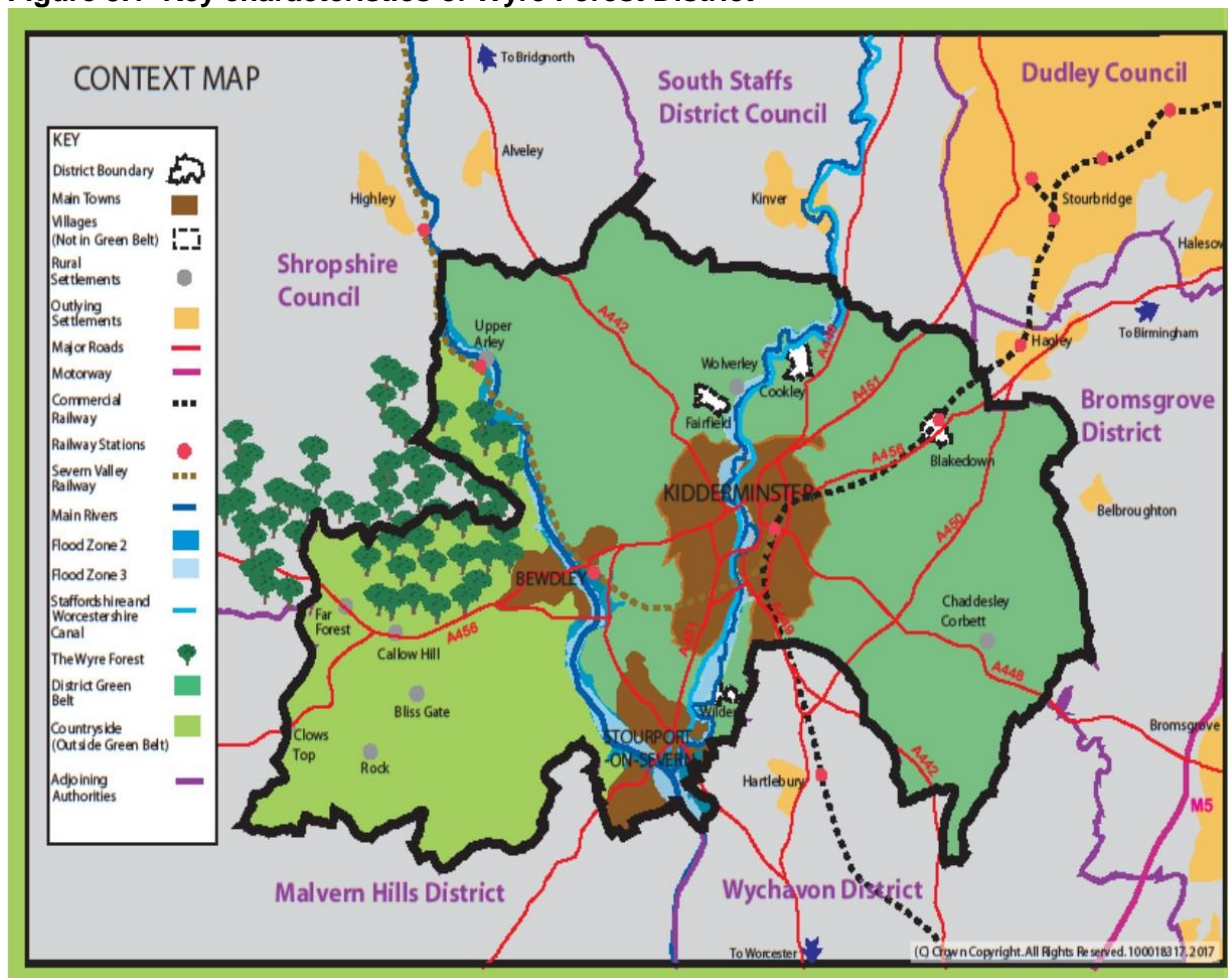
#### **3.3.1. Health and wellbeing**

##### Population

In the UK the population in 2016 was 65.6 million. This is projected to reach 74 million by 2039 (ONS). Wyre Forest's population has grown slightly since 1991 but in recent years this has started to increase. After a decade with a population increase of only 1.1% (2001-2011), the population increased by a further 1.1% from 2013 to 2015, and a further 1.2% between 2015 and 2017. The rate of growth in Wyre Forest District is below that of Worcestershire which is 6.7%, the West Midlands 8.9%, or England 10.8% (Amion 2017).

Wyre Forest District has an ageing population. The proportion of older residents has been increasing as the baby boom generation of the 1940s retire, while the proportion of residents aged 0-15 has fallen. Table 3.1 shows the proportion of the district's aged 65 and over, and 85 and over. This situation is likely to continue as more residents retire, and with improving healthcare and lifestyles.

**Figure 3.1 Key characteristics of Wyre Forest District**



**Table 3.1 Ageing of the population of Wyre Forest District (ONS)**

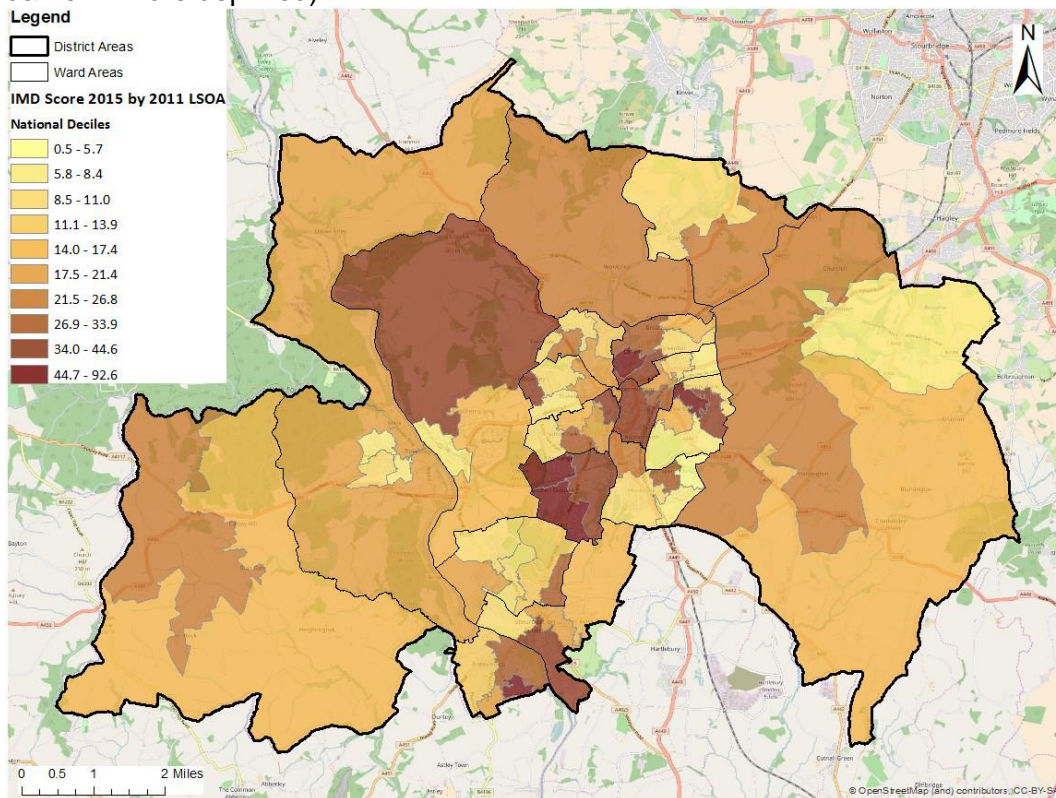
	Year				
	1996	2006	2016	2026	2036
Aged 65 and over (% of population)	16%	18%	24%	27%	31%
Aged 85 and over (% of population)	2%	3%	3%	4%	7%
No. people aged 65+ per 1000 population aged 15-64	243	283	413	489	594

The ageing population has important implications for the resident labour force and the number of jobs that can be supported in Wyre Forest District. The ratio of economically dependent people to economically active people is increasing. An ageing population also increases demand on health and social services. Without a Local Plan allocating sites that consider these issues development could not meet the needs of the elderly in terms of health, social and specialist housing.

#### Deprivation and inequality

Figure 3.2 shows the Index of Multiple Deprivation for Wyre Forest. Just over 20% of the population of the district are within the most deprived 20% areas of the country: this is similar to the national average, but significantly higher than the Worcestershire average (Worcestershire County Council 2017). About 20% of children live in low-income families. This is higher than for Worcestershire as a whole, where the average is 16%.

**Figure 3.2 Multiple deprivation in the Wyre Forest District (lighter = less deprived, darker = more deprived)**



### Health

Life expectancy for both men and women is similar to the England average. Early death rates from heart disease, stroke and cancer are falling over time. However, life expectancy is 9.4 years lower for men and 8.5 years lower for women in the most deprived areas of Wyre Forest than in the least deprived areas. In 2012 the figure was 7.8 for men and 8.5 for women. The situation therefore has remained static for women but has worsened for men.

In terms of adult health, the rate of alcohol-related harm hospital stays is 633 per 100,000 of population, slightly higher than the Worcestershire average (624). The rate of self-harm hospital stays is 201 per 100,000 of population, again slightly higher than Worcestershire (190). Estimated levels of adult excess weight are worse than the England average. Almost 7,000 adults in the Wyre Forest district are recorded as having diabetes. In terms of child health, 23% of Year 6 children are classified as obese, worse than the average for England or the Worcestershire average (18%).

The health gap between the rich and the poor is continuing to increase in England. Priorities in Wyre Forest include improving mental health and wellbeing, reducing harm from alcohol, and increasing physical activity.

### **3.3.2. Local services and facilities**

#### Retail

Kidderminster is the main retail centre in the district and has the widest choice of retail facilities. Since 2005 when the Weavers Wharf retail development opened, the primary shopping area has moved westwards from the traditional town centre which was based around High Street, Worcester Street and Vicar Street. In the traditional town centre there are many empty shops, especially large ones such as the building previously occupied by Woolworths.

Stourport on Severn has a traditional-type high street with a number of independent shops. The majority of shops are occupied and cater to its local catchment. Bewdley is the smallest of the towns within the District: its retail core is compact and focussed on Load Street. The town is an important top-up shopping destination with a range of convenience stores. It does not have a large supermarket. It caters to a smaller market with residents tending to travel to larger towns for a variety of products.

A retail and commercial leisure needs study of 2016 found that there are sufficient retail premises within the district for the Local Plan period. There have been changes in the pattern of shopping with the rise of internet shopping and click-and-collect. Many retailers require smaller premises: this is reflected in Kidderminster where some large retail premises are unoccupied.

#### Other services and facilities

Wyre Forest currently has 97 grass football pitches, 2 full-size 3G pitches and six smaller 3G pitches, 10 senior rugby pitches, 1 junior pitch and 4 mini pitches, 11 cricket pitches and 3 hockey pitches. The district has 23 sports halls, 11 swimming pools and 10 health and fitness suites. In addition there are flat green bowls clubs, gymnastics and rowing clubs. There is an athletics track, tennis courts and squash courts (Knight, Kavanagh & Page, WFDC indoor and built facilities needs assessment, April 2017). Swimming and attending the gym are the most popular sports within the district, with over 10% of the public accessing these activities.

Wyre Forest District has 13 parks and gardens, 26 sites of natural and semi-natural space, and 14 allotment sites. The Wyre Forest covers 600 acres.

If the population of the District increases there is likely to be additional demand on existing cultural facilities, open space and sports facilities.

### **3.3.3. Housing**

There are about 46,912 dwellings in Wyre Forest District. The overall vacancy rate is 2.7% (Arc4, 2018). 71% of occupied dwellings are owner-occupied. This figure includes shared ownership: 14% are social rented (affordable rented) and 14% are private rented. 86% of dwellings within the District are houses or bungalows: of these 37.5% are semidetached, 30% detached, 19% terraced and 14% flats, maisonettes, apartments, mobile or temporary accommodation. Most dwellings in the District have three bedrooms (47%), 9% have one bedroom, 25% have two bedrooms and 18% have four or more bedrooms (Arc4, 2018).

Wyre Forest is positioned within the Worcester strategic housing market area. The 2011 census suggests that 66% of all household moves are within Wyre Forest District area (73% if moves from outside the West Midlands are excluded) and most residents in employment work within the District. Therefore it is a largely self-contained market area (Amion).

#### House prices and affordability

Table 3.2 shows the average house price in the Worcestershire local authorities, and the change from 2017 to 2018. Wyre Forest has the lowest house prices in Worcestershire but had the highest rise in house prices during the last 12 months. Table 3.3 shows housing affordability, as a ratio of income to house price. Compared to nearby districts, Wyre Forest is broadly average in terms of housing affordability. Housing in the district, as elsewhere in England, is increasingly unaffordable, and this trend can be expected to continue in the future.

**Table 3.2 House prices** (Worcestershire Economic Summary May 2018)

Authority	Average House Price	Change May 17 – May 18
Bromsgrove	£267,622	2.5%
Malvern Hills	£265,952	7.7%
Redditch	£200,843	4.2%
Worcester	£216,017	9.8%
Wychavon	£265,701	3.9%
Wyre Forest	£186,900	9.8%
Worcestershire	£232,699	6.2%

**Table 3.3 Housing affordability: house price to income ratio** (Source Arc4, 2018)

	Lowest quartile			Median		
	2015	2016	2017	2015	2016	2017
Bromsgrove	7.45	8.30	8.50	7.60	8.07	8.00
Redditch	8.16	7.52	7.91	8.02	7.66	7.48
Lichfield	7.04	6.72	7.69	6.34	6.62	7.41
Wyre Forest	6.56	6.62	7.17	6.12	6.41	6.78
Tamworth	6.96	6.90	6.74	6.19	6.44	6.77
East Staffs.	6.59	6.36	6.62	6.33	5.98	6.41
West Mids.	6.50	6.53	6.65	6.29	6.40	6.59

### Housing need

The most recent Objective Assessment of Housing Need (OAHN) was undertaken by Arc4 in October 2018. It identifies that the overall requirement for new dwellings per annum is 276, including an annual need for 158 affordable homes. An additional 487 units for (C2 use) institutional or care home are also required, plus a site for travelling showpeople who are being displaced from their current site. In the longer term, about 17 pitches for Gypsies and Travellers are also needed.

If housing sites are not allocated through a Local Plan, speculative development could be built in unsustainable locations where residents may have to travel more to access services. There is likely to be a lack of infrastructure which could result in a lack of community facilities. Much of the district needs smaller 1- and 2-bedroom units: without an up-to-date Local Plan, developers may build larger dwellings that are less needed.

### **3.3.4. Climatic factors and energy**

In 2014, 4.7 tonnes of carbon dioxide (CO<sub>2</sub>) were emitted per person in Wyre Forest, a 26% reduction compared to the 2005 baseline year. When looking at emissions from the domestic sector only, the carbon emissions are higher than the county average. This may be due to the fact a number of properties are off the mains gas network and/or are solid wall properties that are harder to heat. Projections for climate change in the West Midlands based on medium emissions scenarios suggest hotter, drier summers, warmer wetter winters and more extreme weather events.

The district's growing population and economy will increase the demand for energy, which in turn could increase reliance on fossil fuels. Alternative renewable and low carbon sources need to be developed to ensure that supply can meet demand. Without a new Local Plan, measures to reduce energy consumption and increase the use of renewable and low carbon technologies might not be implemented: this would make it difficult to meet national carbon emission targets. The absence of a new Local Plan would also make it more difficult to implement measures to ensure that new developments adapt to the predicted effects of climate change, which may have consequences for the local population and businesses, as well as the built and natural environment.

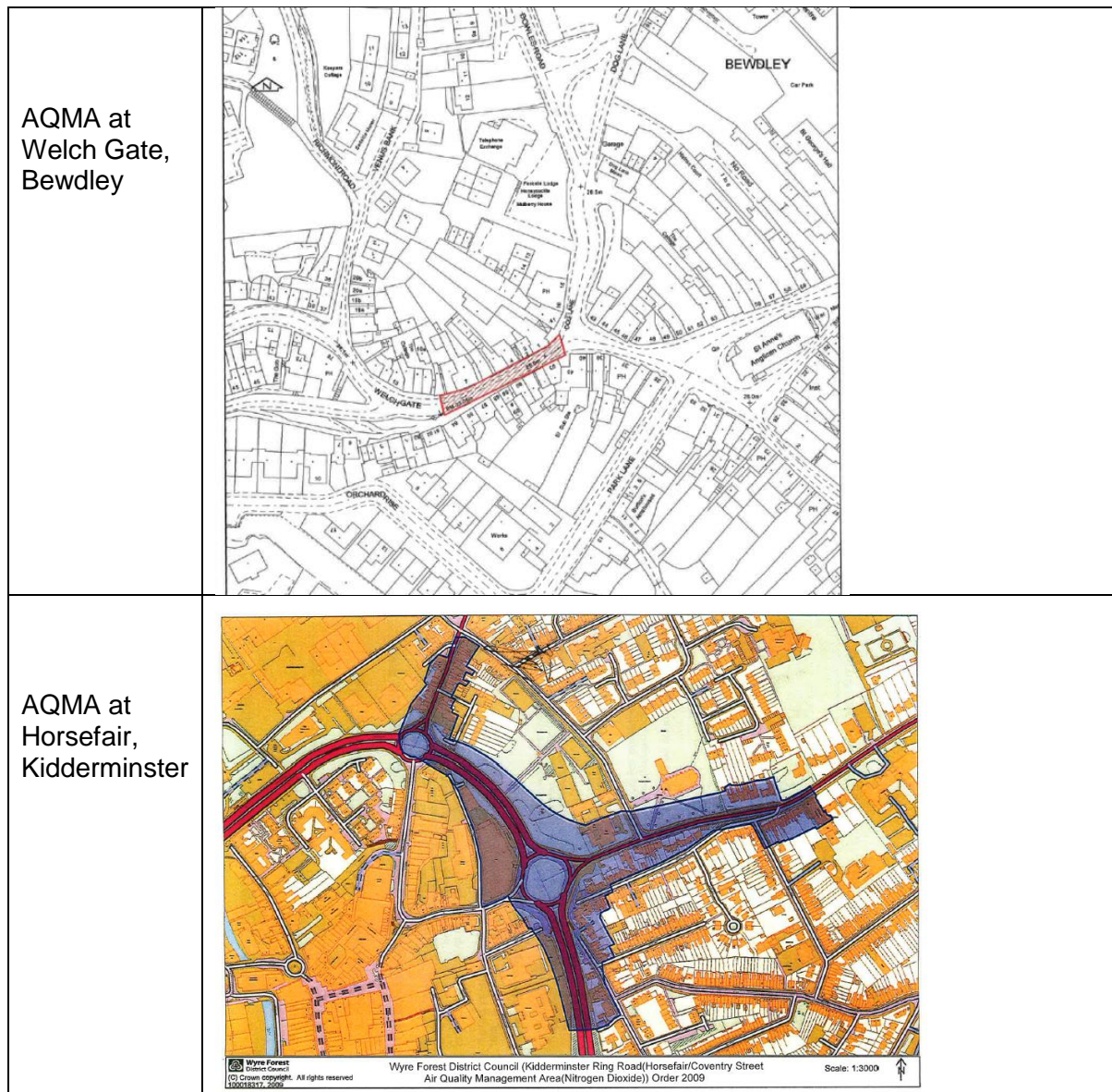
### 3.3.5. Transport and air quality

Most of the people who live in Wyre Forest District also work in the district (arc4, 2018), but about 40% commute out to nearby districts. All three towns in the district are congested. Stourport has a pinch point at the bridge crossing of the River Sever: traffic often queues through the centre of Stourport, to and from the crossing. Bewdley also has a crossing of the River Sever, with traffic crossing into the Georgian high street. Kidderminster and Blakedown both have railway stations with rail services to Birmingham.

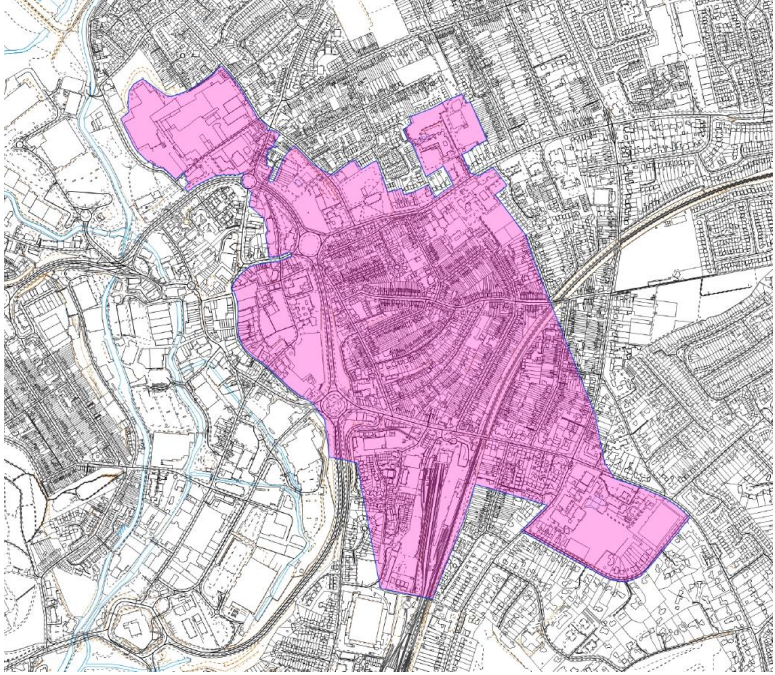
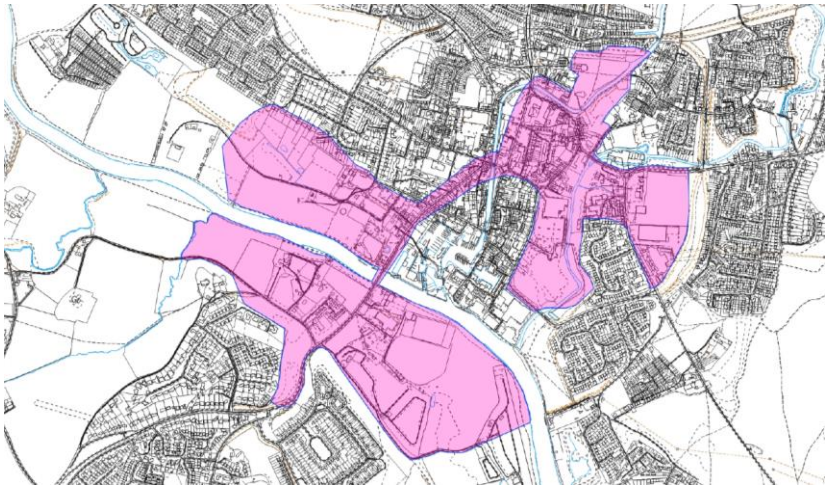
There continue to be two Air Quality Monitoring Areas (AQMAs) in the district: one in the Horsefair, Kidderminster and one at Welch Gate, Bewdley (see Figure 3.3). Additionally there are two air quality consultation areas in Wyre Forest, where air quality is borderline. These are also shown at Figure 3.3.

Without a Local Plan, new housing developments could take place in unsustainable locations where there are not sufficient facilities to meet the increased demand. This would mean additional travelling – including through AQMAs - which would lead to additional pollution and air quality issues.

**Figure 3.3 Air quality management areas in Wyre Forest District**





<p>Air quality consultation area, Kidderminster</p>	
<p>Air quality consultation area, Stourport-on-Severn</p>	

### **3.3.6. Soil and land**

There is a large amount of Grade 1 and 2 in the east of the district.

### **3.3.7. Water resources, water quality and flooding**

#### Water quality

Wyre Forest District has a number of watercourses including the Rivers Severn and Stour. It overlies a principal aquifer of regional strategic importance in terms of water supply, and has several Source Protection Zones to protect public water supplies. The depth of the water table is shallow, given the valley setting of the area. The district is thus located in an extremely sensitive hydrogeological setting.

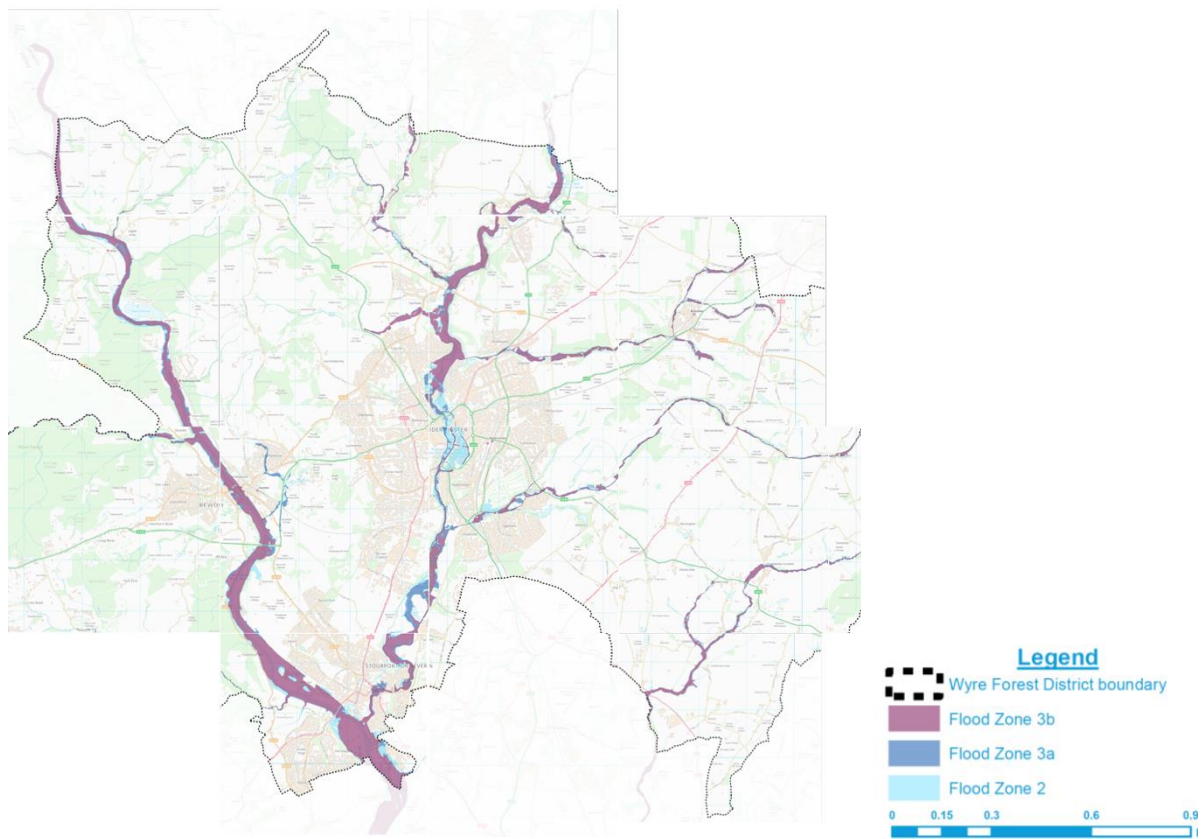
Under the Water Framework Directive, all watercourses are required to reach Good Ecological Status or Potential by 2027. The 2015 Severn River Basin District River Basin Management Plan highlights that several wetlands and surface water catchments within the district are already being impacted by the over-abstraction of groundwater, including the Hurcott and Podmore site of special scientific interest (SSSI), Puxton and Stourvale SSSI,

Hartlebury SSSI and the Blakedown Brook catchment. In the case of the Blakedown Brook, flows are below the standard required to achieve Good Ecological Status. Under the Water Framework Directive, these affected catchments must not deteriorate further (Water Cycle Study 2017). Increased housing in the district will increase pressure on water resources, including groundwater resources.

### Flooding

Areas of the District are subject to regular instances of flooding (see Figure 3.4). Certain areas are at risk of flooding due to existing drainage systems and watercourses becoming overwhelmed during or after heavy rainfall (Water Cycle Study 2018). Areas adjacent to the River Severn are predominantly at risk of flooding after prolonged rainfall outside the district. In Bewdley the erection of demountable barriers in times of flood protects properties from flooding. Flooding is expected to worsen in the future as a result of climate change.

**Figure 3.4 Flood risk in Wyre Forest District** (Source: Strategic Flood Risk Assessment 2018)



### **3.3.8. Landscape and townscape**

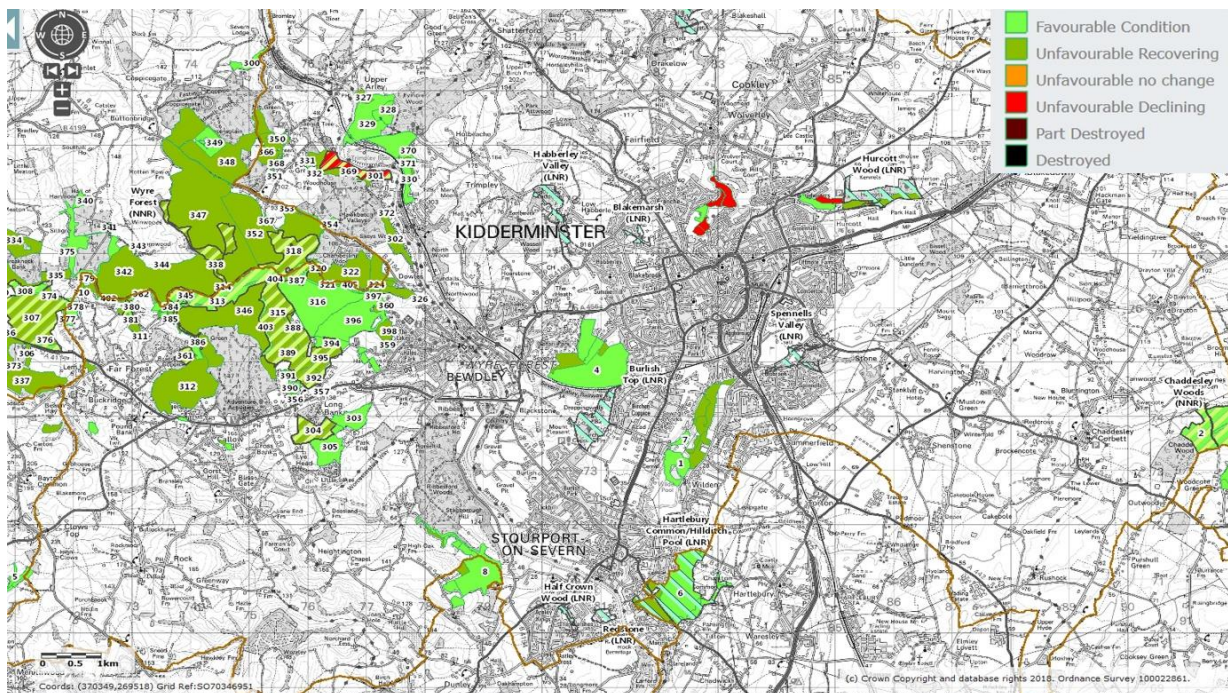
There are no Areas of Outstanding Natural Beauty in Wyre Forest District. The Abberley and Malvern Hills Geopark is an important and distinctive landscape. Figure 3.1 shows that much of the district is covered by Green Belt. The strategic gaps between Bewdley and Stourport, and Stourport and Kidderminster help to prevent urban sprawl.

### 3.3.9. Biodiversity

There are no Special Areas of Conservation or Special Protection Areas in the district. The Wyre Forest is an ancient woodland situated in the west of the District, approximately 6,000 acres in size (although not all of this lies within Wyre Forest District). Much of the forest is designated as an SSSI with many rare plant and animal species being found there. The forest also helps to improve the health and wellbeing of the District's population by offering walks and trails that support all abilities.

Figure 3.5 shows other SSSIs in Wyre Forest District. Most are in favourable or unfavourable-recovering condition. However parts of Puxton Marshes, Stourvale Marsh and Hurcott Pasture SSSIs to the north of Kidderminster, and Eymore Railway Cutting SSSI to the west of Trimpley Reservoir are in unfavourable declining condition. For Eymore, Stourvale and Hurcott this is because of under-grazing and the encroachment of scrub and balsam. For Puxton Marshes this is because of changes in water levels due to the Kidderminster Flood Alleviation Scheme.

Figure 3.5 SSSIs in Wyre Forest District (Source: MAGIC map)



### 3.3.10. Economy and employment

#### Unemployment

Wyre Forest District has generally low unemployment, at an average of 1.7%. However there are pockets of higher unemployment in Foley Park (2.6%) and Hoobrook and Broadwaters wards (2.4%) (County Economic Summary 2018). Unemployment is slightly higher in Wyre Forest District than the average for Worcestershire, but it is considerably lower than unemployment in the West Midlands and England – see Table 3.4. Unemployment levels remained virtually static between 2017 and 2018.

#### Education and skills

The District has suffered due to the decline of carpet manufacturing in Kidderminster. It also has relatively few high-skilled residents, and higher levels of those with no qualifications, than comparator areas (see Table 3.5).

**Table 3.4 Unemployment in Wyre Forest District and comparators** (Worcestershire County Economic Summary May 2018)

	Male	Female	Total	Proportion
Wyre Forest	610	375	985	1.7%
Worcestershire	3450	2100	5555	1.6%
West Midlands	61405	38390	99795	2.8%
England	459525	299190	758710	2.2%

**Table 3.5 Qualifications, Jan-Dec 2017** (Nomis)

Individual levels	Wyre Forest (%)	West Midlands (%)	Great Britain (%)
NVQ4 and above	30.7	31.8	38.6
NVQ3 and above	56.3	50.8	57.2
NVQ2 and above	77.0	69.3	74.7
NVQ1 and above	82.4	80.6	85.4
Other qualifications	7.2	9.0	6.9
No qualifications	10.4	10.4	7.7

### Employment

Average wages in Wyre Forest District are considerably less at £440/week than those in the West Midlands (£515) and Great Britain (£552) (Nomis). This may be due to the district's residents having fewer qualifications when compared to the Great Britain average.

An employment land review (Lichfields 2018) identified a need for at least 29ha of employment land. If this land was not allocated as part of the Local Plan, there could be uncontrolled sporadic development which could harm the environment or affect local infrastructure capacity, which in turn could affect the attractiveness of the area for economic growth. A lack of co-ordination between where new employment development takes place and where it is needed would place increasing demands on transport infrastructure. The uncertainties around Brexit affect business investment and are likely to constrain economic growth (Lichfields 2018).

### **3.3.11. Cultural heritage**

#### Heritage assets

The district contains six Grade I Listed Buildings, 26 Grade II\* and 658 Grade II Listed buildings; one Grade II Registered Park and Garden; and nine Scheduled Monuments. There are 17 Conservation Areas within the District, covering both the urban areas and a number of rural villages (National Heritage List for England).

The 2017 Heritage at Risk Register contains six entries for Wyre Forest District:

- Severn Bridge, Bewdley Grade I
- Ribbesford House, Ribbesford Grade II\*
- Churchill Forge, Churchill: Scheduled Monument and Listed Buildings, 3 Grade II buildings, Conservation Area.
- Gilgal Conservation Area, Stourport-on-Severn
- Green Street, Kidderminster, Conservation Area, Listed Building Grade II
- Ribbesford - 3 grade II Listed Buildings, Conservation Area.

The District also has a local heritage list currently covering Kidderminster, Stourport on Severn, Bewdley, Chaddesley Corbett, Churchill and Blakedown, Wolverley and Cookley, and the Severn Valley Railway. This identifies 1388 non-designated historic buildings and places considered locally significant by the District Council. There are also 3188 non-

designated monuments which include areas of Palaeolithic potential, landscape components, hedgerows, parks and gardens, place names and monuments.

#### Cultural activities

Cultural activities within Wyre Forest District include

- the Bewdley Museum, which tells the story of the growth and trades of Bewdley and the wider Wyre Forest;
- Kidderminster Railway Museum, which houses a vast range of railway artefacts;
- the Museum of Carpet, which is the only museum in the UK dedicated to carpet;
- the Rose Theatre in Kidderminster; and
- The Civic entertainment venue in Stourport on Severn.

Without the Local Plan, development could take place in locations with a detrimental impact – including cumulative impact - on the historic environment. If the historic environment is adversely affected, the local distinctiveness of the district would be affected, and the district could have less appeal as a place to live, work and visit.

#### **3.3.12. Green Belt**

Figure 3.1 shows that the West Midlands Green Belt covers the area to the east of the River Severn. According to the NPPF, Green Belts serve five purposes:

- To check the unrestricted sprawl of large built-up areas;
- To prevent neighbouring towns merging into one another;
- To assist in safeguarding the countryside from encroachment;
- To preserve the setting and special character of historic towns; and
- To assist in urban regeneration, by recycling of derelict and other urban land.

The Green Belt means that development is contained rather than dispersed, reducing the need to travel. Without the Local Plan, development could take place in the Green Belt on a sporadic basis, without being planned to minimise its impact.

#### **3.3.13. Community and settlement identities**

The district is largely rural, and has three towns which form a triangle of settlements at the centre of the district: Kidderminster, Stourport-on-Severn and Bewdley. Between the towns are narrow areas of countryside. Kidderminster is the largest of the three towns and is the main centre for retail, industry and housing. Stourport-on-Severn is a large market town and Bewdley is a smaller riverside market town. In the east of the district are larger, more accessible villages: Blakedown and Cookley have facilities, and Blakedown has a railway station. Villages in the west, which include Rock and Far Forest, are smaller with few facilities and limited public transport.

### **3.4 Task A3. Existing problems and issues**

The SEA Directive requires a description of “Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC” (Annex Id)

Table 3.6 lists the key social, economic and environmental problems and issues in the district.

**Table 3.6 Problems and issues in Wyre Forest District**

**Social problems/issues:**

- Ageing population. Low percentage of residents in the 0-39 age groups; high proportion of residents aged 45-64; and very high proportion of residents aged 65+. The ageing population means that more care facilities are needed for elderly/end of life as well as specialist accommodation. The elderly may want to downsize to smaller residential units which could free up family-sized accommodation.
- High costs of providing healthcare for an ageing population with high obesity levels.
- Need to ensure that residential development caters for all groups in society.
- Low levels of in-migration.
- Noticeable variations in health: people in wealthier areas live longer than those in poorer areas
- Low availability of services in the District's rural areas
- Housing affordability problems
- Fuel poverty
- Increasing use of Kidderminster rail station
- Leisure and sport facilities should be accessible to local residents.

**Economic problems/issues:**

- Loss of traditional manufacturing industries. Working age people need to be attracted to the district as economically active people improve the area. This helps retail and regenerates the area; more people spending money encourages more shops; this in turn improves the town centre so that more retailers wish to open shops, restaurants and provide services.
- High ratio of economically dependent people to economically active people. More economically active people need to be attracted to the district to ensure that communities are better balanced.
- Pockets of higher unemployment in Foley Park and Hoobrook and Broadwaters wards.
- Lower earnings than the West Midlands or Great Britain. About 40% of residents commute to outside the district for work. Need to raise wage levels by attracting employers with higher wages, thus reducing the wages gap between the district and neighbouring local authority areas, and reducing commuting.
- Need to diversify the economy, create more skilled jobs to reduce out of district commuting and increase the retention of young educated residents.
- Low rates of qualification at both GCSE and higher/ further education level.
- Government policy states that 90% of suitable brownfield sites should have a Local Development Order for residential development by 2020. This could potentially push industrial development into other areas such as the Green Belt.
- Need to regenerate the town centres.
- Need to deliver infrastructure to support housing and employment development
- Uncertainties around Brexit

**Environmental problems/issues:**

- Over half of the district falls within the West Midlands Green Belt. There is pressure for development in the Green Belt.
- Flooding within all three towns, and pressure for development in flood zones.
- Poor air quality (AQMA) at Horsefair, Kidderminster and Welch Gate, Bewdley.
- Poor condition of SSSIs to the north of Kidderminster.
- Large amounts of Grade 1 and Grade 2 agricultural land in the east of the District, which needs to be safeguarded.
- Need to improve air quality and water quality, and reduce water abstraction.
- Need to ensure that new development reflects Wyre Forest District's distinctive character.

- Need to protect, conserve, and where possible enhance the District's rich natural environment and historic assets.
- Need to plan for the impact of climate change, which includes flooding, in new development.

### 3.5 Task A4. Developing the SA/SEA framework

The Sustainability Appraisal (SA) Framework provides a structure by which the sustainability effects of a plan can be identified, described, and compared. Development of the Local Plan involved two types of decisions: on policies (general directions for the plan) and on sites (specific locations for development). Assessing the impacts of policies is quite different from assessing the impacts of sites, and two different appraisal frameworks have been used.

#### Policy SA framework

The policy SA framework was based on the SA frameworks that were previously used for the Council's Core Strategy (adopted in December 2010), and the Site Allocations and Policies Local Plan and the Kidderminster Central Area Action Plan (both adopted in July 2013). The framework was modified to reflect the issues identified above, the revised National Planning Policy Framework, and feedback on the SA scoping report. The SA framework proposed in the 2015 Scoping Report had 11 SA objectives. Two additional SA objectives were included in 2017:

- To maintain the integrity of the Green Belt within the District.
- To maintain and enhance community and settlement identities.

This is because most of the development within Wyre Forest District over the current adopted plan period has taken place on previously developed or brownfield land. This type of development has had minimal effect on the Green Belt or community and settlement identities. During the proposed Local Plan period there is not enough previously developed land for all the housing and employment land need. Therefore some greenfield sites, including some that are currently in the Green Belt, will need to be developed. It was therefore considered important to include the additional two SA objectives. Table 3.7 shows the policy SA Framework including the two new objectives.

The SA framework represents the findings of the SA through symbols, ranging from major to minor negative and positive impacts. Table 3.8 shows the categories of impact significance. In the detailed policy appraisals shown at Appendix A, those SA objectives that are not relevant to a particular policy are not shown, to avoid unnecessary blank appraisal cells.

The policy SA framework has been used to assess the impacts of the Local Plan's vision and objectives, strategic options, and policies. The appraisal results are discussed further in Chapters 4, 5 and 7.

**Table 3.7 Policy SA Framework: Objectives and decision-making criteria.**

SA objective	Decision Making Criteria: will the option/policy...
1) To improve health and well-being within the District and reduce inequalities in health.	Improve access to health care facilities?
	Help to improve quality of life for residents?
	Help to increase participation in sport and active recreation?
2. To improve and enhance the provision and accessibility to local services and facilities	Enhance the provision of local services and facilities?
	Contribute to rural service provision across the District?
	Enhance accessibility to the District's countryside?

<b>SA objective</b>	<b>Decision Making Criteria: will the option/policy...</b>
3. To ensure that the housing needs of all residents and communities are met	Provide opportunities to increase the supply of affordable housing across the District?
	Provide affordable access to a range of housing tenures and sizes?
4. To promote energy efficiency & energy generated from renewable and low carbon sources.	Reduce greenhouse gas emissions?
	Encourage renewable energy generation?
	Encourage waste recycling?
5. To reduce the need to travel and move towards more sustainable travel modes; to reduce associated effects of air quality & greenhouse gas emissions	Provide opportunities to increase sustainable modes of travel and reduce congestion?
	Focus development in existing centres and make use of existing infrastructure to reduce the need to travel?
6. To protect soil & land	Re-use brownfield land?
	Result in a loss of Grade 1 or 2 agricultural land?
	Have a detrimental impact on air quality?
	Have a detrimental impact on water quality?
7. To protect water resources and quality; reduce flood risk.	Protect the floodplain from development?
	Reduce the risk of flooding in existing developed areas?
8. To protect and enhance landscape and townscape	Achieve high quality, sustainable design for buildings, spaces and the public realm which is sensitive to the locality?
9. To conserve & enhance the District's biodiversity and geodiversity	Help to safeguard the District's biodiversity and geodiversity?
	Impact on SSSIs and other designated sites?
	Contribute to the District's green infrastructure network?
10. To support the economy & ensure suitable employment opportunities	Reduce unemployment?
	Provide opportunities for businesses to develop and enhance their competitiveness?
	Provide opportunities to further develop adult and community learning facilities in the District?
11. To protect & enhance the historic environment & its settings	Have a positive impact on the District's Heritage Assets?
12. To maintain the integrity of the Green Belt within the District.	Protect the Green Belt?
13. To maintain & enhance community & settlement identities	Maintain and enhance community and settlement identities?

**Table 3.8 Categories of impact significance**

--	Major negative compared to the current situation - Problematic sustainability issues, mitigation difficult and/or expensive.
-	Minor negative compared to the current situation - Potential sustainability issues, mitigation possible
+	Minor positive compared to the current situation - No sustainability constraints.
++	Major positive compared to the current situation - Development would resolve an existing sustainability problem.
?	Uncertain - Uncertain or unknown effect.
0	Neutral - Neutral effect.
+/-	Both positive and negative



### Site SA framework

For many of the SA objectives, more specific information is needed to allow the sustainability of individual sites to be usefully appraised. A specific SA framework was developed for sites: the preferred options consultation included a draft framework, which was revised in response to comments received during the preferred options consultation, and to make it more practically useful.

The site appraisal framework, shown at Table 3.9, does not cover the SA objectives for:

1. Health, as all development will need to achieve the same space and quality criteria, and all new housing is expected to have roughly the same health benefits
4. Energy efficiency and renewables, as all development will need to achieve the same requirements in terms of energy efficiency.

To avoid duplication and ensure that the SA is best integrated into the planning team's analysis of the sites, the SA information was integrated into the Housing and Economic Land Availability Assessment (HELAA) forms for the sites. The site appraisal results are discussed at Chapter 6.

**Table 3.9 Site SA Framework**

	--	-	0	+	++	?
<b>2. Local services and facilities</b>		Poor access, as judged by the HELAA form	Reasonable access, as judged by the HELAA form	Good access, as judged by the HELAA form		
<b>3. Housing needs</b>				Housing site <40ha	Housing site >40ha	Mixed use site, or not stated
<b>5. Need to travel</b>		Poor public transport access as judged by the HELAA form; within 200m of AQMA	Reasonable public transport access, as judged by the HELAA form	Good public transport access, as judged by the HELAA form		
<b>6. Soil and land</b>		Greenfield; grade 2 agricultural land; development could affect other soil/land	Part greenfield, part brownfield	Brownfield		? possible contamination
<b>7. Water and flooding</b>	Mostly/all in flood zone 2 or 3; flagged up as significant concern by water cycle study	Partly in flood zone 2 or significant surface water flooding; in aquifer protection zone or similar	Not in flood or protection zones			Flagged up as possible concern by water cycle study; inconsistency between planner knowledge and water cycle study

	--	-	0	+	++	?
<b>8. Landscape</b>	Significant negative effect on many people	Some negative effect	Little/no effect	Would improve the streetscape		
<b>9. Biodiversity</b>	Adjacent to or on designated nature conservation site; other significant cumulative impact on biodiversity	Within 500m of SSSI or similar effect; affects BAP species; affects significant tree preservation order	No significant impact	Potential for improvement		
<b>10. Economy</b>			No potential	Proposed employment development		Unclear whether employment or other uses
<b>11. Historic env</b>	Impact on Grade I, II, II*; judged by heritage officer to have significant impacts on heritage incl. archaeology	Impact on undesignated heritage assets; judged by heritage officer to have impacts on heritage incl. archaeology	No impact			
<b>12. Green Belt</b>		In Green Belt	Not in Green Belt			
<b>13. Community &amp; settlement identities</b>		Outside built area; affects asset of community value	Adjoins built area	In built area		

### 3.6 Task A5. Consulting on the Scoping Report

The SA Scoping Report was made available for consultation for a 5 week period between 18th May and 29th June 2015. A total of 46 comments were received, including from Historic England, Environment Agency, Natural England, Worcestershire Wildlife Trust, Severn Trent and North Worcestershire Water Management. The comments included additional suggested policies to review; additional baseline data to include; and changes to the SA objectives.

This chapter has included the changes made as a result of the comments, in particular a greater focus on protection and enhancement of biodiversity; more information on SSSI condition; improved data on water quality and flooding including water cycle studies; a focus on enhancing as well as preserving heritage assets; more information on Gypsy and traveller sites; and consideration of archaeological impacts in the site assessments. Other suggestions have been incorporated into the plan, e.g. a strong emphasis on green corridors/infrastructure and sustainable drainage systems (SuDS).

## Chapter 4. Task B1: Appraisal of the plan objectives

### 4.1 Introduction

This is the first of four chapters that appraise the sustainability impacts of the Local Plan vision and objectives, alternatives that were considered, individual proposed sites for development, and the strategic and detailed policies. For all of these, the appraisal helped to fine tune each of these elements of the emerging Local Plan.

The appraisals were undertaken by members of the planning policy team and a consultant using professional judgement, supported by GIS data, baseline data from the Scoping Report, and further updated evidence. Where significant adverse effects have been predicted, the SA has sought, where possible, to find a means of avoiding or mitigating these effects. Where it was considered that there were opportunities to enhance the overall sustainability of the proposals, recommendations were made.

### 4.2 Appraisal of the plan objectives

A first round of draft plan objectives – when there were still 8 rather than 11 objectives - was assessed against the SA framework. Table 4.1 shows the appraisal findings. Most of the plan objectives scored either positively, neutral or unknown. Some of the plan objectives scored negatively for SA objectives 6 (soil and land) and 12 (Green Belt). This is because there is not enough previously developed land to meet the development requirements within the district, so some greenfield and Green Belt land release is needed.

**Table 4.1 Assessment of Plan Objectives against Sustainability Appraisal Objectives.**

Plan objective	SA objective												
	1. Health	2. Services	3. Housing	4. Energy	5. Transport, air	6. Soil, land	7. Water	8. Landscape	9. Biodiversity	10. Economy	11. Heritage	12. Green Belt	13. Communities
1. To encourage the long term sustainable development of Wyre Forest District and its communities.	+	+	+	+	+	?	+	+	?	+	+	-	?
2. To address the key challenges facing the District especially in terms of housing, employment, and transport.	+	+	+	+	+	?	?	?	?	+	0	-	?
3. To address housing needs in order that the existing and future residents' requirements are met and the economic development of the area is supported.	+	+	+	+	?	-	?	?	?	+	0	-	?
4. To recognise the changing nature of employment, encourage economic diversification and make sufficient high quality employment sites available.	+	+	0	+	?	-	?	?	?	+	0	-	?
5. To maximise the use of previously developed land in order to ensure the best	+	+	+	+	+	+	?	+	?	+	?	+	?

Plan objective	SA objective												
	1. Health	2. Services	3. Housing	4. Energy	5. Transport, air	6. Soil, land	7. Water	8. Landscape	9. Biodiversity	10. Economy	11. Heritage	12. Green Belt	13. Communities
use is made of available land both within and beyond the main towns.													
6. To protect and support the role of the Green Belt through a strategic review and to identify limited strategic Green Belt release to enable the delivery of the Plan whilst reinforcing the role and integrity of the Green Belt for future Plan periods.	0	0	+	+	?	?	?	?	?	+	+	+	?
7. To help resolve the traffic issues in Kidderminster by the provision of an alternative route for through-traffic and to enhance the availability and versatility of rail-based services.	+	+	+	0	+	?	?	?	?	+	+	-	?
8. To maximise opportunities for the inclusion of green infrastructure and heritage assets into high quality development in order to provide a good quality of life and maximise the benefits of walking and cycling.	+	+	+	+	+	+	?	+	+	0	+	+	+

Table 4.2 shows the findings for each SA objective. It shows that SA objectives 4 (energy), 7 (water), 8 (landscape), 9 (biodiversity) and 11 (heritage) were not adequately covered by the plan objectives. Plan objective 7 also does not mention walking, cycling or bus transport.

**Table 4.2 Summary appraisal findings for the plan objectives**

SA Objective	Local Plan Review Objectives
1 To improve health and well being within the District and reduce inequalities in health.	Plan objective 8 aims to maximise opportunities for the inclusion of green infrastructure and promote more healthy lifestyles by increasing provision of cycle paths and walk ways. Need to say more about walking and cycling.
2 To improve and enhance the provision and accessibility to local services and facilities.	Plan objective 2 aims to address the key challenges facing the district, especially in terms of housing, employment, and transport.
3 To ensure that the housing needs of all residents and communities are met.	Plan objective 3 aims to meet the needs of the district's growing population. It aims to address housing need in order that the existing and future residents' requirements are met.
4 To promote energy efficiency and energy generated from renewable and low carbon sources.	Not covered by the plan objectives
5 To reduce the need to travel and move towards more sustainable travel modes; to reduce associated effects of	Plan objective 7 is to help resolve the traffic issues in Kidderminster by the provision of an alternative route for through-traffic and to enhance the availability and versatility of rail-

air quality and greenhouse gas emissions.	based services. Walking, cycling and bus transport are not covered.
6 To protect soil and land.	Plan objective 5 is to maximise the use of previously developed land in order to ensure the best use is made of available land both within and beyond the main towns.
7 To protect water resources and quality; reduce flood risk.	Not covered by the plan objectives
8 To protect and enhance landscape and townscape.	
9 To conserve and enhance the District's biodiversity and geodiversity.	
10 To support the economy and ensure suitable employment opportunities.	Plan objective 4 encourages economic diversification and make sufficient high quality employment sites available in order that the economic development of the area is supported.
11 To protect and enhance the historic environment and its settings.	Not covered by the plan objectives
12 To maintain the integrity of the Green Belt within the District.	Plan objectives 6 aims to protect and support the role of the Green Belt through a strategic review and to identify limited strategic Green Belt release to enable the delivery of the Plan whilst reinforcing the role and integrity of the Green Belt for future Plan periods.
13 To maintain and enhance community and settlement identities.	Plan objective 1 is to encourage the long term sustainable development of communities in Wyre Forest District.

### 4.3 Changes made to the plan objectives in response to the SA findings

As a result of these findings, the plan objectives were amended to include greater reference to environmental issues. Plan objectives 1-6 remain the same, but new plan policies were added on green infrastructure/biodiversity, the historic environment and landscape, health, sustainable transport and water/flooding. Table 4.3 shows the appraisal of these new plan objectives.

**Table 4.3 Assessment of new plan objectives against SA objectives**

Plan objective	SA objective												
	1. Health	2. Services	3. Housing	4. Energy	5. Transport, air	6. Soil, land	7. Water	8. Landscape	9. Biodiversity	10. Economy	11. Heritage	12. Green Belt	13. Communities
7. To maximise opportunities for the inclusion of green infrastructure and heritage assets into high quality development in order to provide a good quality of life and maximise the benefits of walking and cycling.	+	+	+	+	+	+	+	+	+	+ /-	+	0	+
8. To promote the historic environment and landscape and conserve heritage assets in a	0	0	?	?	0	0	0	+	0	?	+	0	+

Plan objective	SA objective												
	1. Health	2. Services	3. Housing	4. Energy	5. Transport, air	6. Soil, land	7. Water	8. Landscape	9. Biodiversity	10. Economy	11. Heritage	12. Green Belt	13. Communities
manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations													
9. To increase provision and to facilitate greater access to sport, recreational and other community facilities in order to encourage healthier lifestyles and improve the health and wellbeing of the District's population	+	+	+	0	?	0	0	0	0	+	0	0	+
10. To improve connectivity within the District and achieve more sustainable travel patterns and reduce the need to use the private car through improved public transport services (bus and rail), and new and enhanced cycleways and footpaths. These actions will contribute to an improvement in air quality.	+	+	0	+	+	0	0	0	0	+	0	0	+
11. To protect the District's water supply and quality, and reduce the risk of flooding.	+	+	0	0	0	+	+	0	+	+	0	0	0

## Chapter 5. Task B2: Development and appraisal of alternatives

The SEA Directive requires that “the likely significant effects on the environment of implementing the plan... and reasonable alternatives taking into account the objectives and the geographical scope of the plan, are identified, described and evaluated” (Article 5.1). It also requires “an outline of the reasons for selecting the alternatives dealt with” (Annex 1h).

### 5.1 Introduction

A key role of SA is to explain how alternatives – also known as options – to the plan have been identified, assessed and compared, and why the preferred options have been chosen. The SA findings can help to refine and further develop the alternatives. The SA findings do not form the sole basis for decision making – this is informed also from planning, evidence-based studies, feasibility, and consultation feedback.

This chapter discusses the high-level spatial strategy alternatives considered during the development of the Local Plan. It begins with a discussion of housing numbers, and considers whether all of the housing can be accommodated on previously developed land. It then considers broad locations for housing, and then the best combination of sites that form the preferred option for the plan. In practice, an iterative process was carried out: analysing the individual sites (discussed at Chapter 6), sifting out those that were less sustainable, and focusing on those that are more sustainable.

### 5.2 Amount of housing

The National Planning Policy Framework (NPPF) of July 2018 requires local authorities to carry out a local housing need assessment, using a national standard method (para. 60). Before then, local authorities were expected to provide for the “*full, objectively-assessed needs for market and affordable housing in the housing market area, as far as is consistent with [sustainable development].*”

In 2016 an Objectively Assessed Housing Need (OAHN) study was undertaken by Amion Consultants. This established an OAHN of 254 dwellings per year for the plan period 2016-2032. Following the Brexit vote and the release of updated household projection figures, the analysis was undertaken a second time and republished in April 2017. This gave an OAHN of 300 dwellings per year.

The plan period has now been extended to 2036 and a further local housing need assessment has been carried out using the new standard method set out in the 2018 NPPF. The plan period was extended because the NPPF states that strategic policies should look ahead over a minimum 15-year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure (para. 22). Several respondents to the Preferred Options consultation also suggested that the period of the plan be extended for this reason.

Using the national standard method and the extended plan period, gives 276 dwellings/year or 5,520 over the plan period (Arc4, 2018). The district council is also identifying an additional 15% of sites in case some of the allocated sites don't come forward. Between the start of the plan period in April 2016 and 1 Sep 2018, 521 homes had already been completed, 96 were under construction, and 537 were committed but had not yet been started. This leaves a requirement to find sites for around 5200 dwellings.

Since 2010, virtually all development in the district has been built on previously developed ('brownfield') land. Wyre Forest District Council want to continue with a brownfield-led strategy in the district's three towns because this protects green areas, reduces the need to travel and generally provides new homes near existing services and infrastructure.

However, the capacity from brownfield sites is not sufficient to provide the number of homes that are required over the plan period. The plan aims to site as many of the remaining homes as possible on brownfield land. A Green Belt Boundary Review informed the location of future housing and employment sites in the Green Belt. In total, including those sites already completed, under construction and committed, the Local Plan allocates 49% of housing on brownfield sites, including on brownfield sites in the Green Belt such as Lea Castle. The rest comprises greenfield land that is not in the Green Belt (7%) and Green Belt greenfield land (44%).

### 5.3 Broad areas of development

At the Issues and Options Stage of September 2015, seven alternatives/options for accommodating growth within Wyre Forest District were considered, all of which prioritise brownfield development but reflect different ways of providing the necessary additional greenfield development. Table 5.1 shows the seven options, and how they score against the SA Framework.

**Option 1** is the current Wyre Forest District Council approach to development. It is a sustainable option utilising brownfield land. This continues to be an important contribution to the overall development strategy and makes the most effective use of previously developed land. Most brownfield land is in sustainable locations in existing towns, and has access to services and facilities which reduces the need to travel. This option protects both the Green Belt and high grade agricultural land. However, there is unlikely to be enough available and deliverable brownfield sites within the District for the whole of the new plan period. There may be some viability issues associated with developing brownfield sites such as land remediation costs, which could impact on the deliverability of new development.

**Option 2** is for brownfield regeneration as in Option 1, but if additional greenfield or Green Belt land is required for development, the option focuses this development on sites around the north eastern edge of Kidderminster. Development in this location could make use of sustainable transport links at Kidderminster Rail Station and potentially its future wider links to HS2. This option would have a significant effect on traffic in the area: there is currently an Air Quality Management Area (AQMA) area in Kidderminster. This option could allow for the provision of additional facilities such as employment land, primary school, GP surgery and shop. There could be opportunities for pathways and cycle ways into green spaces to contribute to healthy and active lifestyles and this could improve air quality which may improve health. This option would have an impact on the Green Belt as this area is within the Green Belt, and a comprehensive Green Belt Boundary Review would be required in order to allocate sites in this area. This option would also mean the loss of grade 2 and 3 agricultural land, and an associated effect on the character of the landscape. However, it is considered that this option is a sustainable option and has been progressed to the preferred options stage of the emerging Local Plan.

**Option 3** is for brownfield regeneration as in Option 1 but, if growth levels require additional land, then this option would focus development to sites around the south eastern edges of Kidderminster. This option would allow the need for affordable dwellings to be met. Development here is located to make the most of the employment opportunities along the Worcester Road and Hartlebury Trading Estate corridor. This option would have a significant effect on traffic in the area. It could allow for additional facilities such as school, shop, GP surgery, and may enhance the existing facilities and services in Kidderminster. There could



**Table 5.1 Appraisal of broad spatial options: brownfield and greenfield**

Issues and Options Strategic Options		Sustainability Appraisal Objectives												
		1. Health	2. Services	3. Housing	4. Energy	5. Transport, air	6. Soil, land	7. Water	8. Landscape	9. Biodiversity	10. Economy	11. Heritage	12. Green Belt	13. Communities
1	Brownfield regeneration which focussed on the main towns of Kidderminster and Stourport-on-Severn.	+	+	+	+	++	+	?	+	0	+	?	+	?
2	Brownfield regeneration focussed on the main towns and expansion of Kidderminster to the North East via a sustainable urban extension.	+	+	++	+	++	-	?	-	?	+	?	-	?
3	Brownfield regeneration focussed on the main towns and expansion of Kidderminster to the South East via a sustainable urban extension.	+	+	++	+	++	-	?	-	0	+	?	-	?
4	Brownfield regeneration focus for Stourport-on-Severn with some greenfield and Green Belt release	+	+	+	+	+	+	?	+	0	+	?	-	?
5	Allocate some development to Bewdley through an amendment to the town's settlement boundary to accommodate new development	+	+	+	+	+	-	?	-	0	-	?	-	?
6	Allocate more new development to the villages and settlements within the District's rural east.	+	+	+	+	?	-	?	-	0	-	?	-	?
7	Allocate more development to the villages and settlements within the District's rural west	+	+	+	+	?	-	?	-	0	-	?	+	?

be opportunities through pathways and cycle ways leading to green spaces to contribute to healthy and active lifestyles, and to improve air quality. This option would have an impact on the Green Belt as land to the south east of Kidderminster falls within the Green Belt. In order to allocate sites in this area a comprehensive Green Belt Boundary Review would be required. This option would also have an impact on agricultural land in this area which is grade 2 and 3. Development in this area could also have a significant effect on the landscape character; however due to the location this option is considered to be sustainable and has been progressed to the Preferred Options stage of the Local Plan review.

**Option 4.** Stourport-on-Severn has a population of about 20,000 and additional development is required. There are still significant amounts of brownfield land available for development in Stourport-on-Severn. This option would seek to meet Stourport-on-Severn's future housing and employment needs partially on brownfield sites, but on greenfield land or land in the Green Belt if additional land is needed. Depending on the level of housing and employment

needs, this may be enough to accommodate the majority of development within the new plan period without the need for a sustainable urban extension. Land to the north west of Stourport-on-Severn falls within the Green Belt and therefore any greenfield sites identified here would require a comprehensive Green Belt Boundary Review. Land to the south west of Stourport-on-Severn does not fall within the Green Belt, but contains sensitive landscapes in the open countryside. Most sites in Stourport-on-Severn are not on prime agricultural land, but land at Areley Kings and a few other sites is high quality agricultural land (grade 2 and 3). Stourport-on-Severn has only one bridge crossing, therefore any land allocated for development on land on the Areley Kings side of the river could have a significant effect on congestion, as access over the bridge is at a point which is already congested. Gilgal in Stourport-on-Severn has poor air quality, and additional traffic passing through could worsen the air quality of this area. Land on the Areley Kings side of the river would have a significant visual impact, including on the setting of the settlement. However overall Option 4 scores positively.

**Option 5.** Bewdley has a population of about 9,000, and needs additional dwellings and employment land. However current Wyre Forest District policy has meant that Bewdley has seen only very small amounts of development because of the lack of available brownfield land in the town. Option 5 would see some new development allocated to Bewdley to meet its future needs through an amendment to the town's settlement boundary. Bewdley Town Council is producing a Neighbourhood Development Plan, so any allocations or amendments to the settlement boundary will also need to be considered through this process. Land to the east of the town and river falls within the Green Belt and therefore any sites allocated here would need to be subject to a Green Belt Boundary Review. Land to the west and north-west of the river is not in Green Belt, but it is open countryside and much of it has high landscape value. Additional development in Bewdley may help to retain services and facilities within the town: the last bank closed in 2016. Development in Bewdley should also provide affordable dwellings. Welch Gate is an AQMA, and any development on that side would worsen the already-poor air quality. Development on the opposite side of the river in Wribbenhall is less likely to have a negative impact on the AQMA. This option scores negatively for employment provision as little employment land is proposed.

**Option 6.** Villages in the rural east of the district are more sustainable than the villages in the rural west, as they have more services and are better served by public transport. Blakedown has a railway station. Development in villages can help to retain services and meet local housing need. Some villages and settlements such as Chaddesley Corbett do not have a settlement boundary but are washed over by the Green Belt: a comprehensive settlement boundary review for villages in the east of the District would need to be undertaken. Chaddesley Corbett and Churchill and Blakedown have Neighbourhood Development Plans. Both of these will be important considerations in allocating further development to meet their local needs. Land to the east of the District falls within the Green Belt and therefore any site identification in or around settlements would be subject to a Green Belt Boundary Review. Land in the rural east is also high quality agricultural land grade 2 and 3. This option could have a significant negative effect on the Green Belt. It also scores negatively on the landscape criterion. Large amounts of development land in options 2 and 3 are being proposed to the east of Kidderminster and it is considered that local need in the rural east could be served by the Kidderminster urban extensions.

**Option 7.** The smaller settlements to the west of the River Severn have fewer facilities and limited public transport. Far Forest and Clows Top do have local facilities such as a village hall, shop and church, and Far Forest also has a primary school and public house. Small amounts of development for local need may help to keep local rural services and facilities such as schools and shops open. Only residential development is proposed in the rural west, so it scores negatively on the provision of additional employment. In order to accommodate more development in villages to the west of the District it would be necessary to undertake a

comprehensive settlement boundary review. Some of the smaller settlements in this area do not currently have a settlement boundary drawn around them. This option scores negatively on protecting soil, land and the landscape because development would be on agricultural land. Road transport in the rural west is good but this is scored as an uncertain effect as it would depend largely on where development was situated.

In response to the Issues and Options consultation, 1631 comments were received from 122 respondents. The comments included:

- The need to protect the Green Belt and consider brownfield sites first, and thus support for Option A
- Support for Options B and C if Option A cannot provide enough developable land
- The need to address traffic and parking problems in the district, particularly in the three towns
- The need for affordable properties, a mixture of new housing, and eco-homes
- Dislike of wind turbines and solar panels because of their noise and visual intrusiveness
- Querying of the lack of option regarding development to the south west of Stourport
- The need for a policy on siting telecommunications equipment, and one that protects community and cultural facilities
- The need to consider the impact of the Local Plan on the West Midlands conurbation and vice-versa
- The need to extend the lifetime of the plan to conform to legal requirements

Following the Issues and Options stage it was considered that a combination of options will be needed to accommodate the housing and economic growth needed in the district, with infrastructure requirements, especially schools and highways, being critical to the final strategy:

- Option 1 would not deliver the necessary amount of development land on only brownfield sites. The preferred option is to take forward the option of using brownfield land but to combine this with other options to ensure that enough land will be available.
- Option 2 and 3 are the most sustainable greenfield locations within Wyre Forest District and these options have been taken forward.
- Option 4 has been taken forward because of the need to regenerate Stourport-on-Severn. However any land allocations on the Areley Kings side of the river would exacerbate transport impacts at the bridge, and this will restrict where development can go.
- Option 5 has been taken forward to ensure that local need in Bewdley is met. Impacts on the AQMA will need to be taken into account.
- Option 6 has not been taken forward since Options 2 and 3 would address the local need from the rural east with fewer negative impacts than Option 6.
- Option 7 has been taken forward in the form of a small amount of development to serve local need and to retain local services such as schools and shops.

#### **5.4 Housing sites in each larger town**

In parallel with the consideration of individual development sites – discussed at Section 5.6 - the broader needs of, and development opportunities in, each of the larger towns were then considered. Particular areas for potential development were filtered down.

In **Kidderminster**, brownfield sites could accommodate approximately 820 homes, which will make an important contribution to the development strategy but will not be sufficient to meet the full need for housing in the town. Lea Castle is owned by Homes England, and an

application for up to 600 homes and up to 3,350m<sup>2</sup> of employment uses was made in 2017. A higher number of dwellings (about 1400-1500) on a larger site at Lea Castle would allow the site to become a stand-alone community with a school and possibly a GP surgery. The alternative would be for a smaller Lea Castle site to rely on existing facilities in Cookley or Kidderminster.

Other large greenfield sites to the east of Kidderminster would have good access to the train station and town centre facilities. However the sites at Spennells are constrained by the presence of corn buntings (a priority species) and in the north by priority woodland habitat. A proposal to develop a relief road to the east of Kidderminster was criticised by the public during the Preferred Option consultation, would be very expensive, and has not been supported by the county highways department, and so has not been taken forward. The sites between the A456 and A448 face fewer ecological constraints. Access from these sites to the town centre and train station is also slightly easier. As such, these sites are preferred over the Spennells sites. Consideration needs to be given to the timing of infrastructure delivery in relation to the delivery of housing. Sites nearest the A456 would be key areas for infrastructure provision.

In **Stourport-on-Severn**, about 619 homes can be accommodated on brownfield land. Development on smaller sites is considered appropriate, but larger scale development would overload the transport infrastructure. Large scale development at Pearl Lane is inappropriate because of constrained school capacity, the river crossing is already often congested and would get worse with a large new development, and additional traffic from the site would exacerbate air pollution issues in the town centre. There is also relatively limited access to employment sites on the west side of the river.

**Bewdley** needs some development but it is likely to be limited as new development should not overdevelop the town due to its historical and topographical constraints. There is also an Air Quality Management Area in Bewdley. The Stourport Road Triangle site and land at Catchem's End are considered to be sustainable sites with good access to services and facilities. All land in Bewdley is in a drinking water protected/safeguard zone, but is otherwise relatively unconstrained.

**Blakedown** is a sustainable village with services, facilities and good access to transport links however little has been submitted through the call for sites by landowners. Development in Chaddesley Corbett and Fairfield may be acceptable as both are sustainable locations with services and facilities.

The **rural west** of the District has less access to services and facilities although it is not washed over by the Green Belt. It is considered that small scale development in Upper Arley and Far Forest may safeguard local services such as the village school and shop.

## 5.5 Groups of development sites

At the Preferred Options stage of May 2017, the six preferred options from the Issues and Options stage were combined into two more specific options for location of growth in the district. Each included a common set of sites that were considered to be relatively unconstrained and in appropriate locations. **Option A** additionally included a few larger sites in the Green Belt to the east of Kidderminster that are more contained: Lea Castle, and sites to the east and south-east of Kidderminster. **Option B** additionally included more dispersed growth across the District over a larger number of smaller sites. This could include two urban extensions: one to the east of Kidderminster north of Bromsgrove Road, and an enlarged Lea Castle development which extends to the Stourbridge Road. Option B also included significant development at Areley Kings, and additional development in each of the towns, the Kidderminster-Stourport corridor and the rural west.

Table 5.2 shows the sustainability appraisal findings for the two options. Both options would improve health and wellbeing across the district as development may result in more GP surgeries, and better access to green space via footpaths and cycleways. Both options would provide for the need for housing in the district. Providing the appropriate quantity and quality of dwellings in a range of tenures and sizes could mean that elderly residents in family size dwellings may have the opportunity to move into appropriate size accommodation which could mean that family size dwellings become available. Renewable energy would be encouraged under both options, and all new residential units will have opportunities for recycling waste. Both options would have the potential to include sustainable drainage systems (SUDS) within proposals. Flooding was not expected to be a significant issue under either option. Both options scored negatively with respect to landscape/townscape, as development sites within both options could have a significant visual impact on existing settlements and/or the surrounding countryside.

**Table 5.2 Appraisal of Options A and B**

Issues and Options Strategic Options	Sustainability Appraisal Objectives												
	1. Health	2. Services	3. Housing	4. Energy	5. Transport, air	6. Soil, land	7. Water	8. Landscape	9. Biodiversity	10. Economy	11. Heritage	12. Green Belt	13. Communities
Option A	+	++	++	+	++	-	?	-	?	+	?	-	?
Option B	+	+	++	+	-	-	?	-	?	+	?	-	?

Eight consultation responses were received on the sustainability appraisal of the Preferred Options. Most of the responses related to the scoring of individual sites against the SA framework. More generally, the comments noted that the SA and the emerging Local Plan needed to better cover biodiversity and ecological constraints, taking into account habitats and species of principal importance; the preferred alternatives did not protect the Green Belt and would result in the loss of grade 2 and 3 agricultural land; and the SA process should justify policy choices and why some policies have progressed and others been rejected. In particular, the consultation showed that further information needed to be collected about biodiversity and ecological constraints: this has now been included in the site appraisal of Chapter 6.

Having carried out this work, the council subsequently decided to move forward with a different combination of sites, so this section's discussion has been primarily for the purposes of comprehensiveness.

## 5.6 Individual development sites

An initial 'Call for Sites' was undertaken during autumn 2014. This resulted in 75 sites being put forward by landowners for consideration for future development. Between March 2015 and May 2016 a further 13 sites were put forward. Through the Preferred Options consultation in summer 2017, an additional 51 sites were put forward through a call for sites: this included some sites that had been put forward previously in the Housing and Employment Land Availability Assessment (HELAA).

Following the Preferred Options consultation, the District Council undertook a Brownfield Land Register and revisited its earlier HELAA. This identified some new development sites. Officers also undertook a comprehensive desktop review to identify any other potential sites

which could help to meet future development needs. This included an analysis of the following types of site:

- existing allocations without planning permission
- existing permissions which are not fully implemented
- planning applications which have been refused or withdrawn
- local authority owned land and potentially surplus public sector land
- vacant / derelict land and buildings
- under-used sites such as garage blocks
- rural sites
- large-scale potential redevelopment areas
- sites in /adjoining rural settlements and rural exceptions sites
- potential urban extension sites around the 3 towns

In total, 151 sites were appraised using the SA framework of Table 3.10.

Most of the consultation comments received in response to the SA of the Preferred Options related to the scoring of sites against the SA framework. Issues included:

- Scoring of sites should be less negative as many uncertainties exist so should be scored 0,? or more positively. The scoring should reflect the potential benefits of development.
- Scoring of sites should be more negative. The SA was perceived as being extremely optimistic, as it is unlikely that site development would have a significant positive effect on the district's biodiversity.
- Concern with some sites assessed in SA.
- Concern about the removal of fields, suggesting that mitigation will not meet the needs of existing users of walkways and bridleways.
- Some proposed sites have problems that were not fully addressed in the SA. A site in SA could not have mitigation to lessen impact.

In response to the comments received, the sites were assessed afresh, using GIS and other location-specific information where available. Table 3.9 shows the criteria used. The detailed appraisal results were set out in each site's HELAA form (see **Appendix B**). The form includes information on:

- Sustainability constraints, based on GIS information, the Strategic Flood Risk Assessment / Water Cycle Strategy, information from the District heritage officer and landscape officers, and information from the government's MAGIC website.
- Deliverability and developability of each identified site (in terms of its suitability, availability and achievability) to determine when an identified site is realistically expected to be developed.
- Potential quantity of development that could be delivered on each identified site.
- Recommendations on how any constraints could be overcome

Table 5.2 summarises the site appraisals from the HELAA forms.

In terms of choosing the preferred sites, a site selection paper brought together the key findings from evidence-based studies and considered whether sites should be considered for allocation in the emerging Local Plan. Consideration was given to the Green Belt Review Stages 1 and 2, and any cumulative effects / common circumstances which could affect whether or not a site, or group of sites, should be taken forward for consideration for allocation. Policy implications of allocation were also taken into consideration. Site selection was also informed by discussions with developers, Worcestershire County Council, statutory consultees, Wyre Forest, the Wildlife Trust, Members of the Council's Local Plan Review Panel, and others.

**Table 5.2 Appraisal of candidate sites**

Site	Local services	Housing	Travel	Soil & land	Water & flooding	Landscape	Biodiversity	Employment	Historic	Green Belt	Community	Overall impact
<b>Bewdley</b>												
BR/BE/1	+	+	+/-	?	--	-	-	0	--	0	-	✓
BR/BE/6	+	+	+	-	0	-	--	0	--	0	0	X
BR/BE/10	0	+	0	-	0	--	--	0	-	0	0	X
BR/BE/15	0	+	-	-	-	-	-	0	--	0	-	X
WA/BE/1	0	+	+	-	-	-	-	0	-	-	-	✓
WA/BE/3	0	+	+	-	?	+	-	0	--	-	+	✓
WA/BE/4	0	+	0	-	0	-	0?	0	-	0	0	X
WA/BE/5	0	+	+	-	-	0	-?	0	0	-	0	✓
WA/BE/6	0	+	+	-	0	-	0?	0	0?	-	-	X
WA/BE/14	0	+	+	-	0	--	-	0	-	-	0	X
WA/KF/1	0	+	0	-	-	--	0	0	-	-	0	X
<b>Kidderminster East</b>												
AS/9	-	0	0	-	0	-	0	0	0	-	0	X
AS/10	0	+	0	-	0	-	0	0	0	-	0	X
OC/4	0	+	+	-	0	--	--	0	-	-	0	X
OC/5	0	+	+	-	-	-	0	0	-	-	0	✓
OC/6	+	+	+	-	-	-	0	0	-	-	0	✓
OC/12	0	+	0	-	--	0	--	0	0	-	0	✓
OC/13	0	++	0	--	--	-	--	0	0?	-	0	Partial
WFR/CB/6	0	+	+	--	0	--	-	0	-	-	-	X
WFR/CB/7	0	0	+	--	-	--	-	+	-	-	-	X
WFR/ST/1	0	+	0	-	-	-	--	0	0?	-	0	X
WFR/ST/2	-	+	0	0	-	--	0	0	0	-	-	X
WFR/ST/3	-	+	0	--	--	--	--	0	-	-	-	X
WFR/ST/4	-	+	0	-	?	--	--	0	-	-	-	X
WFR/ST/6	-	0	-	-	-	--	0	0	0	-	-	X
WFR/ST/10	-	+	-	--	0	--	--	0	0	-	-	X
<b>Kidderminster North</b>												
FHN/7	+	?	+	-	0	--	--	?	0	-	+/-	X
FHN/8	0	+	0	-	0	--	-	0	0	-	0	X
WA/BE/13	0	+	+	-	0	--	--	0	0?	-	-	X
WA/KF/2	0	+	0	-	0	-	0	0	0	-	0	X
WFR/WC/3	+	+	+	-	?	-	0	0	0	-	0	X
WFR/WC/5	+	+	+	-	?	--	0	0	-	0	0	X
WFR/WC/10	+	+	+	-	-	-	-	0	0	0	-	Res
WFR/WC/12	+	+	+	-	?	-	-	0	-	-	-	Res
WFR/WC/13	0	+	0	-	0	--	0	0	-	-	-	X
WFR/WC/15	0	++	0	?	0	0	-	0	-	-	0	✓
WFR/WC/16	0	+	0	-	0	--	-	0	0	-	0	X
WFR/WC/17	0	+	0	-	0	--	0	0	0	-	0	X
WFR/WC/19	0	?	+	-	-	-	-	0	0	-	0	X
WFR/WC/20	0	+	0	-	0	--	0	0	--	-	0	X
WFR/WC/21	0	?	0	-	--	-	--	0	--	-	0	X
WFR/WC/32	-	+	0	-	0	--	-	0	-	-	-	✓
WFR/WC/33	0	?	0	-	?	-	-	0	-	-	0	✓
WFR/WC/34	-	+	-	-	?	--	0?	0	0?	-	-	✓
WFR/WC/35	-	+	0	-	0	--	-	0	-	-	-	X
WFR/WC/38	+	+	+	-	-	--	-	0	0	-	-	X
WFR/WC/39	-	0	0	-	0	--	-	?	--	-	-	X
WFR/WC/40	-	0	-	-	-	--	--	?	--	-	-	X
<b>Kidderminster Town</b>												
AS/1	+	?	+	?	?	+	+	?	-	0	+	✓
AS/2	+	?	+/-	?	?	+	0	?	0?	0	?	X
AS/3	+	+	-	?	?	+	+	0	0?	0	+	✓
AS/5	+	+	+	-	--	--	-	0	0?	0	+	✓

Site	Local services	Housing	Travel	Soil & land	Water & flooding	Landscape	Biodiversity	Employment	Historic	Green Belt	Community	Overall impact
AS/6	+	+	+/-	+	0	-	0	0	-	0	+	✓
AS/20	0	+	0	-	-	--	-	0	0?	0	+	✓
AS/22	+	+	+/-	+	-	+	0	0	0?	0	+	X
BHS/2	+	?	+/-	+?	-	--	+	0	--	0	+	✓
BHS/10	+	?	+/-	+?	--	-	+	0	-	0	+	✓
BHS/11	+	?	+	+?	--	0	-	?	-	0	+	✓
BHS/16	+	?	+	0	--	+	-	?	--	0	+	✓
BHS/17	+	?	+	+?	-	+	-	?	--	0	+	✓
BHS/18	+	+	+	+	-	0	-	0	-	0	+/-	✓
BHS/21	0	+	0	-	0	--	-	0	0	-	0	X
BHS/22	+	+	+	-	0	-	-	0	0	0	0	X
BHS/38	+	?	+	+	-	-	-	?	--	0	+	✓
BHS/39	+	?	+/-	+	-	+	-	?	--	0	+	✓
BW/1	+	?	--	+	0	+/-	+/-	?	--	0	+	✓
BW/2	+	?	+/-	+?	0	+	+/-	?	--	0	+	✓
BW/3	+	+	+	0	0	+	-	0	0?	0	+	✓
BW/4	0	+	0	-	0	-	--	0	0	-	0	✓
FHN/11	+	+	+	+?	--	+	-	0	-	0	+	✓
FPH/1	0	+	+	+?	-	-	--	0	0	-	0	X
FPH/5	+	+	+	+	-	+	+/-	0	0	0	+	✓
FPH/6	+	+	+	+?	0	+	+/-	0	0	0	+	X
FPH/8	+	0	+	?	-	+	--	+	0	0	+	✓
FPH/10	+	?	+	+?	0	0	+/-	?	-	0	+	✓
FPH/15	+	?	+	+	0	+	-	?	0	0	+	✓
FPH/18	+	+	+	-	0	0	-	0	0	0	-	✓
FPH/19	+	+	+	0	-	-	-	0	0	0	+/-	✓
FPH/23	+	0	+	+?	?	0	-	+	0	0	+	✓
FPH/24	0	0	+	+?	--	0	-	+	0	0	+	✓
FPH/25	0	0	0	+?	?	-	--	+	-	0	+	X
FPH/27	0	0	+	-	?	0	0	+	0	-	+	✓
FPH/28	+	0	0	+?	0	+	-	+	0?	0	+	✓
FPH/29	0	0	0	+	0	+	0	+	0?	0	+	✓
LI/1	0	+	+	+?	?	0	-	0	0	-	+	X
LI/10	0	0	+	-	?	0	-	0	0	-	0	✓
LI/12	+	+	+	+	?	+	-	0	0?	-	0	✓
MI/26	+	0	+	-	-	+	-	+	0	0	+	✓
MI/34	0	0	+	-	0	0	0	+	0	0	+	✓
MI/37	0	0	+	-	0	--	-	?	0?	-	-	X
OC/11	0	+	+	0	-?	-	-?	0	0	0	0	✓
WAKF/3	-	++	-	-	-	-	--	0	0	-	0	✓
WFR/WC/18	+	+	+	+	-	?	-	0	0	-	+	✓
<b>Rural villages</b>												
BR/RO/1	0	+	0	0	0	+	-	0	0?	0	+	X
BR/RO/2	0	+	-	0	?	?	-	0	0	0	-	✓
BR/RO/4	0	+	-	-	0	-	0	0	0	0	0	X
BR/RO/6	0	+	-	-	0	0	0	0	-	0	0	X
BR/RO/7	0	+	-	-	0	--	-	0	-	0	0	X
BR/RO/12	-	+	-	+	0	?	0	0	-	0	+	X
BR/RO/14	-	+	-	-	0	-	0?	0	0?	0	-	X
BR/RO/21	-	+	0	+	0	?	-	0	0	0	-	✓
BR/RO/22	-	+	-	-	0	-	0	0	-	0	0	X
BR/RO/26	-	+	0	-	0	0	-	0	0?	0	0	X
BR/RO/27	-	+	0	-	-	-	0	0	0	0	-	X
BR/RO/29	-	+	-	-	?	0	-	0	0?	0	-	X
BR/RO/30	-	+	0	-	0	-	-	0	0	0	0	X
WA/UA/1	-	+	-	+/-	0	-	-	0	-?	-	-	✓
WA/UA/4	+	+	+	-	0	-	-	0	--	-	-	✓
WA/UA/5	-	+	-	-	?	--	-	0	0	-	-	X



Site	Local services	Housing	Travel	Soil & land	Water & flooding	Landscape	Biodiversity	Employment	Historic	Green Belt	Community	Overall impact
WA/UA/6	-	+	-	+	0	0	0	0	0	-	-	✓
WFR/CB/2	+	+	+	+	0	0	?	0	-	0	-?	✓
WFR/CB/3	+	+	+	-	0	-	-?	0	-	-	0	X
WFR/CC/7	+	+	0	-	-	-	0?	0	-	-	-	X
WFR/CC/8	+	+	0	-	0	-	0	0	-	-	-	✓
WFR/CC/10	+	+	0	-	-	-	0	0	0?	-	0	X
WFR/CC/11	-	+	-	-	0	-	0	0	-	-	-	X
WFR/ST/9	-	?	-	0	-	0	0	0	-	0	-	X
WFR/WC/22	0	?	+	-	?	-	0	0	-	-	0	Res
WFR/WC/23	+	+	+	-	0	-	-	0	0	0	0	Res
WFR/WC/36	0	+	+	+	?	0	?	0	-	-	+	✓
WFR/WC/37	0	+	0	-	0	-	0	0	-	-	0	✓
<b>Stourport-on-Severn</b>												
AKR/1	+	?	+/-	+	0	+	0	?	-	0	+	X
AKR/2	+	?	+/-	+	-?	0	-	?	-	0	+	✓
AKR/7	+	?	+/-	0	-	+	0	?	-	0	+	✓
AKR/10	+	?	+	+	-	0	0	?	0	0	+/-	✓
AKR/13	0	+	+	-	-	-	0	0	-	0	0	X
AKR/14	0	+	+	-	-	-	0	0	-	0	0	✓
AKR/15	0	+	+	-	0	-	-	0	-	0	0	X
AKR/18	0	?	-	+	-	-	-	0	0	-	0	✓
AKR/20	+	+	+/-	+	-	+	+/-	0	-	0	+	✓
LI/2	+	+	+	-	?	0	-	0	0?	-	0	X
LI/5	0	+	+	-	-	0	-	0	0?	-	0	X
LI/6	0	+	+	-	0	0	-	0	0	-	0	X
LI/7	+	+	+	-	0	0	-	0	0	-	0	X
LI/11	+	+	+	-	-	-/+	0	0	0	-	0	✓
MI/1	+	+	+/-	+	-	+	0	0	-	0	+	✓
MI/3	+	?	+/-	+	0	0	-	?	-	0	+	✓
MI/5	+	+	+/-	0	-	+	-	0	-	0	+	✓
MI/6	+	?	+/-	+	?	+	0	0	0	0	+	✓
MI/7	0	?	0	+	0	+	-	0	0	0	+	✓
MI/10	0	+	-	+	-	+	-	0	0?	0	+	✓
MI/11	-	+	-	+	0	0	-	0	0?	0	+	✓
MI/12	+	+	+	+	0	+	0	-	0	0	+	X
MI/17	-	+	0	-	0	-	-	0	0?	-	+	X
MI/18	0	0	0	+	?	-	-	+	0	-	0	✓
MI/20	-	+	0	-	0	-	-	0	-	-	-	X
MI/21	-	+	-	-	0	-	-	0	-	-	-	Res
MI/24	+	+	+	-	0	0	-	0	0	-	+	✓
MI/33	0	0	0	-	0	0	-	+	0?	0	0	X
MI/35	+	?	+/-	+	0	+	0	?	0	0	+	X
MI/36	0	0	0	+	-	-	-	0	?	-	-	✓
MI/38	+	+	+	-	-	0	0	0	0	-	0	✓

Key: see Table 3.8. Additionally, in the 'overall impact' column:

<b>Planning decision</b>	X	Res	✓
	Not taken forward	Reserved site	Taken forward
<b>Sustainability concerns</b>			✓
	Significant sustainability concerns: 8 or 9 -	Very significant sustainability concerns: 10 or more -	Taken forward and a sustainability concern

As the Objectively Assessed Housing Need number fell from 300 to 276 per year, so less housing became needed. The updated Employment Land Review Study (2018) also reduced the district's employment land need from 40ha to 29ha. This led to the council dropping its support for development on land to the rear of Spennels in favour of more housing at the Lea Castle site. This was because of ecological issues, including the existence of protected corn buntings (birds) on the site; lack of support for an eastern relief road; consultation comments; and the possibility of creating a sustainable urban village at Lea Castle, including a school and possibly a GP surgery and employment land.

Some sites were rejected based on specialised studies. For instance the water cycle study showed that many brownfield sites have problems with flooding, both fluvial and from surface water runoff. Many of the town centre sites have viability issues. For this reason, many of the existing allocations were not taken forward into the emerging Local Plan.

The detailed reasons for sites being brought forward or rejected are given in the Wyre Forest Housing Sites Selection Paper.

Sites that do not come out well in the sustainability appraisal but that have nevertheless been taken forward – shown with a heavy line around them in the last column of Table 5.2 - are:

- OC/13. This is a large 89ha site with a southern area that abuts the ecologically sensitive Hoobrook, is prone to flooding, and host protected animal species; and a less sensitive northern area. Although Table 5.2 shows the impacts of developing the whole site, the plan only proposes to develop the northern parcel of 57ha, avoiding the more sensitive southern part of the site. The northern part would also be expected to provide ecological gain through improved Green Infrastructure.
- WFR/WC/32. This 18ha site is, together with WFR/WC/15, WFR/WC/33 and WFR/WC/34, being brought forward as Lea Castle Village. On its own, WFR/WC/32 does not score well in terms of sustainability, as it is not adjacent to a built area, has poor access to local facilities etc. However when considered together with the other sites, it helps to provide the critical mass needed to provide a new school and other facilities.
- MI/21. This site was removed from the Green Belt and put within the Stourport settlement boundary in 1989, and cannot be moved back into the Green Belt. It is being put forward because the Local Plan must promote non-Green Belt sites before Green Belt sites, but only as a reserved site, if it is promoted in a neighbourhood plan.

Changes resulting from the SA of sites include:

- Revision of some HELAA forms in response to queries raised by the SA, e.g. whether land was greenfield or brownfield, ease of access to sites
- Removal of several sites (e.g. WFR/WC/21, WFR/CC/7) because of their sustainability impacts.
- Clearer explanation for the inclusion of some seemingly unsustainable sites

## **5.7 Affordable housing**

To provide for the full quota of affordable housing need, the Local Plan would need to provide 158 affordable homes per year, or 57% of the objectively assessed housing need. This is not viable: it would not be possible for developers to provide this and make a profit, essentially preventing most housing from being developed in the district.

A viability assessment and discussions with viability consultants confirmed that 25% affordable housing on sites of 10 or more homes, or on sites of 0.5ha or more would be viable. This has been included in the plan.

### **5.8 Density of development, Green Infrastructure**

Another key decision in the plan relates to development density. One approach would be to maximise housing density on Green Belt land, and leave the rest as Green Belt (i.e. agricultural). Instead, the plan calls for the two large new urban extensions – at Lea Castle Village and Kidderminster Eastern Extension – to provide for at least 40% Green Infrastructure, so increasing the size of Green Belt land taken. At Lea Castle, the Green Infrastructure will consist primarily of the existing woodland. The remaining land is expected to be developed as relatively high density housing (approx. 40 dwellings per hectare), schools, community facilities, and in the case of Lea Castle also employment.

This approach, with more green infrastructure and less agricultural land, is expected to provide biodiversity enhancement; improve the health of both residents and non-residents in line with Policy 9 on health and wellbeing; and encourage walking and cycling.

## Chapter 6. Task B3. Appraisal of the proposed plan

The SEA Directive requires information on “the likely significant effects [of the plan] on the environment, including on issues such as biodiversity population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors”. These effects should include secondary, cumulative, synergistic, short, medium and long-term, permanent and temporary, positive and negative effects. (Annex If).

This section considers the main sustainability impacts of the Local Plan’s strategic and development management policies, and proposed site allocations. It first discusses the appraisal of the plan policies, then the site allocations, and then gives an overview of the plan’s effects.

### 6.1 Policy appraisal

Table 1.3 showed the structure of the plan. The plan policies are split into strategic policies (plan Chapter 5-16) and development management policies (plan Chapters 18-28).

Table 6.1 summarises the results of the sustainability appraisal of these policies, and the full appraisals are shown at **Appendix A**. Policies 6D, 30 and 33-36 are not separately assessed because they do not include new information:

- Policy 6D simply refers to Policies 31 and 32 (Lea Castle Village and Kidderminster Eastern Extension)
- Policy 30 simply allocates the Kidderminster Town sites (see Table 5.2)
- Policy 33 allocates the Stourport sites (Table 5.2)
- Policy 34 allocates the Bewdley sites (Table 5.2)
- Policy 35 allocates Cursley Distribution Park (Table 5.2), and supports development in the existing West Midlands Safari and Leisure Park, and Rushock Trading Estate
- Policy 36 simply allocates sites for Policy 6F.

The appraisal compared the likely effects of the policies *against the current situation*, as this is probably the approach that is easiest to understand. So, for instance, if the plan protects a heritage assets or water quality, the appraisal result is neutral (0, no change from today). If, instead, the appraisal had been in terms of *whether the plan does the best that it can* for a particular environmental topic, then the appraisal would have looked much more positive.

The *Green Belt* policies (Ch. 7, 25) overall help to maintain the integrity of the Green Belt within the district, although the scale of housing that the plan needs to provide means that 231ha of Green Belt land has been allocated for development. Protecting the Green Belt means that development is contained rather than dispersed, reducing the need to travel and helping to ensure that essential infrastructure is provided. Green Belt policy protects the historic town of Bewdley by preserving the setting and special character of the town which is one of the five purposes for Green Belt. On the other hand, the large scale Green Belt development proposed by the plan would lead to a reduction in agricultural land, biodiversity and water quality, and to landscape and heritage impacts.

The *housing* policies (Ch. 8, 18, 19) relate to types of dwellings, as well as caravans, and standards for gypsies, travellers and travelling showpeople. They score highly on housing and health criteria, although by their nature they have impacts on soil, water, biodiversity, landscape and the heritage.

**Table 6.1 Sustainability impacts of the Wyre Forest District Local Plan policies**

Policy		1. Health	2. Services	3. Housing	4. Energy	5. Transport, air	6. Soil, land	7. Water	8. Landscape	9. Biodiversity	10. Economy	11. Heritage	12. Green Belt	13. Communities
5A	Sustainable Development		?	+		?	?	?	?	?	+	?	?	
6A	Development needs 2016–2036	+	?	++		-	-	-	-	-	+	-	-	0?
6B	Locating new development		0	+		+	0		0		+		0	+
6C	Kidderminster town as centre		+			?					++			?
6E	Role of Stourport and Bewdley	+	+	+		+					+	+	-	
6F/36	Role of villages and rural areas		0	?	0	-	0	0	0	0	0	0	0	0
7A	Strategic Green Belt Review		+-	+		+	-	-	-	-	+	-	-	0
7B	Reserved housing sites in G Belt			+		+	-	-	-	-		-	-	0
8A	Housing density and mix	+	?	++		-	--	--	--	--	+	--	--	0?
8B	Affordable housing provision	+-		+-		+-					+-			+
8C	Addressing rural housing needs		+	+		-	-?	-?	?	-?	+	-?	-	+
8D	Self build and custom housing			+										+
8E	Housing for older people etc.	?		?										?
8F	Gypsy & Traveller site provision			?										
8G	Site provision for travel. show.	0		0					0	0			0	
9	Health and wellbeing	+	0	+	0	+								0
10A	Diverse local economy	+				+	-?	-?	-?	-?	++	-?	-?	+
10B	Town centre development		+	0		0			?		+			
10C	Sustainable tourism		+			-?	0	0	0	0	+	0	?	
11A	Quality design & distinctiveness								0			0		0
11B	Historic environment								0			0		0
11C	Landscape character								+			+		+
11D	Protecting & enhancing biodiver.	+		-			+	+	+	+	-		+	+
11E	Protecting & enhancing geologic.						0		0	0				
11F	Regenerating the waterways	+							+			+		+
12	Strategic infrastructure	0	0	0							0			
13	Transport and accessibility	0	0			0					0			
14	Strategic green infrastructure	+		-	?	+-	0	0	0	0	-			0
15A	Water conservation & efficiency	?		0				+		0	+-			
15B	Sewerage & water quality	0	0	0				0		0	0			
15C	Flood risk management	0	0	+-				+		0	+-			
15D	Sustainable Drainage Systems	0	0	+-				+		0	+-			
16A	Pollution and land instability	0	+-	+-			0	0		0	+-			
16B	Minerals	?		+	0	+-	0	0	0	0	+	0		
16C	Waste		+		+				0					
18A	Financial viability			+										+
18B	Residential infill development		0	+	0	0	+-		+-	+-		0?	0	+-
18C	Flat conversions	?		+	0	+-	+							?
18D	Residential caravans & mobile	+-		+-	+									?
19	Site standards for Gypsies etc.	0	0	+					0					
20A	Community facilities	0	+			0						0		0
20B	Open space	+				0	0	0	+	0				0
20C	Provision for open space etc.	+				0	0	0	+	0		+		+
21A	Urban employment land	+				0	--	-	-	-	++	-		+
21B	Rural employment					?	0	0	-	0	+	0	-	+
21C	Live work units & homeworking					+	0	0	0	0	+			+
21D	Offices					0	0	0	0	0	+	0		
22A	Town centre development		+	0		0			?		+			
22B	Out of town development		0			0			0		0			0

Policy		1. Health	2. Services	3. Housing	4. Energy	5. Transport, air	6. Soil, land	7. Water	8. Landscape	9. Biodiversity	10. Economy	11. Heritage	12. Green Belt	13. Communities
22C	Change of use from retail to alt.		0			0								0
22D	Local shops		+			+								+
22E	Specialist retailing		?			?			0				0	+?
22F	Food and drink retailing		?											0
22G	Hot food takeaways	0	?											0
23A	Support major tourist attraction		+			-			0	0	+	0	0	
23B	Supporting tourist attractions		+			-?	0	0	0	0	+	0	?	
23C	Tourist accommodation			0		?	0	0	0	0	+		?	
24A	Telecommunicat. & broadband		+			+			-		+			
24B	Renewable & low carbon energy	+		-	++		-?		-?	-?	+	0?		+
25	Safeguarding the Green Belt		+-	+-		+	0	0	0	0	+-	0	++	0
26	Safeguarding the historic environ								0			0		0
27A	Quality design & local distinctive.	0	0						0			0		0
27B	Design of extensions & alteration								0			0		0
27C	Landscaping & boundary treatm	0						?	+	?				+
27D	Advertisements	0							0					
27E	Wyre Forest waterways	+				0		0	+	0		0		0
28A	Reuse & adaptation of rural build			0		-	0	0	-	0	+	0	-	+
28B	Chalets, caravans, mobile home			0		0	0	0	0	0	0		0	
28C	Equestrian development								0	0			0	
28D	Agricultural land quality					0	0			?				
31/6D	Lea Castle Village	+	+	++	0	+-	--	0?	+-	+	+	-?	--	+-
32/6D	Kidderminster Eastern Extension	+	+	++	0	+-	--	0?	+-	+	0	-?	--	+-

The *health* strategic policy (Ch. 9) will help to reduce inequalities in health, and maximise opportunities to lead healthy, active lifestyles.

The *economic* policies (10, 21, 22, 23, 28) support economic growth and help to ensure suitable employment opportunities. They also aim to ensure that retail centres are retained, ensuring that residents have access to services and facilities. Providing enough employment land and retail services within the district reduces the need to travel for these services and maintains and enhances community and settlement identities. However, as with the housing policies, by their nature new employment sites will have impacts on soil, water, biodiversity, landscape and the heritage.

The *unique place* policies (Ch. 11, 26, 27) relate to local distinctiveness and safeguarding the historic environment and landscape. By their nature, these are protective policies – they try to avoid change – so their impacts are generally neutral. These policies protect community/settlement identities as well as the natural environment. The policies on enhancing the environment and waterways will have a range of positive impacts.

The *infrastructure* policies (12, 13, 15, 20, 24) help to ensure that adequate infrastructure is provided to support the additional new homes and employment sites. This will help support local services and facilities, reduce flood risk, minimise the need to travel, and promote energy efficiency. In particular, they would help to ensure that water quality and water resources are not negatively affected by the new development, although this could lead to increased housing costs to pay for the infrastructure. The impacts of policy 24B on renewable energy would depend on what kind of developments come forward.

The *environmental and green infrastructure* policies (14, 16) help to prevent pollution, control minerals and waste development, and provide green infrastructure such as parks. These

policies are mostly neutral, in that they protect rather than enhance. The policies help to ensure people’s health, biodiversity, water and air quality, and the landscape.

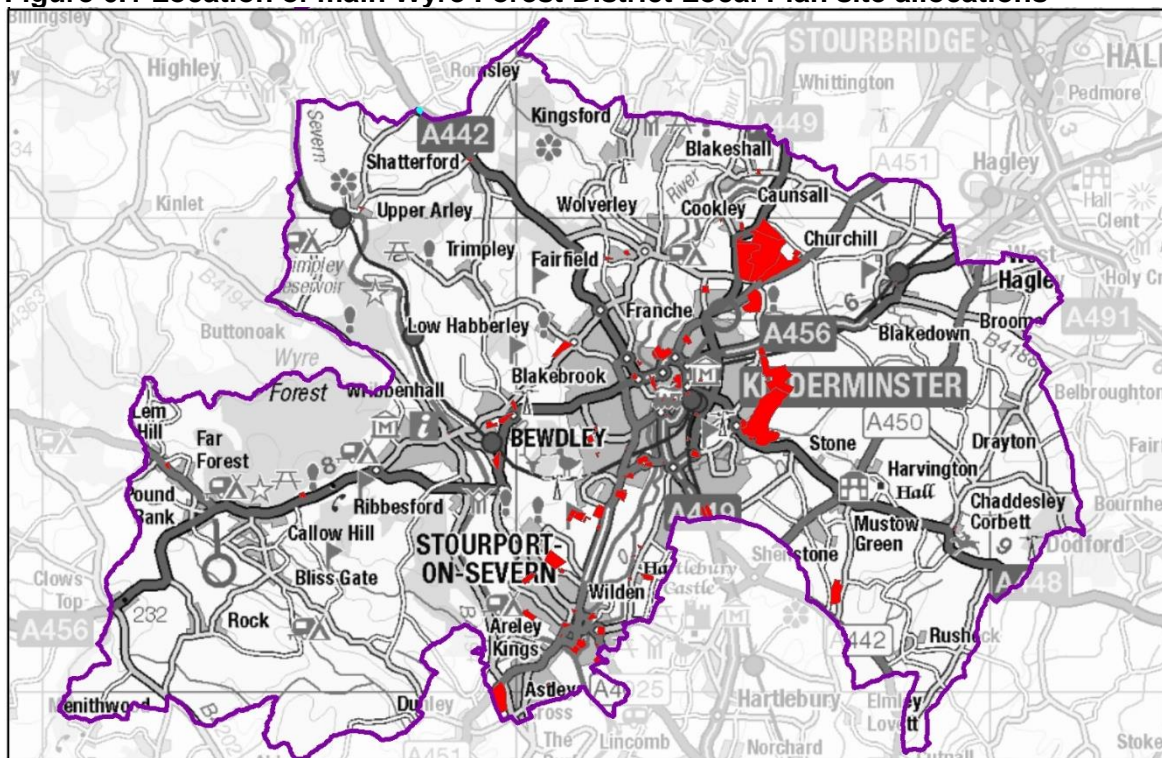
## 6.2 Site appraisal

Table 6.2 shows the results of the appraisal of the proposed site allocations. These are the sites shown at the last column of Table 5.2 with a ✓, and shown in red at Figure 6.1. The ‘water & flooding’ scores have been amended to reflect the Water Cycle Studies of 2017 and 2018, and the Strategic Flood Risk Assessment of 2018. The scorings do not reflect the mitigation measures included in Policies 30-36 of the Local Plan, which would improve many of the scores.

The site allocations in the plan are positive for housing and employment, understandably since they allocate housing and employment land. They are also, with a few exceptions, positive in terms of providing housing near local services and in places that are accessible by public transport, walking and cycling. The main exceptions are in the few rural areas where housing is needed but services are sparse, and the large housing sites at Lea Castle where future development is expected to be accompanied by new local services.

Most of the sites in Kidderminster Town and Stourport are brownfield sites, but many of those in Kidderminster North, Kidderminster East, Bewdley and the rural villages are both greenfield and Green Belt. In total, the plan allocates 204ha of greenfield land, and 231ha of Green Belt land. Not all of the Green Belt land is greenfield: for instance Lea Castle Hospital is a brownfield site in the Green Belt, as are several other smaller sites. Of the 83 sites, thirteen have the potential for flooding problems, seven are likely to have significant landscape impacts, ten are likely to have significant impacts on biodiversity, and thirteen are likely to have significant heritage impacts. Overall, the impact of the site allocations are negative for these topics.

**Figure 6.1 Location of main Wyre Forest District Local Plan site allocations**



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**Table 6.2 Sustainability impacts of the Wyre Forest District Local Plan site allocations**

Site		Local services	Housing	Travel	Soil & land	Water & flooding	Landscape	Biodiversity	Employment	Historic	Green Belt	Community
<b>Kidderminster Town (Policy 30)</b>												
AS/1	Comberton Place	+	?	+	?	?	+	+	?	-	0	+
AS/3	Chester Road SSS	+	+	-	?	?	+	+	0	0?	0	+
AS/5	Victoria Sports Ground	+	+	+	-	--	--	0	0	0?	0	+
AS/6	Lea St School	+	+	+/-	+	0	-	0	0	-	0	+
AS/20	N of Bernie C. Walk	0	+	0	-	-	--	-	0	0?	0	+
BHS/2	Bromsgrove St	+	?	+/-	+	-	--	+	0	--	0	+
BHS/10	Frank Stone building	+	?	+/-	+	--	-	+	0	-	0	+
BHS/11	Green St Depot	+	?	+	+	--	0	-	?	-	0	+
BHS/16	Timber Yard Park Lane	+	?	+	0	--	+	-	?	--	0	+
BHS/17	Rock Works	+	?	+	+	-	+	-	?	--	0	+
BHS/18	Blakebrook School	+	+	+	+	-	0	-	0	-	0	+/-
BHS/38	Kidderminster Fire Station	+	?	+	+	-	-	-	?	--	0	+
BHS/39	Boucher Building	+	?	+/-	+	-	+	-	?	--	0	+
BW/1	Churchfields	+	?	--	+	0	+/-	+/-	?	--	0	+
BW/2	Limekiln Bridge	+	?	+/-	+	0	+	+/-	?	--	0	+
BW/3	Sladen School	+	+	+	0	0	+	-	0	0?	0	+
BW/4	Stourbridge Road ADR	0	+	0	-	0	-	--	0	0	-	0
FHN/11	BT building Mill Street	+	+	+	+	--	+	-	0	-	0	+
FPH/5	Ambulance Station	+	+	+	+	-	+	+/-	0	0	0	+
FPH/8	SDF and adjacent land	+	?	+	?	0	+	--	+	0	0	+
FPH/10	British Sugar Phase 2	+	?	+	+	0	0	+/-	?	-	0	+
FPH/15	Severn Gr shops rifle rang	+	?	+	+	0	+	-	?	0	0	+
FPH/18	Naylors Field Sutton Park Ri	+	+	+	-	0	0	-	0	0	0	-
FPH/19	164/5 Sutton Park Road	+	+	+	0	-	-	-	0	0	0	+/-
FPH/23	British Sugar Phase 1 remai	+	0	+	+	?	0	-	+	0	0	+
FPH/24	Romwire Site	0	0	+	+	--	0	-	+	0	0	+
FPH/27	Adj Easter Park, Worcester	0	0	+	-	?	0	0	+	0	-	+
FPH/28	Hoobrook Site	+	0	0	+	0	+	-	+	0?	0	+
FPH/29	VOSA Worcester Road	0	0	0	+	0	+	0	+	0?	0	+
LI/10	Land r/o Zortech Avenue	0	?	+	-	?	0	-	0	0	-	0
LI/12	Frmr Burlish Golf Clubhouse	+	+	+	+	?	+	-	0	0?	-	0
MI/26	Ratio Park, Finepoint	+	0	+	-	-	+	-	+	0	0	+
MI/34	Oakleaf, Finepoint	0	0	+	-	0	0	0	+	0	0	+
OC/11	Stourminster School	0	+	+	0	-?	-	-?	0	0	0	0
WAKF/3	Land at Low Habberley	-	++	-	-	-	-	--	0	0	-	0
WFR/WC/18	Sion Hill School	+	+	+	+	-	?	-	0	0	-	+
<b>Lea Castle Village (Policy 31)</b>												
WFR/WC/15	Lea Castle Hospital	0	++	0	?	0	0	-	0	-	-	0
WFR/WC/32	Lea Castle East A451	-	+	0	-	0	--	-	0	-	-	-
WFR/WC/33	Lea Castle West A449	0	?	0	-	?	-	-	0	-	-	0
WFR/WC/34	Lea Castle North Axbr Ln	-	+	-	-	?	--	0?	0	0?	-	-
<b>Kidderminster Eastern Extension (Policy 32)</b>												
OC/5	Husum Way	0	+	+	-	-	-	0	0	-	-	0
OC/6	r/o Offmore	+	+	+	-	-	-	0	0	-	-	0
OC/12	Comberton Lodge	0	+	0	-	--	0	--	0	0	-	0
OC/13	Land at Stone Hill North	0	++	0	--	--	-	--	0	0?	-	0
<b>Stourport-on-Severn (Policy 33)</b>												
AKR/2	Cheapside	+	?	+/-	+	--?	0	-	?	--	0	+
AKR/7	Swan Hotel/Working Mens C	+	?	+/-	0	-	+	0	?	-	0	+
AKR/10	Queens Road shops	+	?	+	+	-	0	0	?	0	0	+/-
AKR/14	Pearl Lane	0	+	+	-	-	--	0	0	-	0	0
AKR/18	Yew Tree Walk	0	?	-	+	--	-	--	0	0	-	0
AKR/20	Carpets of Worth	+	+	+/-	+	-	+	-	0	-	0	+



Site		Local services	Housing	Travel	Soil & land	Water & flooding	Landscape	Biodiversity	Employment	Historic	Green Belt	Community
LI/11	W of former school, Conisdon	+	+	+	-	-	-	0	0	0	-	0
MI/1	County Buildings	+	+	+/-	+	0	+	0	0	-	0	+
MI/3	Parsons Chain	+	?	+/-	+?	-	0	-	?	-	0	+
MI/5	Baldwin Road	+	+	+/-	0	--	+	-	0	--	0	+
MI/6	Steatite Way	+	?	+/-	+	?	+	0	0	0	0	+
MI/7	Worcester Rd Car Sales, S	0	?	0	+?	0	+	-	0	0	0	+
MI/10	Four Acres ADR	0	+	-	+	-	+	--	0	0?	0	+
MI/11	3 Sandy Lane Titton	-	+	-	+	0	0	--	0	0?	0	+
MI/24	Adj. Rock Tavern Wilden Ln	+	+	+	-	0	0	-	0	0	-	+
MI/36	Firs Yard Wilden Lane	0	0	0	+	--	-	--	0	?	-	-
MI/38	School site Coniston Cres	+	+	+	-	?	0	0	0	0	-	0
<b>Bewdley (Policy 34)</b>												
BR/BE/1	Bewdley Fire Station	+	+	+/-	?	--	-	-	0	--	0	-
WA/BE/1	Stourport Road triangle	0	+	+	-	-	-	-	0	-	-	-
WA/BE/3	Catchem's End	0	+	+	-	?	+	-	0	--	-	+
WA/BE/5	Land S of Habberley Road	0	+	+	-	-	0	-?	0	0	-	0
<b>Previously developed sites in the Green Belt (Policy 35)</b>												
	Rushock Trading Estate	Continuation of existing planning policies on these sites										
	West Midlands Safari Park	Continuation of existing planning policies on these sites										
WFR/ST/9	Cursley Distribution Park	-	?	-	0	-	0	0	0	-	0	-
<b>Villages and rural areas (Policy 36)</b>												
BR/RO/2	Lem Hill Nurseries	0	+	-	0	?	?	-	0	0	0	-
BR/RO/21	Alton Nurseries	-	+	0	+	0	?	-	0	0	0	-
WA/UA/1	Bellmans Cross Shatterford	-	+	-	+/-	0	-	-	0	-?	-	-
WA/UA/4	Allotments Upper Arley	+	+	+	-	0	-	-	0	--	-	-
WA/UA/6	Red Lion Ct, Bridgnorth Rd	-	+	-	+	0	0	0	0	0	-	-
WFR/CB/2	Station Yard Blakedown	+	+	+	+?	0	0	?	0	-	0	-?
WFR/CC/8	Fold Farm Chaddesley Corb	+	+	0	-	0	-	0	0	-	-	-
WFR/WC/22	Low Lane Fairfield ADR*	0	?	+	-	?	-	0	0	-	-	0
WFR/WC/36	Rock Tavern car p Caunsall	0	+	+	+	?	0	?	0	-	-	+
WFR/WC/37	Land at Caunsall Road	0	+	0	-	0	-	0	0	-	-	0
<b>Reserved (Policy 7B)</b>												
WFR/WC/10	Kimberlee Avenue ADR	+	+	+	-	?	-	-	0	0	0	-
WFR/WC/12	Lawnwood Cookley	+	+	+	-	?	-	-	0	-	-	-
WFR/WC/22	Low Lane Fairfield ADR*	0	?	+	-	?	-	0	0	-	-	0
WFR/WC/23	Hayes Road ADR	+	+	+	-	0	-	-	0	0	0	0
MI/21	Wilden Top ADR	-	+	-	-	0	--	-	0	-	-	-

\* The southern part of the site is allocated as allotments in policy 36; the northern part is a reserved housing site.

### 6.3 Overall impacts of the plan

Table 6.3 shows the plan's overall impacts on the various dimensions of sustainability. Overall the plan's impacts are expected to be neutral or positive. The plan aims to protect the environment – soil, water, biodiversity, the landscape, heritage and the Green Belt. It has many positive impacts, particularly in terms of health, housing, the economy and communities. The plan has limited control over energy use and production, but the policies that it does have on these topics would have a positive impact. Most of the plan's negative environmental impacts come from its policies about housing and economic development: to deliver the legally-required housing numbers and associated employment land, the plan proposes more development in both urban and rural areas, with some development in the Green Belt.

**Table 6.3 Overall impacts of the Wyre Forest District Local Plan**

1. Health	+	The plan supports healthy active lifestyles. It aims to maximise the delivery of green infrastructure, and provide housing and employment sites in locations that are close to existing services. This encourages walking and cycling, as well as reducing the reliance on cars with their associated air pollution problems. The policies on open spaces and sports pitches will help to counter the district's higher-than-average obesity levels.
2. Services	0	The plan focuses development on the existing towns, which helps to ensure that services will be available to the new residents. It particularly focuses on Kidderminster which has the widest range of retail, employment and services. The large new development site at Lea Castle will be expected to provide a new school and other services. Only a few housing sites in rural areas do not have good access to services, and these have been included because of the strong need for rural housing.
3. Housing	++	The plan's delivery of 5,520 new dwellings will have significant benefits for housing. It will help to provide for the district's objectively assessed housing need, including affordable and specialist housing. The plan seeks to ensure that there is a mix of dwelling type for both market and affordable dwellings to meet the need within the district. It also proposes one new site for travelling showpeople.
4. Energy	+/-	The plan aims to minimise the need to use energy through good design, and to increase the production of renewable energy. It also aims to minimise the need to travel by private car, so reducing energy use. Overall the plan is likely to reduce per person energy use but, because of the increase in the population, it is unlikely to reduce overall energy use.
5. Transport, air	+/-	The plan policies seek to maximise walking, cycling and the use of public transport by locating development near services and providing attractive, safe walking and cycling paths. Most of the proposed development is in Kidderminster or in urban extensions to Kidderminster, with most of the remaining development going to Stourport and Bewdley. The development sites generally avoid being in, or exacerbating the situation in, air quality management areas. Again, the plan is likely to reduce per person car use, but not overall car use because of the increase in population.
6. Soil, land	-	Where possible, the plan uses previously developed, currently un- or under-used land, for housing and employment sites. Previously developed land is generally in sustainable locations close to existing services and facilities which reduces the need to travel, this in turn helps the traffic issues and air quality. Using previously developed land means that less greenfield land is needed for development, less agricultural land would be developed, and more of the district remains rural. Still, the plan proposes the development of 25 greenfield sites totalling 194ha (including four non-Green Belt sites totalling 17.8ha) More than half of the greenfield land area is at three large sites: Lea Castle West, Offmore, and Stone Hill North.
7. Water	+/-	A water cycle study (JBA 2018) shows that Severn Trent Water will have enough water supply infrastructure in place to meet the needs of Wyre Forest's residents under the proposed Local Plan. plan aims to ensure that appropriate infrastructure is provided to protect water quality and water resources from the impact of new development. It also aims to reduce flooding, for instance through the use of

		sustainable drainage systems. The policy on regenerating the waterways will help to protect water quality and promote enjoyment of the water environment. Still, 13 allocation sites are likely to have flood- or wastewater-related constraints or problems.
8. Landscape	+/-	The plan policies seek to ensure that new development is well designed and high quality, that it is well landscaped, and that existing built development is protected. Development of some of the district's brownfield sites could have a significant improvement visually as the unused sites are developed and improve the surrounding area. However, seven of the development sites are likely to have significant landscape impacts, including the large Lea Castle sites.
9. Biodiversity	+/-	The plan policies on green infrastructure, reducing the need to travel, green infrastructure, sustainable drainage etc. will help to protect existing biodiversity. The policy on protecting and enhancing biodiversity, and the 40% Green Infrastructure requirements for the two new urban extensions aim to actively improve biodiversity. However ten sites are near or on sites designated for nature conservation <sup>2</sup> .
10. Economy	++	The plan supports a range of types of employment, including rural employment, high quality offices, retail, live-work, small firms, tourism and industrial. It provides at least 29ha of employment land: this is enough land for existing businesses to expand and to encourage new business into the District.
11. Heritage	?	The plan policy on heritage aims to protect and make sympathetic use of heritage assets. This also helps to protect community identities. Thirteen of the allocated sites could have a significant impact on heritage assets. Two conservation areas are affected by more than one site: Green Street (BHS-2, BHS-38, BHS-39), and Staffs. and Worcs. Canal (BHS-16, BHS-17, BW-1, BW-2) <sup>3</sup> .
12. Green Belt	+/-	The plan aims to protect and support the role of the Green Belt through a strategic review. The plan recognises the conflict between retaining the Green Belt as it currently is and providing enough land for development. It provides for 29 Green Belt sites totalling 236 ha, equivalent to 2.1% of the Green Belt. Of this, the wider Lea Castle area accounts for 120ha, the wider Eastern Extension area accounts for 79ha (some of the site will remain in the Green Belt); and the rest of the Green Belt sites are much smaller. This approach of allocating Green Belt sites will help to prevent speculative development elsewhere in the district in less sustainable locations.
13. Communities	+	The plan's Chapter 6 policies on the individual towns and communities in the district aim to maintain and enhance the identities of these settlements. The plan provides most of the new housing and employment sites in the district's larger settlements rather than in the smaller rural settlements, so avoiding overwhelming any one location. The rural developments aim to maintain the vitality of the towns. The two major new development areas are at Lea Castle and east of Kidderminster. The plan provides for these areas to be new

<sup>2</sup> The sites with the most obvious potential for biodiversity impacts are:

- BW/4: southern part of site will be kept as a green belt between the development and the SSSI
- MI/36: existing gypsy and traveler site included in the plan to regularize/manage its impacts
- MI/10: existing caravan site and MI/11 former scrapyards plus one dwelling which, when redeveloped, should have no more of a cumulative impact on the Hartlebury Common and Hillditch Coppice SSSI than the current development

<sup>3</sup> All of these sites are previously developed, some with derelict buildings. All policies refer to the conservation area.

	communities with associated services. A limited number of allocated sites, mostly in the rural areas, are not adjacent to any settlement.
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**Secondary or indirect effects** are effects that are not a direct result of the plan, but occur away from the original effect or as a result of a complex pathway. Examples of secondary effects are a development that changes a water table and thus affects the ecology of a nearby wetland; and construction of one project that facilitates or attracts other developments. Key indirect effects of the Wyre Forest District Local Plan include:

- Provision of housing to meet the objectively assessed need, thereby helping to improve people's health and wellbeing, and supporting the vitality of communities.
- Provision of about 5,520 new dwellings and at least 29 ha of employment land, with indirect impacts on agricultural land, water, landscape, biodiversity and the heritage.
- Provision of a balanced of housing and employment land, mostly on sites that are accessible by non-car modes and near existing services, thereby reducing the need to travel, with associated benefits for health and air quality.
- Support for a limited number of Green Belt sites in accessible locations, and for significant extensions to the north and east of Kidderminster, thereby reducing the likelihood of piecemeal development in the district, and helping to ensure that developments have adequate infrastructure and services.
- The green infrastructure policy, coupled with Policies 31 and 32 on Lea Castle and Kidderminster Eastern Extensions, will help to deliver a range of accessible green spaces.

**Cumulative effects** arise, for instance, where several developments each have insignificant effects but together have a significant effect; or where several individual effects of the plan (e.g. noise, dust and visual) have a combined effect. Key cumulative impacts of the plan are:

- Provision of about 5,520 new dwellings to deal with the district's objectively assessed housing need.
- Provision of at least 29ha of employment land.
- Impacts on the Green Belt from 29 sites totalling 236 ha.
- Impacts on greenfield land from 25 sites totalling 194ha.
- Impacts on the Green Street, Staffordshire and Worcestershire Canal, and Stourport No. 1 conservation areas from multiple development sites in/near these areas.
- Impacts on the Hartlebury Common and Hillditch Coppice SSSI from two development sites.
- Air pollution impacts of traffic from new development in addition to the poor air quality already in the air quality management areas.
- The increase in population in the district will affect local services. The plan provides for a range of new services – for instance schools and community centres at Lea Castle and Kidderminster Eastern Extension – but overall there are likely to be increased cumulative impacts on the district's services.

**Synergistic effects** interact to produce a total effect greater than the sum of the individual effects. Synergistic effects often happen as habitats, resources or human communities get close to capacity. Key synergistic impacts of the plan are:

- Several site allocations in Kidderminster town centre together should help to revitalise the eastern part of the centre.
- Several site allocations at Lea Castle together would lead to enough housing to warrant provision of a new primary school, retail provision, a community facility and playing pitches, as required in Chapter 31 of the plan.
- Several site allocations to the east of Kidderminster together would lead to enough housing to warrant provision of a new primary school, retail provision, a community facility and allotments/orchard, as required in Chapter 32 of the plan.

- The policy on revitalisation of waterways jointly with site allocations should help to revitalise the Staffordshire and Worcestershire Canal and the River Stour.
- The tourism policies jointly are likely to improve Wyre District's tourism offer and support the economic diversification of the district.

The key **short term, temporary** (<5 years) effect of the plan is likely to be the construction of about 250 new homes per year, with associated land take, increased urbanisation, traffic etc. The area around Lea Castle and the Kidderminster Eastern Extension will be particularly affected. In the **medium** (>5 years) and **long term** (>20 years), the plan is likely to lead to:

- a change in Green Belt boundaries
- an increase in urbanisation, particularly in the Lea Castle area
- more vibrant centres in Kidderminster, Stourport and Bewley
- decreased per-person travel, but an overall increase in traffic and congestion because of the increased number of people expected over the next 20 years
- decreased per-person energy use, but an overall increase in energy use
- a more planned and cohesive green infrastructure network
- decreased impacts from tourist accommodation

**Permanent effects** of the plan are likely to include:

- An increase in developed land, and a decrease in undeveloped and agricultural land
- Improvements to, and creation of, green infrastructure
- Some irreversible impacts to heritage assets, the historic landscape and biodiversity. Some of these could be positive, e.g. improvements to conservations areas in Kidderminster and Stourport. Others are likely to be negative, e.g. impacts on SSSIs.

## Chapter 7. Task B4: Mitigation

The SEA Directive requires a description of “the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan” (Annex Ig).

Many of the plan policies avoid or minimise other policies’ negative effects. These include:

- For *health*: Policy 9 on health and wellbeing which supports active lifestyles, green spaces and good quality housing; Policies 20B on open space, 20C on provision of open space etc., which together aim to protect the district’s green spaces; and Policy 11F on regenerating the waterways, which will provide new publicly-accessible areas for leisure use.
- For *transport and air*: Policy 13 on transport and accessibility which aims to minimise the need to travel and promote walking, cycling and public transport; and Policy 14 on strategic green infrastructure, which promote walking, cycling and public transport
- For *soil and land*: Policy 11E on protecting and enhancing geodiversity which aims to protect geological sites and geodiversity generally
- For *water*: Policy 15A on water conservation and efficiency, which aims to reduce per capita water use; Policies 15B on sewerage and water quality and 15D on sustainable drainage systems which aim to prevent and reduce water pollution; and Policy 15C on flood risk management which aim to prevent and reduce flooding
- For *heritage*: Policies 11B and 26 on the historic environment, which aim to protect heritage assets and their settings, and make creative and sympathetic reuse of historic buildings
- For *landscape*: Policy 11C on landscape character which aims to protect and enhance the unique character of the district’s landscape and establish a Severn Valley Regional Heritage Park; and Policies 11A and 27A on quality design and distinctiveness
- For *biodiversity*: Policy 11D on protecting and enhancing biodiversity which aims to deliver measurable net gains in biodiversity; and Policy 14 on strategic green infrastructure, which aims to provide a range of new green infrastructure as part of new developments
- For the *Green Belt*: Policy 25 on safeguarding the Green Belt which prevents development in the Green Belt except under strict conditions.

Each of the major site allocations also includes measures to avoid or minimise the negative effects of development, or enhance its positive effects. These include:

- For *health*: Providing green infrastructure corridors, providing pedestrian routes and public realm, retaining access to playing field land, providing new play facilities/allotments
- For *transport and air*: Providing pedestrian and cycling routes
- For *soil and land*: carrying out decontamination where necessary
- For *water*: Locating dwellings outside of the area that is at risk of flooding, providing a buffer zone along a brook, hydraulic modelling to confirm the extent of the floodplain, preventing habitable rooms at ground floor level, providing sustainable drainage systems to control drainage on site, requiring no additional surface water discharge to leave the site
- For *heritage*: Retaining buildings and views that are historically important, protecting the setting of heritage assets, relating the scale and design of the development to existing heritage assets, carrying out archaeological assessments

- For *landscape*: Providing new landmarks, incorporating green areas into the development, providing areas of public open space, requiring buildings to be consistent with the local vernacular, using changes in site levels to reduce the overall height of the built form
- For *biodiversity*: Protecting and enhancing woodland and river/canal-side areas, enhancing existing hedgerows, retaining mature trees, providing buffers, providing bat and bird boxes, providing living walls and green roofs, carrying out bat/otter/ecological surveys, preventing lighting at bat habitats, securing woodland management, limiting access to existing woodlands, exploring the possibility of opening up an existing highway drain, creation of a linear nature reserve
- For the *Green Belt*: Limiting building heights to those of existing buildings, providing extensive landscaping and tree planting to screen boundaries, retaining existing boundary hedgerows and trees, limiting densities in parts of the site to create a more rural feel

In addition, the SA process led to policy changes to make the plan more sustainable. Table 7.1 lists the key changes prompted by the SA, besides minor clarifications of wording. Appendix A shows suggested mitigation measures that have not been integrated into the plan.

**Table 7.1 Changes resulting from the SA of plan policies**

<b>LDP Policy</b>	<b>Change resulting from recommendations made in the SA</b>
10A. A diverse local economy	Policy rephrased to include access by public transport for rural locations
11D. Protecting and enhancing biodiversity	Wording related to the Habitats Regulations Assessment changed to be more consistent with the regulations
11F. Regenerating the waterways	Changes to wording to make the policy clearer and include the River Severn.
15B. Sewerage systems and water quality	Final paragraph on water quality added
16B. Minerals	Reuse and recycling put first, to reflect the waste hierarchy. Reference added to amenity, air pollution including dust, water levels and quality, the landscape, the road network
16C. Waste	Requirement added about facilities being well-designed
20C. Public footpaths (former)	Policy removed as covered by other legislation
21B. Rural employment	New bullet point added about diversification not leading to unacceptable traffic impacts
22D. Local shops	Note added about providing parking where possible
22E. Specialist retailing	Criterion added about parking to Worcestershire County standards
23A. Supporting major tourist attractions	Biodiversity and heritage added as criteria for the SVR
23B. Supporting tourist attractions	Reference to Green Belt policies and the landscape included
24B. Renewable and low carbon energy	Statement added to make the policy also applicable to 'where possible redevelopment of existing buildings'
27B. Design of extensions and alterations	Information added about the 45 degree code. Note that extensions should not <i>cumulatively</i> overwhelm the original building.
27C. Landscaping and boundary treatment	Greater emphasis to the retention of existing vegetation and features; mention that landscaping should encourage walking and cycling, and provide direct routes to relevant services; link to SUDS
28D. Agricultural land quality	Specification of what is meant by 'higher quality agricultural land', i.e. 1, 2 and 3a.

## Chapter 8. Task B5: Monitoring

The SEA Directive requires a description of “the measures envisaged concerning monitoring” (Annex II).

The SEA Directive and Regulations require that the significant effects (positive and negative) of implementing the plan should be monitored, in order to identify at an early stage any unforeseen effects and to be able to take appropriate remedial action. The aim of SA monitoring is to set a framework that indicates whether the plan is making progress towards sustainable development.

Government guidance advises that existing monitoring arrangements should be used where possible in order to avoid duplication. Local authorities, including Wyre Forest District Council, already produce Authority Monitoring Reports (AMR). Table 8.1 suggests an SA monitoring framework for the Wyre Forest District Local Plan focused around the key impacts expected from the plan, which can be integrated into the AMR.

**Table 8.1 SA monitoring framework for the Wyre Forest District Local Plan**

SA objective	Indicator
1. Health	<ul style="list-style-type: none"> <li>Health dimension of the Index of Multiple Deprivation</li> </ul>
2. Services	<ul style="list-style-type: none"> <li>Provision and improvements of other local facilities</li> <li>New retail, office and leisure development in city/district centres</li> <li>Distance of households from key services, e.g. Post Office, School, doctors</li> </ul>
3. Housing	<ul style="list-style-type: none"> <li>Housing approvals, completions and losses</li> <li>Percentage of new dwelling completions on previously developed land</li> <li>Amount and percentage of affordable housing</li> </ul>
4. Energy	<ul style="list-style-type: none"> <li>Per capita CO<sub>2</sub> emissions</li> <li>Installed capacity of renewable energy generating development, by type</li> </ul>
5. Transport, air	<ul style="list-style-type: none"> <li>Vehicle-km on main roads</li> <li>Air Quality Management Areas</li> <li>Mode of travel to work</li> </ul>
6. Soil, land	<ul style="list-style-type: none"> <li>Area of greenfield development</li> </ul>
7. Water	<ul style="list-style-type: none"> <li>Proportion of river length assessed as fairly good or very good for chemical quality and biological quality</li> <li>Per capita consumption of water</li> </ul>
8. Landscape	<ul style="list-style-type: none"> <li>Area of greenfield development</li> </ul>
9. Biodiversity	<ul style="list-style-type: none"> <li>Change in areas of biodiversity importance</li> <li>Condition of SSSIs</li> </ul>
10. Economy	<ul style="list-style-type: none"> <li>Total number of jobs</li> <li>Proportion of working-age residents in employment</li> <li>Amount of employment land available, by type and location</li> </ul>
11. Heritage	<ul style="list-style-type: none"> <li>Number of heritage assets at risk</li> <li>Number of heritage assets removed from the HAR registers</li> </ul>
12. Green Belt	<ul style="list-style-type: none"> <li>Area of development in the Green Belt</li> </ul>
13. Communities	<ul style="list-style-type: none"> <li>Total population, and population by broad age groups</li> </ul>



## Chapter 9 Consultation and next steps

This SA Report is available for comments alongside the Wyre Forest District Pre-Submission Publication Draft Local Plan, from 1 November to 17 December 2018. All responses should be made on the Consultation Response Forms available at [www.wyreforestdc.gov.uk/localplanreview](http://www.wyreforestdc.gov.uk/localplanreview). Further details on how to respond are at Chapter 1 of the draft Local Plan.

Following the Pre Submission Public Consultation, an updated SA Report will be published alongside the Submission Local Plan. The consultation responses will be considered and the emerging Local Plan finalised. The plan will then be submitted to an Independent Examiner who will examine it in an Examination in Public. Any modifications proposed by the Independent Examiner will then be consulted on.

It is anticipated that the Local Plan will be adopted by Wyre Forest District Council in 2020. Once the plan is adopted, Wyre Forest District Council will publish an SEA statement which explains how the sustainability appraisal influenced the Local Plan. Information to support the SEA statement is already presented in this report at Section 4.3, Chapter 5, and Table 7.1.

## Appendix A. Policy appraisals

<b>Policy 5A. Sustainable Development</b>		
<b>SA objectives that are not relevant to this policy</b>	1, 4, 13	
<b>SA objective</b>	<b>Impact of policy</b>	
2. To protect and enhance the provision and accessibility to local services and facilities	?	This policy supports sustainable development, including local services and facilities. However it does not guarantee the provision of such services, and giving permission for new development without adequate supporting services and facilities could exacerbate any existing problems.
3. To ensure that the housing needs of all residents and communities are met	+	This policy helps to ensure that adequate quantities of housing are built to support the local population.
5. To reduce the need to travel and move towards more sustainable travel modes; to reduce associated effects of air quality & greenhouse gas emissions	?	This policy supports sustainable development. However it does not require development to be accessible by walking, cycling or public transport, so its impact could be negative as well as positive.
6. To protect soil & land	?	This policy supports sustainable development. However it does not specify that soil, land, water quality/resources, the landscape and bio/geodiversity should be protected, and so could have negative impacts on them.
7. To protect water resources and quality; reduce flood risk.		
8. To protect and enhance landscape and townscape		
9. To conserve & enhance the District's biodiversity and geodiversity		
10. To support the economy & ensure suitable employment opportunities	+	This policy helps to ensure that adequate quantities of employment development is built to support local jobs.
11. To protect & enhance the historic environment & its settings	?	This policy supports sustainable development. However it does not specify that the historic environment should be protected, and so could have negative impacts on it.
12. To maintain the integrity of the Green Belt within the District.	?	The NPPF includes strong protection for Green Belts. However this policy does not clearly protect the Green Belt, so 'sustainable development' could affect the Green Belt.
<b>Possible mitigation</b>		

<b>Policy 6A. Development needs</b>		
<b>SA objectives that are not relevant to this policy</b>	4	
<b>SA objective</b>	<b>Impact of policy</b>	
1. To improve health and well-being within the District and reduce inequalities in health.	+	The policy provides homes to fill objectively assessed housing need. This helps to ensure that there are adequate homes for everyone, and will help to redress current instances of overcrowding etc.
2. To protect and enhance the provision and accessibility to local services and facilities	?	The policy says nothing about local services, but depending on the amount and location of the new housing and employment development, it could help to support existing services, create new services, or overload services

<b>Policy 6A. Development needs</b>		
<b>SA objectives that are not relevant to this policy</b>	4	
<b>SA objective</b>	<b>Impact of policy</b>	
3. To ensure that the housing needs of all residents and communities are met	++?	The policy will help to ensure that objectively assessed housing needs are provided for, although it provides for only 44% of the need for affordable housing.
5. To reduce the need to travel and move towards more sustainable travel modes; to reduce associated effects of air quality & greenhouse gas emissions	-	The sheer increase in number of homes and employment sites will increase travel, although it will also allow people to live near where they work if they want to. The policy's impacts are in part mitigated by other policies in the plan.
6. To protect soil & land	--	This policy will lead to more than 200ha of greenfield land being developed.
7. To protect water resources and quality; reduce flood risk.	--	This policy will lead to 13 sites being developed in areas that are at risk of flooding or wastewater management problems. The policy's impacts are in part mitigated by other policies in the plan.
8. To protect and enhance landscape and townscape	--	This policy will lead to 7 sites being developed with significant landscape impacts. The policy's impacts are in part mitigated by other policies in the plan.
9. To conserve & enhance the District's biodiversity and geodiversity	--	This policy, combined with the site allocation policies, will lead to 10 sites being developed with significant biodiversity impacts. The policy's impacts are in part mitigated by other policies in the plan.
10. To support the economy & ensure suitable employment opportunities	+	This policy supports economic growth in the district by providing adequate employment land and housing for the future population
11. To protect & enhance the historic environment & its settings	--	This policy will lead to 13 sites being developed with potential significant heritage impacts. The policy's impacts are in part mitigated by other policies in the plan.
12. To maintain the integrity of the Green Belt within the District.	--	This policy will lead to more than 200ha of Green Belt land being built on.
13. To maintain & enhance community & settlement identities	0?	This policy helps to ensure that housing and employment sites are provided that allow people to stay in the district if they want to; and ensures the economic growth of the district.
<b>Possible mitigation</b>		

<b>Policy 6B. Locating new development</b>		
<b>SA objectives that are not relevant to this policy</b>	1, 4, 7, 9, 11	
<b>SA objective</b>	<b>Impact of policy</b>	
2. To protect and enhance the provision and accessibility to local services and facilities	0	The policy aims to focus development in and adjacent to the urban areas where accessibility to public service provision is greatest. It does not suggest an improvement to the services themselves.
3. To ensure that the housing needs of all residents and communities are met	+	The policy aims to provide for and facilitate the delivery of sufficient accessible housing to meet objectively assessed needs

<b>Policy 6B. Locating new development</b>		
<b>SA objectives that are not relevant to this policy</b>	1, 4, 7, 9, 11	
<b>SA objective</b>	<b>Impact of policy</b>	
5. To reduce the need to travel and move towards more sustainable travel modes; to reduce associated effects of air quality & greenhouse gas emissions	+/-	Overall the strategic approach promoted by this policy should help to reduce the per person need to travel, although overall traffic is likely to increase because of the increase in population of the district.
6. To protect soil & land	0	The policy promotes the use of brownfield land, which helps to protect greenfield land and soil quality
8. To protect and enhance landscape and townscape	0	The policy aims to safeguard and (wherever possible) enhance the open countryside.
10. To support the economy & ensure suitable employment opportunities	+	The policy aims to provide accessible, attractive employment sites and positive policies to deliver job creation opportunities
12. To maintain the integrity of the Green Belt within the District.	0	The policy aims to maintain the openness of the Green belt
13. To maintain & enhance community & settlement identities	+	The policy helps to support communities that wish to develop a Neighbourhood Plan
<b>Possible mitigation</b> Include as a principle "Protect from development areas that are sensitive because of their landscape, heritage assets or biodiversity" or similar?		

<b>Policy 6C. Kidderminster town as the strategic centre of the District</b>		
<b>SA objectives that are not relevant to this policy</b>	1, 3, 4, 6-9, 11, 12	
<b>SA objective</b>	<b>Impact of policy</b>	
2. To protect and enhance the provision and accessibility to local services and facilities	+	The policy supports the development of retail, leisure etc. facilities as well as housing and employment land in Kidderminster.
5. To reduce the need to travel and move towards more sustainable travel modes; to reduce associated effects of air quality & greenhouse gas emissions	?	The plan has limited control over the delivery of transport projects. The policy states that sustainable transport links will be sought, where practical and viable.
10. To support the economy & ensure suitable employment opportunities	++	The policy promotes the development of a range of employment sites in Kidderminster, including retail, office, commercial and tourism development.
12. To maintain the integrity of the Green Belt within the District.	-	The development planned adjacent to Kidderminster (Policy 6D) will entail some Green Belt release
13. To maintain & enhance community & settlement identities	?	The policy supports the development of a tourism 'hub', and the evening/nighttime economy and cultural offer of the town. This could provide new services for existing residents, but could also have negative impacts in terms of noise etc.
<b>Possible mitigation</b>		

<b>Policy 6D. Allocation sites</b>	
<b>SA objectives that are not relevant to this policy</b>	1-13
<b>SA objective</b>	<b>Impact of policy</b>
	This policy essentially only refers to Policies 31 and 32. Please see the appraisal of those policies.
<b>Possible mitigation</b>	

<b>Policy 6E. Role of Stourport-on-Severn and Bewdley as market towns</b>	
<b>SA objectives that are not relevant to this policy</b>	4, 6-9, 13
<b>SA objective</b>	<b>Impact of policy</b>
1. To improve health and well-being within the District and reduce inequalities in health.	+ The policy supports the development of community and health facilities for the local area. The policy also aims to safeguard retail provision and ensure that new retail provision is appropriate.
2. To protect and enhance the provision and accessibility to local services and facilities	+
3. To ensure that the housing needs of all residents and communities are met	+ Stourport is expected to make an important contribution to meeting the district's requirement for new homes
5. To reduce the need to travel and move towards more sustainable travel modes; to reduce associated effects of air quality & greenhouse gas emissions	+/- The plan has limited control over the delivery of transport projects. The policy states that sustainable transport should be enhanced 'where practical and viable'. This should help to reduce per person greenhouse gas emissions, but total emissions are likely to rise because of the increase in population
10. To support the economy & ensure suitable employment opportunities	+ The policy promotes employment, start-up business units and commerce, to provide local employment opportunities and enhance economic viability. In Stourport and Bewdley, tourism is expected to increase because of an improved tourism offer.
11. To protect & enhance the historic environment & its settings	+? Development in Stourport's and Bewdley's conservation areas should preserve or enhance those areas.
12. To maintain the integrity of the Green Belt within the District.	- The policy entails some Green Belt release
<b>Possible mitigation</b>	

<b>Policy 6F. Role of the villages and rural areas / Policy 36. Villages and rural areas site allocations</b>	
<b>SA objectives that are not relevant to this policy</b>	1
<b>SA objective</b>	<b>Impact of policy</b>
2. To protect and enhance the provision and accessibility to local services and facilities	0 Policy 6F aims to safeguard shops and public houses, and supports the provision of essential facilities and services. It assumes that the three main towns will continue to provide higher order services and facilities.
3. To ensure that the housing needs of all residents and communities are met	? Policy 6F states that new residential development will be to meet local housing need. This is not clearly stated in Policy 36.

<b>Policy 6F. Role of the villages and rural areas / Policy 36. Villages and rural areas site allocations</b>	
<b>SA objectives that are not relevant to this policy</b>	1
<b>SA objective</b>	<b>Impact of policy</b>
4. To promote energy efficiency & energy generated from renewable and low carbon sources.	0 The policies say nothing about energy efficiency or renewables
5. To reduce the need to travel and move towards more sustainable travel modes; to reduce associated effects of air quality & greenhouse gas emissions	- Rural homes are by nature car-dependent and will increase the need to travel. However Policy 36 allocates only 65 core sites in rural villages, so this impact will be limited.
6. To protect soil & land	0 The rural sites comprise a mixture of greenfield and brownfield sites. Their impact on land, water resources/flooding, biodiversity etc. is likely to be limited.
7. To protect water resources and quality; reduce flood risk.	
8. To protect and enhance landscape and townscape	
9. To conserve & enhance the District's biodiversity and geodiversity	
10. To support the economy & ensure suitable employment opportunities	
11. To protect & enhance the historic environment & its settings	0 The policy protects historic farmsteads from inappropriate development.
12. To maintain the integrity of the Green Belt within the District.	0 None of the rural core sites are proposed in the Green Belt
13. To maintain & enhance community & settlement identities	0 A main aim of both policies is to maintain the vitality of rural communities
<b>Possible mitigation</b>	
Does the policy need to explain what are 'essential' facilities and services? This policy says that rural housing will be for local need, but this is not carried through to policy 36. Should it be? Given that many rural homes will presumably not be on the gas grid, should this policy support renewable energy more strongly, esp. solar heating?	

<b>Policy 7A. Strategic Green Belt Review</b>	
<b>SA objectives that are not relevant to this policy</b>	1, 4
<b>SA objective</b>	<b>Impact of policy</b>
2. To protect and enhance the provision and accessibility to local services and facilities	+/- Allows for some development in the Green Belt, but channels most development to the main towns.
3. To ensure that the housing needs of all residents and communities are met	+ Allows for housing provision in the Green Belt under restricted conditions
5. To reduce the need to travel and move towards more sustainable travel modes; to reduce associated effects of air quality & greenhouse gas emissions	+/- The policy allows development in the Green Belt in a number of locations, most of which are on the edge of towns and so help to minimise the need to travel.
6. To protect soil & land	- The policy allows some development in the Green Belt. Most of this will be on greenfield sites, with
7. To protect water resources and quality; reduce flood risk.	

<b>Policy 7A. Strategic Green Belt Review</b>		
<b>SA objectives that are not relevant to this policy</b>	1, 4	
<b>SA objective</b>	<b>Impact of policy</b>	
8. To protect and enhance landscape and townscape		consequent impacts to soil, water/flooding, the landscape and biodiversity.
9. To conserve & enhance the District's biodiversity and geodiversity		
10. To support the economy & ensure suitable employment opportunities	+/-	Allows for employment development in the Green Belt under very restricted conditions
11. To protect & enhance the historic environment & its settings	-	The policy allows some development in the Green Belt. This is likely to affect the district's historic environment and its settings.
12. To maintain the integrity of the Green Belt within the District.	-	The policy aims to minimise development in the Green Belt, but releases some sites in the Green Belt.
13. To maintain & enhance community & settlement identities	0	By restricting what can be built in the Green Belt, this policy helps to maintain the strategic gaps between the district's settlements, and therefore their identities.
<b>Possible mitigation</b>		

<b>Policy 7B. Reserved housing sites in the Green Belt</b>		
<b>SA objectives that are not relevant to this policy</b>	1, 2, 4, 10	
<b>SA objective</b>	<b>Impact of policy</b>	
3. To ensure that the housing needs of all residents and communities are met	+	Allows for housing provision in the Green Belt under restricted conditions
5. To reduce the need to travel and move towards more sustainable travel modes; to reduce associated effects of air quality & greenhouse gas emissions	+/-	The policy allows development in the Green Belt in a number of locations, most of which are on the edge of towns and so help to minimise the need to travel.
6. To protect soil & land	-	The policy allows some development in the Green Belt. Most of this will be on greenfield sites, with consequent impacts to soil, water/flooding, the landscape, biodiversity and the historic environment.
7. To protect water resources and quality; reduce flood risk.		
8. To protect and enhance landscape and townscape		
9. To conserve & enhance the District's biodiversity and geodiversity		
11. To protect & enhance the historic environment & its settings	-	The policy aims to minimise development in the Green Belt, but releases some sites in the Green Belt.
12. To maintain the integrity of the Green Belt within the District.		
13. To maintain & enhance community & settlement identities	0	By restricting what can be built in the Green Belt, this policy helps to maintain the strategic gaps between the district's settlements, and therefore their identities.
<b>Possible mitigation</b>		

<b>Policy 8A. Housing Density &amp; Mix</b>		
<b>SA objectives that are not relevant to this policy</b>	4	
<b>SA objective</b>	<b>Impact of policy</b>	
1. To improve health and well-being within the District and reduce inequalities in health.	+	The policy provides homes to fill objectively assessed housing need. This helps to ensure that there are adequate homes for everyone, and will help to redress current instances of overcrowding etc.
2. To protect and enhance the provision and accessibility to local services and facilities	?	The policy says nothing about local services, but depending on the amount and location of the new housing, it could help to support existing services, create new services, or overload services
3. To ensure that the housing needs of all residents and communities are met	++?	The policy will help to ensure that objectively assessed housing needs are provided for, although it will provide only about 44% of the affordable homes needed.
5. To reduce the need to travel and move towards more sustainable travel modes; to reduce associated effects of air quality & greenhouse gas emissions	-	The sheer increase in number of homes will increase travel, although it will also allow people to live near where they work if they want to. The policy's impacts is in part mitigated by other policies in the plan.
6. To protect soil & land	--	The policy proposes an average density of 35 dwellings per hectare in the city and town centre and no minimum/average density for the large new urban extensions. This is not particularly high. This policy, combined with the site allocation policies, will lead to more than 200ha of greenfield land being developed.
7. To protect water resources and quality; reduce flood risk.	--	This policy, combined with the site allocation policies, will lead to 13 sites being developed in areas that are at risk of flooding. The policy's impacts is in part mitigated by other policies in the plan.
8. To protect and enhance landscape and townscape	--	This policy, combined with the site allocation policies, will lead to 7 sites being developed with significant landscape impacts. The policy's impacts is in part mitigated by other policies in the plan.
9. To conserve & enhance the District's biodiversity and geodiversity	--	This policy, combined with the site allocation policies, will lead to 10 sites being developed with significant biodiversity impacts. The policy's impacts is in part mitigated by other policies in the plan.
10. To support the economy & ensure suitable employment opportunities	+	This policy supports economic growth in the district by providing adequate housing for the future population
11. To protect & enhance the historic environment & its settings	--	This policy, combined with the site allocation policies, will lead to 13 sites being developed with potential significant heritage impacts. The policy's impacts is in part mitigated by other policies in the plan.
12. To maintain the integrity of the Green Belt within the District.	--	This policy, combined with the site allocation policies, will lead to more than 200ha of Green Belt land being built on.
13. To maintain & enhance community & settlement identities	0?	This policy helps to ensure that housing is provided that allows people to stay in the district if they want to; allows rural communities to expand in a sustainable manner; and ensures that town



<b>Policy 8A. Housing Density &amp; Mix</b>	
<b>SA objectives that are not relevant to this policy</b>	4
<b>SA objective</b>	<b>Impact of policy</b>
	centres are revitalised. The two larger urban expansions are expected to become new communities in their own right. The proposed sites should not 'swamp' communities with over-large new developments.
<p><b>Possible mitigation</b></p> <p>Although the policy includes a table suggesting a dwelling mix, presumably the policy can't <i>require</i> such a mix? What if an entire large site is only for 4 bed houses?</p> <p>An average of 35 dwellings/ha is not high. I would expect that (or more) for the large greenfield sites, and higher in the city/town centres. Reword to remove 'average' density, as that might actually lower housing density.</p> <p>Consider car-free housing?</p>	

<b>Policy 8B. Affordable Housing Provision</b>	
<b>SA objectives that are not relevant to this policy</b>	2, 4, 6-9, 11, 12
<b>SA objective</b>	<b>Impact of policy</b>
1. To improve health and well-being within the District and reduce inequalities in health.	+/- The policy provides for less than half the affordable homes than are needed – 69 rather than 158 per year - but actual requirements would make developments unviable. It provides more affordable homes than would be provided under a 'business as usual' scenario, but fewer than are needed.
3. To ensure that the housing needs of all residents and communities are met	+/-
5. To reduce the need to travel and move towards more sustainable travel modes; to reduce associated effects of air quality & greenhouse gas emissions	+/- The provision of affordable housing makes it possible for people on a low income to still live close to where they work. The policy provides for more affordable homes than would be provided under a 'business as usual' scenario, but fewer than are needed, with mixed results on need to travel.
10. To support the economy & ensure suitable employment opportunities	+/-
13. To maintain & enhance community & settlement identities	+
<b>Possible mitigation</b>	

<b>Policy 8C. Addressing Rural Housing Needs</b>	
<b>SA objectives that are not relevant to this policy</b>	1, 4
<b>SA objective</b>	<b>Impact of policy</b>
2. To protect and enhance the provision and accessibility to local services and facilities	+ This policy, which supports the development of small-scale housing in rural areas, will help to protect and possibly enhance rural services, by ensuring that there is enough population to keep them going.
3. To ensure that the housing needs of all residents and communities are met	+ The policy aims to provide for the housing needs of rural dwellers, particularly those who require affordable dwellings.

<b>Policy 8C. Addressing Rural Housing Needs</b>		
<b>SA objectives that are not relevant to this policy</b>	1, 4	
<b>SA objective</b>	<b>Impact of policy</b>	
5. To reduce the need to travel and move towards more sustainable travel modes; to reduce associated effects of air quality & greenhouse gas emissions	-	Homes in the countryside tend to be far from services and jobs, and so generate more car movements and associated emissions.
6. To protect soil & land	-?	The impact of this policy depends on their location, and whether sites are brownfield or greenfield. Overall, the policy is likely to lead to more development on greenfield land, more flood risk, impacts on the rural landscape, and impacts on biodiversity.
7. To protect water resources and quality; reduce flood risk.		
8. To protect and enhance landscape and townscape		
9. To conserve & enhance the District's biodiversity and geodiversity		
10. To support the economy & ensure suitable employment opportunities	+	The policy supports the rural economy by ensuring that adequate homes are built where they are needed to support rural jobs.
11. To protect & enhance the historic environment & its settings	-?	The impact of this policy will depend on the location of the new homes. However building more homes in the countryside will increase the feeling of urbanisation in a historically rural area, and could affect individual heritage assets.
12. To maintain the integrity of the Green Belt within the District.	-	Some of the rural housing is likely to be on Green Belt land
13. To maintain & enhance community & settlement identities	+	The aim of the policy is to ensure that rural communities remain vibrant, and that local families can stay in their communities.
<b>Possible mitigation</b>		

<b>Policy 8D. Self Build and Custom Housing</b>		
<b>SA objectives that are not relevant to this policy</b>		
<b>SA objective</b>	<b>Impact of policy</b>	
3. To ensure that the housing needs of all residents and communities are met	+	The policy enables self-build and custom housing, so catering to the needs of a specific (albeit limited) group of people, some of whom may wish to build their housing communally. This policy is more supportive of this than the current plan is.
13. To maintain & enhance community & settlement identities	+	
<b>Possible mitigation</b>		

<b>Policy 8E. Housing for Older People and Others with Special Housing Requirements</b>		
<b>SA objectives that are not relevant to this policy</b>		
<b>SA objective</b>	<b>Impact of policy</b>	
1. To improve health and well-being within the District and reduce inequalities in health.	?	The policy aims to provide appropriate housing for older people. However at the moment it only requires housing providers to "provide evidence that they have fully considered the provision of [higher access] housing". It does not clearly require them to provide such housing. As such, it is not clear whether such housing will actually be provided.
3. To ensure that the housing needs of all residents and communities are met	?	

<b>Policy 8E. Housing for Older People and Others with Special Housing Requirements</b>		
<b>SA objectives that are not relevant to this policy</b>		
<b>SA objective</b>	<b>Impact of policy</b>	
13.To maintain & enhance community & settlement identities	?	It is unclear how and where the residential institutional units will be allocated, and how higher accessibility housing will be provided. As such, it is not clear what impact this policy will have on community/settlement identities.
<b>Possible mitigation</b>		
Another approach, given the district's ageing population, would be to be tougher and specify the proportion of buildings that need to be accessible, e.g. 10%.		

<b>Policy 8F. Gypsy and Traveller Site Provision</b>		
<b>SA objectives that are not relevant to this policy</b>		
<b>SA objective</b>	<b>Impact of policy</b>	
3. To ensure that the housing needs of all residents and communities are met	?	This policy states that enough Gypsy and Traveller pitches currently exist, but that more will be required in the future. It does not clearly allocate sites for future demand, so its impact is uncertain.
<b>Possible mitigation</b>		
The policy states that "Further small scale sites to meet the indicative need of 21 pitches to 2034 will be allocated in the Local Plan." Has this been done? Does the policy need to be reworded to show this?		

<b>Policy 8G. Site Provision for Travelling Showpeople</b>		
<b>SA objectives that are not relevant to this policy</b>		2, 4-7, 10, 11, 13
<b>SA objective</b>	<b>Impact of policy</b>	
1. To improve health and well-being within the District and reduce inequalities in health.	0	The policy aims to provide a replacement site for Travelling Showpeople who are being displaced from their existing site. It aims to maintain their housing and health.
3. To ensure that the housing needs of all residents and communities are met	0	
8. To protect and enhance landscape and townscape	0	The replacement site is well screened. It is currently industrial premises.
9.To conserve & enhance the District's biodiversity and geodiversity	0?	The replacement site is adjacent to Burlish Top and Vicarage Farm Heath local nature reserve, and across the road from Vicarage Farm Heath local wildlife site. The impact is likely to be minor at most.
12. To maintain the integrity of the Green Belt within the District.	0	The replacement site is in the greenbelt, but is currently industrial premises, so the overall impact is neutral.
<b>Possible mitigation</b>		
Add a requirement that any development proposal should be for no more land than necessary for the needs of the travelling showpeople (to avoid inefficient use of land and sprawl/visual impact)?		

<b>Policy 9. Health and Wellbeing</b>		
<b>SA objectives that are not relevant to this policy</b>	<b>6-12</b>	
<b>SA objective</b>	<b>Impact of policy</b>	
1. To improve health and well-being within the District and reduce inequalities in health.	+	The policy aims to maintain and improve the health of the district's residents through a range of interventions, e.g. green spaces, energy efficient homes, provision of health services. Health is only partly within the remit of the Local Plan, hence the single +
2. To protect and enhance the provision and accessibility to local services and facilities	0	The policy aims to provide leisure services that help to promote active lifestyles. Its impact is limited but positive.
3. To ensure that the housing needs of all residents and communities are met	+	The policy supports the development of Lifetime Homes, energy efficient homes and dementia- and age-friendly homes.
4. To promote energy efficiency & energy generated from renewable and low carbon sources.	0	The policy supports energy efficient housing. Its impact is limited but positive.
5. To reduce the need to travel and move towards more sustainable travel modes; to reduce associated effects of air quality & greenhouse gas emissions	+	The policy supports the development of public areas, footpaths, bridleways and cycle routes.
13. To maintain & enhance community & settlement identities	0	The policy supports the retention and provision of allotments, community orchards etc., which all support community identities. Its impact is limited but positive.
<b>Possible mitigation</b>		

<b>Policy 10A. A diverse local economy</b>		
<b>SA objectives that are not relevant to this policy</b>	<b>2-4</b>	
<b>SA objective</b>	<b>Impact of policy</b>	
1. To improve health and well-being within the District and reduce inequalities in health.	+	Employment is a key determinant of wellbeing. This policy supports the provision of employment land
5. To reduce the need to travel and move towards more sustainable travel modes; to reduce associated effects of air quality & greenhouse gas emissions	+	The policy supports employment sites in sites that are accessible by public transport
6. To protect soil & land	-?	Supports the development of up to 30(?)ha of employment land, some of which will presumably be on greenfield sites, with associated impacts on flooding, the landscape and biodiversity
7. To protect water resources and quality; reduce flood risk.		
8. To protect and enhance landscape and townscape		
9. To conserve & enhance the District's biodiversity and geodiversity		
10. To support the economy & ensure suitable employment opportunities	++	The policy supports a range of employment sites, including small scale businesses and starter units
11. To protect & enhance the historic environment & its settings	-?	Supports the development of up to 40 (?)ha of employment land, some of which will presumably have impacts on the historic environment and the Green Belt
12. To maintain the integrity of the Green Belt within the District.		

<b>Policy 10A. A diverse local economy</b>		
<b>SA objectives that are not relevant to this policy</b>	2-4	
<b>SA objective</b>	<b>Impact of policy</b>	
13.To maintain & enhance community & settlement identities	+	The policy aims to retain existing employment sites and provide for new employment sites that are appropriate to their location
<b>Possible mitigation</b>		

<b>Policy 10B. Town centre development</b>		
<b>SA objectives that are not relevant to this policy</b>	1, 4, 6, 7, 9 11-13	
<b>SA objective</b>	<b>Impact of policy</b>	
2. To protect and enhance the provision and accessibility to local services and facilities	+	The policy aims to retain and enhance the retail offer and the vitality of Kidderminster, Stourport-on-Severn and Bewdley. By allowing some change of use to leisure and recreation, it also supports the flexible provision of other services. Regeneration of Kidderminster eastern gateway would enhance the provision of services.
3. To ensure that the housing needs of all residents and communities are met	0	The policy allows for some retail development to be changed to residential, but the impact on housing provision is likely to be relatively minor.
5. To reduce the need to travel and move towards more sustainable travel modes; to reduce associated effects of air quality & greenhouse gas emissions	0	The policy aims to maintain the vitality of the town centres, and focus development on the three town centres. This should help to minimise the need to travel.
8. To protect and enhance landscape and townscape	?	The impact of this policy will depend on the type of development that comes forward.
10. To support the economy & ensure suitable employment opportunities	+	The policy would help to protect and enhance the district's employment offer.
<b>Possible mitigation</b>		
Bullet points 5 and 6 seem to say broadly the same thing for residential and retail uses. Can/should they be merged?		

<b>Policy 10C. Sustainable tourism</b>		
<b>SA objectives that are not relevant to this policy</b>	1, 3, 4, 13	
<b>SA objective</b>	<b>Impact of policy</b>	
2. To protect and enhance the provision and accessibility to local services and facilities	+	Encourages the development of tourism facilities which can also be used by local residents
5. To reduce the need to travel and move towards more sustainable travel modes; to reduce associated effects of air quality & greenhouse gas emissions	-?	The policy promotes accessibility of tourist sites by public transport. However by definition tourism attractions involve travel.
6. To protect soil & land	0	The policy aims to ensure that tourism facilities are compatible with the local area and do not cause unacceptable impacts. Tourism facilities may have negative impacts on soil, water resources the landscape and bio/geo-diversity. The impact is likely to be limited.
7. To protect water resources and quality; reduce flood risk.		
8. To protect and enhance landscape and townscape		
9.To conserve & enhance the District's biodiversity and geodiversity		

<b>Policy 10C. Sustainable tourism</b>		
<b>SA objectives that are not relevant to this policy</b>	1, 3, 4, 13	
<b>SA objective</b>	<b>Impact of policy</b>	
10. To support the economy & ensure suitable employment opportunities	+	The policy supports tourism development which generates jobs.
11. To protect & enhance the historic environment & its settings	0	Tourism facilities may have negative impacts on heritage assets. The policy aims to conserve heritage assets and their settings. The impact is likely to be limited.
12. To maintain the integrity of the Green Belt within the District.	?	Tourism facilities in the Green Belt could affect its integrity. The policy does not clearly protect against this.
<b>Possible mitigation</b>		

<b>Policy 11A. Quality design and local distinctiveness</b>		
<b>SA objectives that are not relevant to this policy</b>	1-7, 9, 10, 12	
<b>SA objective</b>	<b>Impact of policy</b>	
8. To protect and enhance landscape and townscape	0	The policy aims to ensure that new development is designed well, and fits well with other existing development and maintains settlement identities. Indirectly, it also helps to protect the settings of heritage assets.
11. To protect & enhance the historic environment & its settings		
13. To maintain & enhance community & settlement identities		
<b>Possible mitigation</b>		

<b>Policy 11B. Historic environment</b>		
<b>SA objectives that are not relevant to this policy</b>	1-7, 9, 10, 12	
<b>SA objective</b>	<b>Impact of policy</b>	
8. To protect and enhance landscape and townscape	0	The policy aims to preserve heritage assets and their settings. Indirectly, this also helps to ensure that new development protects the landscape / townscape and fits well with other existing development and maintains settlement identities.
11. To protect & enhance the historic environment & its settings		
13. To maintain & enhance community & settlement identities		
<b>Possible mitigation</b>		

<b>Policy 11C. Landscape character</b>		
<b>SA objectives that are not relevant to this policy</b>	1-7, 9, 10, 12	
<b>SA objective</b>	<b>Impact of policy</b>	
8. To protect and enhance landscape and townscape	+	The policy aims to protect and enhance the landscape, and supports a Severn Valley Regional Heritage Park. It should lead to improvements in the landscape consistent with Worcestershire County Council guidance (which includes guidance on the historic landscape). The regional heritage park will improve the historic environment and
11. To protect & enhance the historic environment & its settings		
13. To maintain & enhance community & settlement identities		

<b>Policy 11C. Landscape character</b>	
<b>SA objectives that are not relevant to this policy</b>	1-7, 9, 10, 12
<b>SA objective</b>	<b>Impact of policy</b>
	landscape between Stourport-on-Severn and Ironbridge.
<b>Possible mitigation</b>	

<b>Policy 11D – Protecting and enhancing biodiversity</b>	
<b>SA objectives that are not relevant to this policy</b>	2, 4, 5, 11
<b>SA objective</b>	<b>Impact of policy</b>
1. To improve health and well-being within the District and reduce inequalities in health.	+ This policy protects and enhances ('net gains') biodiversity. This is beneficial for health as green areas encourage walking and cycling, and are good for mental health.
3. To ensure that the housing needs of all residents and communities are met	- This policy restricts where housing can go. The requirement to not just protect biodiversity sites but also provide net gain could affect viability.
6. To protect soil & land	+ This policy aims to protect and enhance (via net gain) biodiversity in the district. This will indirectly help to protect and enhance soil/land, water quality and the landscape. It is unlikely that the policy will lead to significant enhancements in practice, hence the single +.
7. To protect water resources and quality; reduce flood risk.	
8. To protect and enhance landscape and townscape	
9. To conserve & enhance the District's biodiversity and geodiversity	
10. To support the economy & ensure suitable employment opportunities	- This policy restricts where employment development can go. The requirement to not just protect biodiversity sites but also provide net gain could affect viability.
12. To maintain the integrity of the Green Belt within the District.	+ This policy is consistent with maintaining the integrity of the Green Belt and enhancing communities, and may improve them.
13. To maintain & enhance community & settlement identities	
<b>Possible mitigation</b>	

<b>Policy 11E – Protecting and enhancing geological conservation</b>	
<b>SA objectives that are not relevant to this policy</b>	
<b>SA objective</b>	<b>Impact of policy</b>
6. To protect soil & land	0 This policy protects (and to a limited amount aims to enhance) geodiversity sites. This will indirectly help to protect soil/land and the biodiversity associated with the geodiversity feature.
8. To protect and enhance landscape and townscape	
9. To conserve & enhance the District's biodiversity and geodiversity	
<b>Possible mitigation</b>	

<b>Policy 11F. Regenerating the waterways</b>		
<b>SA objectives that are not relevant to this policy</b>	2-7, 9, 10, 12	
<b>SA objective</b>	<b>Impact of policy</b>	
1. To improve health and well-being within the District and reduce inequalities in health.	+	This policy aims to improve the quality of the district's waterways, and make them more publicly available. This would help to improve wellbeing by providing new, attractive places for walking and cycling.
8. To protect and enhance landscape and townscape	+	The policy aims to improve the attractiveness of the district's waterways, and particularly the Staffordshire and Worcestershire Canal Conservation Area
11. To protect & enhance the historic environment & its settings		
13. To maintain & enhance community & settlement identities	+	The policy improves community identities by reopening and improving waterways.
<b>Possible mitigation</b>		

<b>Policy 12 – Strategic Infrastructure</b>		
<b>SA objectives that are not relevant to this policy</b>	4-9, 11-13	
<b>SA objective</b>	<b>Impact of policy</b>	
1. To improve health and well-being within the District and reduce inequalities in health.	0	The policy aims to protect the health and wellbeing of the District's residents by providing adequate infrastructure (including health infrastructure) to support the plan.
2. To protect and enhance the provision and accessibility to local services and facilities	0	The policy aims to provide adequate infrastructure for local services, facilities, housing and employment development. It does not aim to improve these facilities, but it should help to ensure that they are adequately supported.
3. To ensure that the housing needs of all residents and communities are met		
10. To support the economy & ensure suitable employment opportunities		
<b>Possible mitigation</b>		

<b>Policy 13. Transport and accessibility in Wyre Forest</b>		
<b>SA objectives that are not relevant to this policy</b>	3, 4, 6-9, 11-13	
<b>SA objective</b>	<b>Impact of policy</b>	
1. To improve health and well-being within the District and reduce inequalities in health.	0	The policy supports walking and cycling, which in turn promote good health. However its actual impact on health is likely to be limited.
2. To protect and enhance the provision and accessibility to local services and facilities	0	The policy supports accessibility to local services by walking, cycling and public transport. It is not significantly different to the current transport policy CP03.
5. To reduce the need to travel and move towards more sustainable travel modes; to reduce associated effects of air quality & greenhouse gas emissions	0	The policy aims to ensure that development is accessible by sustainable travel modes. It is not significantly different to the current transport policy CP03 although it does not refer to air quality.
10. To support the economy & ensure suitable employment opportunities	+/-	The policy works towards reducing congestion which is a constraint on the economy. On the



<b>Policy 13. Transport and accessibility in Wyre Forest</b>	
<b>SA objectives that are not relevant to this policy</b>	3, 4, 6-9, 11-13
<b>SA objective</b>	<b>Impact of policy</b>
	other hand, it also imposes costs/constraints on developers. It supports a range of transport projects that underpin economic development.
<p><b>Possible mitigation</b></p> <p>Does the policy need to say anything about electric charging points for vehicles? The current (Core Strategy) transport policy refers to air quality:  <i>“Proposals for new development should fully consider their impact on air quality, particularly for areas within or adjacent to designated Air Quality Management Areas. Development within or adjacent to an Air Quality Management Area will be required to proactively demonstrate that it has fully considered the promotion of access by alternative modes of transport.”</i></p> <p>Should the new policy include something similar? Also the Core Strategy policy refers to parking standards. Is something needed on this?</p>	

<b>Policy 14 – Strategic Green Infrastructure</b>	
<b>SA objectives that are not relevant to this policy</b>	2, 11, 12
<b>SA objective</b>	<b>Impact of policy</b>
1. To improve health and well-being within the District and reduce inequalities in health.	+ This policy protects and enhances Green Infrastructure. This is beneficial for health as it encourages walking and cycling, and is good for mental health.
3. To ensure that the housing needs of all residents and communities are met	- The need to provide green infrastructure as part of new development – quite a lot in the case of larger sites – reduces the amount of land available for housing, although it also makes the new housing more attractive.
4. To promote energy efficiency & energy generated from renewable and low carbon sources.	? More GI space in theory also allows for the siting of wind turbines etc.
5. To reduce the need to travel and move towards more sustainable travel modes; to reduce associated effects of air quality & greenhouse gas emissions	+/- More GI helps to improve air quality. However the requirement for large quantities of GI could lead to developments being sprawling, thus encouraging car transport.
6. To protect soil & land	0 This policy helps to protect soil, land, water resources, the landscape and biodiversity. In the case of the country park, it could also improve biodiversity but its implementation is not certain.
7. To protect water resources and quality; reduce flood risk.	
8. To protect and enhance landscape and townscape	
9. To conserve & enhance the District's biodiversity and geodiversity	
10. To support the economy & ensure suitable employment opportunities	- The need to provide green infrastructure as part of new development – quite a lot in the case of larger sites – reduces the amount of land available for employment development, although it also makes the new development more attractive.
13. To maintain & enhance community & settlement identities	0 This policy helps to protect the identity of settlements by helping to protect the Green Infrastructure that contributes to that identity.
<p><b>Possible mitigation</b></p> <p>Requiring 40% GI for larger sites seems like a lot.</p>	

<b>Policy 14 – Strategic Green Infrastructure</b>	
<b>SA objectives that are not relevant to this policy</b>	2, 11, 12
<b>SA objective</b>	<b>Impact of policy</b>
<b>Policy 15 A – Water conservation and efficiency</b>	
<b>SA objectives that are not relevant to this policy</b>	2, 4-6, 8, 11-13
<b>SA objective</b>	<b>Impact of policy</b>
1. To improve health and well-being within the District and reduce inequalities in health.	? Reducing water consumption can affect health, e.g. cooling off during a heat wave. However improved water efficiency should allow the same health benefits to be achieved with less water, so at less cost.
3. To ensure that the housing needs of all residents and communities are met	0 The additional cost of water conservation features is minimal, so should not affect the viability of housing developments.
7. To protect water resources and quality; reduce flood risk.	+ The requirement for 110 litres/day is more exigent than at present. This should help to protect water resources. The increase in population will, however, at least partly neutralise this benefit.
9. To conserve & enhance the District's biodiversity and geodiversity	0 Protection of water resources also helps to protect the biodiversity that relies on these resources. The policy is unlikely, however, to lead to biodiversity improvements.
10. To support the economy & ensure suitable employment opportunities	+/- The policy may require water efficiency and recycling technologies to be installed at employment sites, notably some industrial and agricultural operations. This would have a direct cost; however in the longer run this will help the organisation to save money in reduced water bills.
<b>Possible mitigation</b> I found the 'and/or' bit difficult to understand (which suggests that implementation might be a problem). Does i. apply to housing and ii. apply to both housing and employment development? Clarify?	

<b>Policy 15B – Sewerage systems and water quality</b>	
<b>SA objectives that are not relevant to this policy</b>	4-6, 8, 11-13
<b>SA objective</b>	<b>Impact of policy</b>
1. To improve health and well-being within the District and reduce inequalities in health.	0 This policy helps to protect the health of the District's residents by ensuring that adequate sewerage systems are in place.
2. To protect and enhance the provision and accessibility to local services and facilities	0 This policy protects, though does not enhance, the provision of sewerage services in the district.
3. To ensure that the housing needs of all residents and communities are met	0 This policy ensures that housing is adequately served by sewerage services.
7. To protect water resources and quality; reduce flood risk.	0 This policy helps to protect the quality of water sources, and their associated biodiversity
9. To conserve & enhance the District's biodiversity and geodiversity	
10. To support the economy & ensure suitable employment opportunities	0 This policy protects, though does not enhance, the provision of sewerage services in the district.
<b>Possible mitigation</b>	

<b>Policy 15C – Flood risk management</b>		
<b>SA objectives that are not relevant to this policy</b>		
<b>SA objective</b>	<b>Impact of policy</b>	
1. To improve health and well-being within the District and reduce inequalities in health.	0	This policy aims to prevent flooding and its negative impacts on people, services and employment.
2. To protect and enhance the provision and accessibility to local services and facilities		
3. To ensure that the housing needs of all residents and communities are met	+/-	The policy restricts where housing can go, but helps to ensure that the housing that is built is safe from flooding.
7. To protect water resources and quality; reduce flood risk.	+	The policy aims to prevent flooding of not only new but also existing homes. It also aims to ensure that the natural watercourse and floodplain profiles are not affected, to open up culverted watercourses where appropriate, and to protect watercourse a 8m wide buffer.
9.To conserve & enhance the District's biodiversity and geodiversity	0	The policy helps to prevent flooding, with its indirect negative impacts on biodiversity.
10. To support the economy & ensure suitable employment opportunities	+/-	The policy restricts where employment sites can go, but helps to ensure that the sites that are built on are safe from flooding.
<b>Possible mitigation</b>		

<b>Policy 15D – Sustainable Drainage Systems (SuDS)</b>		
<b>SA objectives that are not relevant to this policy</b>		
<b>SA objective</b>	<b>Impact of policy</b>	
1. To improve health and well-being within the District and reduce inequalities in health.	0	The policy aims to prevent flooding and its negative impacts on people, services and employment.
2. To protect and enhance the provision and accessibility to local services and facilities		
3. To ensure that the housing needs of all residents and communities are met	+/-	The policy increases the cost of providing housing, but helps to ensure that the house that is built is safe from flooding.
7. To protect water resources and quality; reduce flood risk.	+	The policy is likely to not only protect against flooding but, to a minor extent, reduce flood risk due to its requirement for substantial betterment of flood risk on brownfield sites.
9.To conserve & enhance the District's biodiversity and geodiversity	0	The policy helps to prevent flooding, with its indirect negative impacts on biodiversity.
10. To support the economy & ensure suitable employment opportunities	+/-	The policy increases the cost of providing employment sites, but helps to ensure that the sites that are built on are safe from flooding.
<b>Possible mitigation</b>		

<b>Policy 16A – Pollution and land instability</b>		
<b>SA objectives that are not relevant to this policy</b>	4, 5, 8, 11-13	
<b>SA objective</b>	<b>Impact of policy</b>	
1. To improve health and well-being within the District and reduce inequalities in health.	0	This policy helps to protect human health from pollution and land instability
2. To protect and enhance the provision and accessibility to local services and facilities	+/-	This policy constrains development where it can affect people or the environment in terms of pollution or land instability. However this also helps to ensure the long-term viability of the development
3. To ensure that the housing needs of all residents and communities are met		
6. To protect soil & land	0	This policy helps to protect soil, water quality and flora/fauna from pollution and land instability
7. To protect water resources and quality; reduce flood risk.		
9. To conserve & enhance the District's biodiversity and geodiversity		
10. To support the economy & ensure suitable employment opportunities	+/-	This policy constrains development where it can affect people or the environment in terms of pollution or land instability. However this also helps to ensure the long-term viability of the development
<b>Possible mitigation</b>		

<b>Policy 16B - Minerals</b>		
<b>SA objectives that are not relevant to this policy</b>	2, 12, 13	
<b>SA objective</b>	<b>Impact of policy</b>	
1. To improve health and well-being within the District and reduce inequalities in health.	?	The policy says nothing about this at the moment, but mineral development works can increase noise, dust etc.
3. To ensure that the housing needs of all residents and communities are met	+	This policy indirectly supports the provision of new housing development by ensuring that building materials are available.
4. To promote energy efficiency & energy generated from renewable and low carbon sources.	0	This policy encourages recycling and reuse of construction waste on site, which helps to reduce embodied energy.
5. To reduce the need to travel and move towards more sustainable travel modes; to reduce associated effects of air quality & greenhouse gas emissions	+/-	The policy aims to provide materials locally. It also aims to reduce the need to move materials by encouraging reuse and recycling of construction materials on site. It says nothing about mineral development works not having an unacceptable impact on the road network.
6. To protect soil & land	0	This policy safeguards mineral resources, although this is only so that they can be extracted in the future.
7. To protect water resources and quality; reduce flood risk.	0	The policy aims to minimise dust, changes to water levels etc.
8. To protect and enhance landscape and townscape		
9. To conserve & enhance the District's biodiversity and geodiversity	0	The policy aims to protect biodiversity.

<b>Policy 16B - Minerals</b>		
<b>SA objectives that are not relevant to this policy</b>	2, 12, 13	
<b>SA objective</b>	<b>Impact of policy</b>	
10. To support the economy & ensure suitable employment opportunities	+	The policy aims to make best use of important mineral resources, and provide construction materials.
11. To protect & enhance the historic environment & its settings	0	The policy aims to protect the historic environment
<b>Possible mitigation</b> Does the policy need to say anything about the Green Belt?		

<b>Policy 16C - Waste</b>		
<b>SA objectives that are not relevant to this policy</b>	1, 3, 5-7, 9-13	
<b>SA objective</b>	<b>Impact of policy</b>	
2. To protect and enhance the provision and accessibility to local services and facilities	+	The policy aims to ensure that adequate waste management facilities are available.
4. To promote energy efficiency & energy generated from renewable and low carbon sources.	+	The policy aims to ensure that adequate waste management facilities are available. This helps to reduce embodied energy and facilitate energy from waste.
8. To protect and enhance landscape and townscape	0	The policy includes a requirement that facilities should be well-designed.
<b>Possible mitigation</b>		

<b>Policy 18A. Financial viability</b>		
<b>SA objectives that are not relevant to this policy</b>		
<b>SA objective</b>	<b>Impact of policy</b>	
3. To ensure that the housing needs of all residents and communities are met	+/-	The policy requires a viability statement where affordable housing and other requirements as required by Policy 8 might make the development unviable. This policy essentially enforces the policies of Chapter 8. This helps to ensure that the housing provided reflects the needs of the district's residents rather than the wishes of the developers, but could restrict the provision of some housing on some sites.
13. To maintain & enhance community & settlement identities	+/-	
<b>Possible mitigation</b>		

<b>Policy 18B. Residential infill development</b>		
<b>SA objectives that are not relevant to this policy</b>	1, 7, 10	
<b>SA objective</b>	<b>Impact of policy</b>	
2. To protect and enhance the provision and accessibility to local services and facilities	0	Small scale infill development would typically be close to existing services but would not actively improve these services
3. To ensure that the housing needs of all residents and communities are met	+	The policy supports small scale infill development

<b>Policy 18B. Residential infill development</b>		
<b>SA objectives that are not relevant to this policy</b>	1, 7, 10	
<b>SA objective</b>	<b>Impact of policy</b>	
4. To promote energy efficiency & energy generated from renewable and low carbon sources.	0	The policy says nothing about energy efficiency and renewable energy, although it refers to other policies (e.g. 11B, 26, 27A).
5. To reduce the need to travel and move towards more sustainable travel modes; to reduce associated effects of air quality & greenhouse gas emissions	0	The policy supports development that would typically be close to existing services, thus minimising (but not obviating) the need to travel
6. To protect soil & land	+/-	Although the policy could lead to development on greenfield land, this development would increase development density and make good use of land
8. To protect and enhance landscape and townscape	+/-	The policy would lead to denser, more urban development. However it also refers to Policy 27A on good design, and infill development is likely to have less impact on the landscape than new non-infill development.
9. To conserve & enhance the District's biodiversity and geodiversity	+/-	Infill development will typically be on garden land. This could be quite biodiverse, so could be affected negatively by development. However infill development could help to reduce the need to build outside settlements, and help to preserve larger habitats.
11. To protect & enhance the historic environment & its settings	0?	Infill development could affect heritage assets. However the policy refers to Policies 11B and 26 on the historic environment, so limiting these impacts. Overall the impact of this policy is likely to be limited.
12. To maintain the integrity of the Green Belt within the District.	0	The policy encourages infill development. Some of this may technically be in the Green Belt, where settlements are washed over by the Green Belt. However overall infill development helps to prevent Green Belt development.
13. To maintain & enhance community & settlement identities	+/-	Infill development has the potential to reduce the amenity of adjacent residents. However it also helps to reduce urban sprawl and enhance the vitality of communities.
<b>Possible mitigation</b>		
Include reference to Policies 11D on enhancing biodiversity and 24B on energy efficiency and renewable energy		

<b>Policy 18C. Flat conversions</b>		
<b>SA objectives that are not relevant to this policy</b>		
<b>SA objective</b>	<b>Impact of policy</b>	
1. To improve health and well-being within the District and reduce inequalities in health.	?	Provision of more accommodation – particularly flats as these tend to be more affordable – can help people's health by providing them with housing that might otherwise not be available. However flat conversions have the potential to be small and inadequate.
3. To ensure that the housing needs of all residents and communities are met	+	Conversion into flats can lead to affordable accommodation that might otherwise not be available, and can be an efficient use of buildings

<b>Policy 18C. Flat conversions</b>		
<b>SA objectives that are not relevant to this policy</b>		
<b>SA objective</b>	<b>Impact of policy</b>	
4. To promote energy efficiency & energy generated from renewable and low carbon sources.	0	Flats are generally more energy-efficient than houses, although this benefit is limited
5. To reduce the need to travel and move towards more sustainable travel modes; to reduce associated effects of air quality & greenhouse gas emissions	+/-	Where the buildings are located near existing services, conversion into flats can help to reduce the per capita need to travel. The policy specifies that location to shops and other services will be a criterion.
6. To protect soil & land	+	Flat conversions provide more homes on the same building footprint, so are an efficient form of land use.
13. To maintain & enhance community & settlement identities	?	Conversion of existing buildings into flats can make good use of under-used properties, but can also increase traffic, the need for parking, noise etc. The impact of this policy will depend on the location and type of conversion.
<b>Possible mitigation</b>		

<b>Policy 18D. Residential caravans and mobile homes</b>		
<b>SA objectives that are not relevant to this policy</b>		
<b>SA objective</b>	<b>Impact of policy</b>	
1. To improve health and well-being within the District and reduce inequalities in health.	+/-	The policy promotes the use of residential caravans and mobile homes ('caravans') only for short-term use. This helps to ensure that residents live in adequate long-term accommodation, but can reduce the amount of housing available for the district's residents.
3. To ensure that the housing needs of all residents and communities are met	+/-	
4. To promote energy efficiency & energy generated from renewable and low carbon sources.	+	Caravans tend to be energy inefficient. A reduction in caravans and an increase in settled homes will help to improve energy efficiency.
13. To maintain & enhance community & settlement identities	?	The policy is unclear about what will happen to existing mobile homes.
<b>Possible mitigation</b>		
The policy is unclear about what will happen to existing mobile homes, especially to those in which people have been living for a long time.		

<b>Policy 19. Providing accommodation for gypsies, travellers and travelling showpeople</b>		
<b>SA objectives that are not relevant to this policy</b>		
<b>SA objective</b>	<b>Impact of policy</b>	
1. To improve health and well-being within the District and reduce inequalities in health.	0	The policy aims to ensure that accommodation for gypsies, travellers and travelling showpeople are safe and have the infrastructure necessary to maintain health. It includes requirements for the facilities, including play areas, necessary to achieve this.
2. To protect and enhance the provision and accessibility to local services and facilities	0	
3. To ensure that the housing needs of all residents and communities are met	+	

<b>Policy 19. Providing accommodation for gypsies, travellers and travelling showpeople</b>	
<b>SA objectives that are not relevant to this policy</b>	
<b>SA objective</b>	<b>Impact of policy</b>
8. To protect and enhance landscape and townscape	0 The policy aims to protect the landscape by requiring appropriate boundary treatment and landscaping.
<b>Possible mitigation</b>	

<b>Policy 20A Community facilities</b>	
<b>SA objectives that are not relevant to this policy</b>	3, 4, 6-10, 12
<b>SA objective</b>	<b>Impact of policy</b>
1. To improve health and well-being within the District and reduce inequalities in health.	0 Aims to protect existing community facilities and support appropriate new facilities. This can support good health and wellbeing.
2. To protect and enhance the provision and accessibility to local services and facilities	+ Aims to protect existing community facilities and support appropriate new facilities.
5. To reduce the need to travel and move towards more sustainable travel modes; to reduce associated effects of air quality & greenhouse gas emissions	0 Aims to optimise access to community facilities i.e. ensure that people do not have to travel further than they currently do.
11. To protect & enhance the historic environment & its settings	0 Aims to protect heritage assets that provide community facilities
13. To maintain & enhance community & settlement identities	0 The policy aims to maintain the existing level of provision of community facilities, and support further facilities where appropriate.
<b>Possible mitigation</b>	
A very complicated policy. Can it be made simpler, e.g. by having one part about sport and recreational facilities, and another about other facilities?	
Under A. clarify what 'sequential test' applies?	
Under Diii, should it say 'the community facility is not compatible with adjacent uses'?	

<b>Policy 20B. Open space</b>	
<b>SA objectives that are not relevant to this policy</b>	2-4, 10-12
<b>SA objective</b>	<b>Impact of policy</b>
1. To improve health and well-being within the District and reduce inequalities in health.	+ Protects existing green space and supports the provision of new green space, which supports people's physical and mental wellbeing.
5. To reduce the need to travel and move towards more sustainable travel modes; to reduce associated effects of air quality & greenhouse gas emissions	0 Protects existing green space and supports the provision of new green space, which can act as walking and cycling routes.
6. To protect soil & land	0 Protects green spaces, and the associated soil and land quality
7. To protect water resources and quality; reduce flood risk.	0 Green spaces can act as buffers to streams/rivers, and act as SUDS. The policy protects these benefits



<b>Policy 20B. Open space</b>	
<b>SA objectives that are not relevant to this policy</b>	2-4, 10-12
<b>SA objective</b>	<b>Impact of policy</b>
8. To protect and enhance landscape and townscape	+ Protects green spaces and supports the provision of new green spaces. These would help to improve the landscape/townscape
9.To conserve & enhance the District's biodiversity and geodiversity	0 Helps to protect the biodiversity of green spaces.
13.To maintain & enhance community & settlement identities	0 Green spaces are part of community identities. This policy helps to protect existing spaces, and supports green spaces allocated in Neighbourhood Plans.
<b>Possible mitigation</b>	
Is it worth including a statement about protecting and enhancing biodiversity on open spaces? And about encouraging walking and cycling routes in open spaces particularly where these can act as alternatives to car travel?	

<b>Policy 20C. Provision for open space, sports pitches and outdoor community uses in housing development</b>	
<b>SA objectives that are not relevant to this policy</b>	2-4, 10, 12
<b>SA objective</b>	<b>Impact of policy</b>
1. To improve health and well-being within the District and reduce inequalities in health.	+ Policy encourages redressing the deficiency in public open space as well as open space needs generated by new development. Public open spaces are good for physical and mental health.
5. To reduce the need to travel and move towards more sustainable travel modes; to reduce associated effects of air quality & greenhouse gas emissions	0 Green spaces provide an opportunity for pedestrian/cycling links. The policy says nothing about this.
6. To protect soil & land	0 The policy aims to ensure adequate
7. To protect water resources and quality; reduce flood risk.	0 Green spaces provide an opportunity for SUDS. The policy says nothing about that.
8. To protect and enhance landscape and townscape	+ The policy encourages redressing the deficiency in public open space as well as open space needs generated by new development. This will help to improve the landscape.
9.To conserve & enhance the District's biodiversity and geodiversity	0 Green spaces have the potential to act as Green Infrastructure and improve biodiversity. The policy says nothing about that.
11. To protect & enhance the historic environment & its settings	+ The policy aims to create historic interpretation features
13.To maintain & enhance community & settlement identities	+ The policy encourages redressing the deficiency in public open space, as well as open space needs generated by new development. This will help to enhance community identities.
<b>Possible mitigation</b>	
Another very complex policy that seems to have some duplication: <ul style="list-style-type: none"> <li>• Aii and B both address contributions in lieu of on-site provision</li> <li>• 4<sup>th</sup> bullet point at A, 3<sup>rd</sup> sentence of B and E are all about management/maintenance of green areas</li> </ul> Does the policy need to say more about biodiversity: not just protecting/buffering existing biodiverse areas, but providing new areas of biodiversity? Ditto green areas acting as SUDS?	

<b>Policy 21A. Urban employment land</b>		
<b>SA objectives that are not relevant to this policy</b>	2-4, 12	
<b>SA objective</b>	<b>Impact of policy</b>	
1. To improve health and well-being within the District and reduce inequalities in health.	+	The policy aims to ensure that adequate employment development is available. Employment is a major indicator of wellbeing.
5. To reduce the need to travel and move towards more sustainable travel modes; to reduce associated effects of air quality & greenhouse gas emissions	0	The policy aims to ensure that adequate employment development is available in the district. This will help to prevent out-commuting.
6. To protect soil & land	--	This policy promotes further employment development, which will affect land use
7. To protect water resources and quality; reduce flood risk.	-	This policy promote further employment development, which will lead to more urban runoff sealing of land, potentially an increase in flood risk etc.
8. To protect and enhance landscape and townscape	-	An increase in employment development will exacerbate urbanisation and its townscape impacts
9.To conserve & enhance the District's biodiversity and geodiversity	-	An increase in employment development is likely to negatively affect biodiversity
10. To support the economy & ensure suitable employment opportunities	++	This policy supports the provision of employment land, which is necessary to support the economy
11. To protect & enhance the historic environment & its settings	-	An increase in employment development is likely to negatively affect the historic environment
13.To maintain & enhance community & settlement identities	+	The policy helps to maintain an adequate balance between housing and employment
<b>Possible mitigation</b>		

<b>Policy 21B. Rural employment</b>		
<b>SA objectives that are not relevant to this policy</b>	1-4	
<b>SA objective</b>	<b>Impact of policy</b>	
5. To reduce the need to travel and move towards more sustainable travel modes; to reduce associated effects of air quality & greenhouse gas emissions	?	This policy protects existing rural businesses and supports intensification/diversification of rural businesses. Employment development in the countryside is likely to generate additional transport movements.
6. To protect soil & land	0	The policy aims to intensify and diversify rather than expand the footprint of rural businesses.
7. To protect water resources and quality; reduce flood risk.		
8. To protect and enhance landscape and townscape	-	This policy is likely to lead to denser development in the countryside, which could give a more urban feel
9.To conserve & enhance the District's biodiversity and geodiversity	0	The policy aims to intensify and diversify rather than expand the footprint of rural businesses. Any impact would be minor.
10. To support the economy & ensure suitable employment opportunities	+	The policy aims to support the rural economy although its impact is likely to be limited.
11. To protect & enhance the historic environment & its settings	0	The policy aims to intensify and diversify rather than expand the footprint of rural businesses. Any impact would be minor.

<b>Policy 21B. Rural employment</b>		
<b>SA objectives that are not relevant to this policy</b>	1-4	
<b>SA objective</b>	<b>Impact of policy</b>	
12. To maintain the integrity of the Green Belt within the District.	-	Intensification/diversification of rural businesses could affect the integrity of the Green Belt by reducing openness and the rural feel of the area.
13. To maintain & enhance community & settlement identities	+	The policy aims to support rural settlements.
<b>Possible mitigation</b>		

<b>Policy 21C. Live-work units and homeworking</b>		
<b>SA objectives that are not relevant to this policy</b>	1-4, 11, 12	
<b>SA objective</b>	<b>Impact of policy</b>	
5. To reduce the need to travel and move towards more sustainable travel modes; to reduce associated effects of air quality & greenhouse gas emissions	+	The policy aims to provide for integrated living and working spaces. This helps to reduce the need to travel.
6. To protect soil & land	0	The policy promotes live-work units only on previously developed land. This helps to protect soil, land, water quality, the landscape and biodiversity.
7. To protect water resources and quality; reduce flood risk.		
8. To protect and enhance landscape and townscape		
9. To conserve & enhance the District's biodiversity and geodiversity		
10. To support the economy & ensure suitable employment opportunities	+	The policy supports working from home
13. To maintain & enhance community & settlement identities	+	Live/work development reduces commuting and helps to ensure lively, liveable communities
<b>Possible mitigation</b>		

<b>Policy 21D. Offices</b>		
<b>SA objectives that are not relevant to this policy</b>	1-4, 12, 13	
<b>SA objective</b>	<b>Impact of policy</b>	
5. To reduce the need to travel and move towards more sustainable travel modes; to reduce associated effects on air quality & greenhouse gas emissions	0	The policy supports the development of office space, avoiding the need to travel outside the district for this.
6. To protect soil & land	0	The policy supports the development of office space where it does not cause an adverse effect on the built or natural environment.
7. To protect water resources and quality; reduce flood risk.		
8. To protect and enhance landscape and townscape		
9. To conserve & enhance the District's biodiversity and geodiversity		
10. To support the economy & ensure suitable employment opportunities	+	The policy aims to promote office space which is scarce in the district.

<b>Policy 21D. Offices</b>	
<b>SA objectives that are not relevant to this policy</b>	1-4, 12, 13
<b>SA objective</b>	<b>Impact of policy</b>
11. To protect & enhance the historic environment & its settings	0 The policy supports the development of office space where it does not cause an adverse effect on the built or natural environment.
<b>Possible mitigation</b>	

<b>Policy 22A. Town centre development</b>	
<b>SA objectives that are not relevant to this policy</b>	1, 4, 6, 7, 9 11-13
<b>SA objective</b>	<b>Impact of policy</b>
2. To protect and enhance the provision and accessibility to local services and facilities	+ The policy aims to retain and enhance the town centres' retail offer and vitality. By allowing some change of use to leisure and recreation, it also supports the flexible provision of other services. Regeneration of Kidderminster eastern gateway would enhance the provision of services.
3. To ensure that the housing needs of all residents and communities are met	0 The policy allows for some retail development to be changed to residential, but the impact on housing provision is likely to be relatively minor.
5. To reduce the need to travel and move towards more sustainable travel modes; to reduce associated effects of air quality & greenhouse gas emissions	0 The policy aims to maintain the vitality of the town centres, and avoid scattered out-of-town development that would increase the need to travel.
8. To protect and enhance landscape and townscape	? The impact of this policy will depend on the type of development that comes forward. The policy states that development within the Primary Shopping Frontage must not result in clutter or fragmentation.
10. To support the economy & ensure suitable employment opportunities	+ The policy would help to protect and enhance the district's retail offer, with associated jobs.
<b>Possible mitigation</b>	

<b>Policy 22B. Out of town development</b>	
<b>SA objectives that are not relevant to this policy</b>	1 3, 4, 6, 7, 9, 11, 12
<b>SA objective</b>	<b>Impact of policy</b>
2. To protect and enhance the provision and accessibility to local services and facilities	0 The policy aims to protect the vitality and viability of the town centres. This helps to ensure that services are easy to access to walking, cycling and public transport; protects the landscape from the sprawl associated with out-of-town development, and helps to maintain the identifies of the district's main settlements.  This may affect the types of retail outlets that are built, with some negative impacts on jobs. However these impacts are likely to be minimal.
5. To reduce the need to travel and move towards more sustainable travel modes; to reduce associated effects of air quality & greenhouse gas emissions	
8. To protect and enhance landscape and townscape	
10. To support the economy & ensure suitable employment opportunities	
13.To maintain & enhance community & settlement identities	

<b>Policy 22B. Out of town development</b>	
<b>SA objectives that are not relevant to this policy</b>	1, 3, 4, 6, 7, 9, 11, 12
<b>SA objective</b>	<b>Impact of policy</b>
<b>Possible mitigation</b> It feels like the two bullet points repeat themselves about the sequential test	

<b>Policy 22C. Change of use from retail to alternative uses</b>	
<b>SA objectives that are not relevant to this policy</b>	1, 3, 4, 6-12
<b>SA objective</b>	<b>Impact of policy</b>
2. To protect and enhance the provision and accessibility to local services and facilities	0 This policy aims to ensure the provision of retail shops that are not in town centre locations.
5. To reduce the need to travel and move towards more sustainable travel modes; to reduce associated effects of air quality & greenhouse gas emissions	0 By preventing the conversion of retail to other uses, this policy helps to ensure that services are provided within walking and cycling distance.
13. To maintain & enhance community & settlement identities	0 This policy helps to maintain community identities by ensuring that communities are served by appropriate retail facilities.
<b>Possible mitigation</b>	

<b>Policy 22D. Local shops</b>	
<b>SA objectives that are not relevant to this policy</b>	1, 3, 4, 6-12
<b>SA objective</b>	<b>Impact of policy</b>
2. To protect and enhance the provision and accessibility to local services and facilities	+ This policy supports the provision of new/extended local shops which are a key local facility
5. To reduce the need to travel and move towards more sustainable travel modes; to reduce associated effects of air quality & greenhouse gas emissions	+ This policy helps to reduce the need to travelling by supporting new shops within walking distance
13. To maintain & enhance community & settlement identities	+ Local shops support community identities. This policy supports new/extended local shops.
<b>Possible</b> Is there a reason for the 280sqm cut-off? Explain in the reasoned justification?	

<b>Policy 22E. Specialist retailing</b>	
<b>SA objectives that are not relevant to this policy</b>	1, 3, 4, 6, 7, 9-11
<b>SA objective</b>	<b>Impact of policy</b>
2. To protect and enhance the provision and accessibility to local services and facilities	? This policy aims to protect existing retail outlets, and ensure that new outlets are in appropriate locations. The impact of this policy on local services will depend on the type of outlet proposed and its location.

<b>Policy 22E. Specialist retailing</b>		
<b>SA objectives that are not relevant to this policy</b>	1, 3, 4, 6, 7, 9-11	
<b>SA objective</b>	<b>Impact of policy</b>	
5. To reduce the need to travel and move towards more sustainable travel modes; to reduce associated effects of air quality & greenhouse gas emissions	?	This policy aims to ensure that retail facilities are located appropriately. This should help to limit the need to travel by car. However some retail outlets, e.g. convenience store in petrol station, could encourage more travel by car.
8. To protect and enhance landscape and townscape	0	The policy aims to protect the open landscape and Green Belt by only supporting specialist retailing outside the Green Belt, where it is limited in scale and where farm shops use existing buildings.
12. To maintain the integrity of the Green Belt within the District.		
13. To maintain & enhance community & settlement identities	+?	The policy aims to protect community identities by preventing inappropriate retail outlets. It supports farm shops subject to conditions, which can help to enhance community identities.
<b>Possible mitigation</b>		

<b>Policy 22F. Food and drink retailing</b>		
<b>SA objectives that are not relevant to this policy</b>	1, 3-12	
<b>SA objective</b>	<b>Impact of policy</b>	
2. To protect and enhance the provision and accessibility to local services and facilities	?	The impact of the policy depends on the proposed retail facility and its possible impacts on neighbouring land uses.
13. To maintain & enhance community & settlement identities	0	The policy aims to protect the amenity of communities by preventing inappropriate food and drink retail outlets
<b>Possible mitigation</b>		

<b>Policy 22G. Hot food takeaways</b>		
<b>SA objectives that are not relevant to this policy</b>		
<b>SA objective</b>	<b>Impact of policy</b>	
1. To improve health and well-being within the District and reduce inequalities in health.	0	The policy aims to prevent health problems, particularly in children, by restricting the location of hot food takeaways.
2. To protect and enhance the provision and accessibility to local services and facilities	?	The impact of the policy depends on the proposed retail facility and its possible impacts on neighbouring land uses.
13. To maintain & enhance community & settlement identities	0	The policy aims to protect the amenity of communities by preventing inappropriate food and drink retail outlets
<b>Possible mitigation</b>		

<b>Policy 23A. Supporting major tourist attractions</b>		
<b>SA objectives that are not relevant to this policy</b>	1, 3, 4, 6, 7, 13	
<b>SA objective</b>	<b>Impact of policy</b>	
2. To protect and enhance the provision and accessibility to local services and facilities	+	Encourages the development of tourism facilities which can also be used by local residents, e.g. Wyre Forest
5. To reduce the need to travel and move towards more sustainable travel modes; to reduce associated effects of air quality & greenhouse gas emissions	-	Encourages several developments in the Green Belt and other undeveloped areas that would be primarily accessed by car (W Mids Safari Park, Wyre Forest, arboreta)
8. To protect and enhance landscape and townscape	0	The policy supports development that would not have a negative impact on the landscape or biodiversity.
9. To conserve & enhance the District's biodiversity and geodiversity		
10. To support the economy & ensure suitable employment opportunities	+	Supports new employment in tourism facilities
11. To protect & enhance the historic environment & its settings	0	The policy supports development that would not have a negative impact on the historic environment.
12. To maintain the integrity of the Green Belt within the District.	0	Several of the proposed attractions would be in the Green Belt (WVR, safari park). The policy aims to protect the integrity of the Green Belt.
<b>Possible mitigation</b>		

<b>Policy 23B. Supporting tourist attractions</b>		
<b>SA objectives that are not relevant to this policy</b>	1, 3, 4, 13	
<b>SA objective</b>	<b>Impact of policy</b>	
2. To protect and enhance the provision and accessibility to local services and facilities	+	Encourages the development of tourism facilities which can also be used by local residents
5. To reduce the need to travel and move towards more sustainable travel modes; to reduce associated effects of air quality & greenhouse gas emissions	-?	Tourist attractions will often be accessed by car and coach, though the policy promotes use of brownfield over greenfield sites
6. To protect soil & land	0	Tourism facilities may have negative impacts on soil, water resources the landscape and bio/geo-diversity. The policy aims to conserve heritage assets and their settings, and to enhance and safeguard the natural environment. The impact is likely to be limited.
7. To protect water resources and quality; reduce flood risk.		
8. To protect and enhance landscape and townscape		
9. To conserve & enhance the District's biodiversity and geodiversity		
10. To support the economy & ensure suitable employment opportunities	+	The policy supports tourism development which generates jobs.
11. To protect & enhance the historic environment & its settings	0	Tourism facilities may have negative impacts on heritage assets. The policy aims to conserve heritage assets and their settings. The impact is likely to be limited.
12. To maintain the integrity of the Green Belt within the District.	?	Tourism facilities in the Green Belt could affect its integrity. The policy does not clearly protect against this.
<b>Possible mitigation</b>		

<b>Policy 23C. Tourist accommodation</b>		
<b>SA objectives that are not relevant to this policy</b>	1, 2, 4, 11, 13	
<b>SA objective</b>	<b>Impact of policy</b>	
3. To ensure that the housing needs of all residents and communities are met	0	Although conversion of dwellings to tourist accommodation is permitted by the policy, its impact is not likely to be significant
5. To reduce the need to travel and move towards more sustainable travel modes; to reduce associated effects of air quality & greenhouse gas emissions	?	The travel impact of tourism accommodation will depend on its location, type of accommodation etc.
6. To protect soil & land	0	The policy restricts development in the countryside, including hard standing for caravans. This will restrict impacts on soil, land, water etc.
7. To protect water resources and quality; reduce flood risk.		
8. To protect and enhance landscape and townscape	0	The policy restricts hard standing for caravans, new build in the countryside etc.; and development that is inappropriate to the local area. This should limit impacts on the landscape and townscape.
9. To conserve & enhance the District's biodiversity and geodiversity	0	The policy aims to minimise impacts on the natural environment
10. To support the economy & ensure suitable employment opportunities	+	The policy supports tourism accommodation, which in turn supports the economy
12. To maintain the integrity of the Green Belt within the District.	?	The policy supports development that is 'not inappropriate in the Green Belt'.
<b>Possible mitigation</b>		

<b>Policy 24A. Telecommunications and broadband</b>		
<b>SA objectives that are not relevant to this policy</b>	1, 3, 4, 6, 7, 9, 11-13	
<b>SA objective</b>	<b>Impact of policy</b>	
2. To protect and enhance the provision and accessibility to local services and facilities	+	Helps to provide broadband / telecommunications to new development
5. To reduce the need to travel and move towards more sustainable travel modes; to reduce associated effects of air quality & greenhouse gas emissions	+	Broadband / telecommunications helps to reduce the need to travel
8. To protect and enhance landscape and townscape	-	The policy aims to minimise the visual intrusiveness of telecommunications equipment, and to refuse permission for projects with significant impacts. However such equipment has unavoidable impacts on the land/townscape.
10. To support the economy & ensure suitable employment opportunities	+	High quality telecommunications supports businesses
<b>Possible mitigation</b>		



<b>Policy 24B. Renewable and low carbon energy</b>	
<b>SA objectives that are not relevant to this policy</b>	2, 5, 7 9, 12
<b>SA objective</b>	<b>Impact of policy</b>
1. To improve health and well-being within the District and reduce inequalities in health.	+ Energy efficient building design and integrated renewable energy would help to reduce fuel poverty and improve people's health
3. To ensure that the housing needs of all residents and communities are met	- Energy efficient building design and integrated renewable energy increases the cost of housing and might make some of it unviable
4. To promote energy efficiency & energy generated from renewable and low carbon sources.	++ This policy supports energy efficiency and the development of renewable energy.
6. To protect soil & land	-? Renewable energy development (e.g. photovoltaic farms) can take up large land area.
8. To protect and enhance landscape and townscape	-? Renewable energy development can have significant landscape and biodiversity impacts
9. To conserve & enhance the District's biodiversity and geodiversity	
10. To support the economy & ensure suitable employment opportunities	+ Energy efficiency is economically effective. Renewable energy can generate employment.
11. To protect & enhance the historic environment & its settings	0? The policy aims to protect the historic environment from the impacts of renewable energy projects
13. To maintain & enhance community & settlement identities	+ The policy encourages community ownership of renewable energy assets.
<b>Possible mitigation</b>	
The first two sentences of C. seem to partly overlap/duplicate each other	

<b>Policy 25 – Safeguarding the Green Belt</b>	
<b>SA objectives that are not relevant to this policy</b>	1, 4
<b>SA objective</b>	<b>Impact of policy</b>
2. To protect and enhance the provision and accessibility to local services and facilities	+/- Allows for some services and facilities (e.g. outdoor sport, allotments) in the Green Belt, but restricts those that would conflict with Green Belt policies.
3. To ensure that the housing needs of all residents and communities are met	+/- Allows for housing provision in the Green Belt under very restricted conditions
5. To reduce the need to travel and move towards more sustainable travel modes; to reduce associated effects of air quality & greenhouse gas emissions	+ By restricting what can be built in the Green Belt, the policy indirectly supports more urban and brownfield development, which are more likely to be accessible by walking, cycling and public transport.
6. To protect soil & land	0 By protecting the Green Belt, the policy also protects soil and land, water quality, the landscape and biodiversity associated with the Green Belt
7. To protect water resources and quality; reduce flood risk.	
8. To protect and enhance landscape and townscape	
9. To conserve & enhance the District's biodiversity and geodiversity	
10. To support the economy & ensure suitable employment opportunities	+/- Allows for employment development in the Green Belt under very restricted conditions

<b>Policy 25 – Safeguarding the Green Belt</b>	
<b>SA objectives that are not relevant to this policy</b>	1, 4
<b>SA objective</b>	<b>Impact of policy</b>
11. To protect & enhance the historic environment & its settings	0 By protecting the Green Belt, the policy also protects the historic landscape
12. To maintain the integrity of the Green Belt within the District.	++ The entire purpose of this policy is to maintain the integrity of the Green Belt
13. To maintain & enhance community & settlement identities	0 By restricting what can be built in the Green Belt, this policy helps to maintain the strategic gaps between the district's settlements, and therefore their identities.
<b>Possible mitigation</b>	

<b>Policy 26 – Safeguarding the Historic Environment</b>	
<b>SA objectives that are not relevant to this policy</b>	
<b>SA objective</b>	<b>Impact of policy</b>
8. To protect and enhance landscape and townscape	0 The policy aims to protect heritage assets, use them creatively and sympathetically where possible, and record any material change to a heritage asset. Essentially it aims to preserve the status quo.
11. To protect & enhance the historic environment & its settings	0
13. To maintain & enhance community & settlement identities	0
<b>Possible mitigation</b>	

<b>Policy 27A. Quality design and local distinctiveness</b>	
<b>SA objectives that are not relevant to this policy</b>	3-7, 9, 10, 12
<b>SA objective</b>	<b>Impact of policy</b>
1. To improve health and well-being within the District and reduce inequalities in health.	0 The policy supports the development of a safe and secure environment, which helps to protect health and wellbeing.
2. To protect and enhance the provision and accessibility to local services and facilities	0 The policy requires provision of appropriate parking facilities and mix of uses where appropriate. This will help to ensure accessibility to local services, although the impact is likely to be limited.
8. To protect and enhance landscape and townscape	0 The policy aims to ensure that new development is designed well, and fits well with other existing development and maintains settlement identities. Indirectly, it also helps to protect the settings of heritage assets.
11. To protect & enhance the historic environment & its settings	
13. To maintain & enhance community & settlement identities	
<b>Possible mitigation</b>	

<b>Policy 27B. Design of extensions and alterations</b>		
<b>SA objectives that are not relevant to this policy</b>	1-7, 9, 10, 12	
<b>SA objective</b>	<b>Impact of policy</b>	
8. To protect and enhance landscape and townscape	0	This policy aims to protect the existing town/ landscape (including the historic environment and its settings) from inappropriate development
11. To protect & enhance the historic environment & its settings		
13. To maintain & enhance community & settlement identities	0	The policy aims to ensure that settlement identities are maintained by preventing inappropriately designed extensions and alterations
<b>Possible mitigation</b>		

<b>Policy 27C. Landscaping and boundary treatment</b>		
<b>SA objectives that are not relevant to this policy</b>		
<b>SA objective</b>	<b>Impact of policy</b>	
1. To improve health and well-being within the District and reduce inequalities in health.	0	The policy aims to ensure that landscaping helps to minimise crime. The impact is not likely to be significant but it is positive.
7. To protect water resources and quality; reduce flood risk.	?	Landscaping has the potential to integrate SUDS but the policy does not mention this.
8. To protect and enhance landscape and townscape	+	The policy's main aim is to ensure that new development is attractive
9. To conserve & enhance the District's biodiversity and geodiversity	?	Landscaping has the potential to significantly improve biodiversity but the policy makes little of this
13. To maintain & enhance community & settlement identities	+	The policy helps to ensure that new development is well integrated into the existing community and provides an attractive, safe new development
<b>Possible mitigation</b>		
Consider referring to the ecosystem services offered by landscaping, and so also mention its aesthetic value, possibility for providing food for humans or animals etc? Refer to public art as well as 'lighting and architectural features'? Ensure that lighting does not have negative impacts on e.g. bats		

<b>Policy 27D. Advertisements</b>		
<b>SA objectives that are not relevant to this policy</b>	2-7, 9-13	
<b>SA objective</b>	<b>Impact of policy</b>	
1. To improve health and well-being within the District and reduce inequalities in health.	0	The policy aims to ensure that advertising signage is not prejudicial to health/safety
8. To protect and enhance landscape and townscape	0	The policy aims to ensure that advertising signage does not detract from the landscape/townscape including the historic environment and its settings
<b>Possible mitigation</b>		

<b>Policy 27E. Wyre Forest waterways</b>		
<b>SA objectives that are not relevant to this policy</b>		
<b>SA objective</b>	<b>Impact of policy</b>	
1. To improve health and well-being within the District and reduce inequalities in health.	+	This policy aims to improve the quality of the district's waterways, and make them more publicly available. This would help to improve wellbeing by providing new, attractive places for walking and cycling.
5. To reduce the need to travel and move towards more sustainable travel modes; to reduce associated effects of air quality & greenhouse gas emissions	0	This policy has the potential to explicitly support walking and cycling, and improvements to water quality, but does not do so.
7. To protect water resources and quality; reduce flood risk.		
8. To protect and enhance landscape and townscape	+	The policy aims to improve the attractiveness of the district's waterways.
9. To conserve & enhance the District's biodiversity and geodiversity	0	This policy has the potential to explicitly improve biodiversity along the waterways, but does not do so.
11. To protect & enhance the historic environment & its settings	0	The policy refers to a high quality riverside environment that does not harm the character of conservation areas, but could be more active in stressing the heritage dimension of the waterways.
13. To maintain & enhance community & settlement identities		
<b>Possible mitigation</b>		
This policy seems to focus on 'high quality environment' without being clear about what this means, and with an implicit focus on attractiveness. Although the supporting text mentions biodiversity and the historic environment, the policy itself could more actively/explicitly explain that 'high quality environment' includes use of the waterways for sustainable transport; protection/enhancement of water quality and biodiversity; and reference to the waterways' historic significance.		

<b>Policy 28A. Re-use and adaptation of rural buildings</b>		
<b>SA objectives that are not relevant to this policy</b>		
<b>SA objective</b>	<b>Impact of policy</b>	
3. To ensure that the housing needs of all residents and communities are met	0	This policy allows adaptation of rural buildings for residential use under restricted circumstances. It is unlikely to significantly increase the district's housing stock.
5. To reduce the need to travel and move towards more sustainable travel modes; to reduce associated effects of air quality & greenhouse gas emissions	-	This policy supports rural businesses and housing. Employment development in the countryside is likely to generate additional transport movements.
6. To protect soil & land	0	The policy aims to ensure that good use is made of existing rural buildings. Its impact is likely to be minimal.
7. To protect water resources and quality; reduce flood risk.		
8. To protect and enhance landscape and townscape	-	This policy is likely to lead to denser development in the countryside, which could give a more urban feel
9. To conserve & enhance the District's biodiversity and geodiversity	0	The policy aims to protect wildlife will permitting re-use and adaptation of rural buildings. Any impact would be minor.
10. To support the economy & ensure suitable employment opportunities	+	The policy aims to support the rural economy, both by allowing re-use and adaptation of rural buildings and by preventing their re-use for residential

<b>Policy 28A. Re-use and adaptation of rural buildings</b>		
<b>SA objectives that are not relevant to this policy</b>		
<b>SA objective</b>	<b>Impact of policy</b>	
		purposes where economic development is possible. Its impact is likely to be limited.
11. To protect & enhance the historic environment & its settings	0	The policy aims to safeguard heritage assets and the historic pattern and form of rural buildings. Any impact would be minor.
12. To maintain the integrity of the Green Belt within the District.	-	Intensification/diversification of rural businesses could affect the integrity of the Green Belt by reducing openness and the rural feel of the area.
13. To maintain & enhance community & settlement identities	+	The policy aims to support rural settlements.
<b>Possible mitigation</b>		
Does the policy need to restrict use of rural buildings that could generate significant transport movements, e.g. at A.v.?		

<b>Policy 28B. Chalets, caravans, mobile homes</b>		
<b>SA objectives that are not relevant to this policy</b>	1, 2, 4, 11, 13	
<b>SA objective</b>	<b>Impact of policy</b>	
3. To ensure that the housing needs of all residents and communities are met	0	The policy prohibits conversion of holiday homes into permanent homes. This helps to ensure that permanent homes are in safe, accessible locations.
5. To reduce the need to travel and move towards more sustainable travel modes; to reduce associated effects of air quality & greenhouse gas emissions	0	
6. To protect soil & land	0	The policy restricts development in the countryside, including hard standing for caravans. This will minimise impacts on soil, land, water etc.
7. To protect water resources and quality; reduce flood risk.	0	
8. To protect and enhance landscape and townscape	0	The policy restricts the further development of caravan, mobile home and chalet development. This will limit impacts on the landscape and natural environment.
9. To conserve & enhance the District's biodiversity and geodiversity	0	
10. To support the economy & ensure suitable employment opportunities	0	The policy restricts the provision of further tourism accommodation.
12. To maintain the integrity of the Green Belt within the District.	0	The policy helps to prevent the development of further chalets etc. in rural areas, some of which are in the Green Belt
<b>Possible mitigation</b>		
I wasn't clear about what "Changes to permanent residential occupation of individual chalets" means in C. B. already covers extensions and E. covers replacement. So what other changes could this cover?		

<b>Policy 28C. Equestrian development</b>		
<b>SA objectives that are not relevant to this policy</b>	1-7, 10, 11, 13	
<b>SA objective</b>	<b>Impact of policy</b>	
8. To protect and enhance landscape and townscape	0	This policy aims to preserve the rural landscape of the district, and protect it from inappropriate equestrian development. It also aims to protect
9. To conserve & enhance the District's biodiversity and geodiversity		

<b>Policy 28C. Equestrian development</b>	
<b>SA objectives that are not relevant to this policy</b>	1-7, 10, 11, 13
<b>SA objective</b>	<b>Impact of policy</b>
12. To maintain the integrity of the Green Belt within the District.	the integrity of the Green Belt from intrusion by larger scale equestrian facilities.
<b>Possible mitigation</b>	

<b>Policy 28D. Agricultural land quality</b>	
<b>SA objectives that are not relevant to this policy</b>	1-5, 8, 9, 11-13
<b>SA objective</b>	<b>Impact of policy</b>
6. To protect soil & land	0 This policy protects higher grade agricultural land from development. This will indirectly protect water resources by protecting infiltration capacity.
7. To protect water resources and quality; reduce flood risk.	
10. To support the economy & ensure suitable employment opportunities	? The policy protects high quality agricultural land, which in the long run helps to protect the district's agriculture. However it can prevent other forms of economic development.
<b>Possible mitigation</b>	

<b>Policy 31. Lea Castle Village</b>	
<b>SA objectives that are not relevant to this policy</b>	
<b>SA objective</b>	<b>Impact of policy</b>
1. To improve health and well-being within the District and reduce inequalities in health.	+ The policy includes provision for playing pitches, allotments/orchard, play facilities, pedestrian and cycle links, and 'potentially' a GP surgery
2. To protect and enhance the provision and accessibility to local services and facilities	+ The policy includes provision for a community facility, primary school, play facilities etc.
3. To ensure that the housing needs of all residents and communities are met	++ The policy would lead to the delivery of around 1400 new dwellings, including affordable housing, community-led, self-build and custom-build housing.
4. To promote energy efficiency & energy generated from renewable and low carbon sources.	0 The policy says nothing about energy efficiency
5. To reduce the need to travel and move towards more sustainable travel modes; to reduce associated effects of air quality & greenhouse gas emissions	+/- The policy expects the provision of a new roundabout on the A449, and new access points from the A449 and A451. It encourages the provision of walking and cycling paths. This is likely to minimise per capita vehicle movements, but there will be an overall increase in traffic as a result of the development.
6. To protect soil & land	-- The policy aims for 1400 dwellings on 92.8ha (taking out the 7ha for employment, and 4ha for a school, community centre etc.). This is an average of 15 dwellings/ha. Even if half of the remaining land was used for allotments, green space etc., housing density would be only 30/ha.

<b>Policy 31. Lea Castle Village</b>		
<b>SA objectives that are not relevant to this policy</b>		
<b>SA objective</b>	<b>Impact of policy</b>	
7. To protect water resources and quality; reduce flood risk.	0?	The policy requires sustainable urban drainage, and for all run-off to be treated on site. It suggests (but does not require) opening up a culverted watercourse.
8. To protect and enhance landscape and townscape	+/-	The landscape in the Lea Castle is very sensitive. The policy requires appropriate landscaping, new plantings including street trees, retention of mature boundary trees, and development to be kept below the ridgeline in places.
9. To conserve & enhance the District's biodiversity and geodiversity	+?	The policy requires the existing coniferous plantation to be gradually replaced by broadleaved trees and ground flora, to aid the local dormouse and bat populations. It aims to restrict recreational activities where horseshoe bats and dormice may be affected, and the development is expected to demonstrate a net overall biodiversity gain.
10. To support the economy & ensure suitable employment opportunities	+	The policy would deliver around 7ha of employment land.
11. To protect & enhance the historic environment & its settings	-?	There are several heritage assets near the proposed development. The policy says nothing explicitly about protecting the setting of these assets.
12. To maintain the integrity of the Green Belt within the District.	--	Lea Castle Village would take 103.8ha out of the Green Belt
13. To maintain & enhance community & settlement identities	+/-	The policy aims towards providing a new settlement with school, community facilities, allotments etc. Most of the services for the new settlement would be in Kidderminster Town.
<p><b>Possible mitigation</b></p> <p>This policy - removing 7ha for employment land and 4ha for school and community services - would have 15 dwellings per hectare. Even if half of the remaining space was for woodland/allotments/etc., it would have an average density of 30 dwellings per hectare. This does not seem like an efficient use of space, esp. for Green Belt land. Please could you either provide an explanation for why this very low density is appropriate or (preferably) increase the density?</p> <p>The policy could require the provision of a cycle path between the site and the edge of Kidderminster, preferably one that makes access to Kidderminster by walking and bike faster than access by car.</p> <p>The policy says nothing about energy efficiency. Should it?</p> <p>There are several heritage assets in the vicinity of the site: Woodhouse Farmhouse, Park Gate Inn, Lea Castle Park, Lea Castle Farm, barn at Park Gate Road. Their setting could be affected by the development. Are the proposed measures for landscape etc. adequate to protect these heritage settings? Does anything else need to be put in place?</p>		

<b>Policy 32. Kidderminster Eastern Extension</b>		
<b>SA objectives that are not relevant to this policy</b>		
<b>SA objective</b>	<b>Impact of policy</b>	
1. To improve health and well-being within the District and reduce inequalities in health.	+	The policy requires the development to include pedestrian and cycle links, allotments/orchard, play facilities, and a community facility.

<b>Policy 32. Kidderminster Eastern Extension</b>		
<b>SA objectives that are not relevant to this policy</b>		
<b>SA objective</b>	<b>Impact of policy</b>	
2. To protect and enhance the provision and accessibility to local services and facilities	+	
3. To ensure that the housing needs of all residents and communities are met	++	The policy would lead to the delivery of around 1400 new dwellings, including affordable and custom-build housing.
4. To promote energy efficiency & energy generated from renewable and low carbon sources.	0	The policy says nothing about energy efficiency
5. To reduce the need to travel and move towards more sustainable travel modes; to reduce associated effects of air quality & greenhouse gas emissions	+/-	The policy expects the provision of a new roads. It encourages the provision of walking and cycling paths, including a link to the Comberton and Offmore Estates. This is likely to minimise per capita vehicle movements, but there will be an overall increase in traffic as a result of the development.
6. To protect soil & land	--	The policy aims for 1440 dwellings on 84.4ha (taking out 4ha for a school, community centre etc.). This is an average of 17 dwellings/ha. It is not clear why over 50% of the site area is proposed as a green space, rather than simply not developing part of it.
7. To protect water resources and quality; reduce flood risk.	0?	The policy requires Lord Foley's irrigation system to be retained where practical, and to link this with sustainable urban drainage systems. It requires road run-off to use sealed systems.
8. To protect and enhance landscape and townscape	+/-	The policy requires the easter edge of development to be planted up
9. To conserve & enhance the District's biodiversity and geodiversity	+?	The policy requires the creation of a linear nature reserve along the western edge, in part to promote a buffer zone, and expects betterment of the Hoobrook and tributaries.
10. To support the economy & ensure suitable employment opportunities	0	No employment land proposed
11. To protect & enhance the historic environment & its settings	-?	The policy requires an archaeological assessment, and an assessment of the impact on settings of designated heritage assets.
12. To maintain the integrity of the Green Belt within the District.	--	Would take 88.4ha out of the Green Belt
13. To maintain & enhance community & settlement identities	+/-	The policy aims towards providing a new settlement with school, community facilities, allotments etc. Most of the services for the new settlement would be in Kidderminster Town.
<p><b>Possible mitigation</b></p> <p>Again, removing 4ha for school and community facilities, this would lead to a density of 17.2 dwellings/ha. Can this be increased?</p> <p>What happens if the assessment finds significant archaeology or a significant on heritage setting? Does this need to be stated?</p> <p>The policy for Lea Castle states that all run-off must be managed on-site. Should this policy say the same?</p>		