

Wyre Forest District Local Plan 2016-2036

Statement of Consultation

March 2020

Wyre Forest District Council

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1. Introduction

Purpose of the Statement of Consultation

1.1 This Statement of Consultation sets out the consultation that Wyre Forest District Council has undertaken in producing the Proposed Submission version of the Wyre Forest District Local Plan 2016-2036. It explains how consultation and engagement has shaped the Local Plan.

1.2 This document has taken account of the representations received on the Pre-Submission Publication version of the Local Plan (the Regulation 19 version) in relation to soundness, legal compliance and the Duty to Co-operate.

Regulatory Context for Consultation and Engagement

1.3 This Statement of Consultation forms one of the proposed submission documents referred to in Regulations 17, 19 & 22 of The Town and Country Planning (Local Planning) (England) Regulations 2012 and has been prepared under these Regulations. Regulation 22 (1)(c) 2012 requires that a statement of consultation, including the following information, be submitted alongside the development plan documents:

- *Which bodies and persons the local planning authority invited to make representations under Regulation 18,*
- *How those bodies and persons were invited to make representations under Regulation 18,*
- *A summary of the main issues raised by any representations made pursuant to Regulation 18,*
- *How any representations were made pursuant to Regulation 18 have been taken into account;*
- *If representations were made pursuant to Regulation 20, the number of representations made and a summary of the main issues raised in those representations; and*
- *If no representations were made in regulation 20, that no such representations were made.*

1.4 Regulation 18 further states that a local planning authority must—

(1) (a) notify each of the bodies or persons specified in paragraph (2) of the subject of a local plan which the local planning authority propose to prepare, and

(b) invite each of them to make representations to the local planning authority about what a local plan with that subject ought to contain.

(2) The bodies or persons referred to in paragraph (1) are—

(a) such of the specific consultation bodies as the local planning authority consider may have an interest in the subject of the proposed local plan;

(b) such of the general consultation bodies as the local planning authority consider appropriate; and

(c) such residents or other persons carrying on business in the local planning authority's area from which the local planning authority consider it appropriate to invite representations

(3) In preparing the local plan, the local planning authority must take into account any representation made to them in response to invitations under paragraph (1).

Duty to Co-operate

1.5 This statement of consultation provides a record of the stages of consultation that have been carried out on the Local Plan. However, the Council also has a duty to co-operate with other local planning authorities and other prescribed bodies in the formulation of development plan documents. This 'duty to co-operate' is a requirement of Section 33A of the Planning and Compulsory Purchase Act 2004, as inserted by the Localism Act 2011. Under the latest National Planning Policy Framework (NPPF) 2019, a requirement is placed on local planning authorities to produce Statements of Common Ground to detail cross boundary planning matters.

1.6 Full details of how the Council has engaged with those bodies is available in the Statements of Common Ground, which will be submitted to the Planning Inspectorate. As Duty to Co-operate discussions continue it is likely that progress will need to be documented further and updates made to some of the Statements of Common Ground during the examination period.

Statement of Community Involvement (SCI)

1.7 The Council's Statement of Community Involvement (SCI) 2013 sets out how the Council will consult on planning policy documents and planning application decisions. Paragraph 18 of the Planning and Compulsory Purchase Act 2004 requires all local planning authorities to produce an SCI. It is considered that the consultation processes outlined in this Consultation Statement comply with the SCI and NPPF. The adopted SCI can be viewed here: <https://www.wyreforestdc.gov.uk/media/89733/Statement-of-Community-Involvement.pdf>

2. Wyre Forest District Local Plan Context

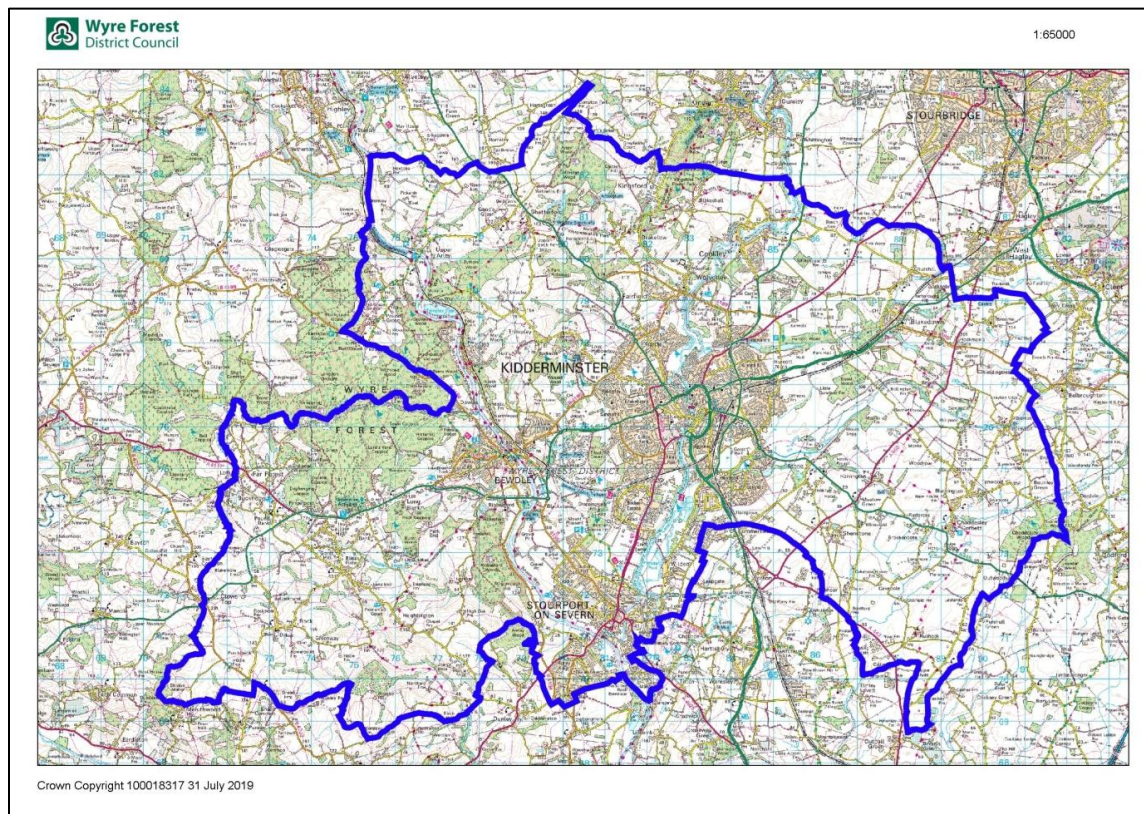
2.1 Since 2015, Wyre Forest District Council has been working towards the preparation of the Local Plan for the period 2016 – 2036. The Local plan sets out the policies and plans to guide future development within Wyre Forest District up to 2036. It will be the statutory document against which individual planning applications are determined. The Local Plan therefore has a key role in shaping the future of the district.

2.2 The Council has consulted extensively on the development of the Local Plan. The key public consultation stages are listed below:

- Issues and Options consultation – September/October 2015
- Preferred Options (Regulation 18) consultation – June/August 2017
- Pre-Submission Publication (Regulation 19) consultation – November/December 2018
- Pre-Submission Publication (Regulation 19) reopened consultation – September/October 2019

2.3 Figure 1 shows the district boundary of Wyre Forest District.

Figure 1: Map of Wyre Forest District



3. Issues and Options consultation on the Wyre Forest District Local Plan Review

3.1 As part of the Local Plan Review, the Council produced an “Issues and Options” document in 2015. This identified a number of potential options for locating new development in Wyre Forest District and also asked questions about the main issues and challenges which may affect the District both now and in the future. This was the first stage of the Local Plan Review and it was not the purpose of the Issues and Options document to allocate sites for future development. Rather it identified some broad areas for potential development in the future to encourage comment and debate. This did not necessarily mean that those broad areas would be subject to development within the new plan period.

3.2 The six week public consultation on the Issues and Options document started on 1st September 2015 and closed on 16th October 2015. The aim of the consultation was to seek views on the issues the Council should be developing policies on and to put forward potential options for a future development and growth strategy. It provided the opportunity for local residents, businesses, key stakeholders and Duty to Co-operate partners to submit further evidence or options for consideration.

3.3 The six week consultation period was undertaken in accordance with the requirements set out in the Council’s adopted SCI. A detailed consultation plan is shown in Appendix 1 which provides further information on the consultation measures employed. Comments could be submitted by post, email or online using the online consultation portal. Four manned roadshows were undertaken by officers, a live twitter debate and a presentation to the Parish Forum. The roadshows undertaken during the consultation period were held at the dates and venues shown in Table 1.

Table 1: Roadshow events during the Issues & Options consultation (2015)

Date	Time	Venue
Saturday 5 th September 2015	11am to 3pm	Stourport Carnival
Sunday 6 th September 2015	10am to 2pm	Bewdley Farmers’ Market
Saturday 12 th September 2015	10am to 2pm	Weavers Wharf, Kidderminster
Thursday 17 th September 2015	10am to 3pm	Kidderminster Market

3.4 The consultation generated a high response rate of 1631 comments in total. Appendix 2 sets out a summary of the comments received in relation to each section of the document, and the Officer response to the issues raised detailing how they would be taken into account in the next stage of plan making. The responses received and the Officer comments were reported to Cabinet on 22nd December 2015. All responses received were used to help develop the Preferred Options (Regulation 18) stage of the Local Plan Review.

3.5 Responses were received from local residents, key stakeholders, Duty to Co-operate partners and private sector/landowner interests. Generally the document was

well received due to its identification of potential growth options to encourage open debate about the District's future development strategy.

3.6 There was continued support (particularly amongst local residents) for brownfield regeneration of the main towns and retention of the Green Belt. However, private sector representatives raised concerns over the viability and deliverability of brownfield sites and also that the Local Plan should be capable of meeting the District's housing needs in full.

3.7 Chapter 6 of the Issues and Options document set out 7 potential broad options for accommodating future growth within the District. The responses received to these broad options are summarised below:

- **Option 1 (Brownfield regeneration which focuses on the main towns of Kidderminster and Stourport)** – there was general support for the focus on brownfield regeneration. However, the development industry had concerns over deliverability and considered that all allocations should be comprehensively reviewed. There should be a continued emphasis on the main towns but a mix of brownfield and greenfield sites should be allocated.
- **Option 2 (Brownfield regeneration focussed on the main towns and expansion of Kidderminster to the North East via a sustainable urban extension)** – There was some support for this option. It was felt that the focus here should be on the former Lea Castle Hospital site. There was great concern over the impact of increased traffic on Hurcott Lane and the SSSI. Private Sector interests feel that the Area of Development Restraint (ADR) sites should also be prioritised although local residents were concerned over the loss of Green Belt land.
- **Option 3 (Brownfield regeneration focussed on the main towns and expansion of Kidderminster to the South East via a sustainable urban extension)** – Many objections were received to this option from local residents on the Spennells Housing Estate. They had particular concerns over the impact on the open countryside and on the transport network of the housing estate. They considered that there would be adverse impact on recreational opportunities and that infrastructure requirements would be significant. However, there was a level of support from the development industry for this option.
- **Option 4 (Brownfield Regeneration Focus for Stourport)** – There was widespread support for the brownfield regeneration of Stourport, with many people stating that there are enough sites available. However, private sector interests put forward land at Areley Kings for consideration which isn't in the Green Belt. Developer interests had concerns over the deliverability of the Stourport Relief Road and associated potential restrictions on new development coming forward.

- **Option 5 (Allocate some development to Bewdley through an amendment to the town's settlement boundary to accommodate new development)** – Whilst many local residents wish to see only modest development in and around Bewdley, concerns were raised over low housing completions for the town and the need to address local housing needs. There were many concerns over traffic impacts on the Welch Gate Air Quality Management Area. A number of land owners put forward sites and they considered that the settlement boundary should be redrawn to provide some new development opportunities for the town during the plan period.
- **Option 6 (Allocate more development to the villages and settlements within the District's Rural East)** – There is not much enthusiasm for allocating development to villages in the east of the District. However some people feel that modest growth could be allocated to the larger villages. Some respondents felt that more should be made of transport links via Blakedown Rail Station. The main concern is that new development should be proportionate to the size of the villages.
- **Option 7 (Allocate more development to the villages and settlements within the District's Rural West)** – Whilst a number of sites have been put forward by landowners to the west of the District, many respondents (both residents and private sector interests) felt that this option was the most unsustainable strategy because of poor access to local services and increased trip generation. Small amounts of infill development could come forward in response to local housing need.

4. Preferred Options (Regulation 18) consultation on the Wyre Forest District Local Plan Review

4.1 Updated and new technical evidence base documents produced, the Sustainability Appraisal and the consultation responses received from the Issues and Options stage were used to help shape the Preferred Options for the District's future development strategy. A public consultation took place on the Preferred Options (Regulation 18) stage of the Plan Review during Summer 2017.

4.2 The Preferred Options consultation represented the second stage in the review of the District's Local Plan. The first stage was the Issues and Options consultation in late 2015. The aim of the Preferred Options consultation was to seek views on:

- Consultees' preference for a more concentrated spatial strategy (Option A in the document) or a more dispersed spatial strategy (Option B in the document) with their inherent advantages and disadvantages;
- The Strategic Policies that arise from the spatial strategy;
- The Development Management Policies that will be required to support the implementation of the proposed Plan;
- The sites proposed for allocation that will be required to support the implementation of the Plan.

4.3 Consultation at this stage provided an opportunity for local residents, businesses, key stakeholders and Duty to Co-operate partners to comment on the progress made up to this stage by the Council as it formulated its new local plan. It also provided consultees an opportunity to provide further evidence, options or sites for consideration. Comments could be made on any of the sites and suggestions for new sites were also encouraged through the Call for Sites that took place during the consultation period.

4.4 The responses received to this consultation were used to inform the development of the Pre-Submission Plan. The Preferred Options document took account of:

- The extensive evidence base that had been built up since 2015;
- The Issues and Options consultation reported in December 2015 to Cabinet;
- Duty to Co-operate conversations with neighbouring authorities, the County Council, relevant Statutory Organisations and key infrastructure providers;
- Advice received from the Local Plans Review Panel;
- Advice received from the Portfolio Holder and associated conversations with Cabinet.

4.5 An important factor in demonstrating the soundness of the Local Plan relates to being able to show wide public engagement in its development. Public consultation is required by Regulation 18 of the Town & Country Planning (Local Planning) (England) Regulation 2012.

4.6 Consultation for the Preferred Options stage was carried out in accordance with the District Council's adopted Statement of Community Involvement (2013) and with specific and general consultation bodies as set out by the Town & Country Planning (Local Planning) (England) Regulations 2012.

4.7 A Consultation Plan was produced (as shown in Appendix 3), which set out the measures which the Council would take in order to engage stakeholders and the wider community in the Preferred Options consultation. It included specific details on the proposed dates, timescales and consultation methods that Officers intended to use. At the Cabinet meeting on 14th June 2017 it was decided that "the public consultation on the Preferred Options Consultation be undertaken in accordance with the Consultation Plan" (as shown in Appendix 3 of this report).

4.8 The Preferred Options consultation was held over an 8 week period. It started on 15th June 2017 and closed at 5pm on 14th August 2017. During the consultation period the Council sought views on the Preferred Options document and its associated evidence base. The Preferred Options consultation was the main consultation opportunity for the community and other stakeholders to comment and influence the sites that the Council had identified at this stage as being the most suitable to allocate for development purposes. The consultation was held in accordance with the Town and Country (Local Planning) (England) Regulations 2012, as set out in the SCI. Comments could be submitted by post, email or online using the online consultation portal. Eight drop-in sessions were undertaken during the consultation period and were held at the dates and venues shown in Table 2.

Table 2: Drop-in sessions during the Preferred Options (Reg 18) consultation (2017)

Date	Time	Venue
Monday 10 th July 2017	3:45pm to 8pm	Heronswood Primary School, Spennells, Kidderminster
Wednesday 19 th July 2017	2pm to 7pm	The Wyre Room, St Georges Hall, Load Street, Bewdley
Friday 21 st July 2017	1pm to 5:30pm	Rowland Hill Centre, Kidderminster
Saturday 22 nd July 2017	10am to 4pm	Offmore Evangelical Church Hall, Kidderminster
Wednesday 26 th July 2017	1:30pm to 6:30pm	Areley Kings Village Hall, Stourport
Friday 28 th July 2017	2pm to 7pm	Cookley Village Hall
Saturday 29 th July 2017	10am to 4pm	Stourport Civic Hall
Friday 4 th August 2017	2pm to 7pm	St Oswalds Church Centre, Broadwaters Drive, Kidderminster

4.9 In order to meet the requirements of Regulation 18, the District Council notified all of those people registered on its Local Plan consultation database to inform them of the consultation and to invite them to make representations. A copy of this letter can be found in Appendix 3. In order to publicise the proposals to residents and businesses in the area, a leaflet was produced and distributed to households and businesses within the district. The leaflet also notified residents of the consultation drop-in sessions. A copy of the leaflet can be viewed in Appendix 3.

4.10 A total of 5029 responses were received to this consultation. A call for sites exercise was also undertaken as part of the Preferred Options consultation. A total of 51 sites were submitted for consideration through the call for sites. A summary of the consultation responses received and the Officer responses to the issues raised can be found in Appendix 4. A list of the sites submitted through the call for sites with accompanying maps can also be found in Appendix 4.

4.11 The Summary of Consultation Responses for the Preferred Options consultation (June 2017) details the key issues raised during the Preferred Options consultation and how Officers responded and took issues into account for the next stage of plan making. The Summary of Consultation Responses for the Preferred Options can be found in Appendix 4.

4.12 On 24th September 2018 and 15th October 2018 Local Plans Review Panel (LPRP) also considered the consultation responses to the Preferred Options consultation and gave feedback to officers regarding the officer comments to the consultation responses. The Summary of Consultation Responses for the Preferred Options (Appendix 4) was approved by Cabinet on 30th October 2018.

4.13 As a result of the representations to the Preferred Options consultation, the Council has progressed updates to various pieces of evidence in order to address the technical issues that have arisen from the Regulation 18 consultation. Updates to the evidence base have been undertaken for the following technical studies:

- Objectively Assessed Housing Needs (now the Housing Needs Study)
- Employment Land Review
- Heritage Impact Assessment
- Traffic Modelling
- Ecological Appraisals
- Strategic Flood Risk Assessment update
- Water Cycle Study update
- Infrastructure Delivery Plan update
- Viability Assessment update
- Green Belt Study update
- Open Space, Built Facilities and Playing Pitch Strategies

4.14 The findings of these updated technical studies have helped to inform the Pre-Submission Publication (Reg 19) version of the Local Plan.

5. Pre-Submission (Regulation 19) consultation on the Wyre Forest District Local Plan 2016-2036

5.1 Following the Preferred Options consultation, work commenced on the Pre-Submission Publication version of the Local Plan. Further technical evidence base work was undertaken in relation to the proposed site allocations and the findings of this with officer recommendations were presented to LPRP on 24th September 2018 and 15th October 2018. LPRP thus reviewed the proposed site allocations and made their recommendations to officers.

5.2 The Pre-Submission Publication document took account of:

- The extensive evidence base that has been built up since 2015;
- The Issues and Options consultation reported in December 2015 to Cabinet;
- The Preferred Options consultation reported to Overview and Scrutiny and Cabinet in October 2018;
- Duty to Co-operate conversations with neighbouring local authorities, the County Council, relevant Statutory Organisations and key infrastructure providers;
- Advice received from LPRP.

5.3 On 15th October 2018 LPRP considered the proposed Local Plan Pre-Submission Publication document (October 2018 version) in its entirety. This enabled the LPRP to consider the draft policies, including the development strategy proposed for the district. This October 2018 version of the Pre-Submission document and supporting evidence base studies were then approved by Cabinet on 30th October 2018. The Regulation 19 consultation started on 1st November 2018 and ended at 5pm on 17th December 2018. The Planning Policy team hosted eight drop-in sessions during the consultation period where residents could come along and ask questions about the Local Plan Pre-Submission Publication and view the documentation, including all the technical evidence base studies. The drop-in sessions were held at the dates and venues shown in Table 3.

Table 3: Drop-in sessions during the Pre-Submission (Reg 19) consultation (2018)

Date	Time	Venue
Friday 16 th November 2018	3pm – 7pm	Cookley Village Hall
Saturday 17 th November 2018	10am – 2pm	Offmore Evangelical Church Hall, Kidderminster
Tuesday 20 th November 2018	5:30pm – 8pm	Héronswood Primary School, Spennells, Kidderminster
Friday 23 rd November 2018	3pm – 7pm	Areley Kings Village Hall
Saturday 24 th November 2018	10am – 2pm	Stourport Civic Hall
Tuesday 27 th November 2018	3pm – 7pm	St Georges Hall, Bewdley
Thursday 29 th November 2018	3pm – 7pm	Kidderminster Town Hall
Friday 30 th November 2018	3pm – 7pm	St Oswalds Church Centre, Broadwaters Drive, Kidderminster

5.4 The Statement of Publication Consultation (2018) in Appendix 5 sets out how the Pre-Submission consultation in 2018 was undertaken and who the Council consulted. The report also provides a summary of the consultation responses received and a summary of the main issues raised from consultees (produced in accordance with Regulation 22 (c) (v)).

5.5 A total of 1043 consultation responses were received to the November/December 2018 consultation. After the consultation period ended, the Planning Policy team considered all the consultation responses received. Following receipt of responses to that consultation, it was agreed with Worcestershire County Council that the transport evidence would benefit from further clarification, and it was therefore necessary to update some of the technical evidence base documents.

5.6 The sites to be included in the Pre-Submission document could be finalised only when the technical evidence base studies were completed and consistent with other evidence base documents due to their interdependency. The key studies that were updated/produced were as follows:-

- Transport evidence Base Paper (June 2019)
- A450 Corridor Enhancement Report (June 2019)
- SLC Rail Technical Note on Blakedown Station Car Park Needs (June 2019)
- Infrastructure Delivery Plan (June 2019)
- Viability Assessment Note (June 2019)
- WFDC Golf Facility Review (June 2019)
- Burlish Golf Course Vision document (June 2019)

5.7 These updates to the various evidence base studies led to sections of the Local Plan Pre-Submission Document needing to be updated. As a result, the Local Plan Pre-Submission Document (October 2018) required updates to the following sections:-

- Foreword
- Chapter 1 – Introduction and Context
- Chapter 6 – A Sustainable Future: Development Strategy
- Policy 8G – Site Provision for Travelling Showpeople
- Chapter 10 – A Good Place to do Business – amendment to Table 10.0.1
- Chapter 13 – Transport and Accessibility
- Part C of Local Plan – Proposed Allocations to include:
 - Site allocation at Blakedown and amendment to the settlement boundary for Blakedown village.
 - Removal of Yew Tree Walk site AKR/18.
 - Site allocation LI/10 – a change to employment use.
 - Site allocation LI/12 – a change to Travelling Showpeople use.
 - Site allocation LI/13 – new employment site.
 - Minster Road Outdoor Sports Area.
 - South Kidderminster Enterprise Park.
- Local Plan Policies Map updates

5.8 Amendments to the Local Plan included an additional site allocation at Blakedown for car parking for the railway station and residential use. Additional car parking is needed at Blakedown railway station to meet the demand for car parking spaces for rail users on the commuter line to the Black Country and Birmingham as evidenced in the SLC Rail Technical Note on Blakedown Station Car Park (June 2019)¹. In addition to the car parking, housing development on the site would help towards meeting housing needs in Blakedown.

5.9 The site allocation 'Yew Tree Walk, AKR/18' was removed from the Local Plan as a number of issues came to light since the site was proposed. It has been concluded that the site does not meet the criteria for being on the Brownfield Land Register and should therefore be removed from the Local Plan. This is because there is no evidence that the site was used for the extraction of sand and gravel and there is no evidence to show that it has been previously developed as defined by the NPPF. There is also concern over the stability of land and the practicality of actually building on the site which would have implications for the deliverability of this site.

5.10 There was also an amendment made to the location of the Travelling Showpeople site (now site LI/12) and the addition of a new employment site (LI/13). In the Pre-Submission Local Plan consulted on in November 2018, the site LI/10 was allocated as the site for Travelling Showpeople. Since the 2018 consultation, further discussions have been had with the Travelling Showpeople family and they have shown preference for site LI/12 (which currently houses the former Burlish golf club house, shop and storage shed). This site (LI/12) was a proposed allocation in the Local Plan for employment use. These two sites have therefore been switched around to help meet the needs of the Travelling Showpeople family. A new employment site (LI/13) was also added into the Local Plan to help unlock employment use within this area and aid the access route to site allocations LI/10 and LI/12. However, it is important to note that this land is located within the Green Belt and would therefore result in the loss of 1.96ha of green belt land.

5.11 The amendments to the Local Plan also included an amendment to the allocation for Minster Road Outdoor Sports Area. This was following further evidence base work on the former Burlish Golf Course site.

5.12 Amendments were also made to Chapter 6 of the Local Plan following updates to the Council's Five Year Housing Land Supply position and the Government's introduction of the Housing Delivery Test and changes to the Standardised Methodology for calculating housing need.

5.13 The amendments to the Local Plan and the updated technical evidence base documents were presented to LPRP for their consideration and recommendations on 1st July 2019. The amendments and updated technical evidence base were also considered

¹ <https://www.wyreforestdc.gov.uk/media/4583177/Blakedown-Station-Car-Park-Options-June-2019-.pdf>

by Overview and Scrutiny Committee on 4th July 2019. Their subsequent recommendations were reported to Cabinet at the meeting on 16th July 2019.

5.14 On 16th July 2019, Cabinet agreed to the following recommendations:

- a) *Approve the Local Plan Pre-Submission Publication documentation for the re-opened public consultation (Regulation 19);*
- b) *Agree the technical evidence base studies as part of the evidence base for the Local Plan; and*
- c) *Delegate authority to the Corporate Director: Economic Prosperity & Place in consultation with the Cabinet Member for Economic Regeneration, Planning and Capital Investments to make any necessary amendments to the consultation documentation up to the launch of the consultation that may arise from the receipt of additional information following this meeting.*

5.15 At the Council's Cabinet meeting held on 16th July 2019, it was decided to reopen the formal consultation in accordance with Regulation 19 of the Town and Country (Local Planning) (England) Regulations 2012 with all stakeholders on the Pre-Submission Publication version (including the amendments document) of the Local Plan for Wyre Forest District and the associated evidence base documents for six weeks starting on 2nd September 2019 and closing at 5pm on 14th October 2019. This was to allow further representations to be made on the Local Plan following updates to some of the evidence base studies. A detailed summary of the consultation responses received for the 2019 consultation can be found in the Statement of Publication Consultation (2019) in Appendix 6. This summary has been produced in accordance with Regulation 22(c) (v). The detailed consultation summaries for the 2018 and 2019 Pre-Submission consultations (Appendix 5 and 6) will be submitted to the Planning Inspectorate for examination alongside this Consultation Statement and the Local Plan itself.

5.16 The consultation included contacting individuals and organisations on the Local Plan consultation database, public drop-in sessions, and information provided via the Council's website and social media. A number of press releases were issued and a leaflet was sent to households and businesses within the district to notify them of the consultation.

5.17 The Planning Policy team hosted four drop-in sessions during the consultation period where residents could come along and ask questions about the amendments to the Local Plan Pre-Submission Publication and view the documentation, including all the technical evidence base studies. The drop-in sessions were held at the dates and venues shown in Table 4.

Table 4: Drop-in sessions during the reopening of the Pre-Submission (Reg 19) consultation (2019)

Date	Time	Venue
Wednesday 11 th September 2019	3pm to 6pm	Blakedown Parish Rooms, 18 Belbroughton Road, Blakedown, DY10 3JG
Wednesday 18 th September 2019	3pm to 7pm	Corn Exchange, Kidderminster Town Hall, DY10 1DB
Thursday 19 th September 2019	2pm to 4:30pm	Wribbenhall Parish Rooms, Bewdley, DY12 1DQ
Saturday 28 th September 2019	10am to 1pm	Stourport Civic Hall, DY13 8UJ

5.18 In total, the Council received 1588 responses to the Regulation 19 consultations held in 2018 and 2019. Of these, over 53% were from individuals, 25% from representatives of organisations and the remaining from agents on behalf of either organisations or individuals. Table 5 below shows the total number of responses received to the 2018 and 2019 consultations.

Table 5: Total responses received for the 2018 and 2019 Pre-Submission consultations (Regulation 19)

	Total Responses	Individuals	Organisations	Agents on behalf of Organisations or Individuals
Pre-Submission 2018	1043	548	289	206
Pre-Submission 2018 - Re-opened 2019	266	166	57	43
Amendments Document 2019	279	133	54	92
Totals:	1588	847	400	341
Percentages		53.34%	25.19%	21.47%

5.19 All consultation responses received by the Council for the Pre-Submission consultations will be submitted to the Planning Inspectorate for the purposes of the examination of the Local Plan. This includes the consultation responses received for both the November/December 2018 consultation and the September/October 2019 consultation.

5.20 Tables 6 and 7 set out some of the main issues from the Regulation 19 consultations held in 2018 and 2019, and the Council's response to these issues raised.

Table 6: Main issues from Regulation 19 consultation held in 2018

Rep	Issue	Rep Summary	WFDC Response
Worcestershire County Council	Infrastructure Delivery Plan (IDP)	Site list used for the IDP not the same list in the Pre-Submission Plan. WCC will need to undertake transport modelling again.	Some anomalies and inconsistencies were identified within the transport modelling work undertaken for the 2018 Pre-Submission consultation. These have been addressed and corrected in the 2019 modelling work undertaken. The updated transport evidence and revised IDP were consulted on during the re-opened Pre-submission consultation which took place in 2019.
Worcestershire County Council	Viability	Viability assessment appears to be at odds with the site numbers and allocations in pre-submission plan.	WFDC agreed with this comment and an update to viability evidence was produced. The pre-submission viability note was published in June 2019 in preparation for the pre-submission consultation September-October 2019. A viability topic paper will also be produced in preparation of the submission of the local plan.
Worcestershire County Council	Site Allocations	WCC submitted a list of site allocations which need to take account of minerals resource safeguarding issues.	WFDC intend to amend Chapter 37 of the Local Plan to include the list of site allocations which need to take account of minerals resource safeguarding issues. These suggested amendments are included in the Statement of Common Ground with Worcestershire County Council following duty to cooperate discussions.
Worcestershire County Council	Sustainable transport	Concerns for sustainable transport as phase 2 expansion of Blakedown station has not been included.	WFDC have now included this site (WFR/CB/3) in the Local Plan for additional car parking at Blakedown railway station; this was consulted on during the 2019 pre-submission consultation.

Black Country Authorities	Duty to Cooperate	The plan makes no commitment to contribute towards meeting the unmet housing and employment needs of neighbouring authorities.	WFDC is a largely self contained housing market area. Whilst there are linkages with other local authorities these do not take into account more localised housing market drivers. The Statement of Common Ground addresses the issues raised by the Black Country Authorities.
South Staffordshire Council	Duty to Cooperate	It would be consistent with Duty to Cooperate requirements for WFDC to more actively consider meeting the Greater Birmingham and Black Country Housing Market Area (GBBCHMA) shortfall.	WFDC is a largely self contained housing market area. Whilst there are linkages with other local authorities these do not take into account more localised housing market drivers. The statement of common ground addresses the issues raised by South Staffordshire Council.
South Worcestershire Councils	Duty to Cooperate	In accordance with the revised NPPF a Statement of Common Ground should have been prepared by WFDC for South Worcestershire Councils.	Duty to Cooperate meetings have been undertaken and a Statement of Common Ground has been prepared by WFDC for the South Worcestershire Councils. This SofCG will be submitted alongside the Local Plan at submission stage.
South Worcestershire Councils	Paragraph 6.5	The most recent government advice is to ignore the 2016 household projections and use the 2014 household projections and therefore the basis of the housing number should be reconsidered.	WFDC is unusual when compared to other LPA's because the 2016 figure (276) is in fact higher than the 2014 figure (248). National government intends to increase house building to 300,000 per annum across England. WFDC is producing a Housing Topic Paper to provide clear justification for using the higher housing figure of 276, based on the 2016 household projections.

Bromsgrove District Council	Duty to Cooperate	Bromsgrove District Council believes the WFDC local plan is unsound and is not justified, effective or consistent with national policy. BDC has concerns with the Transport Modelling Report and IDP. Conclusion of unsoundness relates to the additional congestion of the A456 through Hagley and A448 at Mustow Green.	WFDC has engaged with BDC to discuss their concerns through the Duty to Co-operate process. A Statement of Common Ground is being prepared jointly between WFDC, BDC and WCC, as WCC are the highways authority. The SofCG will be submitted alongside the submission of the local plan. Both the transport evidence and IDP were updated and consulted on during the 2019 pre-submission consultation.
Natural England	Policy 31.2 Lea Castle Village	Surface water drainage from the site discharges into Hurcott pool, part of a SSSI. Development could impact SSSI through bad water quality and reduced water quantity. Policy should include point to maintain current levels and quality of water.	Natural England subsequently revoked this comment in the 2019 representations.
Residents	Policy 31.2 Lea Castle Village	Object to extending Lea Castle development to 1400 dwellings. Concerns on impact of road infrastructure. Concerns on mixture of housing as there is need for more affordable homes. Loss of green belt land.	By increasing development at Lea Castle to 1400, the site will become a self contained sustainable village including a primary school, employment uses, and community hub with potentially a doctor's surgery. New access points will be provided from A449 & A451. As a major development, the wider site will be expected to meet the 25% affordable homes requirement of Policy 8B. In order to meet the District's housing requirement, a small amount of green belt release is required. However, 49% of all sites in plan are Brownfield.

Highways England	13.11: Highway Network	The local plan will affect traffic levels to junction 4 of M5. Update of the IDP to ensure the plan mitigates the impact on the strategic road network.	WFDC is a largely self contained functional economic market area as outlined in the 2018 employment land review as part of the evidence base. The majority of travel to work flows are either internal to the district or to nearby authorities such as Wychavon, Dudley or Worcester. Identified road improvements in WFD are outlined in the IDP. The SofCG with Highways England sets out what has been agreed by WFDC, WCC and Highways England in response to the issues raised.
Sport England	Site LI/12 Former Clubhouse at Burlish Golf Course	Objects to allocation LI/12 Former Clubhouse at Burlish Golf Course for proposed employment development as this would result in the loss of an existing sports facility. Recommend either to remove allocation or to include provision for investment in an equivalent or better provision of sports facilities in a suitable location.	Two additional background papers were produced as part of the 2019 consultation. One covered golf play in the district, which shows golf play is declining and there are several remaining courses available. The second covers the proposed use of the former Burlish Golf course which is to provide further open space to the public as a nature park, woodland area, and cycle trail.
Sport England	Policy 32: Kidderminster Eastern Extension	Sport England considers this development should make appropriate provision for new outdoor sports and recreation facilities. The policy does not include any on site provision for a playing field to meet the needs of the housing development.	The latest proposal from the site developers is to include two junior football pitches in the community hub area. Any additional contributions towards sport provision would be based on S106 contributions (as outlined in policy 20C) subject to the viability of the proposals.
Residents	Policy 32: Kidderminster Eastern Extension	Concerns on access to proposed development on Husum way. Would like a bridge built over railway. Desire to have a greater tree bund between development and existing houses. Concerns on main road through development to become a 'rat run'. Objections	The main site access will be from the existing roundabout on the A448 by Spennells Valley Road. A secondary access will be taken off Husum Way to the south of the railway bridge. Building a new bridge over railway line would be prohibitively expensive. Spine road will have a 20 mph speed

		to development on Green Belt.	limit and will be designed not to be an alternative route for commuting. Development will include approximately 50% green infrastructure and will be accessible for public to use for recreation.
Sport England	Site LI/11: Land west of former school site Coniston Crescent	Object to site allocation as this would result in a loss of an existing sports facility. WFDC playing pitch strategy (PPS) does not assess the need for golf courses and no evidence has been prepared to demonstrate the golf course is surplus to requirements.	Two additional background papers were produced as part of the 2019 consultation. One covered golf play in the district, which shows golf play is declining and there are several remaining courses available. The second covers the proposed use of the former Burlish Golf course which is to provide further open space to the public in a nature park, woodland area, and cycle trail.
Burlish Concerned Residents Group	Site LI/11: Land west of former school site Coniston Crescent	Object to site allocation as would impose pressure on local infrastructure such as roads. Feel have not been given adequate time to consult.	The site would allow the rounding off of the settlement edge of Stourport with significant landscaping to limit the impact on the open landscape to the north of the site.
Sport England	Site MI/38: School site Coniston Crescent	Object to site allocation as would result in the loss of existing school playing fields. The PPS demonstrates that the playing fields are not surplus to requirements.	WFDC have contacted the school who have confirmed that the previous pitches on this site have not been used or maintained for several years. The PPS was updated in the addendum report to reflect this new evidence and it has also been included in the SofCG with Sport England.
Chaddesley Corbett Parish Council	Site WFR/CC/8: Fold Farm	Object to site allocation. Recommend to remove site so it does not pre-empt the review of the parish neighbourhood plan.	This site is to meet local need for housing as shown by the latest parish housing needs survey.

Kidderminster Foreign Council & Resident Petition	Site WA/KF/3: Land at Low Habberley	Object to site allocation as it is not an appropriate strategy to meet the housing needs of the area. Does not comply with at least three out the five green belt purposes in the NPPF.	This site has a revised justification in the Amendments to the Pre-Submission document (AM30.51) and was consulted on during the 2019 pre-submission consultation. The retention and enhancement of the western hedgerow boundary will provide a strong and defensible Green Belt boundary.
Rock Parish Council	Policy 36.1 Lem Hill Nurseries BR/RO/2	Object to site allocation as it is not within the settlement boundary, will put pressure on local facilities and school and there is no local identified housing need.	This brownfield site is allocated for residential development for local needs as shown in the parish housing needs survey. Other sites have been considered within the settlement boundary, but were ruled out because they were greenfield with ecological constraints.
Worcestershire Wildlife Trust	Site AKR/18: Yew Tree Walk	Concerned that site could not sustain the high numbers of housing. Development would remove all the semi natural habitat within the site boundary. A reduction in habitat on site would not maintain the wildlife likely to be present and potential adverse impact on the local ecological network. Do not consider that site allocation is sound.	This site was subsequently removed at the 2019 pre-submission consultation stage. It has been found that there is no evidence that the site was used for the extraction of sand and gravel so does not meet the criteria of being on the Brownfield Land Register. There were also concerns on the stability of the land which would affect the deliverability of the proposed development.
Friends of St Patricks Field Petition	Site AKR/18: Yew Tree Walk	Friends of St Patricks Field resident group object to site allocation AKR/18: Yew Tree Walk. Believe that WFDC have not shown evidence for this site to be released from Green Belt. Site has not been used for gravel extraction. Feel that access road to development is too narrow. Concerned on ecology of site, and transportation impacts on Stagborough Way.	This site was subsequently removed at the 2019 pre-submission consultation stage. It has been found that there is no evidence that the site was used for the extraction of sand and gravel so does not meet the criteria of being on the Brownfield Land Register. There were also concerns on the stability of the land which would affect the deliverability of the proposed development.
National Federation of	Policy 8: A desirable place	Policy fails to address the requirement to allocate	WFDC has identified that a Gypsy and Traveller

Gypsy and Liaison Groups	to live	sufficient land to meet the need for traveller sites for at least a five year period. Policy is too restrictive.	assessment need update is necessary. This updated evidence base will be produced and submitted to the Planning Inspector.
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Table 7: Main issues from Regulation 19 consultation held in 2019

Rep	Issue	Rep Summary	WFDC Response
Worcestershire County Council	Policy 9: Health and Wellbeing	Officers have identified improvements that should be made to this chapter. WCC believe all HIA thresholds for residential and mixed use developments should be lowered to include all major developments.	Policy 9 has been amended based on WCC recommendations. This is included in the Statement of Common Ground with Worcestershire County Council.
Worcestershire County Council	Viability	Is clear that the viability of the plan is constrained by the economic geography of the district. This will place a high burden on infrastructure providers such as WCC, who do not have the resources to directly fund the infrastructure needs that have been identified.	WFDC will continue to work with WCC in regards to the viability of the plan through the Duty to Cooperate / Statement of Common Ground process. A viability topic paper will also be produced for examination of the plan.
Birmingham City Council	Policy AM6A Development Needs	The plan needs to acknowledge that any housing above local housing need can be attributed to meet unmet housing need with neighbouring authorities.	WFDC is a largely self contained housing market area. Whilst there are linkages with other local authorities these do not take into account more localised housing market drivers. The statement of common ground addresses the issues raised by Birmingham City Council.
Black Country Local Authorities	Policy AM6A Development Needs	The BCA would like to explore when an early review of the WFDC local plan will be triggered.	WFDC will continue to work with the Black Country Authorities as further evidence comes to light from the BCA local plan review. The WFDC local plan will be reviewed in the future in accordance with para 33 of the NPPF and updated as necessary. The Statement of Common Ground addresses the

			issues raised by the Black Country Authorities.
Bromsgrove District Council	Duty to Cooperate	Remains the view of BDC that the WFDC Local Plan is unsound. BDC are still unclear as to what the transport impacts are to the district. Considered the published information does not clearly show the impacts of the development sites or the mitigation strategy. More robust transport evidence base is necessary. Concerns with the IDP in that schemes have been untested and some uncostered.	WFDC and WCC (as highway authority) have engaged with BDC to address their concerns through the Duty to Co-operate process. A Statement of Common Ground has been prepared and will be submitted alongside the local plan. Both the transport evidence and IDP were updated as part of the pre-submission 2019 consultation. A background paper to the SofCG has been prepared by WCC on the impact of traffic on the A456 through Hagley to address BDC concerns.
Environment Agency	Policy AM36.11 Land off Station Drive, Blakedown (WFR/CB/3)	Site (WFR/CB/3) does not appear to have been modelled in the Water Cycle Study.	An addendum has been prepared to include this site in the Water Cycle Study.
Highways England	Infrastructure Delivery Plan (IDP)	Recommends that the IDP should be updated to include a scheme at M5 Junction 4 capable of mitigating the transport implications of the plan at this location.	WFDC is a largely self contained functional economic market area as outlined in the 2018 employment land review. The majority of travel to work flows are either internal to the district or to nearby authorities such as Wychavon, Dudley or Worcester. Identified road improvements in WFD are outlined in the IDP and the proposed car park sites at Blakedown station is to encourage the greater use of public transportation to create a sustainable transport hub. The Statement of Common Ground addresses the issues raised by Highways England.
Sport England	Policy AM8G - Site LI/12	Proposed modification AM8G now proposed to allocate LI/12 former Burlish Golf Course Clubhouse for travelling show people. Recommend amendment of policy to include provision for	As outlined in the former Burlish Golf Course vision document parts of the site will be redeveloped to offer new open space through a country park and woodland area, and also a cycle trial path. Any additional

		appropriate mitigation in an equivalent or better provision of sports facilities in a suitable location. Maintain objection to site MI/38.	contributions towards sport provision would be based on S106 contributions (as outlined in policy 20C) subject to the viability of the proposals.
Wolverley and Cookley Parish Council.	Policy 31.2 Lea Castle Village	Now objecting to any development on the Green Belt within the parish, including the Lea Castle Hospital site of the additional 800 homes. Concerned on the impact on local infrastructure.	By increasing the development to 1400 homes this makes it a sustainable village development and will be able to provide a primary school, community hub, a football pitch and 7ha of employment land. The development will also include a bus route.
Kidderminster Foreign Council	WAKF/3 Land at Low Habberley	Objects to proposed site and considers the reasoning to why this has been allocated to be unsound.	This site has a revised justification in the Amendments to the Pre Submission document (AM30.51), which was consulted on in 2019. The retention and enhancement of the western hedgerow boundary will provide a strong and defensible Green Belt boundary.
Churchill and Blakedown Parish Council & Residents	Policy 36.6A	Object to the proposed amendment for site WFR/CB/3. Consider the plan is unsound as there is no justification for the loss of Green Belt. Consider the plan is not justified as inclusion of site fails to represent an appropriate strategy which has taken into account reasonable alternatives, and is not based on proportionate evidence.	The additional car parking at Blakedown station will help to meet the demand for the use of the railway stations in the district. Train use has increased by 148% between 1998-2018. It will encourage greater use of public transportation. The housing allocation will be in a sustainable location and will meet identified local housing need.
Rock Parish Council	Site BR/RO/2 Lem Hill Nursery site	Object to site allocation (BR/RO/2). Site is outside the settlement boundary.	This brownfield site is allocated for residential development for local needs as shown in the parish housing needs survey. Other sites have been considered within the settlement boundary, but were ruled out because they were greenfield with ecological constraints.

Residents	Policy 6A - Development Needs	Objection to the use of the 276 homes per year figure from the 2016 household projection and instead use the 248 projection from 2014. WFDC approach is inconsistent with national government advice.	WFDC is unusual when compared to other LPA's because the 2016 figure (276) is in fact higher than the 2014 figure (248). National government intends to increase house building to 300,000 per annum across England. WFDC is producing a Housing Topic Paper to provide clear justification for using the higher housing figure of 276, based on the 2016 household projections.
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6. Conclusion

6.1 The preparation of Wyre Forest District Council's Local Plan (2016 – 2036) provided several opportunities for members of the public, organisations and statutory consultees to engage in the Local Plan process via four consultation exercises. The regulation 18 consultation lasted 8 weeks. This was to ensure residents and other stakeholders had sufficient time to look at the new proposals, particularly as it covered the summer holiday period. The regulation 19 consultation was undertaken twice, the first during November/December 2018 lasting for 7 weeks, and the second during September/October 2019 lasting for 6 weeks, giving people ample time to respond.

6.2 The Council has used different ways to engage with the public, by making documents available on website, in the Council's offices and public libraries and at the drop-in sessions held at different venues across the district. The Council also publicised the consultations extensively through the use of social media, press releases, poster displays and leaflet distributions. Consultation response forms for the Regulation 19 consultation were accepted by online survey, by email, post or hand delivered to the Council House, the Hub or during the drop-in sessions. The Planning Policy team also accepted comments during the Preferred Options (Reg 18) and Issues & Options consultations from various sources such as online survey, emails and letters.

7. Appendix

7.1 Appendix 1:

- Consultation Plan for the Issues and Options consultation (2015)
- Issues and Options consultation leaflet

7.2 Appendix 2:

- Issues and Options Consultation Responses (September 2015)

7.3 Appendix 3:

- Consultation Plan for the Preferred Options (Reg 18) consultation (2017)
- Letter sent to stakeholders (Reg 18)
- Statutory and Specific Consultees Notified (Reg 18)
- Preferred Options consultation leaflet (Reg 18)
- Consultation Poster (Reg 18)
- Consultation Response Form (Reg 18)

7.4 Appendix 4:

- Summary of Consultation Responses to the Local Plan Review Preferred Options (Reg 18) consultation (June 2017)

7.5 Appendix 5:

- Statement of Publication Consultation (Regulation 22 (c) (v) Statement) for the WFDC Pre-Submission Consultation (November/December 2018)

7.6 Appendix 6:

- Statement of Publication Consultation (Regulation 22 (c) (v) Statement) for the WFDC Pre-Submission Consultation (September/October 2019)