

## **Appendix C**

**Representations made to the  
Wyre Forest District Local Plan 2016-2036  
Pre Submission Publication Document (October 2018)  
in accordance with Regulation 20 (2) of The Town and Country  
Planning (Local Planning) (England) Regulations 2012**

**Consultation Period September / October 2019**

## APPENDIX C: TABLE OF CONTENTS

Appendix C details the summary of responses received to the Local Plan Pre-Submission Publication document (2018) Re-open consultation September 2019

<b>Part of Document</b>	<b>Page Number</b>
Whole Document	
Foreword and Appendices	7
Chapter 1 - Introduction and Context	8
Chapter 2 - Key Issues and Challenges	10
Chapter 3 - Vision for the Area in 2036	11
Chapter 4 - Core Policies Introduction	15
Chapter 5 - Overarching Sustainable Development Principles	16
Chapter 6 - A Sustainable Future - Development Strategy	19
Chapter 7 - Strategic Green Belt Review	21
Chapter 8 - A Desirable Place to Live	40
Chapter 9 - Health and Wellbeing	65
Chapter 10 - A Good Place to do Business	69
Chapter 11 - A Unique Place	73
Chapter 12 - Strategic Infrastructure	81
Chapter 13 - Transport and Accessibility	90
Chapter 14 - Strategic Green Infrastructure	101
Chapter 15 - Water Management	107
Chapter 16 - Pollution Minerals and Waste	111
Chapter 17 - Development Management Introduction	112
Chapter 18 - A Desirable Place to Live	113
Chapter 19 - Providing Accommodation for Gypsies, Travellers and Travelling Showpeople	114
Chapter 20 - Community Facilities	115
Chapter 21 - Employment Land	118
Chapter 22 - Town Centre Development and Retail	119
Chapter 23 - Sustainable Tourism	120
Chapter 24 - Telecommunications and Renewable Energy	121
Chapter 25 - Safeguarding the Green Belt	125
Chapter 26 - Safeguarding the Historic Environment	126
Chapter 27 - Quality Design and Local Distinctiveness	127
Chapter 28 - Rural Development	129
Chapter 29 - Site Allocations Introduction	130
Chapter 30 - Kidderminster Town	131
Chapter 31 - Lea Castle Village	164
Chapter 32 - Kidderminster Eastern Extension	174
Chapter 33 - Stourport-on-Severn	219
Chapter 34 - Bewdley	257
Chapter 35 - Previously Developed Sites in the Green Belt	263
Chapter 36 - Rural Wyre Forest	264
Chapter 37 - Monitoring and Implementation Framework	297

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO FOREWARD AND APPENDICES**

THERE WERE NO RESPONSES TO THIS SECTION

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO: WHOLE DOCUMENT**

Respondent	Response No.	Part of Document	Support /Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
Hagley Parish Council	<a href="#">RLPPS26</a>	Whole document	Object	No	No	No	Justified Effective Consistent with National Policy	<p>This objection supplements objections made on the previous consultation.</p> <p>Our objection and that of Bromsgrove District Council (which we saw and support) is that the Plan fails adequately to address its adverse impacts on Bromsgrove District and particularly our parish of Hagley. The burden of having a river of traffic flowing through Hagley along A456 is already intolerable. Congestion is already very severe at peak times. Alterations to the Hagley Island (junction with A491) have considerably improved congestion at that junction but congestion at the A456 junctions with B4187 and A450 remains bad. The Plan (as revised) does little to address that; and it must. If a car park with 500 spaces was full every day and was diverting Birmingham or Stourbridge bound passengers off A456 through Hagley, it might reduce the traffic volume by 2-3% at most. This is within what is regarded by planners and traffic engineers as de minimis when considering increases in traffic caused by development. Accordingly, the slight decrease is also de minimis.</p> <p>Furthermore we are puzzled and alarmed that no new traffic evidence, data or information has been provided in either the original Pre-Submission Local Plan or in your amendments to it. We would therefore reiterate our comments in our response to your original Plan “ Your own Transport Modelling Report shows that the A456 through Hagley will be operating above its capacity at both the morning and evening peaks in 2036, based on planned developments in Wyre Forest (although it is not clear whether this is based on your latest development proposals, or when the capacity will be reached; as you will note from our comments above we believe that it is already at or near capacity). However, you (or WCC) have provided no evidence based proposal on how to deal with this problem, with only a vague and uncostered reference to a bypass being required for Hagley. We therefore consider that the WFLP is unsound because we do not believe that it is either Justified, Effective or Consistent with National Policy.</p>	Please see our response on Transport issues to the original Pre Submission Local Plan. Our comments have not changed.	Yes	To amplify as necessary this objection and natural justice, ensuring that the Inspector hears both sides of the argument.
Doug Hine	<a href="#">RLPPS264</a>	Whole plan	Comment	Yes	Yes	Yes		I generally support this Pre-Submission Local Plan, but I find it deficient in a number of areas. It is also frustrating that haste is required for WFDC to get a Local Plan in place so that it does not fall foul of the “5 year land supply”		No	

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								<p>stipulation in the NPPF. As a result, the community is faced with a threat where delay to the Plan – even to clarify its imperfect aspects – could lead to worse outcomes for planned and sustainable development in the District.</p> <p>Ideally, town planning should put front and centre and address all interconnected aspects, including construction, housing, energy, transport, food, waste, water, health, the economy and natural habitats. Communities should be empowered, and local shops, social and community facilities, medical services, schools, streets, parks and open spaces, decent homes and public transport should be affordable and accessible to everyone now and for future generations.</p> <ol style="list-style-type: none"> <li>1. A preference for higher density and affordable housing in the 3 town centres, rather than building identikit “suburban sprawl” estates on Green Belt and green fields. Fringe estates will lead to more car journeys – in contradiction to targets to reduce carbon emissions – and social isolation.</li> <li>2. There has not been time for a new WFDC administration to develop a strategy to support community and social housing. Hopefully, as this progresses, the need to develop on the green field site allocations will be reduced.</li> <li>3. There is not sufficient detail as to how the Council will “mitigate Climate Change.”</li> <li>4. There should be greater support for lower energy and ecological sustainability standards in building. Examples in Europe include Passivhaus and the Swiss Minergie building standards.</li> <li>5. WFDC should progress more aggressively it’s Empty Homes Strategy (adopted in 2017), so that the demand for new homes is reduced.</li> <li>6. TRANSPORT – The Local Plan is weak on transport solutions for the district, especially considering the growth in population and business activity which is envisaged. The obvious solution of improved bus services is unfortunately out of council hands because of Government laws which ban local governments from operating or significantly subsidising public transport. Detail on walking and cycling is also inadequate. Blakedown station is getting a car park for 200+ cars</li> </ol>			

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								when a bus station and extension to the bus transport network would be preferable. The possibility of mainline trains running on the SVR line was mentioned, with stops at Silverwoods/Foley Park, the Safari Park and Bewdley. I am pleased by this proposal and hope that it can overcome any bureaucratic obstacles.			
Roger Coleman	<a href="#">RLPPS47</a>	BR/RO/2 Lem Hill Nursery	Object	No	No	No	Consistent with National Policy	<p>I believe that the late submission of Lem Hill Nursery replacing other local agreed sites when this site is outside the settlement area is not sound. The entrance to the site may suit a modest nursery but is positively dangerous for the number of houses envisaged; it is on a bank visibility is poor and right turns out of the site would be particularly hazardous. Whilst I pass regularly down this road my known local residents have done so all their lives and see this as a death trap. I also object to the use of the name Lem Hill Nurseries when it has been known as Bill White Nurseries for approx. 20 years.</p> <p>It seems this use of Lem Hill Nurseries is an attempt to confuse the public and given that the documentation has been completed by one of the joint owners of the property who is also a councillor and happens to be current chair of the districts Planning committee very disturbing. As a councillor she should be fully aware of the Nolan principles and her position in regard to this application and how a member of the public could view it and as many in fact have.</p>	I believe this site is unsuitable and the original sites should be reinstated. I am also aware that an almost 'secret' local consultation has been put together without informing ward councillors or Rock Parish Council its councillors or clerk and has without opportunity to fully discuss suddenly found a housing requirement of 50 units. This should be revisited openly and publicly to all Rock parish residents.	No	
Worcestershire Regulatory Services Mark Cox	<a href="#">RLPPS35</a>	Whole document	Comment					WRS have reviewed the Wyre Forest District Local Plan Review - Pre-Submission Publication Consultation and have no adverse comments to make.			
Taylor Wimpey West Midlands	<a href="#">RLPPS284</a>	Whole Plan	Comment					<p><b>RESPONSE TO PRE-SUBMISSION PUBLICATION LOCAL PLAN (INCLUDING AMENDMENTS)</b></p> <p>1. 3.1 Wyre Forest District Council is currently at an advanced stage of the Local Plan Review to establish an up to date policy framework to guide development in the District to 2036. The Council's decision to review the currently adopted Local Plan</p>		Yes	

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								<p>is fully supported by Taylor Wimpey to ensure:</p> <ul style="list-style-type: none"> <li>• The housing requirement is aligned to the most up to date information, including household and economic projections;</li> <li>• Planning policies and proposals are fully consistent with recent changes in legislation, the National Planning Policy Framework and the PPG;</li> <li>• The local plan is up to date, reflecting Government guidance that plans should be regularly reviewed and the evidence base renewed to respond to changing needs within the District.</li> </ul> <p>3.2 It is recognised that the emerging Local Plan, once adopted, will replace the existing Development Plan documents; specifically, the Core Strategy (December 2010), the Site Allocations and Policies Local Plan (July 2013) and the Kidderminster Central Area Action Plan (July 2013). The new Local Plan will cover the period 2016-2036 and will establish how much development is required and how these development requirements will be distributed across the District. Further comment in respect of the overall growth requirements and spatial distribution of this growth is set out within these representations.</p> <p>3.3 A plan period to at least 2036 is supported by Taylor Wimpey to provide a long- term development strategy covering at least 15 years from the date of adoption, providing certainty through a plan-led system. This satisfies national guidance set out at paragraph 22 of the NPPF that states <i>“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.”</i> A plan period of at least 15 years gives certainty to the development industry and other organisations concerned with the delivery of infrastructure as to how, where and when land will come forward and provides clarity to local residents and employers.</p>			

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Steve Colella	<a href="#">RLPPS229</a>	Whole Plan	Object	No	No	No	Justified Effective Consistent with National Policy	<p>My objection remains to be that that the plan fails to address its adverse impacts on adjoining local authorities and particularly Hagley, Stourbridge and Bromsgrove. Traffic volumes, congestion and poor air quality should be well documented and reported upon in the Transport impact assessments. However, such knowledge has been ignored as there are no robust investment plans that could be seen by a planning inspector as making the WFDC Development plan safe. Thus continuing to ignore these facts would surely render the plan as unsafe and ultimately destined to fail.</p> <p>The strategy around train and bus travel is flawed and severely underestimates the potential to remove more vehicles off the road network in favour of increasing train travel at the earliest point. This takes traffic off the roads at Worcester and Kidderminster thus improving congestion and travel times, air quality and basic human health and wellbeing.</p> <p>The only real investment option is the construction of link roads or by-passes to the M5 to create one or two extra junctions. The proposal in the original plan to create a Hagley by-pass on the A450 is ill thought out as main traffic streams are through the A456 and A491. This demonstrates a total lack of awareness of the facts. The by-pass should be before Blakedown as it suffers the same congestion issues as Hagley and Stourbridge.</p> <p>There seems little support from WFDC and WCC in respect of engaging with detailed and justified planning documents to BDC. BDC is Hagley's parent authority and as such must</p>	<p>The sites at Kidderminster East and Lea Castle are unsustainable, particularly when considering traffic impact assessments and likely costs of mitigating by-passes or link roads. Without a costed, consulted and alternative option appraisals development of these sites must be seen as being unsustainable and therefore unsafe. Alternative development sites across Wyre Forest are required in order to provide a safe and robust ranked list of sited that meet the NPPF Guidance. Ranked Green Belt developable sites using GB value test would suggest that sites elsewhere way from congested routes would ultimately be more sustainable.</p> <p>The transport infrastructure is heavy under pressure and is</p>	Yes	To amplify as necessary this objection and natural justice, ensuring that the Inspector hears both side of the argument.

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								<p>be given access to strategic plans.</p> <p>Given the impact of development on neighbouring communities the lack of direct consultation must be seen as a measure of whether the plan is future proofed, meeting basic planning protocol, is safe and meets the NPPF in the eyes of the Planning inspectorate.</p>	<p>currently unsustainable even before the start of any future development. Train travel is under supported on the routes that serve Worcestershire into Birmingham and the Black Country. Kidderminster should be made into the main park and ride in the county with free parking encouraging commuter and leisure too. To continue with pay to park on station car parks is a negative strategy on increasing train travel and reducing use of the motor vehicle.</p>		

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019**  
**RESPONSES TO CHAPTER 1: INTRODUCTION AND CONTEXT**

Respondent	Response No.	Part of Document	Support /Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
Worcestershire County Council, Planning Economy & Performance  Emily Barker	<a href="#">RLPPS80</a>	1.19 Evidence Base- IDP	Comment					<p>Our December 2018 response also raised concerns over the viability of the plan. Following revisions to the Infrastructure Delivery Plan and a subsequent plan viability assessment, it is clear that this remains an issue, and we wish to reiterate our comments on this matter.</p> <p>It is clear that the viability of the plan is constrained, which is not a reflection of the plan itself, but of the economic geography of the district. This places a very high burden on infrastructure providers such as WCC to either look for alternative sources of funding, which may or may not be available, or to fund through their own resources.</p> <p>WCC does not have the resources to directly fund the infrastructure needs it has identified directly, and although funding may be available for transport, through either LEP or other government funding for example, the funding pots for new schools or to expand schools arising from local plan growth are very limited.</p> <p>We will continue to work with WFDC to address these matters but caution that we may not be able to support individual planning applications if alternative funding sources are not available to support infrastructure delivery.</p> <p>We regret, however, that other recommendations we made to ensure the plan is sound have not yet been addressed. As such, we wish to stress that - with the exception of the section titled 'Sustainable Transport', and subject to ongoing DtC discussions between WCC and WFDC officers - the comments submitted by WCC and dated 17th December 2018 remain extant and should be taken into account.</p>			
Natural England	<a href="#">RLPPS266</a>	Policy 30 Kidderminster Town	Support	Yes	Yes	Yes		Natural England notes and supports the deletion of the former settling ponds at Wilden Lane (reference PH/1) from the list of allocated sites for Kidderminster (Table 30) and the policies map. This land adjoins Wilden Marsh and Meadows Site of Special Scientific Interest (SSSI). The deletion of FPH/1 is consistent with the following NPPF		No	

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RESPONSES TO CHAPTER 1: INTRODUCTION AND CONTEXT**

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								<p>paragraphs:</p> <p>170 (Sub section 'a' 'protecting and enhancing.... sites of biodiversity value' and 'd' minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures' ) ,</p> <p>171 (Excerpt – 'Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework...').</p> <p>NPPF Para 170 regarding the establishment of coherent and resilient ecological networks is supported through the Nature Recovery Network approach set out in the Government's Emerging 25-year Environment Plan.</p>			

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RESPONSES TO CHAPTER 2: KEY ISSUES AND CHALLENGES**

Respondent	Response No.	Part of Document	Support/ Comment/ Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
Phillip Oliver	<a href="#">RLPPS48</a>	2.0.1	Comment	Yes	No	Yes	Effective	<p>There is nothing in this section on mitigating climate change i.e. reducing carbon emissions and other GHGs. In the light of the Governments recent commitment to the UK being carbon neutral by 2050 mitigation should be a key objective in the new Local Plan. There is also no reference to the districts council decision recent to declare a climate emergency although no target date was set for achieving carbon neutrality.</p> <p>In the chapter of the 2018 NPPF which covers climate change and what the planning system should achieve “ It should help : to shape places in ways that contribute to radical reductions in greenhouse gas emissions”.</p> <p>There needs to be a section on how the council will ensure that all new developments are carbon neutral. Following the release of the latest NPPF the UK Green Building Council has recently clarified with the government the powers that local authorities have over energy efficiency standards. In particular local authorities are no longer restricted in their ability to require energy efficiency standards above building regulations.</p>	The district council should adopt a policy whereby the projected increase in carbon emissions of any new development should be a material consideration in granting planning permission.	No	

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 3: VISION FOR THE AREA IN 2036**

Respondent	Response No.	Part of Document	Support/ Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
Horton Estates Ltd	<a href="#">RLPPS88</a>	Table 3.0.1	Object	Yes	No	Yes	Consistent with National Policy	<p>Hortons' Estate Ltd ("Hortons") supports the wording in bullet point 8 which refers to the existing and significant industrial estates within the rural area where sustainable growth will be supported. However, Hortons requests that an additional bullet point be added to refer to the effective reuse of previously- developed land throughout the District, in accordance with paras. 84, 117, 138 and 145 of the Framework. This will ensure consistency with national policy and provide an overarching vision to support the fifth objective under Table 3.0.2 ("Aims and Objectives").</p> <p>Supports wording in bullet point 8 of table 3.0.1 but an additional point should be added to refer to the effective reuse of previously-developed land throughout the District. This will ensure consistency with national policy and provide an overarching vision to support the fifth objective under Table 3.0.2 ("Aims and Objectives").</p> <p>Hortons' Estate Ltd is the owner of Cursley Distribution Park which is proposed for allocation in the Local Plan under Policy 35. This is a substantial previously-developed site in the Green Belt and Hortons therefore wishes to participate in the Examination Hearings.</p>	<p>An additional bullet point should be included within the Vision:</p> <p><i>"Suitable opportunities for the use of Previously-developed land will have been prioritised to meet development needs"</i></p>	Yes	
Horton Estates Ltd	<a href="#">RLPPS85</a>	Table 3.0.2	Object	Yes	No	Yes	Justified	<p>Hortons' Estate Ltd ("Hortons") supports Objective 5 relating to maximising the reuse of previously- developed land (PDL) both within and beyond the main towns. Significant areas of PDL exist beyond the main towns, including industrial estates such as Hortons' Cursley Distribution Park, and it is important that sustainable redevelopment and growth of these sites is supported even where they lie within the Green Belt (in accordance with paras. 84, 117, 138 and 145</p>	<p>It is requested that the following text be added to the end of Objective 6:</p> <p><i>"In addition to these limited Green Belt releases, the partial/complete redevelopment or infilling of previously-developed sites in the Green Belt will be supported to ensure the</i></p>	Yes	

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RESPONSES TO CHAPTER 3: VISION FOR THE AREA IN 2036**

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								<p>of the Framework).</p> <p>Notwithstanding the above, Hortons considers that Objective 6 should be expanded to cross-reference the Local Plan's identification of specific PDL sites in the Green Belt under Policy 35 where infilling or partial/complete redevelopment will be permitted.</p> <p>Objective 6 in table 3.0.3 should be expanded to cross-reference the Local Plan's identification of specific PDL sites in the Green Belt under Policy 35 where infilling or partial/complete redevelopment will be permitted.</p> <p>Hortons' Estate Ltd is the owner of Cursley Distribution Park which is proposed for allocation in the Local Plan under Policy 35. This is a substantial previously-developed site in the Green Belt and Hortons therefore wishes to participate in the Examination Hearings.</p>	<i>effective use of land"</i>		

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RESPONSES TO CHAPTER 3: VISION FOR THE AREA IN 2036**

Respondent	Response No.	Part of Document	Support/ Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
Taylor Wimpey West Midlands	<a href="#">RLPPS282</a>	Table 3.0.2 Development Plan Aims and Objectives	Support					<p><b>Vision, Aims and Objectives</b></p> <p>3.4 The Vision set out in Table 3.0.1 is broadly supported. The Vision rightly seeks to ensure the District’s housing market provides a choice of accommodation responding to local needs and that housing delivery is balanced with jobs creation within the District. To achieve this Vision it will be necessary to provide the right number of new homes to attract and retain economically active residents within the District to support the economic growth ambitions.</p> <p>3.5 The Vision recognises the role of Kidderminster within the District as a focus for retail and commercial leisure opportunities, supporting a vibrant visitor economy and evening economy. In addition, the Vision highlights brownfield opportunities that are available and seeks to remedy current infrastructure issues, including traffic congestion in the town centre. Whilst it is recognised that brownfield opportunities exist within Kidderminster, these opportunities are finite and following successful regeneration of many of these sites in the past 10 to 20 years, the role that these sites can play in viably delivering development requirements has significantly diminished.</p> <p>3.6 The Vision envisages that new development is properly supported by the timely provision of suitable infrastructure. Taylor Wimpey recognises that the delivery of new infrastructure will be necessary to support new development to mitigate for needs arising from new residents and the opportunities that may exist for assisting in delivering strategic infrastructure projects that have a far wider benefit to businesses and residents within the District and could assist in addressing a number of the</p>		Yes	<p>Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan.</p> <p>Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern extension in the overall spatial strategy contained therein.</p>

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RESPONSES TO CHAPTER 3: VISION FOR THE AREA IN 2036**

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								<p>highlighted issues.</p> <p>3.7 It is noted that the Pre-Submission Publication document updates this Vision to include reference to the Kidderminster Eastern Extension as a well-designed residential development offering a choice of quality new homes set within an extensive new area of green space. Taylor Wimpey endorses this reference as the Kidderminster Eastern Extension represents a strategic element of the spatial strategy for the District to 2036.</p> <p>The Plan's Aim and Objectives are also supported by Taylor Wimpey. The Plan Objectives of: addressing housing need; supporting economic growth; identifying Green Belt release through a strategic review; and improving connectivity within the District to achieve more sustainable travel patterns are key components of delivering the Plan aim of ensuring <i>"Wyre Forest will be a District where people want to live and work and fulfil their potential without the excessive need for travel."</i></p>			

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 4: CORE POLICIES INTRODUCTION**

THERE WERE NO RESPONSES TO THIS SECTION

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 5: OVERARCHING SUSTAINABLE DEVELOPMENT PRINCIPLES**

Respondent	Response No.	Part of Document	Support/ Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
Phillip Oliver	<a href="#">RLPPS50</a>	5A	Comment	Yes	No	Yes	Effective	<p>The purpose of the planning system is to contribute to the achievement of sustainable development. The 2012 version of the NPPF defines the objective of sustainable development as “meeting<sup>the</sup> needs of the present without compromising the ability of future generations to meet their own needs”<sup>1</sup> This a key consideration for climate change because any development that would increase carbon emissions or other GHGs would contribute to compromising the ability of future generations to meet their needs.</p> <p>1. Resolution 42/187 of the United Nations General Assembly.</p>		No	
Taylor Wimpey West Midlands	<a href="#">RLPPS185</a>		Comment					<p>To avoid any confusion, this representation provides a comprehensive response and therefore is intended to <u>replace</u> that previously submitted in December 2018.</p> <p>This representation relates to land off Comberton Road, Kidderminster (see Site Location Plan at <b>Appendix 1</b>) which is within the control of Taylor Wimpey.</p> <p>Land off Comberton Road forms a significant element of the proposed East of Kidderminster Urban Extension, which Policy 32 (Kidderminster Eastern.</p> <p><b>Policy 5A Sustainable Development</b></p> <p>3.9 Policy 5A broadly reflects national guidance and is broadly consistent with the presumption of sustainable development that is at the heart of the National Planning Policy Framework.</p> <p>3.10 Paragraph B should be updated to</p>	<p>3.10 Paragraph B should be updated to reiterate that planning applications that accord with the policies contained within the Development Plan will not only be approved (subject to material considerations), but be approved ‘without delay,’ to ensure consistency with paragraph 11 of the NPPF.</p> <p>3.11 Whilst the policy sets out the Council’s approach to implementing the presumption in favour of sustainable development through the determination of planning applications, it is essential that the policies and proposals set out with the Local Plan as a whole, positively seek opportunities to meet the development needs of Wyre Forest, including the appropriate housing needs and provide necessary flexibility to adapt to rapid change. Further views on this aspect are considered</p>	Yes	<p>Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan.</p> <p>Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.</p>

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 5: OVERARCHING SUSTAINABLE DEVELOPMENT PRINCIPLES**

Respondent	Response No.	Part of Document	Support/ Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
								<p>reiterate that planning applications that accord with the policies contained within the Development Plan will not only be approved (subject to material considerations), but be approved 'without delay,' to ensure consistency with paragraph 11 of the NPPF.</p> <p>3.11 Whilst the policy sets out the Council's approach to implementing the presumption in favour of sustainable development through the determination of planning applications, it is essential that the policies and proposals set out with the Local Plan as a whole, positively seek opportunities to meet the development needs of Wyre Forest, including the appropriate housing needs and provide necessary flexibility to adapt to rapid change. Further views on this aspect are considered further within these representations.</p>	further within these representations.		
Phillip Oliver	<a href="#">RLPPS49</a>	5.5	Comment	Yes	No	Yes	Effective	<p>Section 8 of the revised 2018 NPPF is about the 3 overarching objectives of sustainable development which are interdependent are Economic, Social and Environmental. In this pre-submission Local Plan the 3 overarching objectives are re-titled as "roles" but I assume that the level of importance is the same. In the description of the Environmental Objective, in the NPPF, it is "mitigating and adapting to climate change including moving to a low carbon economy".</p> <p>This is a significant objective and planning officers should give it strong weight when considering applications especially with developments which increase carbon/GHG emissions, and would be a net loss, not a net gain to the Environmental objective.</p>		No	

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Phillip Oliver	<a href="#">RLPPS51</a>	5.5 a.iii	Comment	Yes	No	Yes	Effective	Access to everyday facilities is already poor. The low quality bus service makes it difficult for those without access to a car to get to town centres, General Practitioners, council offices etc. Getting to Worcestershire Royal Hospital by public transport is particularly difficult since it involves having to change services at least once.		No	
Phillip Oliver	<a href="#">RLPPS52</a>	5.7	Comment	Yes	Yes	Yes	Effective	Promoting local food production will become increasingly important as climate change adversely impacts agricultural production in countries we import from. Cropping methods and rotations should be designed to reduce Green House Gas emissions including Permaculture and low till methods.		No	

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RESPONSES TO CHAPTER 6: A SUSTAINABLE FUTURE – DEVELOPMENT STRATEGY**

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Richborough Estates  Ian Deverell	<a href="#">RLPPS232</a>	Policy 6A Development Needs	Comment					<p>Policy 6A of the Pre-Submission plan seeks to deliver 5,520 dwellings over the plan period 2016 - 2036, equating to a requirement of 276 dwellings per annum (dpa). This extends the plan period by additional two years beyond that proposed by the Preferred Options paper published for consultation in June 2017. Subject to the plan being adopted in a timely manner, this ensures the plan period lasts for a minimum of fifteen years post adoption, as required by paragraph 22 of the revised National Planning Policy Framework (NPPF2).</p> <p>It appears from the Pre-Submission Plan and the supporting Housing Needs Study (October 2018), the proposed housing requirement is based on the 2016 household projections. The government is currently consulting on revisions to the standard method, which will be published in 2019.</p> <p>The Council should make sure its proposed housing requirement is based on the most up to date evidence at the point of submission, to ensure it is positively prepared and meets the district's minimum housing needs, and accords with national planning policy. We reserve the right to comment on this further at the examination, once the final position has been confirmed at the point when the plan is submitted for examination.</p> <p>It is positive that along with existing commitments and completions, the Pre-Submission plan proposes to allocate sites sufficient to provide a 15% buffer in the supply. This will allow flexibility for non-implementation and ensure the Council is able to maintain a five year housing land supply and that the plan is effective.</p> <p>The Council should make sure its proposed housing requirement is based on the most up to date evidence at the point of submission, to ensure it is positively prepared and meets the district's minimum housing needs, and accords with national planning policy. We reserve the right to comment on this further at the examination, once the final position has been confirmed at the point when the</p>			

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								plan is submitted for examination.			
Richborough Estates  Ian Deverell	<a href="#">RLPPS231</a>	Policy 6B Locating New Development	Comment					<p>Together with Policy 7A (which we comment on below), the overall spatial strategy proposed by Policy</p> <p>6B is sound. It is the most appropriate strategy and accords with national planning policy. This includes releasing Green Belt land around the district's most sustainable settlements.</p> <p>Housing and employment growth will be directed to the most sustainable locations within the district, principally the main town of Kidderminster, where there is a significant range of services and facilities, and is served by a regular train service to Birmingham and Worcester. Indeed NPPF2 paragraph 103 is clear that plan making should actively manage patterns of growth and focus development to locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.</p> <p>In accordance with this strategy the Pre-Submission plan proposes land to the north west of Habberley Road (site allocation ref: WA/KF/3) as an allocation for residential development. As we demonstrate in response to Policy 30 below, the site represents a sustainable opportunity for residential growth on the edge of Wyre Forest's main town.</p>			

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 7: STRATEGIC GREEN BELT REVIEW**

Respondent	Response No.	Part of Document	Support/ Comment/ Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
Maria Davies	<a href="#">RLPPS32</a>	Policy 7A Strategic Green Belt Review	Object	No				<p>I feel that the focus on Green Belt Land does not comply with already government guidelines to preserve agricultural land which has been seen relevant to climate change and the way we need to grow within our own areas to prevent carbon footprint globally. I have previously explained my deep concerns at the loss of such prime land to provide not only food for the future, but for the benefit for pharmaceuticals or sustainable alternatives to plastic fibres. These are all uses for future generations that will best benefit our town and economy in the long run.</p> <p>Any future builds upon these vital lands will bring more flooding more pollution and social problems. All jobs within the town do reflect the need for expansion of new homes. Once again there any many homes within the town that lay unoccupied, with many existing buildings that could be converted for use to overlook properties, existing buildings already empty is far from right. The regeneration of the town centrally should be examined first and foremost.</p> <p>Opposed to Green Belt release as it does not comply with government guidelines to preserve agricultural land, which is relevant to both climate change and the need to produce food in our own areas. It will also bring more flooding. Many existing buildings in Kidderminster town could be converted for houses instead.</p>	It is difficult to outline one particular plan/modification as many who have viewed these plans. Those at least who know about the plans to which there are still many who don't and how they will affect them in the future. It has been difficult to absorb which are dwellings to that of retail or industrial. I like many are solely focused on the areas of Green Belt for obvious reasons, primarily as flood defence, carbon capture areas, nature and well being overall. It is more vital than housing in these areas to preserve all manner of life that is proven at greatest risk in our nearest of future.	No	It would be pointless to speak at the examination as research continually shows how vital it is to retain Green Belt. This is always a question of obtaining more funds off the back of what is part of our lungs for clean air the focus will always be for these desirable locations. But is must be viewed by those who have put forward to Government level how important these areas are toward our long term future and those to follow.
Taylor Wimpey West Midlands	<a href="#">RLPPS268</a>	.Policy 7A	Comment					<p>To avoid any confusion, this representation provides a comprehensive response and therefore is intended to <u>replace</u> that previously submitted in December 2018.</p> <p>This representation relates to land off Comberton Road, Kidderminster (see Site Location Plan at <b>Appendix 1</b>) which is within the control of Taylor Wimpey.</p> <p>Land off Comberton Road forms a significant element of the proposed East of Kidderminster Urban Extension, which Policy 32 (Kidderminster Eastern.</p> <p><b>Policy 7A Strategic Green Belt Review</b></p> <p>3.43 The Council recognises the need to release land from the Green Belt in order to meet the identified</p>		Yes	<p>Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan.</p> <p>Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern extension in the overall spatial strategy contained</p>

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								<p>housing needs and other development requirements across the Plan period. It is noted that the strategic allocation on the eastern edge of Kidderminster urban area is identified as an area to be removed from the Green Belt. This is supported by Taylor Wimpey as 'sound.'</p> <p>3.44 A Strategic Review of the Green Belt (September 2016) prepared by Amec Foster Wheeler forms part of the Local Plan Review evidence base. The Green Belt Review assesses a number of parcels of land against the five purposes of the Green Belt as set out within the NPPF.</p> <p>3.45 Sites are identified as either making a 'significant contribution', a 'contribution' or a 'limited contribution' to the Green Belt purposes.</p> <p>3.46 The exceptional circumstances for releasing land from the Green Belt of increased housing demand coupled with a reduced level of brownfield land opportunities and a tightly drawn Green Belt boundary restricting the ability to deliver sustainable growth are endorsed by Taylor Wimpey.</p> <p>3.47 The NPPF, at paragraph 138, is clear that when reviewing Green Belt boundaries, local planning authorities should take account of the need to promote sustainable patterns of development. Kidderminster is the most sustainable location for growth within the District and the town is completely enveloped by Green Belt. Whilst brownfield sites may represent development opportunities within the existing urban area, this source of supply is diminishing or becoming increasingly difficult to bring forward for development due to identified barriers, therefore Green Belt release is necessary to support the sustainable growth of the town and to ensure identified issues and objectives are met within the plan period.</p> <p>3.48 Further consideration of the role of the Green Belt to the east of Kidderminster is set out in chapter 4 to these representations.</p>			therein.

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								<p><b>LAND AT COMBERTON ROAD, KIDDERMINSTER</b></p> <p>4.1 Taylor Wimpey is currently in control of the land to the north of Comberton Road and to the south of the Birmingham to Worcester railway line, and a further area of land to the south of Comberton Road, as shown on the Site Location Plan appended to this representation (<b>Appendix 1</b>).</p> <p>4.2 Sites OC/6 and OC/13N form the majority of the proposed East of Kidderminster Urban Extension. Land to the south of Comberton Road represents an omission site previously identified as an Option 'A' site within the Preferred Options document.</p> <p>4.3 Land to the north of Comberton Road has been promoted as an infrastructure led residential development incorporating significant green infrastructure provision, land for a primary school and land for other community facilities that may be required.</p> <p>4.4 Whilst an area of land to the south of Comberton Road is promoted for development, this is promoted as a latter phase that could be delivered beyond the proposed plan period (safeguarded land).</p> <p>4.5 A Development Vision document has been prepared to introduce an initial concept master plan for the delivery of the site. This document attached at <b>Appendix 2</b>, pulls together a wide range of technical information collected to date that has been utilised in shaping the initial proposal and provides an indication of how the site could be delivered and will function as an eastern extension to the town of Kidderminster.</p> <p>4.6 Taylor Wimpey is committed to delivering on the following objectives for land north of Comberton Road:</p> <ul style="list-style-type: none"> <li>• Delivery of quality new homes;</li> <li>• Delivery of a choice of housing;</li> <li>• Provision of a quality design;</li> <li>• Maintenance and enhancement of connectivity and accessibility;</li> <li>• Provision of public open space;</li> <li>• Provision of community facilities;</li> </ul>			

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								<ul style="list-style-type: none"> <li>Maintenance and enhancement of site characteristics;</li> <li>Creation of an attractive and safe community; and</li> <li>Achievement of sustainable and safe development.</li> </ul> <p>4.7 These objectives underpin a Development Framework for the site that identifies the following key features for land to the north of Comberton Road:</p> <ul style="list-style-type: none"> <li>Approximately 1,400 dwellings;</li> <li>Delivery of a new 20mph spine road, providing a new vehicular link between Birmingham Road (A456), via Husum Way, and Comberton Road/Stone Hill (A448);</li> <li>Provision of new pedestrian/cycle links between the site and Tennyson Way and Borrington Road to provide permeability and integration with the existing urban edge of Kidderminster;</li> <li>Provision of land for the delivery of a number of community uses, including the provision of a new Primary School, a community facility to accommodate a meeting room, potentially café and potentially a GP surgery;</li> <li>Significant provision of Green Infrastructure to include a landscape mitigation strategy that has been developed in line with the Kidderminster East GI Concept Statement;</li> <li>Provision of SuDS through the delivery of new attenuation features; and</li> <li>A new enduring Green Belt boundary to the east of Kidderminster.</li> </ul> <p>4.8 Further consideration of the site is set out below having regard to the Council's evidence base and the technical information prepared on behalf of Taylor Wimpey to date. This analysis concludes that sites OC/6 and OC/13N, which are within the control of Taylor Wimpey, are both suitable and deliverable. This provides confidence that the proposed East of Kidderminster Urban Extension is 'soundly' based.</p>			
Cookley & Caunsell	<a href="#">RLPPS208</a>	Policy 7A Strategic	Object	No	No	No		Not consistent with National Policy - Policy 31 - WFDC have treated all the villages and hamlets within the	Green Belt boundaries should be only altered where	Yes	

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Neighbourhood Plan		Green Belt Review						<p>Parish differently. Wolverley has been termed washed-over Green Belt and development with only small sites being considered within the Local Plan – even brownfield sites are not listed. Caunsall is washed-over Green Belt but two sites in the Green Belt have been listed for potential development. Cookley is regarded as surrounded by Green Belt but an extremely large development will be allowed in present Green Belt. There are no such distinctions for Green Belt in National Policy.</p> <p>As the Cookley and Caunsall Neighbourhood Plan Committee we consider that we are partners in any development within our parish. We have a lot of knowledge of the planning process now and have unique local knowledge. As proposed development within Cookley Parish is the largest in scale of any proposed by the Local Plan, we wish to be part of the examination of the plan.</p>	<p>exceptional circumstances are fully evidenced and justified. WFDC have not shown exceptional circumstances and need to demonstrate this with independent overview to ensure compliance to NPPF (paragraph 136).</p> <p>National Green Belt policy must be adhered to, it is not acceptable for Wyre Forest Council to alter Green Belt boundaries without exceptional need. All the North Worcestershire villages should have the same Green Belt criteria applied to them: Cookley, Caunsall and Wolverley.</p> <p>WFR/WC/12 Lawnswood House should remain within the Green Belt. The Cookley ADR – Land off Kimberley Avenue should remain an ADR. WFR/WC/32/33/34 should remain as Green Belt to protect rural nature of Cookley and for the 600 house already agreed for the Lea Castle hospital site.</p>		
Richborough Estates Ian Deverell	<a href="#">RLPPS233</a>	Policy 7A Strategic Green Belt Review	Comment					<p>As required by NPPF2, the Council has demonstrated exceptional circumstances for reviewing its Green Belt boundaries. The Council's own brownfield register (December 2017) identifies capacity for 2,598 dwellings only on brownfield land. This predominantly comprises the Lea Castle Hospital site, which is a proposed allocation in the Pre-Submission Plan. This is not sufficient to meet the Council's housing needs alone.</p> <p>Over 50% of Wyre Forest is located within the West Midlands Metropolitan Green Belt. It completely surrounds the district's most sustainable town, Kidderminster, and covers at least half the area around</p>			

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								<p>the district's second and third largest settlements (Stourport-on-Severn and Bewdley respectively). The Green Belt has not been reviewed for the district's long term needs since the Local Plan adopted in 1996, over 22 years ago.</p> <p>Densities are maximised on all proposed allocations.</p> <p>Exceptional circumstances have been established for reviewing Wyre Forest's Green Belt boundaries to ensure they are capable of enduring beyond the plan period, as required by NPPF2 paragraph 99. Indeed Green Belt release is necessary to ensure the plan is positively prepared and the district's housing needs are met in full, as well as ensuring the overall spatial strategy is effective and deliverable across the plan period.</p>			
Persimmon Homes Limited	<a href="#">RLPPS94</a>	Policy 7A Strategic Green Belt Review	Object		No		Justified Effective	<p>RPS has previously submitted representations on behalf of Persimmon Homes South Midlands on Green Belt Review matters (under Policy 7A) in response to the Pre-Submission Plan issued in 2018. RPS notes that the Council has not published any updated evidence on Green Belt matters since the previous round of consultation. Consequently, RPS wishes to maintain the objections submitted at that time.</p> <p><u>Green Belt Compensation</u></p> <p>In July 2019 MHCLG issued brief, albeit important, guidance dealing with a number of Green Belt matters<sup>1</sup>, providing greater detail linked to the over-arching national policy on compensatory improvements in paragraph 138 of the NPPF 2019, and accounting for <i>openness</i>. It is noted that the consultation version provided by the Council is dated July 2019 which will have been around the time the new guidance was published. This is perhaps unfortunate timing and whilst it is reasonable that the Council could not have anticipated this, the Plan will still need to ensure consistency with this guidance and be modified, where necessary.</p> <p>The PPG requires that policies are needed in the Plan to deal with compensatory improvements to the</p>	<p>Based on the foregoing analysis, RPS suggests that the policy be modified to take into account the suggested modifications submitted on the Pre-Submission Plan in Dec 2018, as well as in response to the additional comments set out above, in relation to the test of soundness (justified and effective). In addition, the Green Belt policies need to be revised having appropriate regard to the new PPG advice on Green Belt matters, in particular compensatory improvements, so that the policy meets the test of soundness (consistent with national policy). RPS</p> <p>Suggest that additional clarification can be added to Policy 7A on this, through appropriate modifications to the policy wording.</p>	Yes	In order to properly represent the interests of the client.

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								<p>environmental quality and accessibility of the remaining Green Belt, once it has been demonstrated that it is necessary to release Green Belt for development (the 'exceptional circumstances' test) once the relevant sites have been identified. Furthermore, for those sites identified for release from the Green Belt, consideration will be needed in terms of the specific land considered suitable for compensatory improvement in association with the land being released, as well as the scope of works and the mechanisms by which such compensatory improvements are to be secured.</p> <p>In terms of responding to the matter of compensatory improvements, RPS consider that the policies on Green Belt, as drafted, do not reflect the recently published PPG advice in relation to those sites that have been selected for release from the Green Belt in Wyre Forest. To assist the Council in this regard, supporting evidence has been prepared in relation to site WA/BE/3, which is attached to these representations for reference as <b>Appendix 1</b> (also submitted at the previous consultation stage). Through the promotion of this site as part of the Local Plan, the development of this site would involve the transfer of an adjacent parcel of land (currently in private ownership) into public ownership. The extent of the land is illustrated on the Accessibility Plan on page 24 of the attached document defines as 'Proposed Green Space'. Consequently, this demonstrates that appropriate compensation improvements are possible in this location and are also achievable and deliverable in the plan period, and this should be recognised through appropriate amendments to the Plan.</p> <p>To ensure consistency with this point in relation to other sites proposed for removal from the Green Belt, consideration should be given to this issue, to ensure that the Plan is consistent with national policy in this regard.</p> <p><u>Green Belt Openness</u></p> <p>The guidance also offered clarity on how 'openness' should be accounted for in the assessment of Green Belt. Although the need to consider openness is not something new, (featuring within NPPF paragraph 133),</p>			

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								<p>the updated guidance provides further clarification relevant for Plan making.</p> <p>The updated PPG asks Plan makers to consider openness in both visual and spatial terms, whilst also considering the duration of development proposals and implications of transport movements. In relation to the first point, this is captured to a large extent, through the first three purposes of the Green Belt (NPPF 134, a-c). As part of the Council's assessment, this is ascribed to NPPF134 (a), relating to the prevention of sprawl, and NPPF134(c) in the context of urbanising influences. In relation to NPPF134(a) the criterion considers in terms of a strong/moderate/weak contribution, on the basis of ' <i>what extent is the parcel free from development and have a sense of openness</i>' (2018</p> <p>Green Belt Review, Table 2.3). RPS considers that this objective is conflating the issue of openness with previously developed land, considered separately through the NPPF within paragraph 134(e). With the benefit of the updated PPG in relation to openness, there are strong grounds for the Council to revisit their assumptions in relation to openness, and in particular the treatment on NPPF134(a).</p> <p>These factors have informed the Council's approach towards the assessment of Green Belt parcels, including those proposed to be removed from the Green Belt, in order to meet the District's future growth needs.</p> <p><u>Land at Kidderminster Road</u></p> <p>In addition to representations submitted on behalf of Persimmon Homes at the previous consultation stage in December 2018, RPS wishes to submit further representations in respect of the Council's approach to Green Belt in Wyre Forest, in particular the assessment of 'land off Kidderminster Road, Bewdley' (ref. WA/BE/3, located in GB Parcel SW2). This builds on the response made to the earlier Reg 19 consultation, and draws upon the updated guidance available. The site has been included within the Council's proposed list of sites to be removed from the Green Belt, for allocation as residential development. Whilst RPS maintains the</p>			

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								<p>support for this allocation, there are concerns with the way the Council has approached the evidence base, and in particular, the appraisal of the Green Belt at this location.</p> <p>In relation to this site, RPS suggests that on a fair and proportionate application of the evidence presented in the Council's Green Belt Review (updated May 2018) the assessment of 'significant contribution' to the purpose of Green Belt has not been robustly derived. This is for number of reasons. Firstly, in terms of the five Green Belt purposes, the Council has scored the site as making a 'significant contribution' against two purposes, as 'contributing' to two more purposes, and making a 'limited contribution' against one purpose. On this basis alone, RPS considers that the site has not been appraised correctly, and suggest a more reasoned would be that the site, in overall terms, merely makes a 'contribution' towards the purpose of Green Belt when considered on the basis of the Council's evidence.</p> <p>Furthermore, RPS also disagrees with the Council's suggestion that the site makes a 'significant contribution' 'in terms of the separation it provides between Bewdley and Kidderminster. To the contrary, it is clear that the orientation of the site (running along a narrow strip of land to the rear boundaries of existing properties immediately adjacent) means the site does not impinge on the substantial gap between the two settlements, and in any case stops at the boundary with the A456. This is a clear physical boundary which creates a firm demarcation between what is part of Bewdley's built development edge and the wider countryside. Although the evidence here notes that the A456 would act as a long-term edge, the Council's assessment has not, in RPS' view, taken this into account on its overall judgement of impact.</p> <p>Consequently, RPS suggests that the site would not result in any development that would materially reduce this gap by any great extent. The Council's conclusion is further questioned on the basis that the assessment of 'significant contribution' applied to the site against the purpose ('to prevent neighbouring towns from merging into one another') as set out in the Green Belt Review –</p>			

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								<p>Strategic Analysis (September 2016) (Appendix B6 p4 refers), does not seem credible as the assessment specifically draws in adjacent parcels as a basis for the analysis (referring specifically to parcels NW1 and SW1). This means that the assessment does not apply at the site-specific level, but in fact relates to a larger area of land not considered in the analysis at this point. This is also evident based on the conclusions set out in the May 2018 Update, which essentially repeats the earlier conclusions of the GBR September 2016 report. In this regard, a separate assessment of the site carried out by Pegasus concludes that the potential conflict of the proposed development of site WA/BE/3 with aspects of Green Belt policy will be limited to the site level and in the wider landscape context the proposed development will not conflict with the purpose or function of the Green Belt.</p> <p>In the context of the recent PPG updates, the matter of openness is linked to the consideration of landscape and visual matters through the acknowledged relevance of 'visual impacts'. Consequently, the previous representations [to the regulation 19 process], including the preliminary landscape and visual assessment (PLVA), remain relevant in regard to their conclusions which find that, taking a landscape led approach, proposed development on the site would have a limited impact on the wider landscape and limited conflict with Green Belt policy. The findings of the PLVA demonstrate that, in landscape terms physical impacts are limited to the site with perception of change restricted to the immediate locality and that the site is contained by a strong framework of existing built form, green infrastructure and the highways network. These aspects are key contributors to the limited level of visual impact, as relevant to the PPG. Furthermore, in discussing Green Belt, the PPG makes reference to potential 'compensatory improvements to the environmental quality and accessibility of the remaining Green Belt land'. The landscape led approach to the proposed development (as appraised in the PLVA), along with the release of additional land to the west from private to public use, will deliver landscape and visual enhancements, contribute to the green infrastructure network (via tree and woodland planting) and enhance</p>			

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Respondent	Response No.	Part of Document	Support/ Comment/ Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
								<p>recreational access through new walking and cycle routes and open space; each of these are relevant and positive matters in respect of the PPG and Green Belt.</p> <p>Based on the foregoing analysis, RPS does not consider the assessment of the site (WA/BE/3) has been undertaken in fair and reasonable manner, and therefore is not credible (and therefore is not justified). Consequently, a reconsideration of the GB assessment would be helpful in order to address the concerns set out above and would assist in providing the necessary policy basis for the proposed allocation of the site. A reassessment of this site would allow the Council to take the above factors into account, and would also enable consideration of the supplemental land parcel proposed to be gifted by Persimmon to a relevant body, to ensure the long-term use of the land for public amenity, in accordance with the updated PPG on suitable compensation measures.</p> <p>I feel that the focus on Green Belt Land does not comply with already government guidelines to preserve agricultural land which has been seen relevant to climate change and the way we need to grow within our own areas to prevent carbon footprint globally. I have previously explained my deep concerns at the loss of such prime land to provide not only food for the future, but for the benefit for pharmaceuticals or sustainable alternatives to plastic fibres. These are all uses for future generations that will best benefit our town and economy in the long run.</p> <p>Any future builds upon these vital lands will bring more flooding more pollution and social problems. All jobs within the town do reflect the need for expansion of new homes. Once again there any many homes within the town that lay unoccupied, with many existing buildings that could be converted for use to overlook properties, existing buildings already empty is far from right. The regeneration of the town centrally should be examined first and foremost.</p> <p>Based on the foregoing analysis, RPS does not consider the assessment of the site (WA/BE/3) has been undertaken in fair and reasonable manner, and</p>			

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								therefore is not credible (and therefore is not justified). Consequently, a reconsideration of the Green Belt assessment would be helpful in order to address the concerns set out above and would assist in providing the necessary policy basis for the proposed allocation of the site. A reassessment of this site would allow the Council to take the above factors into account, and would also enable consideration of the supplemental land parcel proposed to be gifted by Persimmon to a relevant body, to ensure the long-term use of the land for public amenity, in accordance with the updated PPG on suitable compensation measures.			
Gillian Hill	<a href="#">RLPPS27</a>	25	Object	Yes	No	No	Effective Consistent with National Policy	<p>The Green Belt should be retained as much as is humanly possible for a variety of reasons, all very well known by reasonable people as regards the effect the loss of wildlife will have on pollination etc of food crops. Furthermore the Green Belt provides said crops. Lea Castle Hospital site has fields, now under threat, used to provide wheat, potatoes etc for the local populace and beyond. Furthermore this will be compounded if and when the quarry, directly opposite is allowed to happen, decimating the Green Belt, wildlife and Cookley even more. Cookley feels under threat by Worc Council having both of these developments over shadowing them. It also appears that the 1400 houses planned for Lea Castle is much greater than any other development throughout the county. Why is this? Is it because it is the furthest point from Worcester?</p> <p>Please protect Cookley, our small corner of this green and pleasant land.</p>	Return to the original plan of 600 houses only, not 1400. Use all of the empty public houses and retail outlets to provide flats, houses and apartments. Use Lea Castle as a retirement village so freeing up many residential properties, some of which will be 'affordable' for those who need homes.	No	
Owl Homes	<a href="#">RLPPS216</a>	Policy 7A	Support	Yes	Yes	Yes		<p>Owl Homes is working with the landowners of land off Habberley Road, Bewdley to support proposals for residential development. The site is a proposed allocation in the emerging Local Plan to which these representations relate. Owl Homes supports the Council in proactively seeking growth in its area and in preparing a new Local Plan to enable this.</p> <p>Owl Homes supports the principle of Policy 7A which takes a positive approach to undertaking a Strategic Green Belt Review in accordance with the Districts settlement hierarchy and releasing Green Belt to support the vitality and viability of settlements where</p>		Yes	To endorse the Council's approach to undertaking a Green Belt review, particularly around the most sustainable settlements in the District.

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								<p>growth has been limited by the Green Belt. Further Owl Homes supports the acknowledgement that Bewdley is a location where development can be met sustainably and economically.</p> <p>The Policy is positively prepared, justified, effective and consistent with National policy which promotes sustainable development and the release of Green Belt where exceptional circumstances are demonstrated through the preparation of a Local Plan (NPPF Paras 11, 136 and 137). Further the NPPF (Para 138) promotes sustainable patterns of development when drawing up or reviewing Green Belt boundaries.</p> <p>Owl Homes supports the recognition of the sustainability of Bewdley which has a wide range of facilities and is a suitable location for sustainable growth such as at Land off Habberley Road which is a proposed allocation (Policy 34.4) in the emerging Plan. Owl Homes have an agreement in place with the landowner which ensures that the site is deliverable within the Plan Period.</p>			
Adrian Voysey	<a href="#">RLPPS2</a>	7.4	Object	Yes	No		Justified Effective	I think the development of Wilden Top is in breach of section 7.8. Adding additional houses on the Green Belt is not justified.			
Adrian Voysey	<a href="#">RLPPS1</a>	7.4	Object	Yes	No	Yes	Justified Effective	The site off Wilden Top that hosts the former Golf course should remain as open land. This area would benefit residents better if it was developed for recreational activities.		No	
Cookley and Caunsell Neighbourhood Plan	<a href="#">RLPPS207</a>	Paragraph 7.7 Green Belt Review	Object	No	No	No		<p>Not consistent with National Policy - Policy 7.7 &amp; NPPF (paragraph 136) Green Belt boundaries should be only altered where exceptional circumstances are fully evidenced and justified. WFDC have not done shown justification. Even the Wyre Forest Five Year Housing Land Supply Calculation 2019 lists a requirement of 1302 dwellings by 2024, from a point where there is national housing shortage. The calculation of housing need, which the 2018 Local Plan Document was based upon, is part of a now discredited Office for National Statistics calculation, which grossly over estimated need and has now been down-graded.</p> <p>As the Cookley and Caunsall Neighbourhood Plan Committee we consider that we are partners in any</p>	<p>Green Belt boundaries should be only altered where exceptional circumstances are fully evidenced and justified. WFDC have not shown exceptional circumstances and need to demonstrate this with independent overview to ensure compliance to NPPF (paragraph 136).</p> <p>National Green Belt policy must be adhered to, it is not acceptable for Wyre Forest Council to alter Green Belt</p>	Yes	

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								development within our parish. We have a lot of knowledge of the planning process now and have unique local knowledge. As proposed development within Cookley Parish is the largest in scale of any proposed by the Local Plan, we wish to be part of the examination of the plan.	boundaries without exceptional need. All the North Worcestershire villages should have the same Green Belt criteria applied to them: Cookley, Caunsall and Wolverley.  WFR/WC/12 Lawnswood House should remain within the Green Belt. The Cookley ADR – Land off Kimberley Avenue should remain an ADR. WFR/WC/32/33/34 should remain as Green Belt to protect rural nature of Cookley and for the 600 house already agreed for the Lea Castle hospital site.		
Cookley and Caunsall Neighbourhd Plan	<a href="#">RLPPS206</a>	Policy 7B Reserved Housing Sites in the Green Belt	Object	No	No	No		<p>WFR/WC/12</p> <p>The draft of Cookley and Caunsall Neighbourhood Plan has already earmarked this site for a sustainable, community- led, attainable housing site. There are very few suitable sites within the settlement boundary of Cookley. Our concern is that by annexing this land into the boundary that it will be open to commercial developers, who will be interested in housing that maximises their profit margins and not in meeting the needs as identified in the housing needs survey for our parish. Being such a small site commercial developers will not need to provide affordable or social housing.</p> <p>WFR/WC/12 Lawnswood and Land off Kimberley Avenue ADR. We do not want these sites to be housing reserved sites but the status to remain as it is. We do not accept WFDC having them as preferred housing over those as identified in the Cookley and Caunsall Neighbourhood Plan.</p> <p>As the Cookley and Caunsall Neighbourhood Plan Committee we consider that we are partners in any development within our parish. We have a lot of knowledge of the planning process now and have unique local knowledge. As proposed development within</p>	<p>Green Belt boundaries should be only altered where exceptional circumstances are fully evidenced and justified. WFDC have not shown exceptional circumstances and need to demonstrate this with independent overview to ensure compliance to NPPF (paragraph 136).</p> <p>National Green Belt policy must be adhered to, it is not acceptable for Wyre Forest Council to alter Green Belt boundaries without exceptional need. All the North Worcestershire villages should have the same Green Belt criteria applied to them: Cookley, Caunsall and Wolverley.</p> <p>WFR/WC/12 Lawnswood House should remain within the Green Belt. The Cookley ADR – Land</p>	Yes	

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								Cookley Parish is the largest in scale of any proposed by the Local Plan, we wish to be part of the examination of the plan.	off Kimberley Avenue should remain an ADR. WFR/WC/32/33/34 should remain as Green Belt to protect rural nature of Cookley and for the 600 house already agreed for the Lea Castle hospital site.		
Taylor Wimpey West Midlands	<a href="#">RLPPS267</a>	.Policy 7B	Object				Justified Effective Consistent with National Policy	<p>To avoid any confusion, this representation provides a comprehensive response and therefore is intended to <u>replace</u> that previously submitted in December 2018.</p> <p>This representation relates to land off Comberton Road, Kidderminster (see Site Location Plan at <b>Appendix 1</b>) which is within the control of Taylor Wimpey.</p> <p>Land off Comberton Road forms a significant element of the proposed East of Kidderminster Urban Extension, which Policy 32 (Kidderminster Eastern).</p> <p><b>Policy 7B Reserved Housing Sites in the Green Belt</b></p> <p>3.49 Taylor Wimpey does not support the approach set out in respect of Areas of Development Restraint within the District.</p> <p>3.50 The NPPF states that it is crucial for Local Plans to “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 to infrastructure.” Therefore, it is necessary for the Local Plan to consider future development needs within the District beyond the proposed Plan period (2036).</p> <p>3.51 Whilst there is currently no fixed guidance on the length of time beyond the proposed Plan period an LPA consider for through the plan making process, the NPPF at paragraph 139 states that ‘safeguarded land’ should be identified, where necessary, in order to meet longer term development needs <b>stretching well beyond the plan period</b>. It also states that plans should “be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period.”</p>		Yes	<p>Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan.</p> <p>Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern extension in the overall spatial strategy contained therein.</p>

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								<p>3.52 Policy 7B identifies a very limited number of safeguarded sites that would only yield less than 150 homes in total. This equates to approximately half a year of supply for the District. Four of the five sites are safeguarded sites identified in the current Local Plan.</p> <p>3.53 In determining the appropriate quantum of safeguarded land to identify within Wyre Forest District it is necessary to consider the local context, including: the opportunities for meeting longer term development needs outside of the Green Belt beyond the plan period; and, the likely level of future housing and employment that will be required to meet the needs of the District beyond the plan period including cross boundary pressures.</p> <p>354 In terms of future development sites available or likely to become available within Wyre Forest, it needs to be recognised that over two thirds of the District currently lies within the West Midlands Green Belt. The most sustainable settlement in the District, Kidderminster, which is the focus for development within the current plan period, is completely enveloped by Green Belt. Within Kidderminster there are no or very few opportunities that exist to meet longer term development needs outside of the West Midlands Green Belt, other than the limited brownfield opportunities that may arise.</p> <p>3.55 In the longer-term Kidderminster will need to retain a key role in providing new homes to meet the objectively assessed housing needs of the District, including identified needs for affordable homes. With the existing Green Belt drawn tightly around the existing settlement boundary, it is necessary to release land from the Green Belt in the longer term to ensure future needs can be met and the vitality of services and facilities can be maximised in the longer term.</p> <p>3.56 Whilst the Pre-Submission Local Plan proposes to roll forward a degree of safeguarded land, this level and location of provision is ineffective in ensuring long term development needs can be met and Green Belt boundaries will endure in the long term.</p>			

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								<p>3.57 To ensure Kidderminster continues to play an important role in meeting longer term housing needs and to ensure an enduring Green Belt boundary beyond the plan period, safeguarded land should be identified around Kidderminster within this Local Plan. Land to the south of Comberton Road within the control of Taylor Wimpey would represent a logical location for development beyond the plan period and should be safeguarded accordingly.</p> <p><b>LAND AT COMBERTON ROAD, KIDDERMINSTER</b></p> <p>4.1 Taylor Wimpey is currently in control of the land to the north of Comberton Road and to the south of the Birmingham to Worcester railway line, and a further area of land to the south of Comberton Road, as shown on the Site Location Plan appended to this representation (<b>Appendix 1</b>).</p> <p>4.2 Sites OC/6 and OC/13N form the majority of the proposed East of Kidderminster Urban Extension. Land to the south of Comberton Road represents an omission site previously identified as an Option 'A' site within the Preferred Options document.</p> <p>4.3 Land to the north of Comberton Road has been promoted as an infrastructure led residential development incorporating significant green infrastructure provision, land for a primary school and land for other community facilities that may be required.</p> <p>4.4 Whilst an area of land to the south of Comberton Road is promoted for development, this is promoted as a latter phase that could be delivered beyond the proposed plan period (safeguarded land).</p> <p>4.5 A Development Vision document has been prepared to introduce an initial concept master plan for the delivery of the site. This document attached at <b>Appendix 2</b>, pulls together a wide range of technical information collected to date that has been utilised in shaping the initial proposal and provides an indication of how the site could be delivered and will function as an eastern extension to the town of Kidderminster.</p>			

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								<p>4.6 Taylor Wimpey is committed to delivering on the following objectives for land north of Comberton Road:</p> <ul style="list-style-type: none"> <li>• Delivery of quality new homes;</li> <li>• Delivery of a choice of housing;</li> <li>• Provision of a quality design;</li> <li>• Maintenance and enhancement of connectivity and accessibility;</li> <li>• Provision of public open space;</li> <li>• Provision of community facilities;</li> <li>• Maintenance and enhancement of site characteristics;</li> <li>• Creation of an attractive and safe community; and</li> <li>• Achievement of sustainable and safe development.</li> </ul> <p>4.7 These objectives underpin a Development Framework for the site that identifies the following key features for land to the north of Comberton Road:</p> <ul style="list-style-type: none"> <li>• Approximately 1,400 dwellings;</li> <li>• Delivery of a new 20mph spine road, providing a new vehicular link between Birmingham Road (A456), via Husum Way, and Comberton Road/Stone Hill (A448);</li> <li>• Provision of new pedestrian/cycle links between the site and Tennyson Way and Borrington Road to provide permeability and integration with the existing urban edge of Kidderminster;</li> <li>• Provision of land for the delivery of a number of community uses, including the provision of a new Primary School, a community facility to accommodate a meeting room, potentially café and potentially a GP surgery;</li> <li>• Significant provision of Green Infrastructure to include a landscape mitigation strategy that has been developed in line with the Kidderminster East GI Concept Statement;</li> <li>• Provision of SuDS through the delivery of new attenuation features; and</li> <li>• A new enduring Green Belt boundary to the east of Kidderminster.</li> </ul> <p>4.8 Further consideration of the site is set out below</p>			

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								having regard to the Council's evidence base and the technical information prepared on behalf of Taylor Wimpey to date. This analysis concludes that sites OC/6 and OC/13N, which are within the control of Taylor Wimpey, are both suitable and deliverable. This provides confidence that the proposed East of Kidderminster Urban Extension is 'soundly' based.			

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 8: A DESIRABLE PLACE TO LIVE**

Respondent	Response No.	Part of Document	Support /Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
Owl Homes	<a href="#">RLPPS218</a>	Policy 8A	Support	Yes	Yes	Yes		<p>Owl Homes is working with the landowners of land off Habberley Road, Bewdley to support proposals for residential development. The site is a proposed allocation in the emerging Local Plan to which these representations relate. Owl Homes supports the Council in proactively seeking growth in its area and in preparing a new Local Plan to enable this.</p> <p>Policy 8A sets out that a minimum housing requirement of 276 new homes a year across the Plan Period. Table 8.0.1 outlines an indicative mix for the delivery of new dwellings within the Plan Period however confirms that the actual mix will be influenced by both the market and housing needs specific to the site.</p> <p>Owl Homes support the flexibility of the approach to assessing the mix required in housing developments acknowledging their changing market and site specific constraints will be an influencing factor. The Policy has therefore been positively prepared and is justified in that it will respond to changing and specific needs which will ensure the Policy is effective. The Policy is consistent with National Policy in particular NPPF Para 61.</p> <p>Owl Homes has control over land at Habberley Road which is a proposed allocation for residential development. The flexibility allowed by this Policy assists the delivery of the site and development which meets the market demands of the area.</p>		Yes	To support the Council's approach to housing mix, acknowledging the role that the changing market and site specific conclusions will have on this.
Taylor Wimpey West Midlands	<a href="#">RLPPS269</a>	Policy 8A	Comment					<p>To avoid any confusion, this representation provides a comprehensive response and therefore is intended to <u>replace</u> that previously submitted in December 2018.</p> <p>This representation relates to land off Comberton Road, Kidderminster (see Site Location Plan at <b>Appendix 1</b>) which is within the control of Taylor Wimpey.</p> <p>Land off Comberton Road forms a significant element of the proposed East of Kidderminster Urban Extension, which Policy 32 (Kidderminster Eastern.</p> <p><b>Policy 8A Housing Density &amp; Mix</b></p>		Yes	<p>Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan.</p> <p>Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern</p>

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								<p>3.58 The policy sets out a suggested dwelling size and market/ affordable mix using proportions. This is considered to be overly prescriptive given that in different locations there may be an excessive amount of a particular dwelling size and, therefore, any new proposal should not be constrained from delivering an appropriate mix to achieve a better balance overall. However, it is noted that the policy has been updated since the Preferred Option to recognise that Table 8.0.1 provides an 'indicative view' on likely overall dwelling size required and that the actual mix achieved will be influenced by the market. This is supported by Taylor Wimpey.</p> <p>3.59 In terms of the average density requirement, this is consistent with the requirements of the NPPF (an average of 35 dwellings per hectare), and it is noted that modifications to the policy have been provided since the Preferred Options document to provide an element of flexibility to allow for new development to reflect local character, which may be at a lower/ higher density depending on the location of the proposal. This is supported by Taylor Wimpey as 'sound.'</p> <p><b>LAND AT COMBERTON ROAD, KIDDERMINSTER</b></p> <p>4.1 Taylor Wimpey is currently in control of the land to the north of Comberton Road and to the south of the Birmingham to Worcester railway line, and a further area of land to the south of Comberton Road, as shown on the Site Location Plan appended to this representation (<b>Appendix 1</b>).</p> <p>4.2 Sites OC/6 and OC/13N form the majority of the proposed East of Kidderminster Urban Extension. Land to the south of Comberton Road represents an omission site previously identified as an Option 'A' site within the Preferred Options document.</p> <p>4.3 Land to the north of Comberton Road has been promoted as an infrastructure led residential development incorporating significant green infrastructure provision, land for a primary school and</p>			extension in the overall spatial strategy contained therein.

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								<p>land for other community facilities that may be required.</p> <p>4.4 Whilst an area of land to the south of Comberton Road is promoted for development, this is promoted as a latter phase that could be delivered beyond the proposed plan period (safeguarded land).</p> <p>4.5 A Development Vision document has been prepared to introduce an initial concept master plan for the delivery of the site. This document attached at <b>Appendix 2</b>, pulls together a wide range of technical information collected to date that has been utilised in shaping the initial proposal and provides an indication of how the site could be delivered and will function as an eastern extension to the town of Kidderminster.</p> <p>4.6 Taylor Wimpey is committed to delivering on the following objectives for land north of Comberton Road:</p> <ul style="list-style-type: none"> <li>• Delivery of quality new homes;</li> <li>• Delivery of a choice of housing;</li> <li>• Provision of a quality design;</li> <li>• Maintenance and enhancement of connectivity and accessibility;</li> <li>• Provision of public open space;</li> <li>• Provision of community facilities;</li> <li>• Maintenance and enhancement of site characteristics;</li> <li>• Creation of an attractive and safe community; and</li> <li>• Achievement of sustainable and safe development.</li> </ul> <p>4.7 These objectives underpin a Development Framework for the site that identifies the following key features for land to the north of Comberton Road:</p> <ul style="list-style-type: none"> <li>• Approximately 1,400 dwellings;</li> <li>• Delivery of a new 20mph spine road, providing a new vehicular link between Birmingham Road (A456), via Husum Way, and Comberton Road/Stone Hill (A448);</li> <li>• Provision of new pedestrian/cycle links between the site and Tennyson Way and Borrington Road</li> </ul>			

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								<p>to provide permeability and integration with the existing urban edge of Kidderminster;</p> <ul style="list-style-type: none"> <li>• Provision of land for the delivery of a number of community uses, including the provision of a new Primary School, a community facility to accommodate a meeting room, potentially café and potentially a GP surgery;</li> <li>• Significant provision of Green Infrastructure to include a landscape mitigation strategy that has been developed in line with the Kidderminster East GI Concept Statement;</li> <li>• Provision of SuDS through the delivery of new attenuation features; and</li> <li>• A new enduring Green Belt boundary to the east of Kidderminster.</li> </ul> <p>4.8 Further consideration of the site is set out below having regard to the Council's evidence base and the technical information prepared on behalf of Taylor Wimpey to date. This analysis concludes that sites OC/6 and OC/13N, which are within the control of Taylor Wimpey, are both suitable and deliverable. This provides confidence that the proposed East of Kidderminster Urban Extension is 'soundly' based.</p>			
Richborough Estates Ian Deverell	<a href="#">RLPPS234</a>	Policy 8A Housing Density and Mix	Comment					The flexibility the policy provides is welcomed, in particular the acknowledgement that the " <i>...actual mix of housing will be influenced by both the market and housing needs specific to the site</i> " and different density standards could be supported where necessary to respond to the surrounding context. This flexibility will ensure the plan is able to adapt to rapid change, as required by NPPF2 paragraph 11, and ultimately effective in meeting the district's housing needs.			
Taylor Wimpey West Midlands	<a href="#">RLPPS270</a>	.Policy 8B	Comment					<p>To avoid any confusion, this representation provides a comprehensive response and therefore is intended to <u>replace</u> that previously submitted in December 2018.</p> <p>This representation relates to land off Comberton Road, Kidderminster (see Site Location Plan at <b>Appendix 1</b>) which is within the control of Taylor Wimpey.</p> <p>Land off Comberton Road forms a significant element of the proposed East of Kidderminster Urban</p>		Yes	<p>Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan.</p> <p>Taylor Wimpey also</p>

Local Plan Review Pre-Submission Consultation (September / October 2019)

Summary of Consultation Responses (Regulation 20(2) of the Town and Country Planning (Local Planning) (England) Regulations 2012)

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RESPONSES TO CHAPTER 8: A DESIRABLE PLACE TO LIVE**

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								<p>Extension, which Policy 32 (Kidderminster Eastern.</p> <p><b>Policy 8B Affordable Housing Provision</b></p> <p>3.60 Policy 8B requires sites of 10 or more dwellings to deliver a minimum affordable housing provision of 25%. A reduction in the affordable housing requirement from the previously proposed 30% is supported by viability evidence set out in Viability Report dated October 2018 by HDH Consultants and the updated Pre-Submission Viability Note prepared by HDH Consultants. However, in light of the latest Viability Note this would support a further reduction in the affordable housing requirement within the Lea Castle Village and the Kidderminster Eastern Extension due to the increasing strategic infrastructure burden.</p> <p>3.61 It is noted that Policy 31.1 accepts that the provision of affordable housing is likely to be lower in the central part of the Lea Castle site <i>“owing to significant demolition and infrastructure costs.”</i> In light of the latest IDP and viability evidence, it is contended by Taylor Wimpey that this recognition should also be afforded to the Kidderminster Eastern Extension.</p> <p>3.62 In relation to tenure split, Policy 8B identifies an indicative tenure split of 65% rented (including social rent) and 35% intermediate tenure will be sought. This does not appear to be aligned to the Council’s own evidence base contained within the Wyre Forest Housing Needs Study 2018. This document, at page 54, instead identifies data to support a 60% rented/ 40% intermediate tenure split.</p> <p>3.63 To ensure the Policy is consistent with the Council’s own evidence base, the indicative tenure split should be amended to provide an indicative 60% rented (including social rent) and 40% intermediate (including sub-market private rent and shared ownership) tenure split.</p> <p>3.64 The reference to the tenure split being ‘indicative’ is supported. It is recognised that there are a number of different affordable housing models that are being</p>			considers it necessary to participate due to the significance of the Kidderminster Eastern extension in the overall spatial strategy contained therein.

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 8: A DESIRABLE PLACE TO LIVE**

Respondent	Response No.	Part of Document	Support /Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
								<p>brought to the market and accordingly the local planning authority should not be too prescriptive setting out targets. In addition, it is advised that this policy requirement remains flexible to allow for site specific circumstances, such as viability and/ or tenure profile of location, whereby it may be appropriate to offer a different proportional split.</p> <p>3.65 With regard to build to rent schemes, the policy requires security of tenure through tenancy agreements of 3 years or more. This may not be appropriate for all build to rent proposals and there should be some flexibility in the application of this requirement.</p> <p><b>LAND AT COMBERTON ROAD, KIDDERMINSTER</b></p> <p>4.1 Taylor Wimpey is currently in control of the land to the north of Comberton Road and to the south of the Birmingham to Worcester railway line, and a further area of land to the south of Comberton Road, as shown on the Site Location Plan appended to this representation (<b>Appendix 1</b>).</p> <p>4.2 Sites OC/6 and OC/13N form the majority of the proposed East of Kidderminster Urban Extension. Land to the south of Comberton Road represents an omission site previously identified as an Option 'A' site within the Preferred Options document.</p> <p>4.3 Land to the north of Comberton Road has been promoted as an infrastructure led residential development incorporating significant green infrastructure provision, land for a primary school and land for other community facilities that may be required.</p> <p>4.4 Whilst an area of land to the south of Comberton Road is promoted for development, this is promoted as a latter phase that could be delivered beyond the proposed plan period (safeguarded land).</p> <p>4.5 A Development Vision document has been prepared to introduce an initial concept master plan for the delivery of the site. This document attached at <b>Appendix 2</b>, pulls together a wide range of technical</p>			

Local Plan Review Pre-Submission Consultation (September / October 2019)

Summary of Consultation Responses (Regulation 20(2) of the Town and Country Planning (Local Planning) (England) Regulations 2012)

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 8: A DESIRABLE PLACE TO LIVE**

Respondent	Response No.	Part of Document	Support /Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
								<p>information collected to date that has been utilised in shaping the initial proposal and provides an indication of how the site could be delivered and will function as an eastern extension to the town of Kidderminster.</p> <p>4.6 Taylor Wimpey is committed to delivering on the following objectives for land north of Comberton Road:</p> <ul style="list-style-type: none"> <li>• Delivery of quality new homes;</li> <li>• Delivery of a choice of housing;</li> <li>• Provision of a quality design;</li> <li>• Maintenance and enhancement of connectivity and accessibility;</li> <li>• Provision of public open space;</li> <li>• Provision of community facilities;</li> <li>• Maintenance and enhancement of site characteristics;</li> <li>• Creation of an attractive and safe community; and</li> <li>• Achievement of sustainable and safe development.</li> </ul> <p>4.7 These objectives underpin a Development Framework for the site that identifies the following key features for land to the north of Comberton Road:</p> <ul style="list-style-type: none"> <li>• Approximately 1,400 dwellings;</li> <li>• Delivery of a new 20mph spine road, providing a new vehicular link between Birmingham Road (A456), via Husum Way, and Comberton Road/Stone Hill (A448);</li> <li>• Provision of new pedestrian/cycle links between the site and Tennyson Way and Borrington Road to provide permeability and integration with the existing urban edge of Kidderminster;</li> <li>• Provision of land for the delivery of a number of community uses, including the provision of a new Primary School, a community facility to accommodate a meeting room, potentially café and potentially a GP surgery;</li> <li>• Significant provision of Green Infrastructure to include a landscape mitigation strategy that has been developed in line with the Kidderminster East GI Concept Statement;</li> </ul>			

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 8: A DESIRABLE PLACE TO LIVE**

Respondent	Response No.	Part of Document	Support /Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
								<ul style="list-style-type: none"> <li>Provision of SuDS through the delivery of new attenuation features; and</li> <li>A new enduring Green Belt boundary to the east of Kidderminster.</li> </ul> <p>4.8 Further consideration of the site is set out below having regard to the Council's evidence base and the technical information prepared on behalf of Taylor Wimpey to date. This analysis concludes that sites OC/6 and OC/13N, which are within the control of Taylor Wimpey, are both suitable and deliverable. This provides confidence that the proposed East of Kidderminster Urban Extension is 'soundly' based.</p>			
Richborough Estates	<a href="#">RLPPS235</a>	Policy 8B Affordable Housing Provision	Comment					<p>It is critical that the plan allocates sufficient viable residential sites to ensure the plan meets the district's affordable housing needs. Whilst we support the minimum provision of 25% affordable housing on sites, there is concern the tenure split will not accord with NPPF2 paragraph 64, which requires at least 10% to be available for affordable home ownership on major development housing schemes (ten dwellings or more).</p> <p>Policy 8B of the Pre-Submission plan proposes a tenure split of 65% rented (including social rent) and 35% intermediate tenure (including sub-market private rent and shared ownership). At any scale of development, (be it 100 dwellings or 5,000), this tenure split would result in an affordable home ownership level of 8.75%.<sup>1</sup> This would not be consistent with NPPF2 paragraph 64. The tenure split should therefore be reconsidered to provide 40% intermediate and 60% rented accommodation (as a minimum) to ensure that the policy is sound and consistent with national policy.</p>	The tenure split should therefore be reconsidered to provide 40% intermediate and 60% rented accommodation (as a minimum) to ensure that the policy is sound and consistent with national policy.		
Owl Homes	<a href="#">RLPPS219</a>	Policy 8B	Comment	Yes	Yes	Yes		<p>Owl Homes is working with the landowners of land off Habberley Road, Bewdley to support proposals for residential development. The site is a proposed allocation in the emerging Local Plan to which these representations relate. Owl Homes supports the Council in proactively seeking growth in its area and in preparing a new Local Plan to enable this.</p> <p>Policy 8B sets out a 25% affordable housing requirement on sites in excess of 10 dwellings or 0.5 ha. The NPPF</p>	<p>Para 2:-</p> <p>Affordable housing provision of a minimum of 25% on major application sites i.e. more than 10 dwellings or on sites within identified rural areas comprising more</p>	Yes	To ensure that the Policy is consistent with National Policy.

Local Plan Review Pre-Submission Consultation (September / October 2019)

Summary of Consultation Responses (Regulation 20(2) of the Town and Country Planning (Local Planning) (England) Regulations 2012

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 8: A DESIRABLE PLACE TO LIVE**

Respondent	Response No.	Part of Document	Support /Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
								<p>(Para 63) states that “provision of affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas (where policies may set out a lower threshold of 5 units or fewer)”. It is considered that Policy 8B is not entirely consistent with National Policy in requiring affordable housing on all sites 0.5ha and over.</p> <p>The Policy at present seeks this contribution on all applicable sites however, there should be some flexibility where achieving 25% affordable housing is demonstrated to be unviable, consistent with National Policy (NPPF Para 57).</p> <p>The Policy also sets out that the contribution will be sought where it is considered that a site has been split/is linked to another site that has received consent with no/lower contribution accepted and is followed by an application on as to avoid contributions, however it is unclear how this would be evidenced and is not entirely justified.</p> <p>In relation to Vacant Building Credit, the Policy requires 2-3 years of appropriate marketing to have been undertaken and evidence of no interest submitted to support an application. This period of time is considered to be overly onerous where 1 year would be more appropriate and achievable. This approach is also not consistent with National Policy which supports the reuse of brownfield land and the reduction of affordable housing requirements in such instances. Further the NPPG (Para 028 Ref. 23b-028-20190315) advises that Vacant Building Credit applies where the building has not been abandoned and suggests that when having regard to the intention of national policy they may consider:</p> <ul style="list-style-type: none"> <li>• Whether the building has been made vacant for the sole purposes of redevelopment.</li> <li>• Whether the building is covered by an extant or recently expired planning permission for the same or substantially the same development.</li> </ul> <p>Owl Homes support the flexibility allowed in the Policy for contributions on sites that are affordable led</p>	<p>than 5 dwellings will generally be required. Where proposals do not meet this requirement, a Viability Assessment should be submitted to the Council. Cont...</p> <p>Bullet no.3: The building has not been made vacant for the sole purpose of redevelopment.</p>		

Local Plan Review Pre-Submission Consultation (September / October 2019)

Summary of Consultation Responses (Regulation 20(2) of the Town and Country Planning (Local Planning) (England) Regulations 2012

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 8: A DESIRABLE PLACE TO LIVE**

Respondent	Response No.	Part of Document	Support /Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
								schemes.			
Wyre Forest Community Land Trust Limited Tim Mason	<a href="#">RLPPS59</a>	Policy 8C	Comment	Yes				The need to ensure that local housing development within Wyre Forest is not entirely dominated by the small handful of large housing developers is vital to ensure a stronger dynamic mix of innovative housing solutions for local people.	A reference to Community Led Housing initiatives would help better align the plan with emerging national policy, consider adding Residential and <u>Community Led Housing</u> schemes that take account of local housing needs on windfall sites will be positively considered within the rural areas.	No	
Wyre Forest Community Land Trust Limited Tim Mason	<a href="#">RLPPS63</a>	8.21 Policy 8D - Self Build and Custom	Comment					Policy 8D mis-references the districts Self Build and Custom Register in the third paragraph as Custom and Self Build register  Overall provision will be reviewed on an annual basis as part of the residential land availability assessment and will be based on the demand as set out in the Custom and Self Build <u>and Custom</u> Register maintained by the Council.			
Owl Homes	<a href="#">RLPPS220</a>	Policy 8D	Object	Yes	Yes	Yes		Owl Homes is working with the landowners of land off Habberley Road, Bewdley to support proposals for residential development. The site is a proposed allocation in the emerging Local Plan to which these representations relate. Owl Homes supports the Council in proactively seeking growth in its area and in preparing a new Local Plan to enable this.  The Policy does not distinguish between allocated and non-allocated development sites. It should be clarified that allocated sites will not be required to provide serviced plots, unless allocated as such. The Policy as presently drafted would hold up the delivery of allocated sites and therefore has the potential to impact on the Council's housing land supply.  The proposed threshold is considered to be too low and	The Policy should clarify that allocated sites will not be required to provide serviced plots, unless allocated as such and it is suggested that the time period to establish whether plots can be built out due to lack of take up should be reduced to 6 months.	Yes	Due to concerns regarding the drafting of the policy.

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 8: A DESIRABLE PLACE TO LIVE**

Respondent	Response No.	Part of Document	Support /Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
								<p>should be amended to proposals comprising of 50 or more dwellings.</p> <p>Further, the Policy does not allow self-build/custom-build sites to be developed unless they have not been taken up within 12 months. 12 months is too long and would likely cause delays to delivering the site, especially on smaller sites as drafted in the Policy. It is suggested that 6 months would be more appropriate. This will prevent plots laying undeveloped for long periods of time whilst offering sufficient time for those seeking self-build/ custom build housing to express an interest. This is a positive approach which will assist the Council in being able to meet its housing need in a sustainable method.</p> <p>The Policy should be revisited and should state that the requirements do not apply to allocated sites which have not been allocated for self-build/ custom-build development. Owl Homes objects to the low threshold proposed and the requirement to wait 12 months before being able to develop self-build/ custom-build plots that have not been taken up.</p>			
Wyre Forest Community Land Trust Limited  Tim Mason	<a href="#">RLPPS62</a>	8.21 Policy 8D - Self build and Custom Housing	Comment					Modifications to Local Plan submitted.	Many authorities have recognised that innovative solutions to local housing issues are essential to help fully meet the local needs. Increasingly many forward thinking Authorities have recognised the role of Community Led Housing in all its various guises as a significant aid to community solutions towards housing issues / difficulties. Developing and incorporating CLH into Spatial development policies helps	NO	

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 8: A DESIRABLE PLACE TO LIVE**

Respondent	Response No.	Part of Document	Support /Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
									<p>Authorities and local communities in achieving the desired outcomes.</p> <ul style="list-style-type: none"> <li>• CLH falls within the statutory definition of Self and Custom Build housing. (see NPPF glossary) and legal definition for purpose of applying Self-build and Custom House Building Act 2015, is contained in Section 1(A1) and (A2) of that Act.</li> <li>• Using Self and Custom Build definition to support CLH development – Housing Act 2016 requires LPAs to make land available to meet demand on their self-build registers</li> <li>• Independent community collaboration (group acquire site and split into plots for</li> </ul>		

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 8: A DESIRABLE PLACE TO LIVE**

Respondent	Response No.	Part of Document	Support /Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
									<p>self-builds) and supported community self-build (social landlord or similar helps people build group of homes together). If adopted, the principles of this policy could result in more CLH planning applications.</p> <p>The policy could open with the following statement as used in best practice within Authorities taking a lead on such innovation:</p> <p>“When considering development proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework and set out by the policies of this Local plan. We will work with applicants, infrastructure providers and the local</p>		

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 8: A DESIRABLE PLACE TO LIVE**

Respondent	Response No.	Part of Document	Support /Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
									community to find solutions which mean that proposals will be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area".		
Kingsbridge Property Services	<a href="#">RLPPS84</a>	Policy 8D Self Build and Custom Housing	Object		No		Justified Effective	<p><b>POLICY 8D SELF-BUILD AND CUSTOM HOUSING Not justified or effective</b></p> <p>Policy 8D deals with delivery of Self-Build and Custom Housing. The policy is not <i>justified</i> and not <i>effective</i> as it does not make any actual allocations for such housing. Rather, it seeks to encourage provision on major housing allocations subject to caveats or provides development management considerations against which an application would be assessed. Delivery of self-build and custom housing may not result from this approach. Specific allocation of a site/s for self-build and custom housing is more likely to lead to delivery to meet the need and the policy should be modified to make specific site/s allocation.</p> <p>A specific site allocation on land west of Hurcott Lane should be made (see below).</p> <p><b>The approach of the Plan to provision of Self -Build and Custom Housing</b></p> <p>The primary approach in Policy 8D appears to be delivery on general allocated housing sites where developers are asked to explore provision where viable (Policy 31.2 Lea Castle and 32.4 East of Offmore and Stone Hill North). It states,</p> <p><i>'sites of more than 50 dwellings will be considered as most suitable for delivering self-build dwellings.'</i> Even if such provision is made on these sites, as large sites there will be a long lead in time before a self-build element will</p>		Yes	<p>Policy 8D should be modified as follows:</p> <p><b>Policy 8D</b> - The provision of self-build and custom-build homes will be facilitated in a number of ways including:</p> <ul style="list-style-type: none"> <li>As part of the housing mix on the allocated housing sites at 'Lea Castle' and 'East of Offmore and Stone Hill North' as specified in the policy relating to the specific allocation;</li> <li>On sites allocated for this specific purpose in accordance with Policy 8D(i);</li> <li>On unallocated sites in accordance with development management considerations in Policy 8D(ii)</li> </ul> <p><b>8D(i)</b> The following site/s</p>

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 8: A DESIRABLE PLACE TO LIVE**

Respondent	Response No.	Part of Document	Support /Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
								<p>be available and even then, it is only secured for 12 months after which, if it is not taken up for self-build or custom housing, it will revert to market housing.</p> <p>The policy goes on to state that the District Council will support planning applications for small scale self-build and custom housing provided they are in keeping with other policies of the Plan and does suggest they will work proactively with others to identify appropriate sites for serviced plots of 10 houses or more. There are however no specific site allocations identified in the Local Plan that would meet such a need and that would provide a justified and effective approach.</p> <p>To give the best chance of delivery and flexibility, the need can be met through all these ways, that is:</p> <ul style="list-style-type: none"> <li>• Through the housing mix on allocated general housing sites;</li> <li>• On sites allocated for this specific purpose in accordance;</li> <li>• On unallocated sites in accordance with Policy 8D</li> </ul> <p><b>The legislative background and the Plan</b></p> <p>The legislative background is in the Self-build and Custom Housebuilding Act 2015 (as amended by the Housing and Planning Act 2016). It places a duty upon local authorities to keep a register of those seeking to acquire serviced plots in the area for their own self-build and custom house building. Those wishing to register must meet basic eligibility criteria. The management of these registers is controlled by the Self-build and Custom Housebuilding (Register) Regulations 2016. The District Council have a register that covers the period April 2016-2018. At April 2018, it showed there is a local demand for 60 Self build and Custom Plots within the District. On a technicality, the register needs to be amended to accord with the base periods specified in the Planning Practice Guidance so it runs annually from October. This is significant as Councils have three years within which to permission an equivalent number of suitable plots of land to that on the register.</p>			<p>should be allocated to provide serviced land for self-build and custom build housing :</p> <ul style="list-style-type: none"> <li>• Land west of Hurcott Lane – for approximately 12 plots or other such number as justified by the Self-Build and Custom Build Register</li> </ul> <p><b>8D(ii) On unallocated sites the district council will support planning applications....(as per the rest of 8D as written)</b></p>

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 8: A DESIRABLE PLACE TO LIVE**

Respondent	Response No.	Part of Document	Support /Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
								<p>The 2015 Act says local authorities have a duty to have regard to the register when carrying out planning and housing functions. In planning terms, this extends to plan-making, as well as decision taking. Councils with plan-making functions should use their evidence on demand for this form of housing from the registers that relate to their area in developing their Local Plan and associated documents. It is a guide in preparing the development plan in this case that there is currently a need for 60 such plots.</p> <p>The Act also requires local authorities to give suitable development permission to enough serviced plots of land to meet the demand for self-build and custom housebuilding in their area arising during each base period. The level of demand is established by reference to the number of entries added to an authority's register during a base period and the register is therefore a material consideration in determining a planning application.</p> <p>There is no duty on a relevant authority to permission land in specific locations requested by those on the register but local authorities should use preferences expressed to guide its decisions when looking at how to meet its duty to grant planning permission. This helps to ensure that land is being permissioned as suitable for self-build and custom housebuilding which people are actually keen to develop. Policy 8D as set out makes no such correlation between either the total number on the register or the location preferences stated. Whilst this may change over the life of the development plan, it should still recognize the need and make specific allocations to meet it.</p> <p><b>A site to allocate for the specific purpose - Land west of Hurcott Lane</b></p> <p>I act on behalf of Kingsbridge Property Services who has acquired from Stanmore Properties Ltd, land designated as BW/4 Hurcott ADR south. The site was previously allocated in the Preferred Options as part of Core Housing Site BW/4 for 200 houses and is now proposed in the Pre submission Plan instead as Green Gap (Policy</p>			

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 8: A DESIRABLE PLACE TO LIVE**

Respondent	Response No.	Part of Document	Support /Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
								<p>30.12). The land in their ownership is shown on location plan 2639-100 Rev B.</p> <p>Separate representation is made on behalf of Stanmore Properties Ltd to the Pre-Submission Plan 2018 in respect of removal of Green Gap and re-allocation for housing as previously proposed.</p> <p>This representation is submitted in addition to that representation but for the site to be allocated to meet a self-build and custom housing need as an alternative to a general allocation for 200 houses.</p> <p>The need immediately applicable to the location is approximately 12 serviced plots, which comes from the Council's register as follows:</p> <ul style="list-style-type: none"> <li>• Kidderminster town - 4</li> <li>• Hurcott Road – 3</li> <li>• Broadwaters (north of Stourbridge Road) – 5</li> </ul> <p>It is possible others on the register would be interested in the location and others may come forward not yet on the register so this should be viewed as a minimum.</p> <p>The allocation of the site for a modest number of serviced plots for self-build and custom housing can be accommodated on the north east part of the site fronting Hurcott Lane which has the following benefits:</p> <ul style="list-style-type: none"> <li>• It is outside Green Belt – currently it is Area of Development Restraint, now proposed as Green Gap (Policy 30.12) to protect heritage and ecological interest;</li> <li>• It can provide a buffer to protect historic Hurcott village if necessary;</li> <li>• It can provide a buffer to protect ecological interests in the Hurcott Pastures SSSI if necessary;</li> <li>• take access off Hurcott Lane via Stourbridge Road junction thereby taking advantage of proposals to stop up the lane to through traffic;</li> </ul>			

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 8: A DESIRABLE PLACE TO LIVE**

Respondent	Response No.	Part of Document	Support /Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
								<p><b>ENCLOSURE</b> location plan 2639-100 Rev B</p> <p>To summarise, Policy 8D should make specific site allocations to meet the specific need for self-build and custom build housing in order to be justified and effective in delivering the identified housing need. A suitable site west of Hurcott Lane should be so allocated.</p> <p>Policy 8D in regards to self build and custom housing is not justified and not effective as it does not make allocations for such housing. Policy 8D should make specific site allocations to meet the need for self build and custom housing. A suitable site west of Hurcott Lane should be allocated.</p>			
Taylor Wimpey West Midlands	<a href="#">RLPPS271</a>	.Policy 8D	Comment				Justified	<p>To avoid any confusion, this representation provides a comprehensive response and therefore is intended to <u>replace</u> that previously submitted in December 2018.</p> <p>This representation relates to land off Comberton Road, Kidderminster (see Site Location Plan at <b>Appendix 1</b>) which is within the control of Taylor Wimpey.</p> <p>Land off Comberton Road forms a significant element of the proposed East of Kidderminster Urban Extension, which Policy 32 (Kidderminster Eastern.</p> <p><b>Policy 8D Specialist Housing Requirements</b></p> <p>3.66 In terms of the requirement for all major housing development proposals to provide evidence that they have fully considered the provision of self/ custom build within the overall housing mix on site, from an urban design/ masterplanning perspective, the integration of a number of self builds into a scheme being delivered by a volume housebuilder (that often work on standard house types) would possibly be difficult to achieve in respect of both making an efficient use of land; and to achieve design consistency. Further, sites currently being put forward by developers have been negotiated on the basis of existing planning policies and values and such an addition could impact on viability. It is recommended that further work be commissioned in order to find out where households would like to have the opportunity to</p>		Yes	<p>Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan.</p> <p>Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern extension in the overall spatial strategy contained therein.</p>

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 8: A DESIRABLE PLACE TO LIVE**

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								<p>undertake a self build, so that the planning policies can better provide for the need rather than simply asking developers of all large sites to offer land.</p> <p>3.67 In addition, the Council's own evidence base does not appear to fully justify a need for self/custom build properties to be considered on all sites over 10 dwellings. In March 2018 only 60 people had registered indicating preferences for plots in rural locations and larger dwellings with 3 or more bedrooms. This evidence does not support the Council's proposed requirements under this policy.</p> <p><b>LAND AT COMBERTON ROAD, KIDDERMINSTER</b></p> <p>4.1 Taylor Wimpey is currently in control of the land to the north of Comberton Road and to the south of the Birmingham to Worcester railway line, and a further area of land to the south of Comberton Road, as shown on the Site Location Plan appended to this representation (<b>Appendix 1</b>).</p> <p>4.2 Sites OC/6 and OC/13N form the majority of the proposed East of Kidderminster Urban Extension. Land to the south of Comberton Road represents an omission site previously identified as an Option 'A' site within the Preferred Options document.</p> <p>4.3 Land to the north of Comberton Road has been promoted as an infrastructure led residential development incorporating significant green infrastructure provision, land for a primary school and land for other community facilities that may be required.</p> <p>4.4 Whilst an area of land to the south of Comberton Road is promoted for development, this is promoted as a latter phase that could be delivered beyond the proposed plan period (safeguarded land).</p> <p>4.5 A Development Vision document has been prepared to introduce an initial concept masterplan for the delivery of the site. This document, attached at <b>Appendix 2</b>, pulls together a wide range of technical information collected to date that has been utilised in</p>			

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								<p>shaping the initial proposal and provides an indication of how the site could be delivered and will function as an eastern extension to the town of Kidderminster.</p> <p>4.6 Taylor Wimpey is committed to delivering on the following objectives for land north of Comberton Road:</p> <ul style="list-style-type: none"> <li>• Delivery of quality new homes;</li> <li>• Delivery of a choice of housing;</li> <li>• Provision of a quality design;</li> <li>• Maintenance and enhancement of connectivity and accessibility;</li> <li>• Provision of public open space;</li> <li>• Provision of community facilities;</li> <li>• Maintenance and enhancement of site characteristics;</li> <li>• Creation of an attractive and safe community; and</li> <li>• Achievement of sustainable and safe development.</li> </ul> <p>4.7 These objectives underpin a Development Framework for the site that identifies the following key features for land to the north of Comberton Road:</p> <ul style="list-style-type: none"> <li>• Approximately 1,400 dwellings;</li> <li>• Delivery of a new 20mph spine road, providing a new vehicular link between Birmingham Road (A456), via Husum Way, and Comberton Road/Stone Hill (A448);</li> <li>• Provision of new pedestrian/cycle links between the site and Tennyson Way and Borrington Road to provide permeability and integration with the existing urban edge of Kidderminster;</li> <li>• Provision of land for the delivery of a number of community uses, including the provision of a new Primary School, a community facility to accommodate a meeting room, potentially café and potentially a GP surgery;</li> <li>• Significant provision of Green Infrastructure to include a landscape mitigation strategy that has been developed in line with the Kidderminster East GI Concept Statement;</li> <li>• Provision of SuDS through the delivery of new</li> </ul>			

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RESPONSES TO CHAPTER 8: A DESIRABLE PLACE TO LIVE**

Respondent	Response No.	Part of Document	Support /Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
								<p>attenuation features; and</p> <ul style="list-style-type: none"> <li>A new enduring Green Belt boundary to the east of Kidderminster.</li> </ul> <p>4.8 Further consideration of the site is set out below having regard to the Council's evidence base and the technical information prepared on behalf of Taylor Wimpey to date. This analysis concludes that sites OC/6 and OC/13N, which are within the control of Taylor Wimpey, are both suitable and deliverable. This provides confidence that the proposed East of Kidderminster Urban Extension is 'soundly' based.</p>			
Wyre Forest Community Land Trust Limited  Tim Mason	<a href="#">RLPPS60</a>	8.23 Policy 8E	Comment					The embedding of Community Led Housing within a number of generic policies helps engage the local community in a meaningful way with the Local Plan.	<p>Consider the inclusion of Community Led Housing initiatives into the enhanced mix of solutions for older people and others with special housing requirements. The championing of co-housing, cooperative housing and community land trust initiatives significantly enhances the local approach to housing solutions for such groups and genuinely engages the local community in the development of such vital housing solutions.</p> <p>The Council will continue to work with providers, developers and <u>Community Led Housing initiatives</u> to meet the additional need for 1,642 C3 dwellings for older people over the</p>	No	

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									lifetime of the plan.		
Taylor Wimpey West Midlands	<a href="#">RLPPS272</a>	Policy 8E	Comment				Justified	<p>To avoid any confusion, this representation provides a comprehensive response and therefore is intended to <u>replace</u> that previously submitted in December 2018.</p> <p>This representation relates to land off Comberton Road, Kidderminster (see Site Location Plan at <b>Appendix 1</b>) which is within the control of Taylor Wimpey.</p> <p>Land off Comberton Road forms a significant element of the proposed East of Kidderminster Urban Extension, which Policy 32 (Kidderminster Eastern.</p> <p><b>Policy 8E Housing for Older People and others with specialist housing requirements</b></p> <p>3.68 With regard to providing evidence to demonstrate that major housing development proposals have fully considered the provisions of certain tenures and types and for the need for 487 residential units to be met on sites allocated for housing, it must be recognised that the care accommodation industry is very different to the house building industry. Whilst on the larger schemes care homes can be provided for, on smaller schemes it is far more difficult to make a viable and meaningful contribution. The Council’s policy should remain flexible in requiring such specialist development given the complexities. Further, it is likely that opportunity sites will exclusively come forward for homes for older people and/ or specialist housing, which may meet the needs identified.</p> <p>3.69 Under Policy 8E on sites of 10 or more dwellings 20% of dwellings must meet higher optional Building Regulation of Part M Category 2 accessible and adaptable homes and 1% Part M Category 3 wheelchair user homes.</p> <p>3.70 If the Council wishes to adopt the higher optional standards for Part M Category 2 and 3 then this should only be done in accordance with the NPPF (para 127f &amp; Footnote 46). The Written Ministerial Statement (WMS) dated 25th March 2015 stated that <i>“the optional new</i></p>		Yes	<p>Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan.</p> <p>Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern extension in the overall spatial strategy contained therein.</p>

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								<p><i>national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the NPPG.” Taylor Wimpey considers that this policy requirement has not been justified by the evidence base available and the higher optional standards should be removed.</i></p> <p><b>LAND AT COMBERTON ROAD, KIDDERMINSTER</b></p> <p>4.1 Taylor Wimpey is currently in control of the land to the north of Comberton Road and to the south of the Birmingham to Worcester railway line, and a further area of land to the south of Comberton Road, as shown on the Site Location Plan appended to this representation (<b>Appendix 1</b>).</p> <p>4.2 Sites OC/6 and OC/13N form the majority of the proposed East of Kidderminster Urban Extension. Land to the south of Comberton Road represents an omission site previously identified as an Option ‘A’ site within the Preferred Options document.</p> <p>4.3 Land to the north of Comberton Road has been promoted as an infrastructure led residential development incorporating significant green infrastructure provision, land for a primary school and land for other community facilities that may be required.</p> <p>4.4 Whilst an area of land to the south of Comberton Road is promoted for development, this is promoted as a latter phase that could be delivered beyond the proposed plan period (safeguarded land).</p> <p>4.5 A Development Vision document has been prepared to introduce an initial concept master plan for the delivery of the site. This document attached at <b>Appendix 2</b>, pulls together a wide range of technical information collected to date that has been utilised in shaping the initial proposal and provides an indication of how the site could be delivered and will function as an eastern extension to the town of Kidderminster.</p>			

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								<p>4.6 Taylor Wimpey is committed to delivering on the following objectives for land north of Comberton Road:</p> <ul style="list-style-type: none"> <li>• Delivery of quality new homes;</li> <li>• Delivery of a choice of housing;</li> <li>• Provision of a quality design;</li> <li>• Maintenance and enhancement of connectivity and accessibility;</li> <li>• Provision of public open space;</li> <li>• Provision of community facilities;</li> <li>• Maintenance and enhancement of site characteristics;</li> <li>• Creation of an attractive and safe community; and</li> <li>• Achievement of sustainable and safe development.</li> </ul> <p>4.7 These objectives underpin a Development Framework for the site that identifies the following key features for land to the north of Comberton Road:</p> <ul style="list-style-type: none"> <li>• Approximately 1,400 dwellings;</li> <li>• Delivery of a new 20mph spine road, providing a new vehicular link between Birmingham Road (A456), via Husum Way, and Comberton Road/Stone Hill (A448);</li> <li>• Provision of new pedestrian/cycle links between the site and Tennyson Way and Borrington Road to provide permeability and integration with the existing urban edge of Kidderminster;</li> <li>• Provision of land for the delivery of a number of community uses, including the provision of a new Primary School, a community facility to accommodate a meeting room, potentially café and potentially a GP surgery;</li> <li>• Significant provision of Green Infrastructure to include a landscape mitigation strategy that has been developed in line with the Kidderminster East GI Concept Statement;</li> <li>• Provision of SuDS through the delivery of new attenuation features; and</li> <li>• A new enduring Green Belt boundary to the east of Kidderminster.</li> </ul>			

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								4.8 Further consideration of the site is set out below having regard to the Council's evidence base and the technical information prepared on behalf of Taylor Wimpey to date. This analysis concludes that sites OC/6 and OC/13N, which are within the control of Taylor Wimpey, are both suitable and deliverable. This provides confidence that the proposed East of Kidderminster Urban Extension is 'soundly' based.			

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 9: HEALTH AND WELLBEING**

Respondent	Response No.	Part of Document	Support /Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
Worcestershire County Council, Planning Economy & Performance  Emily Barker	<a href="#">RLPPS79</a>	Policy 9 Health and Well Being	Comment					<p>WCC Planning and Public Health officers have identified improvements that should be made to Policy 9: Health and Wellbeing, and are working with WFDC officers to produce amended policy wording. In particular, we believe that HIA thresholds for residential and mixed-used developments should be lowered to include all major development, and we will work with WFDC to address this matter through the Statement of Common Ground. We expect all proposed amendments to the Health and Wellbeing policy to be progressed through main modifications to the plan.</p> <p>We regret, however, that other recommendations we made to ensure the plan is sound have not yet been addressed. As such, we wish to stress that - with the exception of the section titled 'Sustainable Transport', and subject to ongoing DtC discussions between WCC and WFDC officers - the comments submitted by WCC and dated 17th December 2018 remain extant and should be taken into account.</p>			
Taylor Wimpey West Midlands	<a href="#">RLPPS273</a>	.Policy 9	Comment					<p>To avoid any confusion, this representation provides a comprehensive response and therefore is intended to <u>replace</u> that previously submitted in December 2018.</p> <p>This representation relates to land off Comberton Road, Kidderminster (see Site Location Plan at <b>Appendix 1</b>) which is within the control of Taylor Wimpey.</p> <p>Land off Comberton Road forms a significant element of the proposed East of Kidderminster Urban Extension, which Policy 32 (Kidderminster Eastern.</p> <p><b>Policy 9. Health and Well Being</b></p> <p>3.71 The policy aspirations set out in Policy 9 are supported by Taylor Wimpey as 'sound.' Land north of Comberton Road provides a unique opportunity to provide facilities that would foster and encourage healthy, active lifestyles for new residents and the existing residents of Kidderminster by providing significant new green infrastructure and a new</p>		Yes	<p>Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan.</p> <p>Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern extension in the overall spatial strategy contained therein.</p>

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RESPONSES TO CHAPTER 9: HEALTH AND WELLBEING**

Respondent	Response No.	Part of Document	Support /Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
								<p>network of footpaths/cycleways that would encourage walking, cycling, physical activity, exercise and informal recreation. In addition, opportunities are present for the provision of a community orchard and for a new accessible health facility.</p> <p><b>LAND AT COMBERTON ROAD, KIDDERMINSTER</b></p> <p>4.1 Taylor Wimpey is currently in control of the land to the north of Comberton Road and to the south of the Birmingham to Worcester railway line, and a further area of land to the south of Comberton Road, as shown on the Site Location Plan appended to this representation (<b>Appendix 1</b>).</p> <p>4.2 Sites OC/6 and OC/13N form the majority of the proposed East of Kidderminster Urban Extension. Land to the south of Comberton Road represents an omission site previously identified as an Option 'A' site within the Preferred Options document.</p> <p>4.3 Land to the north of Comberton Road has been promoted as an infrastructure led residential development incorporating significant green infrastructure provision, land for a primary school and land for other community facilities that may be required.</p> <p>4.4 Whilst an area of land to the south of Comberton Road is promoted for development, this is promoted as a latter phase that could be delivered beyond the proposed plan period (safeguarded land).</p> <p>4.5 A Development Vision document has been prepared to introduce an initial concept master plan for the delivery of the site. This document attached at <b>Appendix 2</b>, pulls together a wide range of technical information collected to date that has been utilised in shaping the initial proposal and provides an indication of how the site could be delivered and will function as an eastern extension to the town of Kidderminster.</p> <p>4.6 Taylor Wimpey is committed to delivering on the following objectives for land north of Comberton</p>			

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								<p>Road:</p> <ul style="list-style-type: none"> <li>• Delivery of quality new homes;</li> <li>• Delivery of a choice of housing;</li> <li>• Provision of a quality design;</li> <li>• Maintenance and enhancement of connectivity and accessibility;</li> <li>• Provision of public open space;</li> <li>• Provision of community facilities;</li> <li>• Maintenance and enhancement of site characteristics;</li> <li>• Creation of an attractive and safe community; and</li> <li>• Achievement of sustainable and safe development.</li> </ul> <p>4.7 These objectives underpin a Development Framework for the site that identifies the following key features for land to the north of Comberton Road:</p> <ul style="list-style-type: none"> <li>• Approximately 1,400 dwellings;</li> <li>• Delivery of a new 20mph spine road, providing a new vehicular link between Birmingham Road (A456), via Husum Way, and Comberton Road/Stone Hill (A448);</li> <li>• Provision of new pedestrian/cycle links between the site and Tennyson Way and Borrington Road to provide permeability and integration with the existing urban edge of Kidderminster;</li> <li>• Provision of land for the delivery of a number of community uses, including the provision of a new Primary School, a community facility to accommodate a meeting room, potentially café and potentially a GP surgery;</li> <li>• Significant provision of Green Infrastructure to include a landscape mitigation strategy that has been developed in line with the Kidderminster East GI Concept Statement;</li> <li>• Provision of SuDS through the delivery of new attenuation features; and</li> <li>• A new enduring Green Belt boundary to the east of Kidderminster.</li> </ul>			

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								4.8 Further consideration of the site is set out below having regard to the Council's evidence base and the technical information prepared on behalf of Taylor Wimpey to date. This analysis concludes that sites OC/6 and OC/13N, which are within the control of Taylor Wimpey, are both suitable and deliverable. This provides confidence that the proposed East of Kidderminster Urban Extension is 'soundly' based.			
Owl Homes	<a href="#">RLPPS221</a>	Policy 9	Comment	Yes	Yes	Yes		<p>Owl Homes is working with the landowners of land off Habberley Road, Bewdley to support proposals for residential development. The site is a proposed allocation in the emerging Local Plan to which these representations relate. Owl Homes supports the Council in proactively seeking growth in its area and in preparing a new Local Plan to enable this.</p> <p>The NPPG (Para 005 Ref. 53-005-20190722) states that a Health Impact Assessment is a useful tool to use where there are expected to be significant impacts. Having regard to this, Policy 9's requirement for all developments of 25 or more dwellings to be screened does not appear to be relatively justified, positively prepared or consistent with National Policy. It is considered that this threshold should be raised to ensure it captures development likely to have an impact but doesn't unduly impede smaller scale sites.</p> <p>Additionally it should be clarified that the screening would not be required of allocated sites, given that they should have been assessed prior to allocation.</p> <p>This Policy generally is considered to be justified, effective and consistent with National Policy however requiring a HIA screening on all developments of 25+ dwellings may be too onerous and the Policy could be more positively prepared by raising the threshold to 100 dwellings.</p>	The Policy should be revisited, raising the threshold for HIA screening to 100 dwellings.	Yes	To ensure that the Policy is not overly onerous on smaller scale sites.

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 10: A GOOD PLACE TO DO BUSINESS**

Respondent	Response No.	Part of Document	Support /Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Any other Comments?	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
Taylor Wimpey West Midlands	<a href="#">RLPPS274</a>	Policy 10A	Comment						<p>To avoid any confusion, this representation provides a comprehensive response and therefore is intended to <u>replace</u> that previously submitted in December 2018.</p> <p>This representation relates to land off Comberton Road, Kidderminster (see Site Location Plan at <b>Appendix 1</b>) which is within the control of Taylor Wimpey.</p> <p>Land off Comberton Road forms a significant element of the proposed East of Kidderminster Urban Extension, which Policy 32 (Kidderminster Eastern.</p> <p><b>Policy 10A A Diverse Local Economy</b></p> <p>3.72 As set out above, the Local Plan gives a figure of 29ha of employment land that will be brought forward in the period up to 2036. This requirement is informed largely by the Employment Land Study 2018 undertaken by Lichfields, which identifies a decline in jobs within the District over the past 20 years.</p> <p>3.73 However, a concern with the 29ha employment land requirement is that it does not appear to take into account what could be needed in the event of Wyre Forest seeing stronger economic growth. For example, the Worcestershire Local Enterprise Partnership's Strategic Economic Plan has a vision to grow the LEP economy by 25,000 jobs by 2025 and to support growth sectors such as advanced manufacturing. It is unlikely that Wyre Forest will make much of a contribution to this target if its economy only grows under baseline conditions. Consideration should therefore be given to increasing the quantum of employment land brought forward by the Local Plan.</p>		Yes	<p>Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan.</p> <p>Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern extension in the overall spatial strategy contained therein.</p>

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RESPONSES TO CHAPTER 10: A GOOD PLACE TO DO BUSINESS**

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									<p><b>LAND AT COMBERTON ROAD, KIDDERMINSTER</b></p> <p>4.1 Taylor Wimpey is currently in control of the land to the north of Comberton Road and to the south of the Birmingham to Worcester railway line, and a further area of land to the south of Comberton Road, as shown on the Site Location Plan appended to this representation (<b>Appendix 1</b>).</p> <p>4.2 Sites OC/6 and OC/13N form the majority of the proposed East of Kidderminster Urban Extension. Land to the south of Comberton Road represents an omission site previously identified as an Option 'A' site within the Preferred Options document.</p> <p>4.3 Land to the north of Comberton Road has been promoted as an infrastructure led residential development incorporating significant green infrastructure provision, land for a primary school and land for other community facilities that may be required.</p> <p>4.4 Whilst an area of land to the south of Comberton Road is promoted for development, this is promoted as a latter phase that could be delivered beyond the proposed plan period (safeguarded land).</p> <p>4.5 A Development Vision document has been prepared to introduce an initial concept masterplan for the delivery of the site. This document, attached at <b>Appendix 2</b>, pulls together a wide range of technical information collected to date that has been utilised in shaping the initial proposal and provides an indication of how the site could be delivered and will function as an eastern extension to</p>			

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									<p>the town of Kidderminster.</p> <p>4.6 Taylor Wimpey is committed to delivering on the following objectives for land north of Comberton Road:</p> <ul style="list-style-type: none"> <li>• Delivery of quality new homes;</li> <li>• Delivery of a choice of housing;</li> <li>• Provision of a quality design;</li> <li>• Maintenance and enhancement of connectivity and accessibility;</li> <li>• Provision of public open space;</li> <li>• Provision of community facilities;</li> <li>• Maintenance and enhancement of site characteristics;</li> <li>• Creation of an attractive and safe community; and</li> <li>• Achievement of sustainable and safe development.</li> </ul> <p>4.7 These objectives underpin a Development Framework for the site that identifies the following key features for land to the north of Comberton Road:</p> <ul style="list-style-type: none"> <li>• Approximately 1,400 dwellings;</li> <li>• Delivery of a new 20mph spine road, providing a new vehicular link between Birmingham Road (A456), via Husum Way, and Comberton Road/Stone Hill (A448);</li> <li>• Provision of new pedestrian/cycle links between the site and Tennyson Way and Borrington Road to provide permeability and integration with the existing urban edge of Kidderminster;</li> <li>• Provision of land for the delivery of a number of community uses, including the provision of a new Primary School, a community facility to accommodate a meeting room, potentially café and potentially a GP surgery;</li> <li>• Significant provision of Green</li> </ul>			

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									<p>Infrastructure to include a landscape mitigation strategy that has been developed in line with the Kidderminster East GI Concept Statement;</p> <ul style="list-style-type: none"> <li>• Provision of SuDS through the delivery of new attenuation features; and</li> <li>• A new enduring Green Belt boundary to the east of Kidderminster.</li> </ul> <p>4.8 Further consideration of the site is set out below having regard to the Council's evidence base and the technical information prepared on behalf of Taylor Wimpey to date. This analysis concludes that sites OC/6 and OC/13N, which are within the control of Taylor Wimpey, are both suitable and deliverable. This provides confidence that the proposed East of Kidderminster Urban Extension is 'soundly' based.</p>			

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RESPONSES TO CHAPTER 11: A UNIQUE PLACE**

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Stop Lea Castle Farm Quarry Action Group  Adrian Carlos	<a href="#">RLPPS25</a>	Policy 11C	Object		No		Positively Prepared Justified Effective Consistent with National Policy	See attached submission by Stop Lea Castle Farm Quarry Action Group.  The Wyre Forest Local Plan contains many policies to protect the general landscape and historic landscape. The plan however needs to recognise that the district contains landscapes and historic landscapes that have particular value and should be recognised and protected as such.  <b><u>Objections to Plan</u></b>  To help meet these Plan Objectives and Policies, the Local Plan should specifically identify the former Lea Castle Parkland as an area of unique, historic and special locally valued landscape.  <b><u>Worcestershire Archive &amp; Archaeology Service</u></b> <ul style="list-style-type: none"> <li>• There are archaeological interest within the area, being the former World War II grass landing strip,</li> <li>• the presence of unrecorded, as yet unknown, below-ground heritage assets (archaeological remains) cannot be discounted and stray finds of archaeological material including a silver denarius of Vitellius (AD 69-69) have been made in the area</li> <li>• the setting of designated heritage assets in the vicinity of the area include, but not limited to, the Grade II listed Sion Hill Court (NHLE 1100640) to the south and the Grade II Listed North Lodges (NHLE 1296589) to the northeast.</li> </ul> <b><u>Environment Agency</u></b> <ul style="list-style-type: none"> <li>• The estate is located on a Principle Aquifer of the Wildmoor Sandstone Formation within Source Protection Zone 3 of the Cookley Public Water Supply. The hydrogeological setting at this location is sensitive</li> </ul> <b><u>Parish Council</u></b> <ul style="list-style-type: none"> <li>• An ancient wall borders the estate, this is a local landmark</li> <li>• This is a biodiverse area where many animals and fungi are likely to be affected</li> <li>• The estate contains a number of (TPO'd) trees.</li> </ul>	See attached submission by Stop Lea Castle Farm Quarry Action Group.  <b><u>Conclusion</u></b>  The Lea Castle Parkland, generally defined by the Castle Wall, is a valued landscape and an historic landscape.  The Parkland has many demonstrable physical attributes and fulfils functions which elevate it above the ordinary. This value is not just its popularity and is more than being appreciated. This elevates the site above the ordinary in terms of impact from development and warranting protection.  The value of the landscape is also notable due to the heritage assets on the site including the Grade II listed Gatehouse and lodges. While locally listed the connected estate wall and Wolverley Lodge should be seen as structures which are ancillary to the listed building, built at the same time and as such should also be covered by the listing. The remaining avenue of trees linking the gatehouses to the site of the main house is covered by Tree Protection Orders as are other trees within the Parkland. The Parkland also has a relationship with the	Yes	Stop Lea Castle Farm Quarry Action Group represents the majority of residents of the Parish of Wolverley and Cookley and wishes to set out residents' concerns regarding the possible development of this land. Residents believe the Lea Castle Parkland to be valued landscape and wish to help the Inspector understand the special value of this area.

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 11: A UNIQUE PLACE**

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								<ul style="list-style-type: none"> <li>The land is described as “acid sand” which provides a unique habitat for various flora and fauna.</li> </ul> <p><u>Wolverley and Cookley Historical Society</u></p> <ul style="list-style-type: none"> <li>This is a historical site</li> <li>The neo-gothic castle was built by the Knights, an important family in the Parish during the 18th and 19th century.</li> <li>The house was surrounded by parkland.</li> <li>It is suggested that the laying out of the grounds could have been in the picturesque taste (Survey of Parks and Gardens: Lockett 1997).</li> <li>The area is defined as “former parkland”.</li> <li>there remains a 19th C. wall that defines the boundary of the estate</li> <li>The wall has served as a focus for community races etc in the recent past</li> <li>lodges serving as entrances at the end of long straight driveways; at the North East, Grade II listed and at the South, on the Local List.</li> <li>These structures help to characterise the heritage of the two villages and should be viewed in context with the whole parkland.</li> <li>There are well used public footpaths along the driveways and between the areas enjoyed by local people and walking groups.</li> </ul> <p>The last revision to NPPF amended the protection afforded valued landscapes such that protection is in a manner commensurate with their statutory status or identified quality in the development plan. There is a need therefore for development plans to specifically identify valued landscapes for that protection.</p> <ul style="list-style-type: none"> <li>The paths are shown as early as on the tithe map of 1837.</li> <li>Medieval documents refer to a settlement at The Lea. Although its exact position is vague it was undoubtedly in the area of Lea Castle.</li> </ul> <p><u>Worcestershire Countryside Access Mapping Officer</u></p> <ul style="list-style-type: none"> <li>Public rights of way as recorded on the Definitive Map: Wolverley and Cookley footpaths WC-622 and WC-624 and Bridleways WC-625 and WC-626 cross</li> </ul>	<p>Wolverley Conservation Area and Staffordshire and Worcestershire Canal Conservation Area.</p> <p>The Parkland should be recognised in the Local Plan as Valued Landscape.</p> <p>The Parkland should additional be protected from any development that detracts from its natural or historic landscape.</p> <p>In respect of soundness of the Plan,</p> <p><b>Positively prepared</b> – policies do not meet the need to adequately protect landscapes of local and historical importance;</p> <p><b>Justified</b> – the Plan does not follow an appropriate strategy of identifying Valued Landscapes to afford them special protection;</p> <p><b>Effective</b> – the existing policies will fail to protect valued landscapes and landscapes of historic importance; and</p> <p><b>Consistent with national policy</b> – the NPPF refers to valued landscapes being protected and enhanced in a manner commensurate with their statutory status or identified quality in the development plan. This</p>		

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								<p>the estate</p> <p><u>CPRE</u></p> <ul style="list-style-type: none"> <li>The estate is the former park of Lea Castle, a gentlemen's park largely only indicated by being surrounded by a brick wall having two lodges. These may deserve to be listed.</li> </ul> <p><u>Worcestershire County Council Ecology</u></p> <ul style="list-style-type: none"> <li>the proximity to sites of local (i.e. county) importance, including the Staffordshire and Worcestershire Canal and River Stour Local Wildlife Sites and Grassland Inventory sites including Cookley Rough,</li> <li>the proximity of this site to the Wyre Forest Biodiversity Delivery Area</li> </ul> <p><u>Historic England</u></p> <ul style="list-style-type: none"> <li>The designated heritage assets include but are not limited to the Wolverley and Staffordshire and Worcestershire Canal Conservation Areas to the west and northwest as well as several grade II listed buildings.</li> <li>non-designated features of historic, architectural, archaeological or artistic interest can be of national importance and make an important contribution to the character and local distinctive of an area and its sense of place</li> </ul> <p><u>Worcestershire Count Council Landscape</u></p> <ul style="list-style-type: none"> <li>The estate is contained within the broad landscape character type Sandstone Estate lands.</li> <li>The setting of the estate is located within a transitional landscape that moves from a more typical Sandstone Estate lands character, east of the site, toward a post-medieval historic landscape character of mixed irregular fields, meadows and woodland, influenced in part, by the Stour Valley.</li> <li>In addition, the site is within an area of former post-medieval designed landscape, which adds another layer of inherited character and includes distinctive structural features and historic buildings</li> </ul>	<p>additional text from the 2019 NPPF is not addressed in the Plan which was prepared prior to this.</p> <p><b><u>Suggested Policy Change</u></b></p> <p><b>Policy 11C - Landscape Character</b></p> <p><b>1. Landscape Character</b></p> <p>New development must protect and where possible enhance the unique character of the landscape including individual settlements or hamlets located within it. Opportunities for landscape gain will be sought alongside all new development, in order that landscape character is strengthened and enhanced.</p> <p>Planning policies and decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils.</p> <p>Valued Landscapes include;</p> <ul style="list-style-type: none"> <li>Lea Castle Parkland</li> </ul> <p>Lea Castle Parkland should be protected from any development that detracts from its natural or historic landscape.</p>		

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								<ul style="list-style-type: none"> <li>the Stour and Staffordshire and Worcestershire Canal corridor is a strategic Green Infrastructure link</li> </ul> <p><u>Worcestershire Wildlife Trust</u></p> <ul style="list-style-type: none"> <li>The estate falls within open agricultural countryside and that it contains some semi-natural habitats that may be of value, both in their own right and in terms of the species they may hold.</li> <li>The estate is bordered and contains woodland and is close to wetlands that have Local Wildlife Site Status (River Stour and Staffordshire and Worcestershire Canal).</li> </ul> <p><u>Wyre Forest Countryside Manager</u></p> <ul style="list-style-type: none"> <li>the estate is in proximity to a couple of SSSI and other wildlife site</li> <li>Dormice are known to be in proximity to this site</li> <li>Bats species are known to exist in area</li> </ul> <p><u>Wyre Forest Conservation</u></p> <ul style="list-style-type: none"> <li>Lea Castle estate had remained undisturbed by the expansion of Kidderminster into the early-20th century as recorded (as a park) on the 1st edition of the OS 6 inch.</li> <li>Much of the area defined then as park is still green.</li> <li>An avenue connected the house with the south lodge.</li> <li>The house at Cookley is noticed on Isaac Taylor's 1772 map.</li> <li>The early 19th century house was demolished in 1945. This house was a neo-gothic castle which suggests that a picturesque taste would have been applied to the laying-out of the grounds, but details cannot be made out from early or mid-19th century printed maps</li> <li>The mid-19th century castellated lodges and the brick boundary wall survive.</li> <li>Although the park is still legible 20<sup>th</sup> century encroachment and a variety of uses has reduced its aesthetic and historic values somewhat, although overall significance is low/medium.</li> <li>WSM 17233 Wolverley Camp General Hospital: Hospital built in 1942 accommodation for 500</li> </ul>			

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								<p>patients used by US Servicemen until the end of the war.</p> <ul style="list-style-type: none"> <li>• Former Military Grass Landing Strip WSM29266:</li> <li>• Lea Castle Farm Wolverley WSM30493 comprises a partially extant C18 farmstead with buildings now converted to residential use.</li> <li>• Originally the brick pierced barns were used for threshing.</li> <li>• 1 and 2 South Lodges ref: LLWC55 and LLWC56 Lodge Houses originally serving Lea Castle (which was pulled down in 1945). Dating to c.1818, both Lodges served as the entrance from Wolverley. Square building, red brick construction, with castellated parapet to roof, buttresses to each corner, hood moulds to windows and doors. Extension to rear.</li> <li>• These are included on the Local list for their architectural and historic values contributing to a medium significance.</li> <li>• The adjacent Staffordshire and Worcestershire Canal Conservation Area within its woodland setting. This is a site highly sensitive to development due to its intact rural parkland character, topography and impact on mature woodland which form the setting for the Conservation Area.</li> </ul> <p><b>Conclusion</b></p> <p>The Lea Castle Parkland, generally defined by the Castle Wall, is a valued landscape and an historic landscape.</p> <p>The Parkland has many demonstrable physical attributes and fulfils functions which elevate it above the ordinary. This value is not just its popularity and is more than being appreciated. This elevates the site above the ordinary in terms of impact from development and warranting protection.</p> <p>The value of the landscape is also notable due to the heritage assets on the site including the Grade II listed Gatehouse and lodges. While locally listed the connected estate wall and Wolverley Lodge should be seen as structures which are ancillary to the listed building, built at the same time and as such should also be covered by the listing. The remaining avenue of trees linking the gatehouses to the site of the main house is covered by Tree Protection Orders as are other trees within the Parkland. The Parkland also has a relationship with</p>			

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								<p>the Wolverley Conservation Area and Staffordshire and Worcestershire Canal Conservation Area.</p> <p>The Parkland should be recognised in the Local Plan as Valued Landscape.</p> <p>The Parkland should additional be protected from any development that detracts from its natural or historic landscape.</p> <p>In respect of soundness of the Plan,</p> <p><b>Positively prepared</b> – policies do not meet the need to adequately protect landscapes of local and historical importance;</p> <p><b>Justified</b> – the Plan does not follow an appropriate strategy of identifying Valued Landscapes to afford them special protection;</p> <p><b>Effective</b> – the existing policies will fail to protect valued landscapes and landscapes of historic importance; and</p> <p><b>Consistent with national policy</b> – the NPPF refers to valued landscapes being protected and enhanced in a manner commensurate with their statutory status or identified quality in the development plan. This additional text from the 2019 NPPF is not addressed in the Plan which was prepared prior to this.</p> <p><b>Suggested Policy Change</b></p> <p><b>Policy 11C - Landscape Character</b></p> <p>1. <b>Landscape Character</b></p> <p>New development must protect and where possible enhance the unique character of the landscape including individual settlements or hamlets located within it. Opportunities for landscape gain will be sought alongside all new development, in order that landscape character is strengthened and enhanced.</p> <p>Planning policies and decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, sites of biodiversity or</p>			

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
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								<p>geological value and soils.</p> <p>Valued Landscapes include;</p> <ul style="list-style-type: none"> <li>Lea Castle Parkland</li> </ul> <p>Lea Castle Parkland should be protected from any development that detracts from its natural or historic landscape.</p>			
Natural England	<a href="#">RLPPS202</a>	Policy 11D Protecting and Enhancing Biodiversity	Object	Yes	No	Yes	Consistent with National Policy	<p>Incorrect or missing details in Table 1</p> <p>Missing information, which should be added:</p> <p>Hurcott Pasture SSSI - a good example of species-rich, lowland, acidic grassland pasture</p> <p>Incorrectly named SSSI's, which should be changed: Hartlebury Common and Hillditch Coppice SSSI Showground Meadow, Callow Hill SSSI</p> <p>SSSI which would benefit from further information: Kinver Edge SSSI is also notified for geology.</p>	We request that the LPA makes the corrections listed above.	No	
Owl Homes	<a href="#">RLPPS222</a>	Policy 11D	Comment	Yes	Yes	Yes		<p>Owl Homes is working with the landowners of land off Habberley Road, Bewdley to support proposals for residential development. The site is a proposed allocation in the emerging Local Plan to which these representations relate. Owl Homes supports the Council in proactively seeking growth in its area and in preparing a new Local Plan to enable this.</p> <p>NPPF (Para 170) suggests planning policies should minimize impacts on and provide net gains for biodiversity and (Para 174) plans should identify and pursue opportunities for securing measurable net gains for biodiversity. Further (Para 175) opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for</p>	Owl Homes consider that the wording of Policy 11D should be revisited so that net gain is a recommendation rather than an obligation for developments.	Yes	To ensure the Policy is justified and consistent with National Policy.

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
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								<p>biodiversity.</p> <p>Policy 11D sets out a requirement for all developments to achieve net gains to biodiversity. This requirement is overly onerous and goes beyond the guidance of the NPPF. As such the Policy is not entirely justified or consistent with National Policy.</p>			

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 12: STRATEGIC INFRASTRUCTURE**

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Bromsgrove & Redditch DC Mike Dunphy	<a href="#">RLPPS81</a>	12 Strategic Infrastructure	Object	Yes	No	No	Justified Effective Consistent with National Policy	<p><u>Introduction</u></p> <ol style="list-style-type: none"> <li>The previous comments submitted by Bromsgrove District Council BDC in relation to this plan still stand, the comments below expand on those submitted previously. At the time of submission they are submitted as officer comments, they will be presented to BDC members in due course for their consideration.</li> <li>It remains the view of BDC that unfortunately The Wyre Forest Local Plan (WFLP) is unsound, BDC do not consider that the plan is Justified, Effective, or Consistent with National Policy. It is also unfortunate that BDC also now raises concerns about whether the requirements of the Duty to Co-operate to have been met.</li> </ol> <p><u>Evidence concerns</u></p> <ol style="list-style-type: none"> <li>Without repeating the previous concerns verbatim the issue that BDC has is that it is still unclear as to what the transport impacts are, of the WFLP on Bromsgrove District. Concerns were expressed previously on the clarity of the work provided to support the 2018 publication version of the plan. Although efforts have been made to address these concerns, the fact remains that from the published information it is, in the view of BDC, not possible to clearly see what the impacts of the developments sites are, and then clearly understand the mitigation strategy.</li> <li>The need for a more robust transport evidence base has been something that BDC has been raising throughout the development of the WFLP. In response to BDCs November 2018 objection, further discussions took place in February and March 2019 where BDC continued to express its position, with WCC officers in attendance. It is BDCs understanding that these discussion</li> </ol>	<p>BDC considers that the wording of policy 12 could be amended to strengthen them and provide more clarity in relation to the mitigation required. However, as the fundamental issue is with the evidence which underpins these policies, without more robust evidence base BDC still does not consider this plan can be made sound with simple policy wording changes.</p> <p>If it can be demonstrated clearly what the impacts of development are on infrastructure in Bromsgrove, then a clear policy requirement for the delivery of cross boundary infrastructure will need to be included in the plan.</p>	Yes	To hopefully aid the inspector's understanding of the particular local circumstances specific to the objections raised.

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
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								<p>in part led to the additional document that has been published, <i>Wyre Forest Local Plan Review, Transport Evidence June 2019</i>. It had been hoped that the content of this document would have addressed the previous concerns BDC raised but unfortunately it does not do this. The position of BDC is, and has always been, that the Council would like to be able to understand the impacts of the plan on the infrastructure within Bromsgrove District, and then to clearly understand how the proposed mitigation and its delivery has been arrived at.</p> <p>5. Unfortunately the <i>Wyre Forest Local Plan Review, Transport Evidence June 2019</i> does not satisfy this information gap. It is the view of BDC that the document has flaws. The document at section 4 attempts to suggest that an assessment has been done to confirm that the model is fit for purpose. BDC does not see how any actual assessment has been done, and consider that it is not possible to make the conclusion at para 4.6 based on the information in the preceding section.</p> <p>6. A more significant concern is that although there is new information in this report, it is still not possible to ascertain from the information provided what the actual impact of development would be. The document shows that flows and journey times will increase in many locations, but without a base year, or updated base year to compare against, all that can be concluded is that there will be more trips on the network. Without being able to compare a scenario where WFLP developments are not present, and where WFLP developments are present, understanding what the actual impacts of development are, is impossible.</p> <p>7. Another concern with this piece of evidence is that there is no modelling with any mitigation included. Therefore from the evidence available it is not possible to</p>			

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								<p>understand if the suggested mitigation in the Infrastructure Delivery Plan (IDP) actually mitigates both individual development sites and also the cumulative impacts of the WFLP.</p> <p><u>Infrastructure Delivery Plan</u></p> <p>8. Turning to the IDP the BDC position remains the same as previously expressed. The Council's previous concerns centered on the untested and in some cases un-costed schemes and proposals in the IDP. Whilst it is acknowledged that changes have been made to the IDP it is still unclear what the links are between the impact of development and the mitigation that is specified. This is a particular concern for the A456 through Hagley, where previous proposals for a bypass have been softened and the need for a wider review working with other councils seems to have replaced this proposal. BDC has no objection in principle to a wider review of transport infrastructure; indeed it would expect this consideration to come to the fore as the review of the Bromsgrove District Plan gathers momentum. However it is not considered appropriate at this stage to leave it to a wider infrastructure review to mitigate the specific impacts of the WFLP, should they ever be clearly identified, it maybe that the impacts are not significant to warrant such a review or if the impacts are proved to be significant, it is something which may be too late to address via plan making.</p> <p>9. It is also considered that the Duty to Cooperate and Statements of Common ground that BDC will prepare to support its plan are not the place to decide what infrastructure is required to support the developments in Wyre Forest, as para 3.1.21 of the IDP seems to be suggesting. It is the view of BDC that the infrastructure needs of the WFLP need to be clearly identified in the</p>			

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								<p>evidence that supports that plan, and mechanisms put in place to allow for any cross border infrastructure to be delivered. BDC has a strong track record of such an approach both working with Birmingham City Council on the Longbridge Area Action plan, and more recently in working with Redditch Borough Council in providing cross boundary allocations in Bromsgrove District to meet the needs of Redditch Borough.</p> <p>10. Para 3.1.24 of the IDP discusses the rail enhancement taking place at Blakedown station. BDC does not have an objection in principle to this enhancement. However there are concerns with the following statement:</p> <p><i>'Enhancements to parking facilities at Blakedown Station will also help to mitigate the impact of growth on Hagley within Bromsgrove District. Hagley currently suffers from congestion at peak times and this is considered to be a first step in reducing congestion before wider strategic improvements can be considered and implemented.'</i></p> <p>It is not clear how the addition of parking at this station combined with other strategies such as improving of the A450 corridor work together to reduce congestion in Hagley. It could be argued that improving the A450 corridor without complementary improvements on the Hagley area just allows the congestion to get to Hagley quicker. It is of interest to BDC to understand the amount of congestion that improvements at Blakedown will relieve in Hagley, and also the process which has been undertaken to identify this reduction.</p> <p><u>Duty to Co-operate</u></p> <p>11. The above paragraphs largely reiterate the concerns that BDC has over the robustness of evidence base to support the plan. BDC considers it has engaged fully in the attempts to ensure that the DTC has been met. As</p>			

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								<p>highlighted above these evidence related issues are longstanding concerns that BDC has expressed many times. It had been hoped that early engagement initiated by BDC in May 2018, where concerns were expressed about the evidence base that was being worked on to support the previous publication version on the WFLP, would have ensured that no objection needed to be submitted at that time; unfortunately that was not the case, and the Councils previous objection was submitted.</p> <p>12. As referred to above in an attempt to ensure constructive engagement, meetings took place in February and March 2019, where a set of actions were agreed by all parties which it had hoped would result in a robust evidence base which addresses the concerns of BDC. The work which was prepared as a result of these discussions was only seen by BDC in June 2019.</p> <p>13. In June 2019 WFDC published the local plan documents as part of its Overview and scrutiny agenda for the meeting of 4th July 2019. On initial review of these documents BDC again expressed concerns that this evidence still does not address the longstanding issue of clarity of the development impacts. It was agreed that a DTC meeting needed to take place. This meeting took place on the 30th July 2019, at this meeting a set of actions were agreed which would provide BDC the information it sought, in particular the impacts of development on the Hagley area. It was agreed that this information should be provided for the 29th August 2019, prior to the representation period on the publication version of the plan opening. A meeting was pencilled in to discuss this additional work on the 29th August. Subsequent to this meeting it is understood that WFDC contacted WCC separately to request that the work is not provided for the 29th August as agreed,</p>			

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RESPONSES TO CHAPTER 12: STRATEGIC INFRASTRUCTURE**

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								<p>minutes of that meeting confirm this;</p> <p><i>Following on from this meeting WFDC reviewed the proposed meeting date for discussion of Hagley paper and next steps (29th August). They concluded that as there was not time for them to review all the information in advance of the regulation 19 consultation, they would rather the meeting was postponed until late September to allow more time for the paper to be prepared and reviewed and the consultation to commence.</i></p> <p>14. On receiving notification on the minute above BDC requested a further amendment was made to the minutes as below,</p> <p><i>BDC must point out on the record that the reason for the timescale was to allow for all the documents to be available for the start of the representations period. We have reservations about this revised timescale for the publication of the work and the possible implication that BDC and other stakeholders will not have full access to the evidence for the full duration of the regulation 19 representation period.</i></p> <p>15. At the time of writing this representation the information which was agreed on the meeting of the 29th July has still not been provided, and therefore this objection has had to be drafted.</p> <p>Concluding Comments</p> <p>16. BDC continues to raise concerns about the lack of a robust evidence base and, also unfortunately raises potential concerns about the ability of WFDC to meet the DTC. It is hoped that working within the relevant regulations which dictate the plan making process from this point forward, and by continuing to engage with Wyre Forest District Council and Worcestershire County Council, that a solution to the issues above can be found in advance of the submission of</p>			

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 12: STRATEGIC INFRASTRUCTURE**

Respondent	Response No.	Part of Document	Support/ Comment/ Object	Legally Compliant ?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
								<p>the Wyre Forest Local Plan. The outcomes of this ongoing engagement can then be reported in the Statement of Common ground which we understand will accompany the submission</p> <p>All our comments have been made in the relation to section 9 above.</p>			
Taylor Wimpey West Midlands	<a href="#">RLPPS275</a>	Policy 12	Comment					<p>To avoid any confusion, this representation provides a comprehensive response and therefore is intended to <u>replace</u> that previously submitted in December 2018.</p> <p>This representation relates to land off Comberton Road, Kidderminster (see Site Location Plan at <b>Appendix 1</b>) which is within the control of Taylor Wimpey.</p> <p>Land off Comberton Road forms a significant element of the proposed East of Kidderminster Urban Extension, which Policy 32 (Kidderminster Eastern.</p> <p><b>Policy 12 Strategic Infrastructure</b></p> <p>3.74 This policy, whilst acceptable in principle, does not refer to the role of CIL and how this will be used to fund strategic infrastructure. The mechanisms by which the strategic infrastructure is to be delivered should be clearly set out to ensure that developers are fully aware of any requirements relating to their schemes so that the necessary financial planning relating to securing land options/ agreements can be undertaken from the outset.</p> <p><b>LAND AT COMBERTON ROAD, KIDDERMINSTER</b></p> <p>4.1 Taylor Wimpey is currently in control of the land to the north of Comberton Road and to the south of the Birmingham to Worcester railway line, and a further area of land to the south of Comberton Road, as shown on the Site Location Plan appended to this representation (<b>Appendix 1</b>).</p>		Yes	<p>Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan.</p> <p>Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern extension in the overall spatial strategy contained therein.</p>

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 12: STRATEGIC INFRASTRUCTURE**

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								<p>4.2 Sites OC/6 and OC/13N form the majority of the proposed East of Kidderminster Urban Extension. Land to the south of Comberton Road represents an omission site previously identified as an Option 'A' site within the Preferred Options document.</p> <p>4.3 Land to the north of Comberton Road has been promoted as an infrastructure led residential development incorporating significant green infrastructure provision, land for a primary school and land for other community facilities that may be required.</p> <p>4.4 Whilst an area of land to the south of Comberton Road is promoted for development, this is promoted as a latter phase that could be delivered beyond the proposed plan period (safeguarded land).</p> <p>4.5 A Development Vision document has been prepared to introduce an initial concept master plan for the delivery of the site. This document attached at <b>Appendix 2</b>, pulls together a wide range of technical information collected to date that has been utilised in shaping the initial proposal and provides an indication of how the site could be delivered and will function as an eastern extension to the town of Kidderminster.</p> <p>4.6 Taylor Wimpey is committed to delivering on the following objectives for land north of Comberton Road:</p> <ul style="list-style-type: none"> <li>• Delivery of quality new homes;</li> <li>• Delivery of a choice of housing;</li> <li>• Provision of a quality design;</li> <li>• Maintenance and enhancement of connectivity and accessibility;</li> <li>• Provision of public open space;</li> <li>• Provision of community facilities;</li> <li>• Maintenance and enhancement of site characteristics;</li> <li>• Creation of an attractive and safe community; and</li> <li>• Achievement of sustainable and safe</li> </ul>			

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 12: STRATEGIC INFRASTRUCTURE**

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								<p>development.</p> <p>4.7 These objectives underpin a Development Framework for the site that identifies the following key features for land to the north of Comberton Road:</p> <ul style="list-style-type: none"> <li>• Approximately 1,400 dwellings;</li> <li>• Delivery of a new 20mph spine road, providing a new vehicular link between Birmingham Road (A456), via Husum Way, and Comberton Road/Stone Hill (A448);</li> <li>• Provision of new pedestrian/cycle links between the site and Tennyson Way and Borrington Road to provide permeability and integration with the existing urban edge of Kidderminster;</li> <li>• Provision of land for the delivery of a number of community uses, including the provision of a new Primary School, a community facility to accommodate a meeting room, potentially café and potentially a GP surgery;</li> <li>• Significant provision of Green Infrastructure to include a landscape mitigation strategy that has been developed in line with the Kidderminster East GI Concept Statement;</li> <li>• Provision of SuDS through the delivery of new attenuation features; and</li> <li>• A new enduring Green Belt boundary to the east of Kidderminster.</li> </ul> <p>4.8 Further consideration of the site is set out below having regard to the Council's evidence base and the technical information prepared on behalf of Taylor Wimpey to date. This analysis concludes that sites OC/6 and OC/13N, which are within the control of Taylor Wimpey, are both suitable and deliverable. This provides confidence that the proposed East of Kidderminster Urban Extension is 'soundly' based.</p>			

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 13: TRANSPORT AND ACCESSIBILITY**

Respondent	Response No.	Part of Document	Support /Comment/ Object	Legally Compliant?	Sound?	DTC ?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
Bromsgrove & Redditch DC  Mike Dunphy	<a href="#">RLPPS82</a>	13 Transport and Accessibility	Object	Yes	No	No	Justified Effective Consistent with National Policy	<p><u>Introduction</u></p> <ol style="list-style-type: none"> <li>1. The previous comments submitted by Bromsgrove District Council BDC in relation to this plan still stand, the comments below expand on those submitted previously. At the time of submission they are submitted as officer comments, they will be presented to BDC members in due course for their consideration.</li> <li>2. It remains the view of BDC that unfortunately The Wyre Forest Local Plan (WFLP) is unsound, BDC do not consider that the plan is Justified, Effective, or Consistent with National Policy. It is also unfortunate that BDC also now raises concerns about whether the requirements of the Duty to Co-operate to have been met.</li> </ol> <p><u>Evidence concerns</u></p> <ol style="list-style-type: none"> <li>3. Without repeating the previous concerns verbatim the issue that BDC has is that it is still unclear as to what the transport impacts are, of the WFLP on Bromsgrove District. Concerns were expressed previously on the clarity of the work provided to support the 2018 publication version of the plan. Although efforts have been made to address these concerns, the fact remains that from the published information it is, in the view of BDC, not possible to clearly see what the impacts of the developments sites are, and then clearly understand the mitigation strategy.</li> <li>4. The need for a more robust transport evidence base has been something that BDC has been raising throughout the development of the WFLP. In response to BDCs November 2018 objection, further discussions took place in February and March 2019 where BDC continued to express its position, with WCC officers in attendance. It is BDCs understanding that</li> </ol>	<p>BDC considers that the wording of policy 13 could be amended to strengthen them and provide more clarity in relation to the mitigation required. However, as the fundamental issue is with the evidence which underpins these policies, without more robust evidence base BDC still does not consider this plan can be made sound with simple policy wording changes.</p> <p>If it can be demonstrated clearly what the impacts of development are on infrastructure in Bromsgrove, then a clear policy requirement for the delivery of cross boundary infrastructure will need to be included in the plan.</p>	Yes	To hopefully aid the inspector's understanding of the particular local circumstances specific to the objections raised.

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 13: TRANSPORT AND ACCESSIBILITY**

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								<p>these discussion in part led to the additional document that has been published, <i>Wyre Forest Local Plan Review, Transport Evidence June 2019</i>. It had been hoped that the content of this document would have addressed the previous concerns BDC raised but unfortunately it does not do this. The position of BDC is, and has always been, that the Council would like to be able to understand the impacts of the plan on the infrastructure within Bromsgrove District, and then to clearly understand how the proposed mitigation and its delivery has been arrived at.</p> <p>5. Unfortunately the <i>Wyre Forest Local Plan Review, Transport Evidence June 2019</i> does not satisfy this information gap. It is the view of BDC that the document has flaws. The document at section 4 attempts to suggest that an assessment has been done to confirm that the model is fit for purpose. BDC does not see how any actual assessment has been done, and consider that it is not possible to make the conclusion at para 4.6 based on the information in the preceding section.</p> <p>6. A more significant concern is that although there is new information in this report, it is still not possible to ascertain from the information provided what the actual impact of development would be. The document shows that flows and journey times will increase in many locations, but without a base year, or updated base year to compare against, all that can be concluded is that there will be more trips on the network. Without being able to compare a scenario where WFLP developments are not present, and where WFLP developments are present, understanding what the actual impacts of development are, is impossible.</p> <p>7. Another concern with this piece of evidence is that there is no modelling with any mitigation included. Therefore from the</p>			

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
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								<p>evidence available it is not possible to understand if the suggested mitigation in the Infrastructure Delivery Plan (IDP) actually mitigates both individual development sites and also the cumulative impacts of the WFLP.</p> <p><u>Infrastructure Delivery Plan</u></p> <p>8. Turning to the IDP the BDC position remains the same as previously expressed. The Council's previous concerns centered on the untested and in some cases un-costed schemes and proposals in the IDP. Whilst it is acknowledged that changes have been made to the IDP it is still unclear what the links are between the impact of development and the mitigation that is specified. This is a particular concern for the A456 through Hagley, where previous proposals for a bypass have been softened and the need for a wider review working with other councils seems to have replaced this proposal. BDC has no objection in principle to a wider review of transport infrastructure; indeed it would expect this consideration to come to the fore as the review of the Bromsgrove District Plan gathers momentum. However it is not considered appropriate at this stage to leave it to a wider infrastructure review to mitigate the specific impacts of the WFLP, should they ever be clearly identified, it maybe that the impacts are not significant to warrant such a review or if the impacts are proved to be significant, it is something which may be too late to address via plan making.</p> <p>9. It is also considered that the Duty to Cooperate and Statements of Common ground that BDC will prepare to support its plan are not the place to decide what infrastructure is required to support the developments in Wyre Forest, as para 3.1.21 of the IDP seems to be suggesting. It</p>			

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
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								<p>is the view of BDC that the infrastructure needs of the WFLP need to be clearly identified in the evidence that supports that plan, and mechanisms put in place to allow for any cross border infrastructure to be delivered. BDC has a strong track record of such an approach both working with Birmingham City Council on the Longbridge Area Action plan, and more recently in working with Redditch Borough Council in providing cross boundary allocations in Bromsgrove District to meet the needs of Redditch Borough.</p> <p>10. Para 3.1.24 of the IDP discusses the rail enhancement taking place at Blakedown station. BDC does not have an objection in principle to this enhancement. However there are concerns with the following statement:</p> <p><i>'Enhancements to parking facilities at Blakedown Station will also help to mitigate the impact of growth on Hagley within Bromsgrove District. Hagley currently suffers from congestion at peak times and this is considered to be a first step in reducing congestion before wider strategic improvements can be considered and implemented.'</i></p> <p>It is not clear how the addition of parking at this station combined with other strategies such as improving of the A450 corridor work together to reduce congestion in Hagley. It could be argued that improving the A450 corridor without complementary improvements on the Hagley area just allows the congestion to get to Hagley quicker. It is of interest to BDC to understand the amount of congestion that improvements at Blakedown will relieve in Hagley, and also the process which has been undertaken to identify this reduction.</p> <p><u>Duty to Co-operate</u></p> <p>11. The above paragraphs largely reiterate the concerns that BDC has over the robustness of evidence base to support the plan. BDC</p>			

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
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								<p>considers it has engaged fully in the attempts to ensure that the DTC has been met. As highlighted above these evidence related issues are longstanding concerns that BDC has expressed many times. It had been hoped that early engagement initiated by BDC in May 2018, where concerns were expressed about the evidence base that was being worked on to support the previous publication version on the WFLP, would have ensured that no objection needed to be submitted at that time; unfortunately that was not the case, and the Councils previous objection was submitted.</p> <p>12. As referred to above in an attempt to ensure constructive engagement, meetings took place in February and March 2019, where a set of actions were agreed by all parties which it had hoped would result in a robust evidence base which addresses the concerns of BDC. The work which was prepared as a result of these discussions was only seen by BDC in June 2019.</p> <p>13. In June 2019 WFDC published the local plan documents as part of its Overview and scrutiny agenda for the meeting of 4th July 2019. On initial review of these documents BDC again expressed concerns that this evidence still does not address the longstanding issue of clarity of the development impacts. It was agreed that a DTC meeting needed to take place. This meeting took place on the 30th July 2019, at this meeting a set of actions were agreed which would provide BDC the information it sought, in particular the impacts of development on the Hagley area. It was agreed that this information should be provided for the 29th August 2019, prior to the representation period on the publication version of the plan opening. A meeting was penciled in to discuss this additional work on the 29th August. Subsequent to this meeting it is understood</p>			

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RESPONSES TO CHAPTER 13: TRANSPORT AND ACCESSIBILITY**

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								<p>that WFDC contacted WCC separately to request that the work is not provided for the 29th August as agreed, minutes of that meeting confirm this;</p> <p><i>Following on from this meeting WFDC reviewed the proposed meeting date for discussion of Hagley paper and next steps (29th August). They concluded that as there was not time for them to review all the information in advance of the regulation 19 consultation, they would rather the meeting was postponed until late September to allow more time for the paper to be prepared and reviewed and the consultation to commence.</i></p> <p>14. On receiving notification on the minute above BDC requested a further amendment was made to the minutes as below,</p> <p><i>BDC must point out on the record that the reason for the timescale was to allow for all the documents to be available for the start of the representations period. We have reservations about this revised timescale for the publication of the work and the possible implication that BDC and other stakeholders will not have full access to the evidence for the full duration of the regulation 19 representation period.</i></p> <p>15. At the time of writing this representation the information which was agreed on the meeting of the 29th July has still not been provided, and therefore this objection has had to be drafted.</p> <p>Concluding Comments</p> <p>16. BDC continues to raise concerns about the lack of a robust evidence base and, also unfortunately raises potential concerns about the ability of WFDC to meet the DTC. It is hoped that working within the relevant regulations which dictate the plan making process from this point forward, and by continuing to engage with Wyre Forest</p>			

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RESPONSES TO CHAPTER 13: TRANSPORT AND ACCESSIBILITY**

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								<p>District Council and Worcestershire County Council, that a solution to the issues above can be found in advance of the submission of the Wyre Forest Local Plan. The outcomes of this ongoing engagement can then be reported in the Statement of Common ground which we understand will accompany the submission.</p> <p>All our comments have been made in the relation to section 9 above.</p>			
Phillip Oliver	<a href="#">RLPPS45</a>	Policy 13	Comment	Yes	Yes	Yes	Effective	<p>This plan puts a lot of reliance on Travel Plans but I am sceptical as to how the effective the monitoring arrangements will be particularly as the level of traffic is predicted to remorselessly increase. According to the governments predictions the amount of traffic on roads in England and Wales will increase by 51% between 2015 and 2050 so there may be a need to revisit travel plans with a view to reducing further car use.</p> <p>Reducing car use must a key theme of this Local Plan. This requires a range of measures ensuring dense housing development with high quality walking and cycling routes. There needs to be restrictions on car parking along with the provision of transport and delivery hubs to enable the use of cargo bikes and similar for deliveries. In addition there should be climate adaptation measures including green spaces and green architecture.</p>	The Local Plan should stipulate that travel plans should be reviewed every 5 years to take account of the degree of compliance, improvements in public transport, changes in the amount of traffic etc..	NO I do not wish to participate at the oral examination.	
Phillip Oliver	<a href="#">RLPPS55</a>	13 D	Comment	Yes	No	Yes	Effective	<p>With regard to cycling there was a period when new cycling routes were constructed but over the last 10 years there has been little progress. Indeed the quality of some routes has declined. The towpath along the Staffordshire and Worcestershire canal was resurfaced in 2000. Replacing the potholed and muddy path with a flat smooth surface made it an attractive off road route for cyclists (and pedestrians). It provided a safe route from Castle Hill to Crossley Park avoiding the busy roads in Kidderminster Town centre. From Crossley Park it is only a short distance to the pedestrian/cycle route which runs long the bund across Puxton Marsh to Bealeui Close and then into Marlpool Gardens. The</p>		NO	

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
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								surface of the towpath has now deteriorated, becoming potholed and muddy, and needs maintenance. There must be provision for monitoring and maintenance when new off or on carriageway routes are developed or old ones improved.			
Phillip Oliver	<a href="#">RLPPS53</a>	Policy 13	Comment	Yes	No	Yes	Effective	<p>This plan puts a lot of reliance on Travel Plans but I am sceptical as to how the effective the monitoring arrangements will be particularly as the level of traffic is predicted to remorselessly increase. According to the governments predictions the amount of traffic on roads in England and Wales will increase by 51% between 2015 and 2050 so there may be a need to revisit travel plans with a view to reducing further car use.</p> <p>Reducing car use must a key theme of this Local Plan. This requires a range of measures ensuring dense housing development with high quality walking and cycling routes. There needs to be restrictions on car parking along with the provision of transport and delivery hubs to enable the use of cargo bikes and similar for deliveries. In addition there should be climate adaptation measures including green spaces and green architecture.</p>	I would suggest the following wording:"Travel Plans will be reviewed every 5 years. If there has been a significant increase in traffic levels, improved cycling and walking provision, or improved public transport, then the Travel Plan will be modified to reduce the number of journeys by motorised vehicles".	NO	
Phillip Oliver	<a href="#">RLPPS54</a>	Policy 13 D	Comment	Yes	No	Yes	Effective	<p>There needs to be a new approach to bus services otherwise the decline will continue over the plan period. This will have a detrimental impact on measures to reduce social inequality, congestion, pollution and GHG emissions. Bus services should be viewed as a public service providing essential environmental and social benefits. To achieve these objectives will require more investment. In our response to the consultation on Passenger Transport by WCC we suggested 2 possible solutions. One would be the creation of a franchise as set out in the Bus Services Act 2016 were all services in a particular area, both profitable and loss making, are contracted to one operator (although to make a profit for the operator it is likely the area covered would have to be bigger than just the Wyre Forest District). Our other proposal would be the introduction of a work place parking levy with the revenue being ploughed back</p>		NO	

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
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								into the public transport. Nottingham city council introduced a parking levy and are raising £9 million per annum.			
Wyre Forest Cycle Forum Clive Prince	<a href="#">RLPPS64</a>	13.1	Comment	Yes	No	Yes	Effective	Wyre Forest Cycle Forum offers its whole hearted support to the reasoned justifications presented through Chapter 13 – Transport and Accessibility: they describe many of the active concerns we have discussed at our regular meetings.  We hope and expect councillors to understand, endorse and support the implications of its realistic Implementation. We describe evidence in our comments that that the necessary “Soundness” has not been adequately applied.		YES	Please see reasons from earlier submission: The Wyre Forest Cycle Forum wishes to produce constructive comments which can be used to support the future sustainability and transport infrastructure.
Wyre Forest Cycle Forum Clive Prince	<a href="#">RLPPS65</a>	13.2	Comment	Yes	No	Yes	Effective	The Churchfields Master Plan Scheme does not meet the National Planning Policy required Standards of Soundness. The Wyre Forest Cycle Forum have viewed the plan with officers of Wyre Forest District Council and Worcestershire County Council and, whilst supporting the policy, are very concerned that the suggested infrastructure is not adequate for pedestrians and cyclists.  As an example the Blackwell Street underpass on the A456, which links the Horse Fair to Kidderminster Centre, is on the east side of Blackwell Street while the proposed improved footway is on the west side and within this development there is no provision for cyclists at all.	There needs to be provision for cyclists. The upgraded footpath must connect with the underpass. Deprivation and poverty, obesity, air pollution, global warming, mental and physical health are all issues particularly affecting this area. This presently produces is a political opportunity - it would be sad if our responsible politicians failed to grasp it.	Yes	Comments as previously
Wyre Forest Cycle Forum Clive Prince	<a href="#">RLPPS66</a>	3.16	Comment	Yes	No	Yes	Effective	In the current enhancements to Kidderminster Rail Station there is no acknowledgement that access for cycles and e-bikes to the Station are an essential element, especially if the station is to cope with increased passenger numbers. The car park is already full just after 8am on weekdays and the present franchisee restricts bikes being taken onto trains. The WLEP are working with Midlands Energy Hub on e-bike infrastructure at Malvern station, but not in Kidderminster. Future plans for enhancement of parking facilities at Blakedown and Hartlebury cannot replace adequate storage facilities for cycles and e-bikes at Kidderminster and	For effectiveness, there must be a safe entrance to the station for pedestrians, disabled and cyclists coming from Kidderminster centre - the Forum suggests extending the shared use path into the station forecourt - where cars will be travelling slowly and there is no distraction to car drivers from cars travelling down Comberton Hill. Midlands Energy Hub are meeting Wyre Forest District Council this Thursday - effectiveness would be demonstrated if, at this late stage the e-bike	YES	See previous statements- Wyre Forest Cycle Forum is well aware of the problems which have historically limited the implementation. We wish to ensure our constructive support is not interpreted as critical to the implementation of

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
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								we believe these should be given priority, as is the case elsewhere in Europe.	infrastructure being introduced in Malvern can be supported for Kidderminster Station. Storage - adequate storage facilities must be demonstrated at Kidderminster station, particularly in view on the increasing number of passengers needing to use other modes of transport to enable them to use the rail network.		the policy.
Wyre Forest Cycle Forum Clive Prince	<a href="#">RLPPS67</a>	3.18	Comment	Yes	No	Yes	Effective	The present enhancements to Kidderminster Station do not provide safe access for cyclists and pedestrians coming from Kidderminster Town Centre and the proposed re-development of the old Law Courts. They presently use the shared path on the South side of Comberton Hill but the proposed "reconfiguration of the station entrance to provide a safer, more regulated environment for all modes of transport " (ref:WLEP) is neither safe nor more regulated. Whilst cyclists leaving the station could safely use the road used by cars, the entrance drive is too wide to safely cross to access the station, particularly in an environment when car users arriving at the station may feel rushed and anxious to get to their trains.	Urgent dialogue with West Midlands Trains, as franchisee to ensure they do not breach the agreement with WLEP to provide "reconfiguration of the station entrance to provide a safer, more regulated environment for all modes of transport"(ref:WLEP). The simplest/minimal cost option would involve extending the shared use path further and then providing a crossing point within the station complex. Alternatively a further pelican crossing at the station entrance linked to the one on Comberton Hill could allow pedestrians/disabled to cross at the entrance to a shared path on the north side of the station complex.	YES	See previous statements- Wyre Forest Cycle Forum is well aware of the problems which have historically limited the implementation. We wish to ensure our constructive support is not interpreted as critical to the implementation of the policy.
Wyre Forest Cycle Forum Clive Prince	<a href="#">RLPPS68</a>	3.22	Comment	Yes	No	Yes	Consistent with National Policy	The present parking at Kidderminster station is inadequate. The national policy for sustainability does not suggest people drive further to Stourbridge or Blakedown, whilst we acknowledge this is preferable to them driving even further.	Whilst Wyre Forest has significantly improved its cycle transport infrastructure compared with other areas, resourcing adequate safe cycle infrastructure will see the level of e-bike usage common throughout many parts of Europe in our local community, so markedly reducing the need for the population to use their car to travel to Stourbridge and Blakedown.	NO	
Wyre Forest Cycle Forum Clive Prince	<a href="#">RLPPS69</a>	13.33	Comment	Yes	No	Yes	Justified	The health and NHS benefits of cycling extend well beyond reducing obesity. There is also substantial evidence of: <ul style="list-style-type: none"> <li>Reduced all cause mortality/ death rate (Note: in health care, mortality/death rate statistics have much greater weight than</li> </ul>	More resources: the justification for resourcing cycle/e-bike transport infrastructure becomes a much higher priority when it is realised that it significantly influences the health of our local population in so many ways, including reducing the overstretched	NO	

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 13: TRANSPORT AND ACCESSIBILITY**

Respondent	Response No.	Part of Document	Support /Comment/ Object	Legally Compliant?	Sound?	DTC ?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
								<p><i>illness/morbidity statistics)</i></p> <ul style="list-style-type: none"> <li>• Reduced incidence of Diabetes</li> <li>• Reduced incidence of Heart Disease</li> <li>• Cycling being gentle on joints meaning even patients with osteoarthritis can increase their physical activity</li> <li>• Cancer reduction (<i>Studies show reduced incidence of Colon and Breast Cancer as a result of physical activity)</i></li> <li>• Increased fitness in children</li> <li>• Improvement in Mental Health</li> <li>• Reduced Road Traffic Deaths. (<i>Although the risk to cyclists from vehicles is greater than car to car accidents, overall road traffic deaths decrease with increasing cycling)</i></li> <li>• Promotion of cycling (not even the cycling itself) reduces accidents to cyclists by 20%</li> </ul>	needs of the NHS. Cycling has been limited by concern of injury from accidents, without the realisation of the reality that cycling decreases morbidity/illness more than the risk of injury and in it self reduces the risk of injury. Further, with the technology of e-bikes, the belief that cycling is only possible where the countryside is flat or the cyclists are incredibly healthy is no longer an issue.		

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 14: STRATEGIC GREEN INFRASTRUCTURE**

Respondent	Response No.	Part of Document	Support /Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
Richborough Estates  Ian Deverell	<a href="#">RLPPS236</a>	Policy 14 Strategic Green Infrastructure	Comment					<p>NPPF2 defines green infrastructure as a “network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for communities”. This definition indicates green infrastructure provides a qualitative role. In this context, delivering less than</p> <p>40% green infrastructure on site could provide more benefits if it is high quality, including of exceptional ecological value, and very accessible.</p> <p>Furthermore, it conflicts with emerging Policy 20c (provision for open space, sports pitches and outdoor community uses in housing development). Bullet three of Policy 20c requires new development to provide sufficient green infrastructure in accordance with Policy 14, however the precise amount will be determined through local evidence, i.e. the playing pitch strategy.</p> <p>The Council’s Open Space Addendum (October 2018) must form ‘local evidence’. The Addendum provides specific quantitative open space requirements (including all types of strategic green infrastructure) for each proposed allocation, based on site capacity and the associated population generation. In the case of land to the north west of Habberley Road, Kidderminster, the Addendum indicates the open space requirements total 1.59ha. This totals less than 40% of the gross total site area.</p>	<p>Policy 14, as drafted, is therefore not justified by the evidence base and could compromise the plan’s ability to effectively meet the district’s housing needs over the plan period. It should therefore be</p> <p>Modified to remove the 40% requirement for strategic green infrastructure and instead reflect the local evidenced needs (in particular the Open Space Addendum).</p>		

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 14: STRATEGIC GREEN INFRASTRUCTURE**

Respondent	Response No.	Part of Document	Support /Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
								Policy 14, as drafted, is therefore not justified by the evidence base and could compromise the plan's ability to effectively meet the district's housing needs over the plan period. It should therefore be modified to remove the 40% requirement for strategic green infrastructure and instead reflect the local evidenced needs (in particular the Open Space Addendum).			
Sport England Stuart Morgans	<a href="#">RLPPS168</a>	Policy 14 Strategic Green Infrastructure	Comment					Sport England have previously made representations in respect of policy 14 (Green Infrastructure). Whilst the policy is generally supported, representations were made to the 2018 pre-submission draft in respect of consistency with other policies in the plan (notably policies 20B-C) and to the guidance contained in the NPPF paras 96 and 97.	<p>Sport England has re-considered the policy wording following further discussions with the Council. Sport England acknowledges that the policy as drafted makes provision for new developments to contribute towards provision, maintenance, improvement and connectivity of Green Infrastructure. Therefore the previous representations in respect of part B of the policy are withdrawn.</p> <p>Whilst Sport England remains concerned that the exclusion of site allocations from the tests in part 6 of the policy may not be consistent with other policies in the plan and the guidance in the NPPF, it is considered that policy 20A provides adequate protection of playing fields, and therefore Sport England does not wish to object to this policy, but invites the inspector to consider the point raised regarding the exclusion of site allocations and the modification previously put forward.</p>	No	

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 14: STRATEGIC GREEN INFRASTRUCTURE**

Respondent	Response No.	Part of Document	Support /Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
Taylor Wimpey West Midlands	<a href="#">RLPPS276</a>	.Policy 14	Comment					<p>To avoid any confusion, this representation provides a comprehensive response and therefore is intended to <u>replace</u> that previously submitted in December 2018.</p> <p>This representation relates to land off Comberton Road, Kidderminster (see Site Location Plan at <b>Appendix 1</b>) which is within the control of Taylor Wimpey.</p> <p>Land off Comberton Road forms a significant element of the proposed East of Kidderminster Urban Extension, which Policy 32 (Kidderminster Eastern.</p> <p><b>Policy 14 Strategic Green Infrastructure</b></p> <p>3.75 This policy requires new development to contribute positively to the District's green infrastructure network and requires a proportion of each site to be dedicated to green infrastructure. There is concern that this requirement will negatively impact upon a number of policies set out above, including housing land supply, density and viability. The inclusion of a specific percentage is too prescriptive and green infrastructure provision should be considered on a site by site basis.</p> <p><b>LAND AT COMBERTON ROAD, KIDDERMINSTER</b></p> <p>4.1 Taylor Wimpey is currently in control of the land to the north of Comberton Road and to the south of the Birmingham to Worcester railway line, and a further area of land to the</p>		Yes	<p>Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan.</p> <p>Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern extension in the overall spatial strategy contained therein.</p>

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 14: STRATEGIC GREEN INFRASTRUCTURE**

Respondent	Response No.	Part of Document	Support /Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
								<p>south of Comberton Road, as shown on the Site Location Plan appended to this representation (<b>Appendix 1</b>).</p> <p>4.2 Sites OC/6 and OC/13N form the majority of the proposed East of Kidderminster Urban Extension. Land to the south of Comberton Road represents an omission site previously identified as an Option 'A' site within the Preferred Options document.</p> <p>4.3 Land to the north of Comberton Road has been promoted as an infrastructure led residential development incorporating significant green infrastructure provision, land for a primary school and land for other community facilities that may be required.</p> <p>4.4 Whilst an area of land to the south of Comberton Road is promoted for development, this is promoted as a latter phase that could be delivered beyond the proposed plan period (safeguarded land).</p> <p>4.5 A Development Vision document has been prepared to introduce an initial concept master plan for the delivery of the site. This document attached at <b>Appendix 2</b>, pulls together a wide range of technical information collected to date that has been utilised in shaping the initial proposal and provides an indication of how the site could be delivered and will function as an eastern extension to the town of Kidderminster.</p> <p>4.6 Taylor Wimpey is committed to delivering on the following objectives</p>			

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 14: STRATEGIC GREEN INFRASTRUCTURE**

Respondent	Response No.	Part of Document	Support /Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
								<p>for land north of Comberton Road:</p> <ul style="list-style-type: none"> <li>• Delivery of quality new homes;</li> <li>• Delivery of a choice of housing;</li> <li>• Provision of a quality design;</li> <li>• Maintenance and enhancement of connectivity and accessibility;</li> <li>• Provision of public open space;</li> <li>• Provision of community facilities;</li> <li>• Maintenance and enhancement of site characteristics;</li> <li>• Creation of an attractive and safe community; and</li> <li>• Achievement of sustainable and safe development.</li> </ul> <p>4.7 These objectives underpin a Development Framework for the site that identifies the following key features for land to the north of Comberton Road:</p> <ul style="list-style-type: none"> <li>• Approximately 1,400 dwellings;</li> <li>• Delivery of a new 20mph spine road, providing a new vehicular link between Birmingham Road (A456), via Husum Way, and Comberton Road/Stone Hill (A448);</li> <li>• Provision of new pedestrian/cycle links between the site and Tennyson Way and Borrington Road to provide permeability and integration with the existing urban edge of Kidderminster;</li> <li>• Provision of land for the</li> </ul>			

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 14: STRATEGIC GREEN INFRASTRUCTURE**

Respondent	Response No.	Part of Document	Support /Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
								<p>delivery of a number of community uses, including the provision of a new Primary School, a community facility to accommodate a meeting room, potentially café and potentially a GP surgery;</p> <ul style="list-style-type: none"> <li>• Significant provision of Green Infrastructure to include a landscape mitigation strategy that has been developed in line with the Kidderminster East GI Concept Statement;</li> <li>• Provision of SuDS through the delivery of new attenuation features; and</li> <li>• A new enduring Green Belt boundary to the east of Kidderminster.</li> </ul> <p>4.8 Further consideration of the site is set out below having regard to the Council's evidence base and the technical information prepared on behalf of Taylor Wimpey to date. This analysis concludes that sites OC/6 and OC/13N, which are within the control of Taylor Wimpey, are both suitable and deliverable. This provides confidence that the proposed East of Kidderminster Urban Extension is 'soundly' based.</p>			

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 15: WATER MANAGEMENT**

Respondent	Response No.	Part of Document	Support /Comment/ Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
Taylor Wimpey West Midlands	<a href="#">RLPPS277</a>	Policy 15A	Object					<p>To avoid any confusion, this representation provides a comprehensive response and therefore is intended to <u>replace</u> that previously submitted in December 2018.</p> <p>This representation relates to land off Comberton Road, Kidderminster (see Site Location Plan at <b>Appendix 1</b>) which is within the control of Taylor Wimpey.</p> <p>Land off Comberton Road forms a significant element of the proposed East of Kidderminster Urban Extension, which Policy 32 (Kidderminster Eastern.</p> <p><b>Policy 15A Water Conservation</b></p> <p>3.76 Whilst it is commendable to deliver water conservation and efficiency, it is important that local planning policies do not accelerate beyond requirements of building regulations, particularly without evidence to support that such requirements are deliverable and will not prevent the speedy delivery of housing in accordance with the aspirations of the NPPF. Optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the PPG. This evidence does not appear to be present.</p> <p>3.77 The Water Cycle Study Final Report (May 2017) and the Addendum dated October 2018 concludes that <i>“overall, there are no major identified issues which indicate that the planned scale, location and timing of planned development within the District is unachievable from the perspective of supplying water and wastewater services and preventing deterioration of water quality in receiving waters.”</i> This would indicate that accelerating beyond the requirements of</p>	3.78 The requirement for the higher water efficiency standard should be deleted.	Yes	<p>Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan.</p> <p>Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern extension in the overall spatial strategy contained therein.</p>

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 15: WATER MANAGEMENT**

Respondent	Response No.	Part of Document	Support /Comment/ Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
								<p>building regulations in respect of water conservation and efficiency is not justified.</p> <p>3.78 The requirement for the higher water efficiency standard should be deleted.</p> <p><b>LAND AT COMBERTON ROAD, KIDDERMINSTER</b></p> <p>4.1 Taylor Wimpey is currently in control of the land to the north of Comberton Road and to the south of the Birmingham to Worcester railway line, and a further area of land to the south of Comberton Road, as shown on the Site Location Plan appended to this representation (<b>Appendix 1</b>).</p> <p>4.2 Sites OC/6 and OC/13N form the majority of the proposed East of Kidderminster Urban Extension. Land to the south of Comberton Road represents an omission site previously identified as an Option 'A' site within the Preferred Options document.</p> <p>4.3 Land to the north of Comberton Road has been promoted as an infrastructure led residential development incorporating significant green infrastructure provision, land for a primary school and land for other community facilities that may be required.</p> <p>4.4 Whilst an area of land to the south of Comberton Road is promoted for development, this is promoted as a latter phase that could be delivered beyond the proposed plan period (safeguarded land).</p> <p>4.5 A Development Vision document has been prepared to introduce an initial concept master plan for the delivery of the site. This document attached at <b>Appendix 2</b>, pulls together a wide range of technical information collected to date that has been utilised in</p>			

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 15: WATER MANAGEMENT**

Respondent	Response No.	Part of Document	Support /Comment/ Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
								<p>shaping the initial proposal and provides an indication of how the site could be delivered and will function as an eastern extension to the town of Kidderminster.</p> <p>4.6 Taylor Wimpey is committed to delivering on the following objectives for land north of Comberton Road:</p> <ul style="list-style-type: none"> <li>• Delivery of quality new homes;</li> <li>• Delivery of a choice of housing;</li> <li>• Provision of a quality design;</li> <li>• Maintenance and enhancement of connectivity and accessibility;</li> <li>• Provision of public open space;</li> <li>• Provision of community facilities;</li> <li>• Maintenance and enhancement of site characteristics;</li> <li>• Creation of an attractive and safe community; and</li> <li>• Achievement of sustainable and safe development.</li> </ul> <p>4.7 These objectives underpin a Development Framework for the site that identifies the following key features for land to the north of Comberton Road:</p> <ul style="list-style-type: none"> <li>• Approximately 1,400 dwellings;</li> <li>• Delivery of a new 20mph spine road, providing a new vehicular link between Birmingham Road (A456), via Husum Way, and Comberton Road/Stone Hill (A448);</li> <li>• Provision of new pedestrian/cycle links between the site and Tennyson Way and Borrington Road to provide permeability and integration with the existing urban edge of Kidderminster;</li> <li>• Provision of land for the delivery of a number of community uses, including the provision of a new Primary School, a community facility to accommodate a meeting room, potentially café and</li> </ul>			

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 15: WATER MANAGEMENT**

Respondent	Response No.	Part of Document	Support /Comment/ Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
								<p>potentially a GP surgery;</p> <ul style="list-style-type: none"> <li>• Significant provision of Green Infrastructure to include a landscape mitigation strategy that has been developed in line with the Kidderminster East GI Concept Statement;</li> <li>• Provision of SuDS through the delivery of new attenuation features; and</li> <li>• A new enduring Green Belt boundary to the east of Kidderminster.</li> </ul> <p>4.8 Further consideration of the site is set out below having regard to the Council's evidence base and the technical information prepared on behalf of Taylor Wimpey to date. This analysis concludes that sites OC/6 and OC/13N, which are within the control of Taylor Wimpey, are both suitable and deliverable. This provides confidence that the proposed East of Kidderminster Urban Extension is 'soundly' based.</p>			

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 16: POLLUTION MINERALS AND WASTE**

Respondent	Response No.	Part of Document	Support /Comment/ Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
Worcestershire County Council, Planning Economy & Performance  Emily Barker	<a href="#">RLPPS77</a>	Policy 16B Minerals	Comment					<p>WCC's 2018 response included a schedule of recommendations for additions to specific allocation policies to ensure they fully reflect the need to take account of minerals and waste safeguarding. WCC and WFDC officers subsequently met in January 2019 to discuss amendments to site-specific policies, and reached agreement on a list of amendments that would be required. These agreed amendments have not yet been reflected in the text of the plan. WCC is satisfied that these changes can be accommodated within main and/or minor modifications, and is actively engaged with WFDC to agree specific wording. We will also expect this to be reflected in a Duty to Co-operate agreement/Statement of Common Ground between our respective organisations. For the avoidance of doubt, the agreed list showing minerals and waste requirements for proposed site allocations policies is reproduced in the attached letter.</p> <p>We regret, however, that other recommendations we made to ensure the plan is sound have not yet been addressed. As such, we wish to stress that - with the exception of the section titled 'Sustainable Transport', and subject to ongoing DtC discussions between WCC and WFDC officers - the comments submitted by WCC and dated 17th December 2018 remain extant and should be taken into account.</p>			

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 17: DEVELOPMENT MANAGEMENT INTRODUCTION**

THERE WERE NO RESPONSES TO THIS SECTION

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 18: A DESIRABLE PLACE TO LIVE**

THERE WERE NO RESPONSES TO THIS SECTION

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 19: PROVIDING ACCOMODATION FOR GYPSIES, TRAVELLERS AND TRAVELLING SHOWPEOPLE**

THERE WERE NO RESPONSES TO THIS SECTION

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 20: COMMUNITY FACILITIES**

Respondent	Response No.	Part of Document	Support /Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
Theatres Trust  Tom Clark MRTPI	<a href="#">RLPPS34</a>	Policy 20A - Community Facilities	Support	Yes	Yes	Yes		The Trust continues to support this policy as set out in our representation during the previous consultation.		No.	

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 20: COMMUNITY FACILITIES**

Respondent	Response No.	Part of Document	Support /Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
Sport England  Stuart Morgans	<a href="#">RLPPS173</a>	Policy 20C	Object		No		Consistent with National Policy	<p>Sport England are supportive of the intentions of Policy 20C to provide sporting provision (on site or off site) to meet the demand generated from new developments, responding to and addressing the issues and requirements of the Council's Playing Pitch Strategy and other relevant strategies and subsequent updates. However, the policy as currently worded sets out no mechanism as to how demand from new developments can be calculated to inform on site and/or off site sports pitch provision. There also appears an onus on the applicant to demonstrate how they have addressed the issues and requirements of the Council's strategies such as the Playing Pitch Strategy.</p> <p>The Policy makes reference to open space standards contained within Table 20.0.1 but for playing pitches paragraph 20.19 states that provision will be informed by the Planning Obligations SPD. In viewing the currently adopted Planning Obligation SPD it is unclear how demand for playing pitches will be calculated and the Council's Local Development Scheme June 2019, does not set out the timescales as to when the SPD will be updated.</p> <p>Sport England are aware that the Council have prepared addendums to the Playing Pitch Strategy (PPS) and Built Sports Facilities Strategy (BFS), which uses Sport England's Playing Pitch Calculator (PPC), and Sports Facilities Calculator (SFC) to identify the demand for playing pitches and built sports facilities generated by the proposed housing set out in the Local Plan Review. It is anticipated that the Council therefore intends to use the PPC and SFC alongside the evidence in the PPS and BFS, and Sport England would support this approach, providing this is clearly written into the policy and the reasoned justification.</p> <p>It is therefore considered that the Policy 20C is unsound as currently drafted as it is not effective in setting out a consistent approach/mechanism as to how calculate demand generated from developments for sporting facilities and pitches.</p>	<p>To ensure the policy is sound Sport England considers it is necessary for Policy 20C to make reference to Sport England Calculators to ascertain the level and type of provision needed for both indoor sports facilities and outdoor playing pitches. The calculators provide a consistent approach to assessing demand generated from new developments. The following wording is suggested to be added to policy 20C:</p> <p><b>For the provision of indoor sports facilities and outdoor playing pitches, proposals will be expected to use the Sports England Playing Pitch Calculator and Sports Facilities Calculator to ascertain the level and type of provision needed. Applicants will be expected to provide an assessment to demonstrate how the level of demand identified by the calculators will be met, taking account the evidence within the Council's Indoor Sports Facilities and Playing Pitch Strategy so that on site/off-site provision can be appropriately identified to take account of local circumstances and the need to complement the Council's preferred delivery strategy.</b></p> <p>The following paragraphs are suggested to be added to the reasoned justification in paragraphs</p> <p>20.14-20.19:</p> <p><i>The Sport England's Playing Pitch Demand Calculator calculates a development's playing pitch requirements. The calculator identifies associated costs for providing the required pitches and associated ancillary facilities (such as changing rooms and car parking) to meet the demand generated by the development. Whether there is capacity within existing pitches to meet the demand generated by the development or whether additional provision is required needs to be considered, taking into</i></p>	No.	

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 20: COMMUNITY FACILITIES**

Respondent	Response No.	Part of Document	Support /Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
									<p><i>account evidence in the Playing Pitch Strategy.</i></p> <p><i>For larger developments the expectation will be that the development will provide new sports pitches on site. However, in accordance with policy 20C, in cases where it is demonstrated that this is not feasible or appropriate, an off-site contribution will be required. The size of the proposed residential development may not create demand for a whole pitch. In such cases, it may be appropriate to secure a financial contribution to increase the capacity of an existing site or to contribute financially to new provision off-site. Consideration should be given to identifying suitable investment priorities that could serve the proposed development and which could benefit from a contribution towards increasing capacity to meet demand generated from the development, taking into account the findings of the Playing Pitch Strategy.</i></p> <p><i>The Council's Playing Pitch Strategy identifies shortfalls of provision to meet quantitative needs for football (both natural grass pitches and artificial grass pitches) and rugby union, qualitative improvements to grass pitches for all pitch sports and the need for provision of new and improved changing room facilities. It also identifies the need for two 3G additional artificial grass pitches for football, and there is a need to re-surface an existing hockey pitch at Stourport Sports Club.</i></p> <p><i>If financial contributions are found to be preferable, the Playing Pitch Strategy Action Plan should be used to identify existing sites for investment.</i></p>		

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 21: EMPLOYMENT LAND**

THERE WERE NO RESPONSES TO THIS SECTION

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 22: TOWN CENTRE DEVELOPMENT AND RETAIL**

THERE WERE NO RESPONSES TO THIS SECTION

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 23: SUSTAINABLE TOURISM**

THERE WERE NO RESPONSES TO THIS SECTION

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 24: TELECOMMUNICATIONS AND RENEWABLE ENERGY**

Respondent	Response No.	Part of Document	Support/Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Att Ex
Richborough Estates Ian Deverell	<a href="#">RLPPS237</a>	Policy 24A Telecommunications and Broadband	Comment					<p>The requirement for new development to provide ultrafast broadband infrastructure or alternative superfast solutions, and facilitate state of the art mobile coverage for 5G could be overly prohibitive and risks stalling the delivery of new housing. Indeed testing for 5G is still in its initial phases; it has not been tested across the network and is unlikely to be launched before 2020.</p> <p>In order to ensure the policy is justified and does not compromise the plan's ability to effectively deliver the district's housing needs, the policy should be modified to be clear that it is not a requirement of new development to provide this technology, rather it should encourage it where possible.</p>		
Owl Homes	<a href="#">RLPPS224</a>	Policy 24B	Comment	Yes	Yes	Yes		<p>Owl Homes is working with the landowners of land off Habberley Road, Bewdley to support proposals for residential development. The site is a proposed allocation in the emerging Local Plan to which these representations relate. Owl Homes supports the Council in proactively seeking growth in its area and in preparing a new Local Plan to enable this.</p> <p>Policy 24B seeks electric vehicle charging points to be provided with every development. Owl Homes supports the aspiration to encourage more sustainable modes of transport, however in certain circumstances and locations it may not be appropriate to provide electric vehicle charging points on every development and therefore the Policy should allow flexibility in permitting development without this provision, where suitable justification has been provided.</p> <p>At present, the Policy is too onerous and may unduly constrain delivery of development land. As such, it is unsound as it is not justified.</p>	The Policy should be revisited to encourage the provision of electric vehicle charging spaces rather than requiring such provisions.	Yes
Richborough Estates Ian Deverell	<a href="#">RLPPS238</a>	Policy 24B Renewable and Low Carbon Energy	Comment					<p>This policy requires that new development over one dwelling should incorporate renewable energy technology to generate at least 10% of the development's energy needs. All new developments should also include electric vehicle charging points.</p> <p>These requirements are onerous and could comprise the viability of new development and the plan's ability to deliver the district's housing needs in full. There is also no evidence to underpin the policy's requirements.</p> <p>Responses to the Preferred Options consultation made it clear that renewable energy requirements are onerous when standards are already set as part of Building Regulations and this remains the case. Energy efficiency standards are set through Part L of Building Regulations. NPPF2 states that new development should plan to help reduce greenhouse gas</p>	For the policy to be consistent with national planning policy and justified, the last line of the first paragraph and the second section of the policy (titled incorporating renewable and low carbon energy into new development) should be deleted.	

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RESPONSES TO CHAPTER 24: TELECOMMUNICATIONS AND RENEWABLE ENERGY**

Respondent	Response No.	Part of Document	Support/ Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Att Ex
								emissions by its location, orientation and design.  For the policy to be consistent with national planning policy and justified, the last line of the first paragraph and the second section of the policy (titled incorporating renewable and low carbon energy into new development) should be deleted.		
Wyre Forest District Council  Vicky Caulfield	<a href="#">RLPPS107</a>	Policy 24B Renewable and Low Carbon Energy	Comment	Yes	Yes	Yes		24B: General: New housing should be built to the highest standards of energy efficiency e.g. Swiss Minergie/Passivhaus standards.  The NPPF, p48 "The Framework does not prevent local authorities from using their existing powers under the Planning and Energy Act 2008 or other legislation where applicable to set higher ambition. In particular local authorities are not restricted in their ability to require energy efficiency standards above Building Regulations".  In 24.14 it says 80% cut in emissions by 2050, this needs updating to net carbon zero following the new laws. Wyre Forest District Council has also declared a climate emergency. Planting trees in new developments will be vital in carbon capture and meeting net carbon zero.  No mention of empty homes:  A 2017 study found that there were 778 empty properties in the District of which 365 have stood empty for over 6 months- some for many years. This is an era where policies should be stepped up to improve occupancy and therefore reduce demand for new homes.		
Taylor Wimpey West Midlands	<a href="#">RLPPS278</a>	.Policy 24B	Comment					To avoid any confusion, this representation provides a comprehensive response and therefore is intended to <u>replace</u> that previously submitted in December 2018.  This representation relates to land off Comberton Road, Kidderminster (see Site Location Plan at <b>Appendix 1</b> ) which is within the control of Taylor Wimpey.  Land off Comberton Road forms a significant element of the proposed East of Kidderminster Urban Extension, which Policy 32 (Kidderminster Eastern).  <b>Policy 24B Renewable and Low Carbon Energy</b>  3.79 Whilst it is commendable to deliver renewable and low carbon energy as part of a proposal, it is important that local planning policies do not accelerate beyond requirements of building regulations, particularly		Yes

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
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Respondent	Response No.	Part of Document	Support/ Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Att Ex
								<p>without evidence to support that such requirements are deliverable and will not prevent the speedy delivery of housing in accordance with the aspirations of the NPPF.</p> <p>3.80 In addition, the policy states that all new developments should include electric vehicle charging points. This requirement is not considered to be fully justified by the Council and it is questioned whether the network capacity exists for such provision.</p> <p><b>LAND AT COMBERTON ROAD, KIDDERMINSTER</b></p> <p>4.1 Taylor Wimpey is currently in control of the land to the north of Comberton Road and to the south of the Birmingham to Worcester railway line, and a further area of land to the south of Comberton Road, as shown on the Site Location Plan appended to this representation (<b>Appendix 1</b>).</p> <p>4.2 Sites OC/6 and OC/13N form the majority of the proposed East of Kidderminster Urban Extension. Land to the south of Comberton Road represents an omission site previously identified as an Option 'A' site within the Preferred Options document.</p> <p>4.3 Land to the north of Comberton Road has been promoted as an infrastructure led residential development incorporating significant green infrastructure provision, land for a primary school and land for other community facilities that may be required.</p> <p>4.4 Whilst an area of land to the south of Comberton Road is promoted for development, this is promoted as a latter phase that could be delivered beyond the proposed plan period (safeguarded land).</p> <p>4.5 A Development Vision document has been prepared to introduce an initial concept master plan for the delivery of the site. This document attached at <b>Appendix 2</b>, pulls together a wide range of technical information collected to date that has been utilised in shaping the initial proposal and provides an indication of how the site could be delivered and will function as an eastern extension to the town of Kidderminster.</p> <p>4.6 Taylor Wimpey is committed to delivering on the following objectives for land north of Comberton Road:</p> <ul style="list-style-type: none"> <li>• Delivery of quality new homes;</li> <li>• Delivery of a choice of housing;</li> <li>• Provision of a quality design;</li> <li>• Maintenance and enhancement of connectivity and accessibility;</li> </ul>		

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RESPONSES TO CHAPTER 24: TELECOMMUNICATIONS AND RENEWABLE ENERGY**

Respondent	Response No.	Part of Document	Support/ Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Att Ex
								<ul style="list-style-type: none"> <li>• Provision of public open space;</li> <li>• Provision of community facilities;</li> <li>• Maintenance and enhancement of site characteristics;</li> <li>• Creation of an attractive and safe community; and</li> <li>• Achievement of sustainable and safe development.</li> </ul> <p>4.7 These objectives underpin a Development Framework for the site that identifies the following key features for land to the north of Comberton Road:</p> <ul style="list-style-type: none"> <li>• Approximately 1,400 dwellings;</li> <li>• Delivery of a new 20mph spine road, providing a new vehicular link between Birmingham Road (A456), via Husum Way, and Comberton Road/Stone Hill (A448);</li> <li>• Provision of new pedestrian/cycle links between the site and Tennyson Way and Borrington Road to provide permeability and integration with the existing urban edge of Kidderminster;</li> <li>• Provision of land for the delivery of a number of community uses, including the provision of a new Primary School, a community facility to accommodate a meeting room, potentially café and potentially a GP surgery;</li> <li>• Significant provision of Green Infrastructure to include a landscape mitigation strategy that has been developed in line with the Kidderminster East GI Concept Statement;</li> <li>• Provision of SuDS through the delivery of new attenuation features; and</li> <li>• A new enduring Green Belt boundary to the east of Kidderminster.</li> </ul> <p>4.8 Further consideration of the site is set out below having regard to the Council's evidence base and the technical information prepared on behalf of Taylor Wimpey to date. This analysis concludes that sites OC/6 and OC/13N, which are within the control of Taylor Wimpey, are both suitable and deliverable. This provides confidence that the proposed East of Kidderminster Urban Extension is 'soundly' based.</p>		

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 25: SAFEGUARDING THE GREEN BELT**

Respondent	Response No.	Part of Document	Support /Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
Horton Estates Ltd	<a href="#">RLPPS86</a>	Table 3.0.2	Object	Yes	No	Yes	Consistent with National Policy	<p>Hortons' Estate Ltd ("Hortons") supports point v. in Policy 25 although it should also refer to "limited infilling" (as well as "redevelopment") to accord with national planning policy. Para. 145 criterion g) of the Framework states that "limited infilling or the partial or complete redevelopment of previously developed land..." is an exception to inappropriate development in the Green Belt (emphasis added).</p> <p>Policy 25 to be amended to refer to limited infilling and redevelopment to accord with national planning policy.</p> <p>Hortons' Estate Ltd is the owner of Cursley Distribution Park which is proposed for allocation in the Local Plan under Policy 35. This is a substantial previously-developed site in the Green Belt and Hortons therefore wishes to participate in the Examination Hearings</p>	<p>It is requested that point v. is reworded to state:</p> <p><i>"The proposals involve the limited infilling or redevelopment of..."</i>.</p>	Yes	

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 26: SAFEGUARDING THE HISTORIC ENVIRONMENT**

Respondent	Response No.	Part of Document	Support/Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
Richborough Estates Ian Deverell	<a href="#">RLPPS239</a>	Policy 26 Safeguarding the historic environment	Comment					The proposed allocation to the north west of Habberley Road, Kidderminster (site allocation ref: WA/KF/3) will not result in any harm to the significance or setting of any listed building. The nearest listed building is the grade II Low Habberley Farmhouse, 800m to the north, beyond the village of Low Habberley.			

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 27: QUALITY DESIGN AND LOCAL DISTINCTIVENESS**

Respondent	Response No.	Part of Document	Support/Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
Canal & River Trust	<a href="#">RLPPS89</a>	Policy 27E	Support	Yes	No	Yes	Consistent with National Policy	<p>Whilst the Canal &amp; River Trust is generally supportive of this policy and, in particular the need for development to respond to its canalside setting, we consider that a number of minor modifications are necessary to aid clarity and to assist in the delivery of sustainable development as set out in the comments below.</p>	<p>The Trust is supportive of this policy and the need for development to respond to its canalside setting. The policy states however that development 'must' provide a strong active frontage. Whilst as a principle for development this is supported it should be recognised that there may be instances where this is not appropriate, such as where existing landscaping needs to be retained or dominant buildings are better when visually screened. Developments should take account of the current setting/character of the specific site and surroundings and respond accordingly. This should be reflected in the policy.</p> <p>The policy refers to the improvement of the towpath, appropriate to the urban area through which the canal passes. The canal however also passes through rural areas and any improvements to the towpath need to be appropriate for the use, setting and character of the canal corridor. This should be reflected in the policy.</p> <p>We would suggest the following modification:</p> <p>Development adjacent to the canal <i>should, where appropriate, provide a strong, active frontage onto the waterside providing natural surveillance and promoting high levels of activity during the day</i></p> <p><i>Development in proximity to the canal should promote its use as a sustainable pedestrian and cycle route with towpath surfacing appropriate to the area through</i></p>		

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RESPONSES TO CHAPTER 27: QUALITY DESIGN AND LOCAL DISTINCTIVENESS**

Respondent	Response No.	Part of Document	Support/Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
									<p>which the canal passes <i>and its likely use</i></p> <p>It should also be clarified in paragraph 3 of section C that such improvements will be sought from new development adjacent to the waterway where appropriate.</p>		

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 28: RURAL DEVELOPMENT**

THERE WERE NO RESPONSES TO THIS SECTION

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 29: SITE ALLOCATIONS INTRODUCTION**

THERE WERE NO RESPONSES TO THIS SECTION

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 30: KIDDERMINSTER TOWN**

Respondent	Response No.	Part of Document	Support /Comment/Object	Legally Compliant ?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination ?	Reason for Attending
Richborough Estates  Ian Deverell	<a href="#">RLPPS240</a>	Policy 30 Kidderminster Town	Comment					<p>Policy 6B establishes that Kidderminster is the most sustainable settlement in the district and therefore the focus for significant housing growth. This is recognised by Policy 30, which proposes a number of sites as allocations for residential development around Kidderminster. In accordance with NPPF2 paragraphs 59 and 67, it comprises a variety of sites at different scales, which will ensure the plan is able to deliver housing over the plan period. This ranges from large strategic allocations (i.e. the Lea Castle Hospital site), to smaller, 'oven ready' sites which can deliver immediately, such as Richborough's site to the north west of Habberley Road, Kidderminster (this name better reflects its location on the urban edge of Kidderminster).</p> <p>Table 30.0.1 'Allocated sites in Kidderminster' identifies an 'indicative' capacity for dwellings at each of the allocated sites. It could therefore be that sites deliver less than the indicative figure shown, which risk the plan's supply under delivering, and ultimately the Council's position to demonstrate a five year housing land supply.</p> <p>These capacity figures for proposed allocations should therefore be expressed as a 'minimum' to ensure</p> <p>The plan is positively prepared and effective in meeting the district's minimum housing needs.</p>			
Natural England	<a href="#">RLPPS203</a>	Policy 30 Kidderminster Town	Support	Yes	Yes	Yes		<p>Natural England notes and supports the deletion of the former settling ponds at Wilden Lane (reference PH/1) from the list of allocated sites for Kidderminster (Table 30) and the policies map. This land adjoins Wilden Marsh and Meadows Site of Special Scientific Interest (SSSI). The deletion of FPH/1 is consistent with the following NPPF paragraphs:</p> <p>170 (Sub section 'a' 'protecting and enhancing.... sites of biodiversity value' and 'd' minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures'),</p> <p>171 (Excerpt – 'Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework...').</p> <p>NPPF Para 170 regarding the establishment of coherent and</p>		NO	

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RESPONSES TO CHAPTER 30: KIDDERMINSTER TOWN**

Respondent	Response No.	Part of Document	Support /Comment/Object	Legally Compliant ?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination ?	Reason for Attending
								resilient ecological networks is supported through the Nature Recovery Network approach set out in the Government's Emerging 25-year Environment Plan.			
Sally Merritt-Collins	<a href="#">RLPPS58</a>	30	Comment	Yes	No	Yes	Effective	<p>The site WA/KF/3 Land at Low Habberley is known to have a Ministry of Defence oil pipeline running across it. The markers are clearly visible in the hedge lines. This will make it more difficult and expensive to develop which will in turn mean developers will claim that these costs will render the site unviable for affordable housing, as has already happened at less difficult sites in this area. This clearly conflicts with the policy of providing a certain percentage of affordable housing.</p> <p>It also brings into question whether the anticipated number of houses could actually be built - this limitation does not appear to have been considered, only land area used to estimate numbers.</p> <p>It would be especially short sighted to remove Green Belt protection from this site to find it does not yield anything like the expected number of houses or affordable homes.</p> <p>1. The topography of this site (WA/KF/3) would make the incursion on the Green Belt particularly noticeable. Currently as you travel from Bewdley along the B4190, from the top of High Habberley the land to the right is clearly built up, in front is more conurbation, and to the left is the open aspect of the Green Belt that this site occupies. To build here would seriously affect the feeling of openness; the road provides a perfect boundary already between built up area and green belt.</p> <p>2. This land sits in the Parish of Kidderminster Foreign, a rural parish. This parish has no street lighting anywhere and any large new housing development is bound to require street lighting. This would make the development of this area even obvious at night, and would detract from the rural nature of this area.</p> <p>3. This site is away from employment centres in this area. Public transport is at best poor so it is clear that residents here would need vehicles (average minimum likely 2 per property). It is unclear from the estimated number of houses this site is claimed to offer whether adequate provision for parking has been made or whether the developer would have yet another reason to need to build fewer houses, in particular fewer affordable homes.</p>	Remove from the plan sites that are known to be especially expensive and problematic for developers to stand some chance of delivering the affordable homes percentages that this area needs.	NO	
Canal & River	<a href="#">RLPPS90</a>	Policy 30.6	Comment	Yes	No	Yes	Consistent	The site fronts on to the Staffordshire and Worcestershire Canal	We consider that the	NO	

Local Plan Review Pre-Submission Consultation (September / October 2019)

Summary of Consultation Responses (Regulation 20(2) of the Town and Country Planning (Local Planning) (England) Regulations 2012)

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 30: KIDDERMINSTER TOWN**

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Trust							with National Policy	<p>and we welcome policy wording that identifies the need for proposals to create a high quality pedestrian canal side environment and public realm.</p> <p>Point 4 indicates that proposals should “Deliver a new landmark pedestrian bridge over the canal to Weavers Wharf”. As landowner and navigation authority for the Staffordshire and Worcestershire Canal at this point, we would like to highlight that any such bridge would require the Canal &amp; River Trust’s prior agreement.</p> <p>In addition, any new bridge would inevitably interact with the canal towpath on the eastern bank of the canal and would require the addition of adequate signage to ensure a clear and legible route for pedestrians and cyclists, which should be considered as part of any proposal. We believe this is necessary to achieve a safe and accessible environment alongside the waterway in line with paragraph 91b of the National Planning Policy Framework 2019.</p> <p>We therefore consider that a number of minor modifications are necessary to aid clarity and to assist in the sustainable development of this set as set out in the following comments.</p>	<p>following change to Policy 30.6 and its reasoned justification would address the Trust’s concerns</p> <p>“4. Aim to deliver a new landmark pedestrian bridge over the canal to Weavers Wharf”</p> <p>Para 30.17 “A footbridge would help to extend the town centre across the canal and revitalise this area of Kidderminster. Any new bridge should reflect and complement the existing character and quality of the historic environment adjacent to the Staffordshire and Worcestershire Canal, respond to the setting of any listed buildings and ensure no detrimental impact to users of the canal corridor. New links to the canal towpath should be accompanied by appropriate signage and route-finding for pedestrians and cyclists. The Canal &amp; River Trusts agreement will be required for any such crossing.”</p>		
Canal & River Trust	<a href="#">RLPPS91</a>	Policy 30.9	Comment	Yes	Yes	Yes		The eastern edge of the site is located close to the Staffordshire and Worcestershire Canal and we welcome wording within the policy for proposals to reflect and complement the existing character and quality of the historic environment adjacent to the canal. We note that point 11 refers to the provision for ‘improvements to		NO	

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								pedestrian links into the town centre and out into the surrounding countryside'. We feel that the aims of this point could usefully be expanded upon within the policy's Reasoned Justification to include specific reference to the canal towpath as a link for pedestrians and cyclists, a connection that could be promoted with the addition of appropriate signage and way marking.			
Place Partnership Ltd  Ian Fisher	<a href="#">RLPPS98</a>	Policy 30.11	Object	Yes	No	Yes	Justified Effective	<p>Policies 30 and 30.11 allocate the former Sladen School site (BW/3) for 72 Class C3 dwellings. This proposed allocation is intended to replace Policy KCA.Ch4 of the Kidderminster Central Area Action Plan (adopted July 2013), which allocates the site for the following mix of uses:</p> <ul style="list-style-type: none"> <li>• Class C3 dwelling houses – 20 units were anticipated;</li> <li>• Class C2 residential institutions – Supporting paragraph 9.27 to Policy KCA.Ch4 simply stated '<i>...a community development of some kind is also desirable for this site and would be best placed adjacent to Hurcott Road.</i>'; and</li> <li>• Class D2 leisure developments – Policy KCA.Ch4 confirmed that this could be either indoor and/or outdoor developments.</li> </ul> <p>It later transpired that there was no market interest in delivering Class C2 and Class D2 developments at the site. This in turn led to agreement between Worcestershire County Council (WCC) and Wyre Forest District Council (WFDC) that the developing the site entirely for Class C3 housing was the most viable future for it. This agreement between the two authorities was accordingly reflected in the present drafting of Policies 30 and 30.11.</p> <p>However, in the intervening period between the 2018 public consultation on the Pre-submission Publication document and this one, the situation has changed and hence a requirement for these representations.</p> <p>During April 2019 the Government's Department for Education (DfE) informed WCC and WFDC that land is required at the former Sladen School site (BW/3) for the delivery of a new free Special Educational Needs and Disability (SEND) school. The cost of its construction will be covered by the DfE. Once completed, it will be run by a third party chosen by the DfE. As shown on the plan enclosed in <b>Appendix 1</b>, the area required for the school comprises</p>	<p>Worcestershire County Council request that the following modifications be made:</p> <p>1. Amendments to Table 30.0.1 of Policy 30 concerning the Sladen School site as follows:</p> <p><b>Site Ref:</b> BW/3</p> <p><b>Site Description:</b> Sladen School site</p> <p><b>Proposed Use:</b> M</p> <p><b>Indicative no. Dwellings:</b> 20</p> <p><b>Gross Site Area(ha):</b> 2.56</p> <p><b>Removed from Green Belt?</b> N</p> <p>2. 2. Amend Policy 30.11 as follows:</p> <p><i>Policy 30.11 Sladen School Site BW/3 (2.56ha)</i></p> <p><i>This site is allocated as a mixed-use site comprising of a new school and residential development. Proposals</i></p>	NO	Whilst we do not consider it necessary to speak at the examination, we would be prepared to do so if the Planning Inspector and/or District Council considered it to be beneficial to proceedings.

APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
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								<p>1.55ha of the 2.56ha landholding.</p> <p>The DfE have stated that they anticipate that the completed SEND school will cater for 60 pupils, with their age range being 4 to 11 years old. This means they will comprise Years 1 to 6 encompassing Key Stages 1 and 2. It is also intended that the building's design will facilitate tutor groups comprising 8 pupils each. In terms of staffing, the DfE are planning for a staff of 20 comprising of:</p> <ul style="list-style-type: none"> <li>• 15 full-time equivalent teaching posts;</li> <li>• 5 management, safeguarding and administrative posts</li> </ul> <p>Whilst a school of the size needed to accommodate the above would not normally require the 1.55ha specified in this case, it is designed to avoid the situation of a superfluous and undevelopable strip of land being left vacant at the rear of the school site. If there were, it would create safeguarding issues and give WCC on-going maintenance and management problems.</p> <p>The precise timetable for delivery of the new school has not been clarified by the DfE yet (at the time of writing). However, the DfE are aiming for the school to be open and operational by early 2022. This is of course well within the forthcoming Local Plan period.</p> <p>As a significant part of the site is now needed for the new SEND school, it will of course not now be possible to deliver the full 72 Class C3 homes currently envisaged by Policies 30 and 30.11. However, the remainder of the site remains available for housing development. In our view the reduced landholding has an indicative capacity of 20 Class C3 homes (net of site constraints).</p> <p>Whilst this represents a significant loss of 52 potential homes at the site itself, WCC would like to highlight that this can be off-set by the Sion Hill Phase 2 site being allocated for 60 Class C3 homes. Please see our representations on this new site for details. It is also worth noting that 20 Class C3 units are the same as the current allocation of the whole landholding under Policy KCA.Ch4 of the Kidderminster Central Area Action Plan (adopted July 2013).</p> <p>By way of clarification, the three main site constraints of the remaining balance of the former Sladen School site available for housing are as follows:</p>	<p><i>should:</i></p> <ol style="list-style-type: none"> <li>1. <b>1. Safeguard land required for a new 60 place school and associated infrastructure.</b></li> <li>2. <b>2. Deliver Class C3 dwelling houses.</b></li> <li>3. <b>3. Primary vehicular access to the site will be from Hurcott Road.</b></li> <li>4. <b>4. Provide pedestrian links through to the adjoining development at Hurcott flats and to Stourbridge Road to the rear.</b></li> <li>5. <b>5. Design the layout to maximise natural surveillance</b></li> </ol>		

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 RESPONSES TO CHAPTER 30: KIDDERMINSTER TOWN

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								<ul style="list-style-type: none"> <li>Necessity of providing land for a suitable new access road into the site from Hurcott Road;</li> <li>Preserving the trees covered by the TPO at the site; and</li> <li>Need for improvements to the Green Infrastructure network.</li> </ul> <p>The above though does not change the fact that the remaining part of the landholding still enjoys the benefits applicable to the whole site that led to its allocation in the first place, namely</p> <ul style="list-style-type: none"> <li>Allocation and subsequent development of the balance of the site for Class C3 housing would be wholly in accordance with paragraphs 8, 11, 20(a), 35, 59, 67, 117, 118(d), 119, 122 and 123(a) of the National Planning Policy Framework (February 2019);</li> <li>The site is clear, vacant and available immediately;</li> <li>Good vehicular and pedestrian access via Hurcott Road;</li> <li>Good access to public transport, as it is on a bus route;</li> <li>Surrounding land comprises of existing residential properties, which are clearly compatible with new Class C3 houses at the site;</li> <li>Contamination of the land is unlikely;</li> <li>Flat topography of the field;</li> <li>Located within Flood Zone 1 i.e. land least likely to flood;</li> <li>There are no records of any protected species being present;</li> <li>It is not located within the Green Belt or other protected area;</li> <li>There are no heritage constraints; and</li> </ul>	<p><b>throughout.</b></p> <p>6. <b>6. Retain and enhance existing green infrastructure network; in particular the trees along the Hurcott Road frontage.</b></p> <p>7. <b>7. Take into consideration the Kidderminster and Stourport Urban and Waterfront Strategic Development Corridor Green Infrastructure Concept Statement.</b></p> <p>3. Amend paragraphs 30.27 and 30.28 as follows:</p> <p><i>30.27 Sladen Middle School closed in July 2007 and was subsequently demolished. The landholding it formally occupied now comprises 3 distinct land parcels, with trees to the boundaries. It will be necessary for these to be retained and enhanced where possible. Residential</i></p>		

APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 30: KIDDERMINSTER TOWN

Respondent	Response No.	Part of Document	Support /Comment/Object	Legally Compliant ?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination ?	Reason for Attending
								<ul style="list-style-type: none"> <li>No constraints from its planning history.</li> </ul> <p>Place Partnership Limited therefore, on behalf of WCC, advocates the retention of the Class C3 housing allocation for the balance (see <b>Appendix 1</b>) of the land remaining at the former Sladen School site. The indicative capacity of this being 20 Class C3 homes.</p>	<p><i>properties neighbour the landholding on all sides.</i></p> <p><i>30.28 This site is in the ownership of Worcestershire County Council. It is proposed to develop it to deliver a new school and approximately 20 Class C3 dwellings. It will be necessary to ensure that both parts of the scheme are appropriately integrated with each other and neighbouring areas. The role of green infrastructure in and around the whole landholding will be an important component of this.</i></p> <p>4. Amend site allocation map 'BW /3 Sladen School' to reflect the boundaries shown in <b>Appendix 1</b> of these representations.</p>		
Kingsbridge Property Services	<a href="#">RLPPS83</a>	Policy 30.12 Land at Stourbridge Road South BW/4	Object		No		Justified Effective	<p>I act on behalf of Kingsbridge Property Services who has acquired from Stanmore Properties Ltd, land designated as BW/4 Hurcott ADR south. The site was previously allocated in the Preferred Options as part of Core Housing Site BW/4 for 200 houses and is now proposed in the Pre submission Plan instead as Green Gap (Policy 30.12). The land in their ownership is shown on location plan 2639-100 Rev B.</p> <p>The northern part is in another ownership and now has planning permission for 91 houses. The southern part however, previously a Core Housing Site, has now been changed with no consultation with the owner to a Green Gap under Policy 30.12 but there is no</p>	<p>The plan should be modified by</p> <ul style="list-style-type: none"> <li>deleting Policy 30.12 to remove the Green Gap designation</li> <li>The site allocated for self-build and custom housing under Policy 8D</li> </ul>	YES	To explain the case with more detailed information on the proposed allocation requested.

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 30: KIDDERMINSTER TOWN**

Respondent	Response No.	Part of Document	Support /Comment/Object	Legally Compliant ?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination ?	Reason for Attending
								<p>evidence to justify this change.</p> <p>Policy 30.12 and the reasoned justification paragraphs 30.30 to 30.32 say the southern part of the ADR will be allocated as green gap and not released for development “<i>in order to protect the Hurcott Pastures SSSI and the setting of the historic Hurcott Village.</i>” The evidence base does not provide any justification to demonstrate any adverse impact of development to the SSSI or the setting of Hurcott village. There is no evidence to support why this approach is necessary. There are no other green gaps anywhere in the district and the policy has no basis.</p> <p><u>Evidence Base</u></p> <p>Location Plan 2639-100 Rev B shows Hurcott Pastures SSSI to be on the southern part of my client’s ownership and south of the proposed Green Gap. Hurcott village is at the junction of Hurcott Road and Hurcott Lane about 130m south of the proposed Green Gap.</p> <p>There is an extensive evidence base to the Pre-Submission Plan that includes:</p> <ul style="list-style-type: none"> <li>• Heritage Impact Assessment Oct 2018</li> <li>• Preliminary Ecological Appraisal June 2018</li> <li>• Sustainability Appraisal Appendix B (HELAA forms)</li> <li>• Worcestershire Sub-Regional Green Infrastructure Framework - Kidderminster East Strategic Development</li> </ul> <p>Corridor Concept Plan version 1.3</p> <ul style="list-style-type: none"> <li>• Site Selection Paper Oct 2018</li> </ul> <p>None of these present any compelling evidence to support the conclusion that development of this site would damage the Hurcott Pastures SSSI or the setting of Hurcott village, rather the reports refer to constraints and recommend stand- off zones to Hurcott Lane might be needed if housing takes place.</p> <ul style="list-style-type: none"> <li>• Heritage Impact Assessment – Appendix A3 includes an assessment of site BW/4 and makes reference to the southern part of the site as a sensitive landscape setting for Hurcott village, Mill and pool. It accepts mitigation by way of “<i>Retention of dense tree screening to the north of</i></li> </ul>	<ul style="list-style-type: none"> <li>• consequential amendments to Policy 7A Strategic Green Belt Review - Hurcott ADR</li> </ul>		

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 30: KIDDERMINSTER TOWN**

Respondent	Response No.	Part of Document	Support /Comment/Object	Legally Compliant ?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination ?	Reason for Attending
								<p><i>Hurcott Mill and pool will be essential to retain the historic character of the village and setting.</i> It does not say the site should remain undeveloped or open to justify Green Gap; Furthermore, the significance of the heritage assets identified as WSM51479 and WSM08170 is stated as negligible and medium/low respectively;</p> <ul style="list-style-type: none"> <li>• Preliminary Ecological Appraisal refers in the event the site is developed, to at least a 50m stand off from Hurcott Lane and the southern site boundary (i.e. north of the SSSI on the attached Location Plan) but does not say development should be restricted on the rest of the site for any ecological reason;</li> <li>• Sustainability Appraisal is neutral in its assessment;</li> <li>• Green Infrastructure Framework suggests standoffs to Hurcott Lane;</li> <li>• Site selection paper refers to 'potential' adverse hydrology on Hurcott Pastures SSSI which is dry pasture.</li> </ul> <p>The District Council have been unable to produce any evidence of adverse impact.</p> <p>The evidence base lends no support for a designation as Green Gap to protect SSSI or heritage assets.</p> <p>The designation is unsound and is not justified by the evidence. It should be removed and the site allocated for a small serviced site to provide self-build and custom housing as per representations made to Policy 8D.</p> <p>Enclosure - Location plan 2639-100 Rev B</p> <p>Policy 6B establishes that Kidderminster is the most sustainable settlement in the district and therefore the focus for significant housing growth. This is recognised by Policy 30, which proposes a number of sites as allocations for residential development around Kidderminster. In accordance with NPPF2 paragraphs 59 and 67, it comprises a variety of sites at different scales, which will ensure the plan is able to deliver housing over the plan period. This ranges from large strategic allocations (i.e. the Lea Castle Hospital site), to smaller, 'oven ready' sites which can deliver immediately, such as Richborough's site to the north west of Habberley Road, Kidderminster (this name better reflects its location on the urban edge of Kidderminster).</p>			

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 30: KIDDERMINSTER TOWN**

Respondent	Response No.	Part of Document	Support /Comment/Object	Legally Compliant ?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination ?	Reason for Attending
								<p>Table 30.0.1 'Allocated sites in Kidderminster' identifies an 'indicative' capacity for dwellings at each of the allocated sites. It could therefore be that sites deliver less than the indicative figure shown, which risk the plan's supply under delivering, and ultimately the Council's position to demonstrate a five year housing land supply.</p> <p>These capacity figures for proposed allocations should therefore be expressed as a 'minimum' to ensure the plan is positively prepared and effective in meeting the district's minimum housing needs.</p>			
Graham Saxelby	<a href="#">RLPPS30</a>	Paragraph 30.42	Object	Yes	No	Yes	Justified Consistent with National Policy	<p>Development of Naylor's Field (ref FPH/18) would be in conflict with Plan aims 7 &amp; 9 to preserve/create green spaces and to encourage sport and recreation. Section 20.0.1 of the Plan indicates that more green space is required in the area, so building on an existing area seems illogical and contradictory.</p> <p>Policy 8A requires that any development should be in sympathy with the development context, Naylor's Field is surrounded by existing houses, a number of which have accrued the right of access to the field by virtue of having continuous unopposed access to the site from their gardens, so any development must take this right of access into account in the design, limiting the land area available for building. Taking into account the need to preserve the existing hedgerow in the middle of the field, this does not appear to make the site viable for housing development.</p> <p>Section 27 (ii), (vii) &amp; (viii): Any development of the site should preclude the building of dwellings which overlook the existing houses, suggesting that a development of bungalows is most appropriate, but any development is likely to contravene point (viii) in that the access from Sutton Park Rise was deemed inadequate to support the use of the site as a traveller camp in the past, and has not been widened since then. Additionally, the drainage in Sutton Park Rise is unlikely to be adequate to support a further development, as water gathers near the bottom of the Rise now, and more houses will only make matters worse.</p> <p>Additional comments in opposition to the development of Naylor's Field: 1. it provides a safe landing site for the Air Ambulance to meet ground based ambulances – there are not many such sites in Kidderminster.</p>	Due consideration should be taken of the historic, intended purpose of Naylor's Field for educational use and as a playing field for children. The site is not suitable for housing development but would be better used as a play/recreation area for local residents.	NO	

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 30: KIDDERMINSTER TOWN**

Respondent	Response No.	Part of Document	Support /Comment/Object	Legally Compliant ?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination ?	Reason for Attending
								<p>2. The site provides a safe play area for local children, especially during school holidays, and it would be preferable for this use to be expanded and supported, in preference to a housing development.</p> <p>3. Naylor's Field is currently used by many local residents to exercise their dogs – development of the site would drive these people to use the nearby Rifle Range for this purpose, putting more wear and tear into an area that includes SSSI etc and could be considered to be more sensitive to such use.</p> <p>4. I note that no part of the Plan mentions the need to preserve the biodiversity of any area proposed for development, A flora/fauna survey of the site should be carried out before any development is approved to ensure that no protected species will be affected.</p> <p>Due consideration should be taken of the historic, intended purpose of Naylor's Field for educational use and as a playing field for children. The site is not suitable for housing development but would be better used as a play/recreation area for local residents</p>			
Kenneth Adderley	<a href="#">RLPPS9</a>	Policy 30.17	Comment					<p>I am not objecting to the housing developments in or near to Sutton Park Road but am extremely concerned of their impact on the local infrastructure, namely the safety of the junction at Bewdley Hill, already prone to road accidents. Additional traffic from new housing will make this junction even more dangerous. The proposed traffic lights here are badly needed. Consequently I and my friends avoid this junction whenever possible finding alternative routes to Kidderminster town. This inevitably increases traffic density through Sutton Farm Estate.</p>			
Helen Acutt	<a href="#">RLPPS6</a>	Policy 30.17	Object	No	No	No	Positively Prepared	<p>I have had direct access from my property to Naylor's field for over 30 years.</p> <p>This development will remove one of the few open, green spaces that we have. Rifle Range is already a deprived area with lots of social issues and so by removing a field that is used by much of the community (many children) will only add to this problem.</p> <p>The proposed access route to the site via Sutton park Rise is inadequate for the amount of traffic that such development will generate.</p> <p>The field was donated by the Naylor family for educational purposes and not for residential.</p> <p>The field has and is used as a West Midlands Air ambulance landing site.</p>			
Adrian L'Enfant	<a href="#">RLPPS8</a>	Policy 30.17	Object	No	No	No	Positively Prepared Justified	<p>No directly impacted homeowners (those whose properties adjoin this proposed site for development) were engaged or on the</p>			

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 30: KIDDERMINSTER TOWN**

Respondent	Response No.	Part of Document	Support /Comment/Object	Legally Compliant ?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination ?	Reason for Attending
							Effective Consistent with National Policy	<p>original planning proposals to include this site for development.</p> <p>Views around potential building of houses on Naylor’s Field (site FPH/18):</p> <ul style="list-style-type: none"> <li>• We were not previously informed that this piece of land was being included in the local plan for potential housing. Why?</li> <li>• I believe that it is a rare parcel of land, in that it is fully enclosed on all sides. It is also a Green Belt site. There is surely an abundance of brownfield sites in the region that would be better suited for housing development?</li> <li>• I understand that the field was gifted to the Council by the Naylor family for educational use, not for residential development. Why is it not being used for such, particularly since a number of local schools have lost their playing fields in recent years as a consequence of building extensions to accommodate their expansion following the region’s move to a two-tier (primary school/high school) school structure?</li> <li>• The field was included in a gypsy traveller site review conducted in 2011, where it was deemed that the field was “wholly unsuitable due to highways access and the fact that it is surrounded on all sides by residential property”. I do not see how that is any different here.</li> <li>• The only access to the field [via Sutton Park Rise] is, in my view, totally inadequate for the volume of traffic that a development of this nature is likely to create.</li> <li>• I also believe that when the Sutton Park Rise properties were built, the drainage infrastructure was considered wholly inadequate for the volume of those properties, resulting in a ‘tank’ some 40m in length and several metres deep being incorporated under the road in the cul-de-sac at the bottom of the drive. I would imagine that any development of the field would need to connect into that infrastructure. As a resident directly impacted by these proposals this also makes me very uncomfortable.</li> <li>• I know that the field is used extensively by local children and residents for recreation, football, exercising dogs, jogging etc and the field has also been a site for the air ambulance to land (twice in the last year or so). A number of community parties and events have been held on the field and in my opinion; the field is ideally suited to this.</li> <li>• As the field is enclosed on all sides, I suspect that it is one of, if not the only ‘safe’ park areas in the region for children</li> </ul>			

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 30: KIDDERMINSTER TOWN**

Respondent	Response No.	Part of Document	Support /Comment/Object	Legally Compliant ?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination ?	Reason for Attending
								<p>to play. None of the other parks and public spaces that I am aware of across the region offers that same security.</p> <ul style="list-style-type: none"> <li>I have lived here for over 20 years and my understanding has always been that there was a restrictive covenant attached to the land as part of the transfer from the Naylor family to the Council, which prohibited development of the site. This was confirmed to us when we purchased our house by the conveying solicitor. [How] has that been removed?</li> <li>A number of residents, myself included, have made numerous approaches to the council over the years to purchase the field. In a letter dated February 2013, WFDC communicated that the council was unwilling to sell the field but acknowledged that it “would not be developable for dwellings .....It has an established educational use on it and there may be alternatives to residential dwellings”. Further, that letter clearly states that “the County Council do not wish to dispose of the land and are more than content to keep the current arrangements.....for the next 10/15 years...”. That letter was signed by Marcus Hart, Tracey Onslow and John-Paul Campion. Why is that position now changing?</li> <li>Our property has direct access to the field via a gate from our garden which we have used regularly for the 20+ years that we have lived here. We similarly use the field for recreation; the gate is both convenient and this is now arguably a right of access given the passage of time.</li> <li>The field is a thriving habitat for wildlife including bats, hedgehogs and foxes.</li> <li>I note with interest that the Council is taking an interest in Kidderminster’s local history. It has recently taken a grant for £49k to research the history of the town hall. Would it not be interesting to explore the history of the Naylor family, a prominent Kidderminster family, and its bequest to the town which includes this field.</li> <li>Having now been made aware that the field was included in the 2018 Town Plan process, I can see that a number of developers (including Barratt Homes) have already filed objections to its development based on its apparent unsuitability, given that it would be totally out of character with the area.</li> </ul> <p>There are, I am sure, far more deserving sites across the town that can and should be used to accommodate the growing need for residential housing.</p>			

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 30: KIDDERMINSTER TOWN**

Respondent	Response No.	Part of Document	Support /Comment/Object	Legally Compliant ?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination ?	Reason for Attending
								In summary, my view is that the development of this field for residential dwellings is unwelcome, unsuitable and wholly unnecessary.			
Meusz	<a href="#">RLPPS15</a>	30.17 FPH/18	Object	Yes	No	Yes	Positively Prepared Justified	<p>I have recently been made aware of proposals to develop Naylor's field to provide further housing and must confess I find it somewhat alarming that these proposals have only come to light through notices provided at the entrance to the field by concerned local residents rather than through any locally publicised consultation exercise.</p> <p>As a resident of this area for over thirty years I have used (and continue to use) the green space that is Naylor's field on a daily basis. Development of this space will remove one of the few green spaces for recreation we have in this area where people feel safe, thus reducing the amenities enjoyed by the local population. I access the field daily on foot and also have concerns that the access route via Sutton Park Rise is not suitable for the increased volume of vehicular traffic the proposed development is likely to generate, impacting on pedestrian safety.</p> <p>It has always been my understanding the field was donated by the Naylor family for educational purposes and this would, in my view be a better use than more housing. Local schools and youth organisations could be usefully encouraged to make more use of the field. More housing creates a demand for more - not less - amenities such as this field. The area already suffers from a lack of facilities for children to play, the play area in the Rifle Range estate behind the maisonettes having been lost some years ago when that site was developed to provide yet more housing. Children can, and do, play on this field in safety.</p> <p>In addition I understand the Air Ambulance has also made use of the site as a rendezvous point with ambulances for the transfer of patients. Removal of this site would reduce the already limited number of sites where the helicopter can land.</p> <p>Wildlife considerations should also be considered. The grass remained uncut for most of this summer providing a meadow-type environment with wildflowers and grasses encouraging butterflies, bees and other insects. Any development proposals should be subject to a full wildlife and environmental survey.</p>			

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 30: KIDDERMINSTER TOWN**

Respondent	Response No.	Part of Document	Support /Comment/Object	Legally Compliant ?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination ?	Reason for Attending
								Finally, if this development goes ahead, I note there is a proposal to leave part of the field undeveloped. If the proposal is approved, then recreational access to that remaining space must be maintained for the surrounding community who currently enjoy the use of this field. It must not be done in such a way that gives the impression any remaining amenity is for the exclusive use of residents of the new development.			
Amanda Saxelby	<a href="#">RLPPS29</a>	Policy 30.17	Object	Yes	No	Yes	Justified	<p>Development of Naylor's Field (ref FPH/18) would be in conflict with Plan aims 7 &amp; 9 to preserve/create green spaces and to encourage sport and recreation. Section 20.0.1 of the Plan indicates that more green space is required in the area, so building on an existing field seems illogical and contradictory.</p> <p>Policy 8A requires that any development should be in sympathy with the development context, Naylor's Field is surrounded by existing houses, a number of which have accrued the right of access to the field for 20 years or more by having continuous unopposed access to the site from their gardens, any development must take this right of access into account, thus limiting the area available for development. This does not make the site viable for housing development, taking into account the need to preserve the existing hedgerow in the middle of the field as well.</p> <p>Section 14 Strategic Green Infrastructure does not make any reference to the impact on protected wildlife in the event of such a housing development.</p> <p>Section 27 (ii), (vii) &amp; (viii) - Any development of the site should preclude the building of dwellings which overlook the existing houses, suggesting that a development of bungalows is most appropriate, but any development is likely to contravene point (viii) in that the access from Sutton Park Rise was deemed inadequate in the past to support the use of the site as a travellers camp. Additionally, the drainage in Sutton Park Rise will be inadequate to support a further development as water does gather near the bottom of the Rise and additional houses will make matters worse.</p> <p>Additional comments in opposition to the development of Naylor's Field: 1. it provides a safe landing point for the Midlands Air Ambulance to meet ground based ambulances. I have been informed by Midlands Air Ambulance that there are a limited number of sites</p>	<p>Naylor's Field should remain as a safe play area for the local children for sport and recreation.</p> <p>A safe and needed landing point for the Air Ambulance.</p> <p>A haven for the protected wildlife.</p>	NO	

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 30: KIDDERMINSTER TOWN**

Respondent	Response No.	Part of Document	Support /Comment/Object	Legally Compliant ?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination ?	Reason for Attending
								<p>that are suitable for them to land. So building on the field will put lives at risk.</p> <p>2. The site provides a safe play area for local children, especially during school holidays, and it would be preferable for this use to be expanded and supported. This would be in keeping with its original intended purpose.</p> <p>3. Naylor's Field is currently used by many local residents to exercise their dogs, development of the site would mean that they would have to use the Rifle Range nearby for this purpose, which would put more wear and tear on the Range which includes a Site of Special Scientific Interest and could be considered to be more sensitive to such use.</p>			
Shaun Harris	<a href="#">RLPPS31</a>	Policy 30.17 FPH/18	Comment					<p>We didn't receive any notification about any planning permission submitted.</p> <p>We are concerned the access leading out to the field from our garden through the gate will be removed. We use this field to walk our dog and our nephews/nieces, when visiting, use this to play in. We are concerned the wildlife will be destroyed, the main issue being bats that we see most nights, birds, moles and foxes. Removal of the trees and bushes will mean our privacy will be taken away and we will be overlooked. This is also a concern for the environment. We would need to replace our fencing in our garden to keep our privacy, which is a cost to us.</p>		NO	
John Colson	<a href="#">RLPPS56</a>	30.17	Object		No	No	Positively Prepared Consistent with National Policy	<p>I have no knowledge of whether this proposal is legally compliant or not. Our objections are in relation to site FPH/18 and whether it is sound and consistent with national policy. Therefore all questions below pertaining to legal compliance are answered as per this question and our objections are detailed in Any other comments (section 13 if this were paper form).</p> <p>We wish to object to the proposal FPH/18 for the following reasons:</p> <ul style="list-style-type: none"> <li>• Access to the proposed development from Sutton Park Rise is neither suitable nor safe. It should be noted that this was one reason given for WFDC not moving forward with a previous proposal to create a travellers site on Naylor's field. With the limited parking in Sutton Park Rise together within private driveways, on street parking is currently excessive and creates hazards for pedestrians particularly when refuse trucks, delivery lorries etc. have to gain access.</li> <li>• The proposals are not compliant with Policy 20c - Provision for open space. The proposal will have a significantly</li> </ul>	<p>I have no knowledge of whether this proposal is legally compliant or not. Our objections are in relation to site FPH/18 and whether it is sound and consistent with national policy. Therefore all questions below pertaining to legal compliance are answered as per this question and our objections are detailed in Any other comments (section 13 if this were paper form).</p>	NO	

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 30: KIDDERMINSTER TOWN**

Respondent	Response No.	Part of Document	Support /Comment/Object	Legally Compliant ?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination ?	Reason for Attending
								<p>negative effect upon provision in the area which is already poor. Many people currently use the field in its entirety, and more specifically not the small strip of land to the north of the existing hedgerow. It should also be noted that the Air Ambulance has landed within the field approximately 3 times in the last 12 months, a facility that would be removed by the proposed development.</p> <ul style="list-style-type: none"> <li>The proposed development will have a negative effect upon wildlife habitat in the area. Specifically this relates to the hedgerow and the habitat provided for Bats in the area (of which there are many). This would contravene the Wildlife and Countryside Act (1981) and Conservation of habitats and Species regulations (2017) in disturbing or destroying a place for bats to rest or breed.</li> <li>Existing drainage provision within Sutton Park Rise is poor. Main drainage lines cannot cope with heavy rain leading to significant standing water within the carriageway. The proposed development will only serve to exacerbate this issue which may in turn lead to accidents, injuries and damage to property.</li> </ul>			
Steve Vince	<a href="#">RLPPS181</a>	Policy 30.17 FPH/18	Object	No	No	No		<p>The site has been used by the public for over 20 years.</p> <p>It was given in a covenant by the Naylor family to be used by people in locality.</p> <p>Haven for at risk wildlife, hedgehogs and bats.</p> <p>Air ambulance use field when needed in the vicinity.</p> <p>Public use for dog walkers with gated entrance unlike Bewdley Hill or Brinton Park.</p> <p>Children of Rifle Range come to play - no play area on Rifle Range - some children live in flats so need this area.</p> <p>Well used area by local residents as stated above.</p>	<p>An area needs to be left for public use as specified by the Naylor family.</p> <p>If built on needs to be single storey buildings.</p> <p>Gardens that have gates should be accessible in order to maintain boundaries.</p> <p>Building should be on far side of field so public and children who play can access from the original gate so no need to walk through new site to get to area.</p> <p>Hedgerow to stay intact</p>	NO	

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 30: KIDDERMINSTER TOWN**

Respondent	Response No.	Part of Document	Support /Comment/Object	Legally Compliant ?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination ?	Reason for Attending
									as bats, birds, hedgehogs live here.		
Jean Caddick	<a href="#">RLPPS183</a>	Policy 30.17 - FPH/18	Object	No	No	No	Justified Consistent with National Policy	<p>I consider the Local Plan is either inconsistent or fails to comply with National and Local Planning legislation and contrary to Local Planning Policy being non-compliant for the following reasons:</p> <ul style="list-style-type: none"> <li>- Loss of public open space</li> <li>- Access for all (Disability Discrimination Act) i.e. is non inclusive</li> <li>- Protection of naturalized flora and fauna/habitat</li> <li>- Priorisation of previously development land (Brown Field site) has been overlooked</li> <li>- Preservation of the Green Belt</li> <li>- Public consultation on views of local residents.</li> </ul> <p>Naylor's field needs to be retained as a Public Open Space and continue to provide the local population and preserve what is currently a safe sanctuary for local flora and fauna. This was ever the intention of the beneficiaries, the Naylor family of Naylor's carpets, who gifted the field for the enjoyment of all the youth of the area. I understand that Wyre Forest District Council appear to have lost this deed of gift albeit local historian Gay Hill can confirm how Wyre Forest District Council came to acquire this site.</p> <p>I have provided my further comments below together with supporting attachments to assist the inspector in gaining a better understanding of my concerns.</p> <p>A) Loss of public open space will result in Wyre Forest District Council failing to comply with National and Local Planning policy as detailed in the attached in paragraphs 1,2,3,4 and 9.</p> <p>B) Environmentally unsound as the proposal fails to safeguard the natural flora and fauna as detailed in the attached paragraphs 5, 6, 7 and 8.</p> <p>C) Fails to respond to the needs and wants of the local community for the reasons given in the attached paragraphs 10 to 13 inclusive.</p>	Naylor's field needs to be retained as a Public Open Space and continue to provide the local population and preserve what is currently a safe sanctuary for local flora and fauna. This was ever the intention of the beneficiaries, the Naylor family of Naylor's carpets, who gifted the field for the enjoyment of all the youth of the area. I understand that Wyre Forest District Council appear to have lost this deed of gift albeit local historian Gay Hill can confirm how Wyre Forest District Council came to acquire this site.	NO	

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RESPONSES TO CHAPTER 30: KIDDERMINSTER TOWN**

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								D) I wish it to be noted that the consultation process and this form and its structure make it difficult for the average Wyre Forest resident to respond. Therefore the response is likely to be lower because many of the members of the informal group Save Naylor's Field Committee have told me that they felt unable to understand and complete WFDC's Consultation Response Form.			
Lucinda Caddick	<a href="#">RLPPS205</a>	Policy 30.17 Naylor's Field FPH/18	Object	No	No	No	Justified Consistent with National Policy	<p>I consider the Local plan is either inconsistent or fails to comply with National and Local Planning Legislation and contrary to Local Planning Policy being non-compliant for the following reasons:</p> <ul style="list-style-type: none"> <li>Loss of public open space</li> <li>Access for all (Disability Discrimination Act) i.e. is non inclusive</li> <li>Protection of naturalized flora and fauna/ habitat</li> <li>Prioritization of previously developed land (Brown Field site) has been overlooked</li> <li>Preservation of the Green Belt</li> <li>Public consultation on views of local residents ignored</li> </ul> <p>I have provided further comments I supporting attachments to assist the inspector in gaining a better understanding of my concerns.</p> <p>A). Loss of public open space will result in Wyre Forest District Council failing to comply with National and Local Planning policy as detailed in the attached in paragraphs 1, 2, 3, 4 and 9.</p> <p>B). Environmentally unsound as the proposal fails to safeguard the natural flora and fauna as detailed in the attached paragraphs 5, 6, 7 and 8.</p> <p>C). Fails to respond to the needs and wants of the local community for the reasons given in the attached paragraphs 10 to 13 inclusive.</p> <p>D). I wish it to be noted that the consultation process and this form and its structure make it difficult for the average Wyre Forest resident to respond. Therefore, the response level is likely to be lower because many of the members of the informal group Save Naylor's Field Committee have told me that they felt unable to</p>	Naylor's Field needs to be retained as a Public Open Space and continue to provide for the local population and preserve what is currently a safe sanctuary for local flora and fauna. This was ever the intention of the beneficiaries, the Naylor Family of Naylor's Carpets, who gifted the field for the enjoyment of all the youth of the area. I understand that Wyre Forest District Council appear to have lost this deed of gift albeit local historian Gay Hill can confirm how Wyre Forest District Council came to acquire this site.	NO	

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 30: KIDDERMINSTER TOWN**

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								understand and complete WFDC's Consultation Response Form.			
Dawn Sanderson	<a href="#">RLPPS251</a>	Policy 30.17 - FPH18	Object	Yes	No	Yes	Justified	<p>I do not believe this development is justified. Local residents do not want this site to be developed.</p> <p>I wish to object to the proposed housing development of Naylors field in Kidderminster.</p> <p>The letter that I received informing me of the re-opening of the Pre-submission is the first document that I have received about the development at my property.</p> <p>This letter is thanking people for responding to a recent survey about Naylors field - I never received any survey and I can't help but wonder who else hasn't received one It appears this survey has not been correctly executed. My road was listed as a recipient but nothing was received.</p> <p>I do not feel that this site should be used for a housing development and there are many reasons why as follows:</p> <ol style="list-style-type: none"> <li>1. There are already multiple housing development sites in and around Kidderminster and I don't believe we need to ruin this one, small, valuable, open space for more houses. Wildlife is thriving over there, I saw a Heron over there recently, amongst many other birds and insects.</li> <li>2. This area is used by the community as a clean and safe place for children to play. It is surrounded by residents and they can be monitored easily by parents. The local parks are some distance away and local parents would not allow children to wonder that far.</li> <li>3. I use this area to take my dogs for a walk, as do many other local residents, its one place I feel safe to go alone, there are no gangs doing drugs or smashing glass bottles, which does happen at the local Brinton Park. This park is known for anti-social behaviour and there is none of this over Naylors Field. I don't feel safe to go the Brinton Park alone and I don't want my dogs to be injured so I don't use it.</li> <li>4. There are also many elderly residents that use this space to get some fresh air when they have been in their home for many hours and need to get out in a natural space, it's easy to access and it's level, which many elderly people can be unsteady on their feet,</li> </ol>			

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RESPONSES TO CHAPTER 30: KIDDERMINSTER TOWN**

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								<p>they can't use other areas with as much ease. The local nature reserve is not for the elderly, frail, or the young to play.</p> <p>5. Also a big concern for residents is all of the increased traffic this will generate through a small cul-de sac. Access will be awful for the immediate residents with young families.</p> <p>6. I have met lots of my neighbours by using this field for the past few years walking my dogs, its part of the community and I really do believe it's a bad decision to develop this site when it is not needed. It's a sociable place – which is rare.</p> <p>7. Everyone local needs somewhere that is calming, safe and close to nature - it's vital for people's mental well-being and this would cut a lot of people off from that. I believe using this space for development would have a detrimental effect on many of the resident's social life and mental health; I believe local people would become more isolated without this open space. I really don't feel that this is a suitable place, can you tell me why you need to develop this area when there all of the other housing sites all around Kidderminster? I also notice all of the old disused warehouses and various empty buildings in and around town that are wasted, surely it would be more suitable to re-develop these buildings for housing, and also preserve the towns history in the process instead of taking away a much loved small green area from the residents.</p>			
Pre-submission Anonymous	<a href="#">RLPPS285</a>	Policy 30.17 FPH/18	Object					<p>Please find below a number of updated objections to the inclusion of Naylor's Field in the Wyre Forest Local Plan Review (2016 - 2034)-</p> <p>My property backs onto Naylor's field and has had access across the field for over 100 years as my dwelling was part of the Croft Estate owned by the Brinton family so as with the previous occupants have crossed the land in excess of 20 years without dispute so to build houses across the land would restrict access.</p> <p>Naylor's Field has also been accessed by Whitegate Drive residents for over 20 years and council has given permission for resident's events so the use of the field for building will be a loss to the community surrounding the site in addition to the exchange of outlook from green field and trees to houses. Any new houses would also lead to a loss of privacy, detrimental visual impact and</p>			

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 30: KIDDERMINSTER TOWN**

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								<p>increased noise.</p> <p>It should also be noted that since 2003 I have made numerous requests (along with other residents) to purchase all or part of Naylor's field for non building purposes however these have been rejected so dismayed that the land is being proposed for housing so appears discriminating towards residents which are local tax payers whereas proactive towards commercial development companies.</p> <p>Many residents and neighbours use Naylor's field for their children to play, socialize and for dog walking so serves a recreational health use as well as social so its use for building houses will be to the detriment of the community and against government objectives to increase exercise and mobility. Several users are elderly, young or disabled so unrealistic to expect them to use other green spaces.</p> <p>Currently Naylor's Field is home to a wide variety of wildlife and the RSPCA has even been involved in cases involving injured badgers which live in or around the field so removal of the green space and trees will be to their detriment. Polecats, foxes, owls, bats, birds of prey, newts and lizards can also be seen in the field along with various rare invertebrates. The loss of habitat to housing will be an environmental loss and more removal of green space within the town. The trees and ancient hedgerow between the fields would also be adversely impacted by any development.</p> <p>Access to the field is also limited to single narrow vehicular access at Sutton Park Rise which itself is very narrow and the Sutton Park Road itself is already very busy and congested thus adding to green house gas and diesel emissions, especially at the Bewdley Hill and Stourport Road junctions which are accident black spots.</p> <p>Removal of green spaces is of overall detriment to any town or city and with numerous Brown field sites in and around Kidderminster it would surely make more sense to build there which could help rejuvenate the town centre rather than irreversibly take away a field and with it a valuable green space and habitat which has been enjoyed by the wildlife, residents and neighbours for generations.</p>			
Bernard Orme	<a href="#">RLPPS182</a>	Policy 30.17 - FPH/18	Object					The back of our property at Whitegate Drive backs on in our garden gate to Naylor's Field. The gate was there before we moved in 1999. We have a hedge between our property and the field it is about 12ft high and we use our gate on to the Naylor's field about 3 times a year to cut the hedge on the field side off the field is built			

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 30: KIDDERMINSTER TOWN**

Respondent	Response No.	Part of Document	Support /Comment/Object	Legally Compliant ?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination ?	Reason for Attending
								on it would cause us great difficulties keeping the hedge tidy and also big cost if it comes down.			
Janet Parkes	<a href="#">RLPPS252</a>	Policy 30.17 - FPH18	Object	No	No	No	Positively Prepared	Building on Naylor fields will take away a valuable green space from the community. Access route is not suitable for heavy traffic required for building and the existing footpaths will be damaged and made dangerous for local residents. The air ambulance will no longer be able to land there when necessary as it has done in the past. The field was left for the education and use of children in the area housing does not meet that criteria.	Building on Naylor fields will take away a valuable green space from the community. Access route is not suitable for heavy traffic required for building and the existing footpaths will be damaged and made dangerous for local residents. The air ambulance will no longer be able to land there when necessary as it has done in the past. The field was left for the education and use of children in the area housing does not meet that criteria.	NO	
Kenneth Adderley	<a href="#">RLPPS10</a>	Policy 30.18	Comment					I am not objecting to the housing developments in or near to Sutton Park Road but am extremely concerned of their impact on the local infrastructure, namely the safety of the junction at Bewdley Hill, already prone to road accidents. Additional traffic from new housing will make this junction even more dangerous. The proposed traffic lights here are badly needed.  Consequently I and my friends avoid this junction whenever possible finding alternative routes to Kidderminster town. This inevitably increases traffic density through Sutton Farm Estate.			
King Charles I School, Kidderminster Alan Neal	<a href="#">RLPPS22</a>	Paragraph 30.46, Site OC/11 Stourminster School	Comment	Yes	Yes	Yes		1-Whilst not opposing the plan implementation the former Stourminster site, as it about the playing fields of King Charles I school (and Comberton Primary School) needs to comply with safe guarding so far as the school children are concerned.  2 Concern is expressed that the estate road planned through the proposed housing development will be sufficient. Both Chester Road and Borrington Road are already congested. Three school sites are in the location and the increased traffic from the new housing plus additional children going to school, will add to the			

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 30: KIDDERMINSTER TOWN**

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								problem. The proposed new road should be built to take any traffic from the school sites. A wider more accessible road should be built from the Spennells Valley roundabout to the Birmingham Road to accommodate this.			
Cameron Homes  Richard Doffman	<a href="#">RLPPS227</a>	Policy 30.19 Stourminster School Site	Comment					<p>Harris Lamb Planning Consultancy (HLPC) has been instructed by Cameron Homes to submit this representation to the above consultation. This follows HLPC's representation on behalf of Cameron Homes to the Pre-Submission consultation at the end of last year, which supported the inclusion of former Stourminster School as a residential allocation - Policy 30.19. Cameron Homes maintain their support for this allocation and the purpose of this representation is to provide an update with regard to the progress of the planning application, and to reassert amendments that we consider necessary in relation to the development criteria in Policy 30.19 and the Pre-Submission Policy Map that were not made as part of the latest round of amendments.</p> <p><b>Planning Application</b></p> <p>Following the submission of our representations to the Pre-Submission consultation at the end of</p> <p>2018 Cameron Homes has been through a sequence of pre-application meetings with the Council. These meetings have then culminated in the submission of a full planning application for 57 dwellings in August 2019 - 19/0521/FULL.</p> <p>The Planning Officer has been very proactive and all of matters have now been agreed. We have had positive feedback in relation to the principle of developing this former educational site, which has been confirmed to be surplus to requirements by Education &amp; Skills Funding Agency. Positive consultation responses have been received in relation to ecology, trees, housing strategy, highways (subject to a simple change to the access design and a few minor changes to the internal layout), and archaeology, and the heads have been agreed.</p> <p><b>Second development criteria in Policy 30.19</b></p> <p>Policy 30.19 includes a number of development criteria focused around some key development considerations. Most of worded in a way to ensure these matters are properly considered, but that the final solution can still be informed by the detailed survey and</p>		NO	

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 30: KIDDERMINSTER TOWN**

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								<p>assessment work. The exception to this is the second criteria, which requires the provisions of “ponds...at the top of the bank to provide ecological protection and enhancement and provide a SuDS function for the development”. As previously stated, this is overly prescriptive and there is no evidence to suggest that the ponds are necessary to deliver the underlying objectives in relation to ecology or surface water drainage. This remains the case.</p> <p>Through the submission of the aforementioned planning application, measures have been proposed and agreed in relation to ecological protection and enhancements and in relation to surface water drainage within infiltration being the preferred approach. Neither of the solutions proposed include the provision of ponds at the top of the bank. There are also clear limitations to the provisions of pond at the top of the bank because this is where the badger sett is located, thereby creating a clear conflict.</p> <p>Greater flexibility should be allowed in the policy text to facilitate an appropriate solution to be agreed in relation to biodiversity and surface water drainage. For example:</p> <p><i>“Measures to provide ecological protection and enhancements and a strategy to deal with surface water drainage will need to be agreed through the planning application”.</i></p> <p><b>Pre-Submission Policy Map</b></p> <p>We still note that the proposed residential allocation for the Stourminster School Site is overlapped by the open space designation for the adjacent playing fields. To avoid confusion in the future we maintain that the open space designation should be reduced so as not to overlap the proposed residential allocation.</p> <p>Support inclusion of site OC/11 Stourminster School. Greater flexibility should be allowed in policy 30.19 to facilitate an appropriate solution to be agreed in relation to biodiversity and surface water drainage. The open space designation should be reduced so not to overlap the proposed residential allocation.</p>			
Place Partnership Ltd Ian Fisher	<a href="#">RLPPS97</a>	Policy 30.20	Support	Yes	Yes	Yes		<p>Policies 30 and 30.20 allocate the Sion Hill School site (WFR/WC/18) for 56 Class C3 dwellings and for the avoidance of doubt; this allocation continues to be supported by Worcestershire County Council (WCC).</p>	Worcestershire County Council request that the following modifications be made:	NO	Whilst we do not consider it necessary to speak at

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 30: KIDDERMINSTER TOWN**

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								<p>However, the land subject to the above was sold by WCC to the Community Housing Group Ltd, who in turn secured full planning permission (18/0529/FULL) on 07 June 2019 for 56 new residential units of mixed tenure and scale. We understand that, at the time of writing, construction of the scheme by the company will shortly be commencing.</p> <p>The purpose of this representation is that WCC would like to make the Planning Inspector and Wyre Forest District Council aware that the land adjoining the eastern boundary of the above site is now available for new Class C3 housing. WCC refer to this new adjoining site as 'Sion Hill Phase 2' and it is shown in the enclosed red line site plan (<b>Appendix 1</b>).</p> <p>Paragraph 30.49 currently states that:</p> <p><i>'...The potential to develop the remaining part of the playing field in the future should be safeguarded.'</i></p> <p>Sion Hill Phase 2 is the remaining part of the playing field referred to above. Accordingly, WCC would like to take this opportunity to request that it be released from the Green Belt and allocated for an indicative total of 60 Class C3 houses.</p> <p>The grounds for this are because the site benefits from the same advantages as the existing proposed allocation (WFR/WC/18), as well offering additional ones. These are as follows:</p> <ul style="list-style-type: none"> <li>• Allocation and subsequent development of the site for Class C3 housing would be wholly in accordance with paragraphs 8, 11, 20(a), 35, 59, 67, 117, 118(d), 119, 122, 123(a), 137 and 138 of the National Planning Policy Framework (February 2019);</li> <li>• The site is clear, vacant and available immediately;</li> <li>• Its release would not prejudice the openness and visual amenity of the wider Green Belt, due to it being self-contained and benefitting from screening along its boundaries by trees, other vegetation and the adjacent development site (18/0529/FULL). This means that the impact on long-range views caused by development of the Sion Hill Phase 2 site would be acceptable;</li> </ul>	<p>1. 'Sion Hill School Site WFR/WC/18' be renamed 'Sion Hill Phase 1 WFR/WC/18' throughout the Local Plan</p> <p>2. New allocation added to Table 30.0.1 of Policy 30 as follows:</p> <p><b>Site Description:</b> Sion Hill Phase 2</p> <p><b>Proposed Use:</b> H</p> <p><b>Indicative no. Dwellings:</b> 60</p> <p><b>Gross Site Area(ha):</b> 2.37</p> <p><b>Removed from Green Belt? Y</b></p> <p>3. Add a new policy and reasoned justification as follows:</p> <p><b>Policy 30.?? Sion Hill Phase 2 (new reference number)</b></p> <p><i>The site shown on the Policies Map is removed from the Green Belt and allocated for residential development.</i></p> <p>1. <i>1. The development should be sympathetic to</i></p>		the examination, we would be prepared to do so if the Planning Inspector and/or District Council considered it beneficial to proceedings.

Local Plan Review Pre-Submission Consultation (September / October 2019)

Summary of Consultation Responses (Regulation 20(2) of the Town and Country Planning (Local Planning) (England) Regulations 2012

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 30: KIDDERMINSTER TOWN**

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								<ul style="list-style-type: none"> <li>Flat topography;</li> <li>The site is in Flood Zone 1 i.e. least likely to flood;</li> <li>There are no records of any protected species being present;</li> <li>Site constraints limited to TPO 388 along the northern boundary and public footpath 644 along the southern boundary;</li> <li>Contamination is unlikely due to it being a former playing fields</li> <li>No constraints from its planning history;</li> <li>Good access to local facilities, such as a convenience store being within a short walk;</li> <li>Public transport is also good; for example, there is a bus stop nearby;</li> <li>Development of the site for housing would be wholly in-keeping with existing neighbouring properties and with those granted consent (18/0529/FULL) on the adjacent site; and</li> <li>Allocation of Sion Hill Phase 2 for an indicative total of 60 Class C3 homes would off-set the 52 being lost on the Sladen School site (BW/3). Please see our representations on BW/3 for details.</li> </ul> <p>Vehicular and pedestrian access is via the following two points:</p> <ul style="list-style-type: none"> <li>The site layout plan for planning consent 18/0529/FULL (see <b>Appendix 2</b>) deliberately allowed for the Sion Hill Phase 2 land coming forward. This is demonstrated by the main estate road terminating at the boundary between the two sites.</li> <li>A secondary point of access to the Sion Hill Phase 2 land is via Ismere Way to the south. This would though involve securing consent to cross public footpath 644 (without</li> </ul>	<p><i>the character and setting of the local area.</i></p> <p>2. <i>2. Existing mature boundary trees to be retained and enhanced to maintain Green Infrastructure connectivity and visual screening.</i></p> <p>3. <i>3. The potential to create wildlife stepping stones through habitat creation should be explored</i></p> <p><b>Reasoned Justification</b></p> <p>30.?? <i>The landholding comprises of what was the playing field of the former Sion Hill Middle School that stood on the Sion Hill Phase 1 site until its demolition in early 2018.</i></p> <p>30.?? <i>The allocation of this former playing field is a logical addition to the Sion Hill Phase 1 site adjacent to it, which already has the benefit</i></p>		

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
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								<p>obstruction). WCC consider that permission for this would likely be granted. It should also be noted that WCC own the land, as confirmed by the blue line show in the map enclosed as <b>Appendix 1</b>.</p> <p>Place Partnership Limited therefore, on behalf of WCC, advocate the allocation of the Sion Hill Phase 2 land for Class C3 housing and its attendant release from the Green Belt on grounds that it is wholly suitable, available and achievable in policy and delivery terms.</p>	<p><i>of planning consent for 56 new dwellings. The site also has the notable advantage that, unlike others within the Green Belt, it benefits from screening along its existing boundaries.</i></p> <p>4. Add a new site allocation map to the Local Plan, as per <b>Appendix 1</b>, entitled 'Sion Hill Phase 2 site' (and a reference number).</p> <p>5. Amend title of Site Allocation Map entitled 'WFR/WC/18 Sion Hill School site' to 'WFR/WC/18 Sion Hill <b>Phase 1</b> site'.</p>		
Colin Stephens	<a href="#">RLPPS7</a>	Policy 30.21	Object	No				<p>The nominated land is agricultural Green Belt land and not to be built on.</p> <p>The Franche area is already a developed housing estate with fantastic local first school and high school but are already over subscribed and there would be no capacity for extra children. The local doctors and hospital cannot cope now and hundreds of extra people would make it worse.</p> <p>The roads around this site are very busy already with numerous accidents at the island and an increase in traffic will be impossible. The value of houses around this development will be severely affected and the inconvenience, noise and mess for many months will be unbearable. Our houses will be unsellable</p>	<p>None. Agricultural and Green Belt land cannot be built on.</p>		

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 30: KIDDERMINSTER TOWN**

Respondent	Response No.	Part of Document	Support /Comment/Object	Legally Compliant ?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination ?	Reason for Attending
Kidderminster Foreign Parish Council  Elsie Whitehouse	<a href="#">RLPPS13</a>	Policy 30.21	Comment					Could details please be conveyed to the Parish Council about what services they would be responsible for in this development within this parish?		NO	
Louise Green	<a href="#">RLPPS42</a>	Policy 30.21 WA/KF/3	Object	No	No	Yes	Positively Prepared Justified Effective Consistent with National Policy	Not positively prepared - it has not been prepared in agreement with the local parish council (Kidderminster Foreign) whose parish the land at Low Habberley falls within. Not Justified - under "environmental constraints" on page 27 of the WFDC Local Plan Issues & Options Paper (Sept 2015) point 6.12 states " The Eastern Areas of the district fall within the West Midlands green belt and are therefore subject to green belt policy which restricts development except for very special circumstances" It would be taking land out and encroaching on the green belt. Highway Issues - Habberley Road from the junction traffic island at Habberley Lane up to High Habberley is already a dangerous section of road. To facilitate entrance onto a development of this size road widening and a "feed off" right turn lane would be required. The drains already struggle to cope with the ground water running down through Low Habberley and in recent years the houses on Conningsbury drive were flooded. The road between Low Habberley and the traffic island on Habberley Lane regularly floods. Educational Grounds - the local primary schools in particular are already at capacity. Environmental - a development of this size in the green belt would cause considerable damage to wildlife flora & fauna and add to light pollution. At the moment the land is used for agricultural purposes to grow locally sourced food, a much needed strategy to be encouraged.	Widening of Habberley Road and insertion of right turn lane. Upgrading of the drainage system. Increased school places by building new schools or extending existing schools. Abandon the Low Habberley development - there are only approximately 83 properties in the village at the moment, to build 120 on it's doorstep would completely change the character of this small "green belt" no "street lights" rural enclave!!!!	NO	
Colin Mytton	<a href="#">RLPPS70</a>	WA/KF/3	Object	Yes	No	No	Justified	The removal of green land status opens up the land to unwarranted development which will impact on the already overstretched school and medical services and add to an already very busy road layout.  What assessments have been made regarding the underground oil pipeline that runs diagonally through this land in relation to the building of houses above it?  The fast traffic that comes down Habberley Bank already constitutes a dangerous environment at it's junction with Habberley Lane so further access and exit to the development on this stretch will add further dangers.		NO	

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Richborough Estates  Ian Deverell	<a href="#">RLPPS241</a>	Policy 30.21 Land north west of Habberley Road	Comment					<p>Firstly, as noted above, the site adjoins the urban area of Kidderminster and therefore our view is that a more suitable description of the draft allocation is Land north west of Habberley Road, Kidderminster.</p> <p>Richborough has an agreement to promote land to north west of Habberley Road on behalf of the landowners, which is identified for approximately 120 dwellings in the Pre-Submission plan.</p> <p>The site is within close proximity of a wide variety of services and facilities, including a food superstore and post office 400m to the south, Franche Community Primary School 600m to the south, and Baxter College 700m to the south. White Wicket Park, which includes a Neighbourhood Equipped Area of Play, is located less than 1km to the east.</p> <p>The site is not constrained and can deliver housing immediately. Subject to planning permission, the site could be fully delivered within three years and can therefore make a significant contribution to the Council's five year housing land supply.</p> <p>The site is suitable, available now and achievable now. Work to date demonstrates that there are no issues which would preclude development, as summarised below:</p> <ul style="list-style-type: none"> <li>• The site is located within flood zone 1 (so less than 1 in 1,000 years chance of flooding each year);</li> <li>• It is free from any environmental designations such as Sites of Special Scientific Interest, Special Areas of Conservation, Special Protection Areas or Ramsar sites and is not in an Area of Outstanding Natural Beauty;</li> <li>• The site does not contain any listed buildings or scheduled ancient monuments, and does not sit within a designated Conservation Area. the nearest designated heritage asset is 800m from the site, beyond Low Habberley;</li> <li>• Access to the site can be achieved from Habberley Road to the south east, as required by emerging Policy 30.21);</li> <li>• There is no existing infrastructure or utilities, pylons or public rights of way that would preclude residential development. A significant main passes under the site, the</li> </ul>			

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								<p>utility and associated easements can be incorporated into any proposed layout for the site;</p> <p>The site therefore represents sustainable development and an opportunity to make a significant</p> <p>Contribution to the district's five year housing land supply on adoption.</p> <p>The nearest designated heritage asset to the site is over 800m away. The adjacent Habberley House is not a designated heritage asset. Indeed, it is not listed on the Council's Local Heritage List. It is afforded no special protection and therefore the third requirement of Policy 30.21 should be deleted to ensure the policy is justified.</p> <p>Richborough, with their consultant team, will seek to work closely with the Council and statutory consultees through the development plan process and are also able to ensure careful attention to viability and costs in plan-making. Development of the site will help significantly boost the supply of housing across the district; however in line with paragraph NPPF2 paragraph 76, it is imperative that the</p> <p>Scale of development is not subject to unnecessary obligations and policy burden so that the ability to be developed viably is threatened.</p> <p>Development of the site will not result in the unrestricted sprawl of large built-up areas and we consider that the site represents a minimal extension to the north western edge of Kidderminster. Richborough will enhance the existing outward looking field boundaries and associated landscaping to reinforce the defensible Green Belt boundaries, ensuring they are sufficiently robust to endure beyond the plan period.</p> <p>Richborough and their consultant team have undertaken technical work and this will continue over the coming months with further surveys and assessments. As part of this continuing work we will be preparing a site specific evidence base in the form of technical notes and other information reflecting the surveys and assessments to demonstrate the deliverability of the site ahead of the Local Plan Review examination. This evidence base will include:</p>			

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								<ul style="list-style-type: none"> <li>• Landscape and visual technical note</li> <li>• Drainage technical note</li> <li>• Highways technical note</li> <li>• Ecology survey</li> <li>• Vision document and concept master plan</li> </ul> <p>In advance of the Local Plan examination we would welcome entering into a Statement of Common Ground with the Council in respect of the site. As part of this Statement of Common Ground we would be keen to agree the results of our work.</p> <p>We would welcome the opportunity attend the examination hearing sessions to discuss the issues we have identified above which affect the soundness of the plan, and to meet with the Council to discuss the above evidence base when it is further evolved</p>			
SDF Auto	<a href="#">RLPPS96</a>	Policy 30.25 Site FPH/8	Comment	No	No	Yes	Positively Prepared Justified Effective	<p>The complaint refers to site ref Site Ref S FPH/8. SDF and adjacent land 7.96Ha identified for employment. Having attended a consultation that positively recommended the site for employment and was already identified in the 2017 version of the plan it is disappointing that the woodland has been completely removed from the emerging plan. Discussions with future investors has identified the woodland is a critical important enabler.</p> <p>The back third of the woodland can clearly be identified as brownfield in historical maps. The woodland is not of any significant value in terms of flora and fauna and an ecological survey has supported this.</p> <p>It is understood, the concern from the council is that if the whole woodland was identified as employment land then potentially it would be completely removed. The current owner accepts that some woodland must remain as mitigation to any future development and wishes the emerging plan to recognize this (as per tree officers sketch) rather than what has happened – a blanket removal of the site for development.</p> <p>Request to change site policy to include 6.5 acres/2.63 hectares to be developed for employment land. Without the woodland</p>	<p>A plan has been attached which indicates “woodland buffer” following a site visit by the tree officer for Wyre Forest District Council. This represents approximately 2.63 hectares (6.5 acres) of development opportunity within the woodland/ including brownfield. This would allow the wider SDF site of approximately a further 11 acres/ 4.45 hectares (identified in the 2019 version of the local plan) to attract the investment so clearly needed.</p> <p>Suggested wording – “</p>	YES	We would only wish to speak at the examination if our proposal is not accepted by the council during this extended consultation period. We believe on viability/ brownfield / location grounds our request should be supported as it was during the

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								developed as an enabler no major investment is likely and no long term employment I be deliverable.	The woodland within the SDF site is included as employment land in the local plan as an enabler to the wider employment/ investment opportunity of the SDF site but if developed will require a significant environmental buffer of not less that one third of the woodland site to be retained. The specific area to be agreed with the local planning authority during detailed design developed. No clearance works to begin without written agreement of clearance zones with local planning authorities' representatives."		initial public consultation workshops pre 2019.

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Wolverley & Cookley Parish Council  B J Drew	<a href="#">RLPPS14</a>	Policy 31 Lea Castle Village	Object		No	No	Justified Consistent with National Policy	<p>The NPPF seeks to protect Green Belt land and to prevent urban sprawl by keeping land permanently open. The NPPF identifies that the essential characteristics of the Green Belts are their openness and their permanence. A large proportion of Wyre Forest District is designated as Green Belt land and therefore development within this designation needs to be appropriately managed. The NPPF identifies that: 'A local planning authority should regard the construction of new buildings as inappropriate in Green Belt.'</p> <p>NPPF 13. Protecting Green Belt Land, Paragraphs 133 to 147 should be clearly adhered to, in particular 134 (a) to check the unrestricted sprawl of large built up areas.</p> <p>Wolverley &amp; Cookley Parish Council strongly supports the comments of the NPPF and object to any development on Green Belt in our Parish including that around the Lea Castle Hospital Site.</p> <p>Wolverley &amp; Cookley Parish Council are very concerned about the impact on the local infrastructure.</p> <p>Wolverley &amp; Cookley Parish Council does support the development on the PDL Lea Castle Hospital Site of up to 600 houses provided the following issues are fully addressed but does not support any increase.</p> <p>Within the Previously Developed Land (PDL) boundary of the former Lea Castle Hospital, the following development is acceptable in principle:</p> <ul style="list-style-type: none"> <li>• C3 (Dwelling Houses) *</li> <li>• C2 (Residential Institutions)</li> <li>• At least 10% of the homes to be available for affordable home ownership</li> <li>• B1 (Business)</li> <li>• Health and sport facilities</li> </ul> <p>Planning permission for the development/redevelopment of any part of the site will not be granted in isolation unless the application is accompanied by a comprehensive master plan for the whole site, which has been prepared in consultation with the local community and the District Council.</p> <p>Development Principles for the Site</p> <p>As a minimum, the District Council should require development proposals to:</p> <ul style="list-style-type: none"> <li>• demonstrate no greater visual impact on the openness of the Green Belt than existing development.</li> </ul>	To develop local plan policy 31 site reference WFR/WC/15 Lea Castle Hospital only of 600 dwellings.	No	

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								<ul style="list-style-type: none"> <li>• be focused on the previously developed parts of the site.</li> <li>• supplement and enhance existing strong landscape framework surrounding the site to improve ecological and landscape value.</li> <li>• retain Talbotshill Coppice.</li> <li>• retain existing sport pitches for community use.</li> <li>• investigate opportunities for providing safe, attractive and convenient pedestrian and cycle links between the site, Cookley and Kidderminster to ensure that local facilities are accessible by alternatives to the car.</li> <li>• make a financial contribution to the provision of affordable housing off-site in accordance with the adopted Core Strategy Policy CP04.</li> </ul> <p>*Any application for C3 (Dwelling Houses) must be accompanied by a viability assessment that supports the case for the proposed mix, tenure and overall quantum/density of housing on site.</p>			
Homes England Sarah Taylor	<a href="#">RLPPS78</a>	Policy 31 Lea Castle	Support	Yes	Yes	Yes		In support of Policy 31 Lea Castle Village, Homes England is submitting a Vision document that sets out details of the initial technical and environmental work that has informed development of the Draft Concept for the site.		Yes	Homes England would like to be invited to participate at Examination Hearing Sessions relating to the housing issues and issues relating to the strategic allocation at Lea Castle.
Gillian Hill	<a href="#">RLPPS215</a>	Policy 31	Object	No	No	No	Justified	The proposed build at Lea Castle Hospital is huge compared to any other build proposed throughout the whole authority. How can that be justified? Secondly The Crescent residents have always been reassured that traffic would not use the Crescent as a main route. The new plan for the build now shows it as the Primary Route. Furthermore there is little to show that the build will be safe either throughout the construction phases or, once finished, as regards road use bearing in mind the nature of the A449 and A451 with accidents already common place. Only a fraction of accidents are recorded. In addition this huge build will displace the	The response procedure needs to be simple. Allow residents to send in letters either by post or email. Use environmentally friendly methods of construction and build materials. Consider the assurances given in the past to Crescent residents which you have blatantly disregarded by making it a primary route into the Lea	No	

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								<p>abundant wildlife in the area, already reduced by the demolition that has taken place over the last year or so. Some are on the protected species lists. Considering what is happening with our planet at present one would have thought the authority would have insisted on build methods that are carbon neutral and protect our fragile earth. There is nothing at all in this plan, neither on the Lea Castle Build Plan of the initial 600 houses. No mention of sustainable construction, recycled materials, no solar energy, no bat bricks, no hedgehog highways, no cork used in construction etc. Although mention of employment in the plan exactly what would this be? Infrastructure is needed such as school and surgery but all I hear is that 1400 = one school. Exactly where is this figure laid down in either guidelines or law? I would suggest this is a ploy in order to build more than is necessary to achieve said school, therefore not a true representation. Finally I would suggest that this method of asking for comments and responses is somewhat illegal too. It is far too arduous a process many of the authority's residents to undertake. One must have access to computer, be able to negotiate the web then the actual page needs to be found only to be confronted by a process that seems designed to put one off completing.</p> <p>Be bold for once - stand up for the Green Belt. Stand up for the environment and our planet. Consider the people who put the councillors in place and who pay the wages of those employed in local authorities and support them. Finally this method of collecting opinions and objections is awful and obviously designed to stop people actually objecting. This is the third time I have tried to complete the form. Twice it has emptied completed lines or boxes. How do I know it has actually submitted correctly.</p>	Castle site. Build up, 3 or 4 storey apartment blocks so Green Belt can be saved. Use the numerous empty public houses, retail areas and industrial units instead of green fields. As an island we need as much agricultural land as possible to feed the nation surely, not build on it.		
Terry Smith	<a href="#">RLPPS131</a>	Policy 31	Comment		No	No	Positively Prepared Justified	I am writing specifically in relation to the Lea Castle development and the proposed car park and housing development at Blakedown Station. However, I also wish to comment on what is being described as a consultation process; where from the lay persons perspective, I would contend it is no such thing. I deal with my concerns in this latter regard under the comments			

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								<p>section of the form.</p> <p>Having attended one of your drop in sessions, which I found informative, useful and well conducted by the council staff present - my observations are based on a combination of the written plan and the information verbally imparted and unelected representatives from the council at that meeting.</p> <p>LEA CASTLE - Firstly I have no objection to the development of the brown field element of the proposal. However, I do object to the further expansion into Green Belt which I understand increases the number of homes by approx 800.</p> <p>In discussion with the elected official we were told that the number needed to be increased so as to justify the building of a school and doctors surgery on the site. If the site were to be limited to the 600 houses - no school and no doctors surgery would mean undue stress on those type of facilities in other surrounding areas.</p> <p>My challenge is that the surrounding schools and surgeries will need to accommodate those residents of the Lea Castle development during the early years of the building work and partial occupation of the site. I am assuming a school and surgery will not be built from day one and until such time as they are built (if indeed they ever are and here I would like to know what guarantees you will have from the developers/builders) those early residents will need to be accommodated in the very facilities you are seeking to avoid burdening.</p> <p>It does not seem to be a sound piece of thinking to me and fails to distribute the housing need across a wider area of the district.</p> <p>I am concerned about the transparency and geniuses of the consultation process. As I have stated previously I found the drop in sessions informative but that is a long way from consultative. I have two concerns:</p> <p>Once again at the drop in sessions we were directly informed by the elected official that the district council simply had no choice but to pass the Blakedown</p>			

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								<p>development despite the consequences for the greenbelt. The reason given was that if you/they failed to do so the County Council would refuse to sign off the District Local Plan. (Implicit in the comments were that the County Council had actually used this threat rather than it just being an action they may take.)</p> <p>The consequences of no Local Plan were described to us as allowing any builder anywhere in the District to apply for Green Belt planning permission and following appeal would successfully receive permission due to the absence of a local plan defence. The corollary as described was the need to sell the Blakedown station Green Belt to save other Green Belt loss.</p> <p>If this representative by a Council official was true then I strongly contend that the Local Plan has not been positively prepared. If not true or only partially true then we were at best being misled or misinformed which is not what we should expect from a genuine consultation process.</p> <p>My second concern relates to the form you have asked us to complete. I can understand the need for structure but there are a number of residents who are intimidated by the prescriptive nature of your document and who as a consequence will not respond. Surely a consultation is about getting the views from the widest possible audience - experts and lay people alike. I place myself firmly in the latter category and hope that my concerns are correctly categorised to meet your internal processes but worry they may not.</p> <p>In summary:-</p> <p>1 - Don't compromise the Green Belt.</p> <p>2 - A Central Government green policy which wants to increase the use and availability of public transport is not joined up when it requires people to drive miles to park at an out of town station hub rather than more limited expansion at several local stations.</p> <p>3 - District Authorities should be allowed to liaise with</p>			

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								<p>neighbours regarding the broader transport.</p> <p>4 - Please do not allow a village expansion at Lea Castle because it meets theoretical quotas to warrant new facilities (Doctors surgery and School) when in practice many of the early residents will have to use other facilities anyway.</p> <p>5 - Stop confusing the provision of information with a process of consultation. It is not just the written plan that we want to be consulted on but the broader decision making process that lies behind it.</p>			
Neville Brittain	<a href="#">RLPPS180</a>	Policy 31	Comment			Yes		<p>Concerns about proposed mix use development of Lea Castle hospital grounds.</p> <p>Developments on Green Belt when there are Brownfield areas within the district, which some have already had houses built on them.</p> <p>We have great concerns over the number of houses proposed which we understand have gone from 600 to 1400 and now could be 2000.</p> <p>Why the need for so many houses? What Green spaces are the houses going to be surrounded by now that the revised plan could use the whole of the above for housing?</p> <p>Green spaces, gardens to relay, all part of our well being need.</p> <p>INFRASTRUCTURE</p> <p>- Hospitals</p> <p>At present hospitals in the area are already overloaded, how will they ever cope with extra patients, which could number up to 8000 people, have new hospitals even been thought about?</p> <p>- Schools</p>		No	

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								<p>Where are all the children in these new houses going to school, there cannot be enough places in present schools</p> <p>- Extra traffic</p> <p>Extra traffic which could potentially be 4000 plus cars which brings pollution, stress in getting around, is there going to be traffic management at the A449 junction with castle road, at present that road is very busy. How are the present roads going to be improved?? With access and egress from the proposed site.</p> <p>- Sewage</p> <p>Sewage control, what is going to happen there, will there be a new plant built?</p>			
Sport England Stuart Morgans	<a href="#">RLPPS172</a>	Paragraph 31.1 Lea Castle Village	Comment					<p>Sport England have previously made representations regarding Policy 31.1 Lea Castle, supporting the inclusion of land for a new 3G Artificial Grass Pitch and improvements to the changing rooms and upgrading the existing grass pitches, but seeking modifications to the policy to ensure that the development makes appropriate contributions to the capital cost of the sports facilities (not just providing the land) and raising concerns that the policy does not suitably secure the on-going management and maintenance of the proposed sports facilities. Sport England's response summarised the findings of the Council's Playing Pitch Strategy and Built Sports Facilities Strategy which identifies the sports facility investment priorities in Wyre Forest which include the delivery of 2 additional AGP's, as well as investment in grass pitches and ancillary facilities.</p> <p>Since the 2018 pre-submission draft the Council have prepared addendums to the PPS and BFS that utilize Sport England's Playing Pitch Calculator and Sports Facilities Calculator to demonstrate the demand generated by the proposed housing allocations, including Lea Castle. This further underlines the importance of ensuring that the policy makes provision for securing a contribution towards the capital cost of</p>		No	

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								<p>the proposed on-site sports facilities and contributions to off-site improvements in line with this evidence base.</p> <p>Notwithstanding these points, Sport England acknowledges that Policy 31 sets out that the site should be developed in accordance with all general policy requirements including any necessary developer contributions. Subject to addressing the shortcomings of Policy 20C in respect of how developer contributions for playing pitches and other sports facilities are to be calculated, it is accepted that the application of Policy 20C would secure appropriate contributions towards the cost of providing the AGP, grass pitch improvements, changing rooms and any other required contributions to built indoor sports facilities. Nonetheless, there is concern that the reference in Policy 31.1 to providing land for the AGP (without securing a contribution towards the capital cost of delivering the AGP) is potentially inconsistent with recommended modification to Policy 20C to secure developer contributions using Sport England's Facility Calculators. Sport England has therefore amended its position to comment on this policy rather than objecting to it.</p>			
Hazell Charles	<a href="#">RLPPS36</a>	Policy 31.1	Comment					Proposed Lea Castle Village The site for this is situated on land that was part of the former manor and ancient parish of Wolverley. The commons and waste lands in Wolverley Manor were enclosed early by private Act of Parliament (Wolverley Enclosure Act, 1775 and the Award made in 1778.) A smaller development within the precincts of the hospital buildings would preserve this historic landscape which can be viewed in part from the Stourbridge Road as one leaves Kidderminster.		No	
Gillian Hill	<a href="#">RLPPS28</a>	31.1 & 31.2	Object	Yes	No	No	Justified Consistent with National Policy	Firstly may I say that the authority has made it as difficult as possible for the ordinary human to have an input into this consultation? One needs a computer, the ability to access the documents and have knowledge of planning law together with all those Acts and Regulations that apply in this case. This is beyond the reach of many residents so appears non-compliant in that respect. 1400 houses is not a village. There are protected species on the site including bats, dormice (which you know of), grass snakes and polecats as well	It appears that the local authority has gone for the easy option, Lea Castle, instead of considering the whole region for empty and available properties and sites to develop. In addition it seems that Cookley is under threat from the very council who should have its best	No	

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								<p>as the normal species of owls, badgers, foxes and muntjac. There are many different butterflies and moths which are essential, like bees, for the pollination of crops and the well being of humankind. 600 on the footprint is acceptable, the use of Green Belt is not, considering the amount of empty properties (public houses, retail and industrial units) throughout the county which could be turned into residential accommodation.</p> <p>Please protect Cookley. Consider the effect on the environment this large development will have. The A449 already has a significant amount of accidents and near-misses, many of which are not logged by the relevant authorities because they are not informed of them. Residents know only too well the risks posed by the A449, reducing the speed limit will have no effect.</p>	<p>interests at heart. For example the biggest, by far, number of homes in the plan to be built is Cookley (Lea Castle). This will be further exacerbated if and when the proposed quarry directly opposite is allowed to be developed, again decimating wildlife, valued landscape and village life. The 600 properties would be best as a retirement village so allowing property currently lived in by those retirees to become available. The pressure on local roads will increase significantly. Please do NOT use the very small, narrow Crescent as an access point. The bin lorry and delivery vehicles already struggle from time to time.</p>		
Wyre Forest Community Land Trust Limited  Tim Mason	<a href="#">RLPPS61</a>	Policy 31.1	Comment					<p>The embedding of Community Led Housing within a number of generic policies helps engage the local community in a meaningful way with the Local Plan.</p> <p>Proposed modifications submitted.</p>	<p>The vision is basic and limited in its aspiration and innovation towards local responsiveness. It merely outlines criteria for a large developer without any real consideration for smaller developers; community led housing initiatives or its place / association within the rural villages and in particular Cookley and Caunsel which are its nearest neighbours.</p> <p>Incorporation of a requirement for Self Build and Custom Build land to be provided within the development and encouragement for Community Led Housing initiatives would go some way</p>		

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 31: LEA CASTLE**

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									<p>to enhancing the proposal for local people and smaller developers.</p> <p>3c. A flexible community facility able to accommodate a meeting room, cafe and potentially a GP surgery together with some C2 provision (<u>possibly a Community Led Housing cohousing / cooperative housing facilitates common house</u>).</p> <p>8. Provision of pedestrian and cycle links both within and off the site (where deliverable) to connect to facilities in <u>Cookley and Kidderminster</u></p> <p>9. <u>Provision of land for Self and Custom build towards meeting the Wyre Forest self-build register demand and Community Led Housing initiatives.</u></p>		

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 32: KIDDERMINSTER EASTERN EXTENSION**

Respondent	Response No.	Part of Document	Support /Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
Anna Elizabeth Woodford	<a href="#">RLPPS256</a>	Policy 32	Object					<p>We live in the country lanes in the vicinity of the Mustow Green roundabout. We have seen a significant increase in the volume of traffic using our lane (Back Lane) as a "rat run" to avoid the Mustow Green roundabout since we moved here 3 1/2 years ago. This is probably exacerbated by route planners automatically diverting people. We are concerned that the Kidderminster Eastern extension will inevitably feed more traffic through the roundabout and consequently encourage even more people to use Back Lane as a shortcut. We note that "live update" signage is being considered to help manage congestion at Mustow Green, but consider that this will be insufficient - a number of people have little option but to travel via that roundabout and this will only increase given the proposed location of the Kidderminster Eastern extension.</p> <p>We already suffer from vehicles trespassing on our garden (drivers open our gate to do so) (the lane is a single track lane and so cannot cope with significant traffic travelling from opposite directions) and the lane is becoming dangerous due to traffic volumes - dog walking is becoming difficult around rush hour.</p> <p>If the Kidderminster Eastern extension is to proceed, we consider it essential that measures are put in place to prevent vehicles using Back Lane as a shortcut to avoid Mustow Green (e.g. a stopping up order).</p>		No	
Ian Brakewell	<a href="#">RLPPS33</a>	Policy 32- Kidderminster Eastern Extension	Object	Yes	No	Yes	Justified	<p>The housing development that spans OC/5, OC/6 and OC/12 involves the construction of an eastern town by pass that links the A448 with the A456. However at the northern end, instead of meeting the A456 properly at a new T-Junction or main road roundabout, it just "fizzles out" instead on Husum Way hill. This presents the potential problems of danger on Husum Way itself and will lead to congestion here and the already dangerous (and frequently misused) T-Junction at Husum Way and Birmingham</p> <p>Safe traffic management and unimpeded traffic flow is essential, but so too must be mentioned that wildlife on site OC/6. There are prodigious quantities of foxes, bats, owls and curlews that inhabit the semi-cultivated land around old offmore farm.</p>	To connect the A448 with the A456. There must be a sensible solution to the issues identified. The northern section of this new spine road must continue to the A456 proper (with a new railway bridge) and ideally meet the main road at a roundabout that could be situated close to and include Hurcott Lane. It would consequently be very unwise to permit	No	

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 32: KIDDERMINSTER EASTERN EXTENSION**

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									residential development of area OC/5 until the exact route of the new road and new roundabout is fully mapped.		
Donna Lowe	<a href="#">RLPPS40</a>	Policy 32	Object	Yes	No			<p>It still seems unfair that we have to have all the 1300 new homes on the East side. There are so many derelict sites within Kidderminster, back of Matalan for one that could be better utilised rather than using Green Belt. Also Marlpool (onion fields) and the back of Ferndale could easily take 200 houses plus to ease the burden here on the East side.</p> <p>Our road is already busy; traffic lights at the proposed site of the new road onto Husum Way will just compound the danger from the junction at the top of Husum Way onto the Birmingham Road, more congestion, more traffic, even worse pollution.</p> <p>The land is Grade 2 agricultural, better used in the current climate for crops. Our wildlife of bats, curlews and owls will be destroyed from these fields.</p>	<p>A new railway bridge, meaning the new road goes straight up. An island at the top opposite Hurcott Lane, which does two jobs, serves the new road and slows the traffic before the junction at the top of Husum Way, which is already dangerous. There must be at least 20 metres of buffer zone between the end of new homes gardens to older ones, of big tress not saplings.</p>	Yes	<p>Mine and my families health, we have asthma and COPD, are going to be greatly affected and so far I am worried our opinions and concerns are being ignored.</p>
Marc Brownlee	<a href="#">RLPPS111</a>	Policy 32 Kidderminster Eastern Extension	Object	No	No	No		<p>Increased volume of traffic using Husum Way is going to cause a back log of traffic for residents living on Offmore and much more road noise and pollution to the area.</p> <p>To accommodate this traffic would the railway bridge not have to be widened/strengthened or indeed a new bridge built to accommodate the proposed traffic system.</p>	<p>To widen or strengthen the railway bridge on Husum Way due to the increased volume of traffic.</p>	No	
Iain Perks	<a href="#">RLPPS116</a>	Policy 32 Kidderminster Eastern Extension	Object	Yes	No	Yes	Positively Prepared Justified	<p>It is unsound as the proposal to have either a roundabout or traffic island on Husum Way near Shakespeare Drive is dangerous and therefore not safe. The distance from the bridge to there is so short that there are going to be accidents and traffic trailed back to the Birmingham Road. The increase of traffic from the new development, approx. 3000 cars (2 per household) and extra traffic to Blakedown Station will result in bottlenecks and increased pollution.</p> <p>Policy is unsound. Believe access from Husum Way will be dangerous and result in accidents. Increase in traffic will</p>	<p>The only suitable sound alternative would be to build a new Railway Bridge towards Hodge Hill , for the spine road to end at the proposed island at Husum Way.</p>	No	

Local Plan Review Pre-Submission Consultation (September / October 2019)

Summary of Consultation Responses (Regulation 20(2) of the Town and Country Planning (Local Planning) (England) Regulations 2012

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 32: KIDDERMINSTER EASTERN EXTENSION**

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								<p>result in increase pollution.</p> <p>There needs to be a "Tree Bund" of at least 20 metres wide between the existing properties and the new development and of plants/trees that are partially grown and fast growing. As the new development impacts so much on both residents and local wildlife, nesting curfews , owls, badgers, and bats, it should be the case that all Brownfield sites be built on first; Lea Castle, Sion Hill, Sladen and Stourminster to determine whether there is still a need to build the number of houses stated for the Eastern Development. Also why is the Eastern Side bearing the brunt, especially when it narrows the distance to Blakedown. Why are there no proposals on the Ferndale side of Kidderminster?</p>			
Alan Wood	<a href="#">RLPPS118</a>	Policy 32 Kidderminster Eastern Extension	Object	Yes	No	Yes	Effective	<p>1. Access on to Husum Way will be dangerous! An accident black spot.</p> <p>2. The stream at the lower field (back of Chaucer Crescent) floods, hence more run off from the proposed estate will result in major flooding. Suggest storm drains from Blakedown via Offmore and Spennells to the Stour.</p> <p>3. If Blakedown parking is increased the traffic around Offmore will be dramatically increased.</p> <p>4. Safe access would have to be a new railway bridge at the developers cost.</p> <p>5 The tree bund is insufficient and a security issue, absolute minimum should be 30 meters, and densely planted. Who will own it, maintain and manage these areas?</p> <p>6. If the plan goes ahead we should have:</p> <p>a; council tax re assessed</p> <p>b; Reinstatement of all permitted development for the Offmore Court Properties</p> <p>7. Wildlife in the area: Curlews, Crested Newts, Badgers,</p>	<p>1. Dual carriage railway bridge and large islands to accommodate the extra traffic.</p> <p>2. Storm drains from Blakedown to the Stour.</p> <p>3. Dual carriage ways on all feeder roads.</p> <p>4. Railway bridge not Husum road traffic lights or island.</p> <p>5. 30m or more tree bund.</p> <p>6. All affected residents should have council tax reduced and the right to develop the properties with normal constraints,</p> <p>7. Provision of wildlife corridors.</p>		

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RESPONSES TO CHAPTER 32: KIDDERMINSTER EASTERN EXTENSION**

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								<p>Owls and Bats will all be adversely affected.</p> <p>Concerns on the Eastern Extension development due to access from Husum Way, Safe access should be through a new railway bridge at developers cost. Wildlife in the area will be adversely affected.</p> <p>If this development goes ahead you will be devaluing our properties and destroying our aspect. Also causing security issues. We will take legal action re action.</p>			
Taylor Wimpey West Midlands	<a href="#">RLPPS279</a>	Policy 32	Support					<p>To avoid any confusion, this representation provides a comprehensive response and therefore is intended to <u>replace</u> that previously submitted in December 2018.</p> <p>This representation relates to land off Comberton Road, Kidderminster (see Site Location Plan at <b>Appendix 1</b>) which is within the control of Taylor Wimpey.</p> <p>Land off Comberton Road forms a significant element of the proposed East of Kidderminster Urban Extension, which Policy 32 (Kidderminster Eastern.</p> <p><b>Policy 32 Kidderminster Eastern Extension</b></p> <p>3.81 Policy 32 is supported as 'sound,' which includes two large sites under the control of Taylor Wimpey. Sites OC/6 and OC/13N form the majority of the proposed Kidderminster Eastern Extension, which will represent a sustainable, well- designed extension to Kidderminster. The proposed Eastern Extension is underpinned by a wide range of evidence produced by the Council and supported by further technical reports commissioned by Taylor Wimpey to demonstrate the site is sustainable, suitable and deliverable.</p> <p>3.82 Further information is set out within Section 3 to these representations and the accompanying Development Vision document (Appendix 2 on I:drive)</p> <p><b>Section 3</b></p> <p>3.7 It is noted that the Pre-Submission Publication</p>		Yes	<p>Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan.</p> <p>Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern extension in the overall spatial strategy contained therein.</p>

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 32: KIDDERMINSTER EASTERN EXTENSION**

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								<p>document updates this Vision to include reference to the Kidderminster Eastern Extension as a well-designed residential development offering a choice of quality new homes set within an extensive new area of green space. Taylor Wimpey endorses this reference as the Kidderminster Eastern Extension represents a strategic element of the spatial strategy for the District to 2036.</p> <p><b>LAND AT COMBERTON ROAD, KIDDERMINSTER</b></p> <p>4.1 Taylor Wimpey is currently in control of the land to the north of Comberton Road and to the south of the Birmingham to Worcester railway line, and a further area of land to the south of Comberton Road, as shown on the Site Location Plan appended to this representation (<b>Appendix 1</b>).</p> <p>4.2 Sites OC/6 and OC/13N form the majority of the proposed East of Kidderminster Urban Extension. Land to the south of Comberton Road represents an omission site previously identified as an Option 'A' site within the Preferred Options document.</p> <p>4.3 Land to the north of Comberton Road has been promoted as an infrastructure led residential development incorporating significant green infrastructure provision, land for a primary school and land for other community facilities that may be required.</p> <p>4.4 Whilst an area of land to the south of Comberton Road is promoted for development, this is promoted as a latter phase that could be delivered beyond the proposed plan period (safeguarded land).</p> <p>4.5 A Development Vision document has been prepared to introduce an initial concept master plan for the delivery of the site. This document attached at <b>Appendix 2</b>, pulls together a wide range of technical information collected to date that has been utilised in shaping the initial proposal and provides an indication of how the site could be delivered and will function as an eastern extension to the</p>			

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RESPONSES TO CHAPTER 32: KIDDERMINSTER EASTERN EXTENSION**

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								<p>town of Kidderminster.</p> <p>4.6 Taylor Wimpey is committed to delivering on the following objectives for land north of Comberton Road:</p> <ul style="list-style-type: none"> <li>• Delivery of quality new homes;</li> <li>• Delivery of a choice of housing;</li> <li>• Provision of a quality design;</li> <li>• Maintenance and enhancement of connectivity and accessibility;</li> <li>• Provision of public open space;</li> <li>• Provision of community facilities;</li> <li>• Maintenance and enhancement of site characteristics;</li> <li>• Creation of an attractive and safe community; and</li> <li>• Achievement of sustainable and safe development.</li> </ul> <p>4.7 These objectives underpin a Development Framework for the site that identifies the following key features for land to the north of Comberton Road:</p> <ul style="list-style-type: none"> <li>• Approximately 1,400 dwellings;</li> <li>• Delivery of a new 20mph spine road, providing a new vehicular link between Birmingham Road (A456), via Husum Way, and Comberton Road/Stone Hill (A448);</li> <li>• Provision of new pedestrian/cycle links between the site and Tennyson Way and Borrington Road to provide permeability and integration with the existing urban edge of Kidderminster;</li> <li>• Provision of land for the delivery of a number of community uses, including the provision of a new Primary School, a community facility to accommodate a meeting room, potentially café and potentially a GP surgery;</li> <li>• Significant provision of Green Infrastructure to include a landscape mitigation strategy that has been developed in line with the Kidderminster East GI Concept Statement;</li> <li>• Provision of SuDS through the delivery of new attenuation features; and</li> <li>• A new enduring Green Belt boundary to the east of</li> </ul>			

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 32: KIDDERMINSTER EASTERN EXTENSION**

Respondent	Response No.	Part of Document	Support /Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
								<p>Kidderminster.</p> <p>4.8 Further consideration of the site is set out below having regard to the Council's evidence base and the technical information prepared on behalf of Taylor Wimpey to date. This analysis concludes that sites OC/6 and OC/13N, which are within the control of Taylor Wimpey, are both suitable and deliverable. This provides confidence that the proposed East of Kidderminster Urban Extension is 'soundly' based.</p>			
Simon Guest	<a href="#">RLPPS166</a>	Policy 32 Kidderminster Eastern Extension	Object	Yes	No	Yes	Justified	<p>I would like to register my objection to the revised local plan and urge you to reconsider this proposal and hopefully amend/scrap it. The increase in traffic around Offmore/Comberton would be unacceptable as it would create a cut through via a residential area. I am also greatly concerned about the impact on local wildlife if this plan goes ahead. Surely it would make more sense converting the vast array of derelict town centre/industrial buildings rather than build on ever decreasing areas of farmland in this area. I feel that, as ever, the profits of the builders is all that the local council is concerned about rather than what is best for the area. Also it is all very well residents more homes but will money be put into local services to support all these extra residents? Will a new doctors surgery be built to ensure all the extra residents can get an appointment? I doubt it.</p> <p>Traffic around Comberton/Offmore will be unacceptable. More sense to redevelop derelict town centre sites than farmland. Doubts that more money will be put into supporting local services to support the extra residents.</p> <p>I would be interested to know if this is a proper consultancy and comments will be noted or whether you are just paying lip services to what is already a done deal.</p>	I personally do not agree with building houses due to the reasons outlined above. I feel that the whole plan should be scrapped and that you should concentrate on regenerating the town centre by way of building flats in areas where building have stood empty for many years.	No	
Sport England Stuart Morgans	<a href="#">RLPPS169</a>	Policy 32 Kidderminster Eastern Extension	Comment					<p>Sport England has previously objected to this policy in respect of securing appropriate contributions towards playing pitches and built sports facilities to meet the needs of the development, making the case that the site is of sufficient size to accommodate provision of playing pitches within the proposed development. Notwithstanding this</p>		No	

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 32: KIDDERMINSTER EASTERN EXTENSION**

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								<p>point, Sport England commented that if an on-site contribution was not deemed to be appropriate that the policy should make provision for an off-site contribution.</p> <p>Subsequent discussions with the Council have indicated that the Council propose to secure contributions towards off- site sports facility investment from this development. Sport England accepts that this would be an appropriate way forward.</p> <p>Since the 2018 pre-submission draft the Council have prepared addendums to the PPS and BFS that utilize Sport England’s Playing Pitch Calculator and Sports Facilities Calculator to demonstrate the demand generated by the proposed housing allocations, including Kidderminster Eastern Extension. This further underlines the importance of ensuring that the policy makes provision for securing a contribution towards off-site sports facility provision/improvements to existing sports facilities in line with this evidence base.</p> <p>Sport England acknowledges that Policy 32 sets out that the development of the Kidderminster Eastern Extension will be expected to develop in accordance with all general policy requirements including any necessary developer contributions. Subject to addressing the shortcomings of Policy 20C in respect of how developer contributions for playing pitches and other sports facilities are to be calculated, it is accepted that the application of Policy 20C would secure appropriate contributions towards the cost of providing sports facilities to meet the needs of the proposed development. Sport England has therefore amended its position to comment on this policy rather than objecting to it.</p>			
Graham Trickey	<a href="#">RLPPS11</a>	Policy 32	Comment	Yes	No	Yes	Effective	<p>It is complaint - I guess! My view is that you are to build 1400 homes, etc on the eastern approach to Kidderminster using land alongside Birmingham Road and the existing Offmore Estate. You will be adding approx. 2,500 vehicles every day onto and off the new development with just two access points - Husum Way and the Spennells roundabout. This is insufficient and is likely to cause traffic chaos, bottlenecks</p>		Yes	It may be worthwhile having an opinion that is different from the Plan.

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 32: KIDDERMINSTER EASTERN EXTENSION**

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								and unnecessary danger due to the confined space available. You need at least two extra access points (possibly both one way) - one possibly coming through the estate (sacrificing possibly two houses somewhere) and one directly onto the Birmingham Road before the Husum Way junction. Traffic approaching this junction too fast so a roundabout 1/4 mile beforehand will lower speeds and decrease danger and congestion.			
Dean Evans	<a href="#">RLPPS39</a>	Policy 32	Object	Yes	No	Yes	Effective	I believe that the revised plan is unsound; the proposed access is totally unacceptable putting lives at risk and also will add traffic to an already busy road. A new railway bridge would be needed to tackle the problem of it being used as an unofficial bypass. And surely with Brexit approaching I think we need to keep all our good farming land to produce food for this country			
Geoffrey Lowe	<a href="#">RLPPS41</a>	Policy 32	Object	Yes	No			<p>After attending most of the Local Plan meetings it appears this new development will go ahead, despite this still being classed as Green Belt land. Also dismayed to hear that Taylor Wimpey already have financial claim on the land East of Comberton and Offmore. Just hoping if it goes ahead the current residents are offered privacy in the form of mature planting as a barrier from the proposed new development.</p> <p>Ideally a new railway bridge which would lead straight onto the Birmingham road to an island opposite Hurcott Lane would lessen the traffic flow through the Comberton and Offmore estates, which at peak times is very busy and may help reduce road traffic accidents which will no doubt increase if these measures are not considered.</p>	<p>If the new development proceeds consideration of local current long standing residents must be given thought.</p> <p>This is a major development and will affect local residents for many years to come. There must be other areas of Kidderminster which could take some of this housing and reduce the impact on the Eastern Side.</p>		
Barberry Hurcott Limited	<a href="#">RLPPS117</a>	Policy 32 Kidderminster Eastern Extension OC/4	Object	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	See attached representations from RCA and DTA in respect of the land to the rear of Baldwin Road (OC/4).	See attached representations from RCA and DTA in respect of the land to the rear of Baldwin Road (OC/4).	Yes	The matters we have raised in our representations to date are largely technical and go to the heart of the spatial strategy being promoted by the Council. We therefore wish to take an active part at the EiP in order to ensure the

Local Plan Review Pre-Submission Consultation (September / October 2019)

Summary of Consultation Responses (Regulation 20(2) of the Town and Country Planning (Local Planning) (England) Regulations 2012)

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 32: KIDDERMINSTER EASTERN EXTENSION**

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											Inspector is clear on our submissions.
Christine Brookes	<a href="#">RLPPS115</a>	Policy 32 Kidderminster Eastern Extension	Object	Yes	Yes	Yes	Effective	<p>1. Access on to Husum Way will be dangerous! An accident black spot.</p> <p>2. The stream at the lower field (back of Chaucer Crescent) floods, hence more run off from the proposed estate will result in major flooding. Suggest storm drains from Blakedown via Offmore and Spennells to the Stour.</p> <p>3. If Blakedown parking is increased the traffic around Offmore will be dramatically increased.</p> <p>4. Safe access would have to be a new railway bridge at the developers cost.</p> <p>5 The tree bund is insufficient and a security issue, absolute minimum should be 30 meters, and densely planted. Who will own it, maintain and manage these areas?</p> <p>6. If the plan goes ahead we should have:</p> <p>a; council tax re assessed</p> <p>b; Reinstatement of all permitted development for the Offmore Court Properties</p> <p>7. Wildlife in the area: Curlews, Crested Newts, Badgers, Owls and Bats will all be adversely affected.</p> <p>Points:</p> <p>Green Belt Removal</p> <p>Amend Green Belt Boundary to remove the following allocated sites:</p> <p>Kidderminster Eastern Extension (OC/5/6/12/13N)</p> <p>This is the land to the rear of the barns.</p>	<p>1. Dual carriage railway bridge and large islands to accommodate the extra traffic.</p> <p>2. Storm drains from Blakedown to the Stour.</p> <p>3. Dual carriage ways on all feeder roads.</p> <p>4. Railway bridge not Husum road traffic lights or island.</p> <p>5. 30m or more tree bund.</p> <p>6. All affected residents should have council tax reduced and the right to develop the properties with normal constraints,</p> <p>7. Provision of wildlife corridors.</p> <p>Points:</p> <p>Green Belt Removal</p> <p>Amend Green Belt Boundary to remove the following allocated sites:</p> <p>Kidderminster Eastern Extension (OC/5/6/12/13N)</p> <p>This is the land to the</p>	No	

Local Plan Review Pre-Submission Consultation (September / October 2019)

Summary of Consultation Responses (Regulation 20(2) of the Town and Country Planning (Local Planning) (England) Regulations 2012

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 32: KIDDERMINSTER EASTERN EXTENSION**

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								If this development goes ahead you will be devaluing our properties and destroying our aspect. Also causing security issues. We will take legal action re action.	rear of the barns.		
Kate Green	<a href="#">RLPPS165</a>	Policy 32 Kidderminster Eastern Extension	Object	Yes	No	Yes	Positively Prepared Justified Effective	<p>The road junction that is proposed on Husum Way and Shakespeare Drive is dangerous, as traffic will build up and will be queuing onto the Birmingham road. Also the presence of the railway bridge causes a blind spot for oncoming traffic, which may cause accidents. The tree bund between the new development and Offmore properties is not big enough, and will not be effective at maintaining the environment for the current residents. Also for this to be effective it must be ensured that a percentage of these are ever-green trees to ensure it is fit for purpose all year round. Bat, badgers, nesting curfews and owls all call the land their home, plans need to be made to guarantee these animals are safe and have a habitat. The plan you are proposing will damage the landscape, destroy Green Belt land and disrupt wildlife. In an age where we are all trying to be more 'green' and preserve our natural world it seems disrespectful to our planet to be submitting these plans.</p> <p>The proposed road junction at Husum Way and Shakespeare Drive is dangerous and cause accidents. The tree bund proposed is not big enough. Development will damage the landscape, Green Belt and the wildlife on site.</p>	It would be more sensible to build another railway bridge to service the development. This could then lead traffic to the new roundabout planned on the Birmingham road. Land at Ferndale and Marpool could be used to take on some of this new development.	No	
Taylor Wimpey West Midlands	<a href="#">RLPPS283</a>	Policy 32	Comment					<p><b>1. INTRODUCTION</b></p> <p>1.1 These representations are made on behalf Taylor Wimpey Strategic Land (hereafter referred to as 'Taylor Wimpey') to the Wyre Forest District Pre-Submission Publication Local Plan document (October 2018 including 'Amendments to the Pre-Submission Publication Document (July 2019)' and the associated updates and amendments to the Local Plan Evidence base.</p> <p>1.2 To avoid any confusion, this representation provides a comprehensive response and therefore is intended to <u>replace</u> that previously submitted in December 2018.</p> <p>1.3 This representation relates to land off Comberton</p>		Yes	<p>Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan.</p> <p>Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern extension in the overall</p>

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 32: KIDDERMINSTER EASTERN EXTENSION**

Respondent	Response No.	Part of Document	Support /Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
								<p>Road, Kidderminster (see Site Location Plan at <b>Appendix 1</b>) which is within the control of Taylor Wimpey.</p> <p>1.4 Land off Comberton Road forms a significant element of the proposed East of Kidderminster Urban Extension, which Policy 32 (Kidderminster Eastern Extension) identifies as comprising the following sites:</p> <ul style="list-style-type: none"> <li>• <b>OC/5 Land at Husum Way</b></li> <li>• <b>OC/6 Land East of Offmore</b></li> <li>• <b>OC/12 Comberton Lodge Nursery</b></li> <li>• <b>OC/13N Stone Hill North</b></li> </ul> <p>1.5 Taylor Wimpey has a current land interest in sites OC/6 and OC/13N in addition to further land to the south of Comberton Road (OC/13) and to the east of the proposed Kidderminster Eastern Extension.</p> <p>1.6 This representation responds to the emerging policies and allocations, having regard to the national and local policy context. The representations also provide comment in respect of the evidence base that underpins the Local Plan Review and the methodology and approach to site selection, making reference to information submitted on behalf of Taylor Wimpey at earlier stages in the formulation of the Plan.</p> <p>1.7 The representations are framed in the context of the requirements of the Wyre Forest Local Plan to be legally compliant and sound. The tests of soundness are set out in the National Planning Policy Framework (NPPF 2019), paragraph 35. For a Plan to be sound it must be:</p> <ul style="list-style-type: none"> <li>➤ <b>Positively Prepared</b> – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;</li> <li>➤ <b>Justified</b> – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate</li> </ul>			spatial strategy contained therein.

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 32: KIDDERMINSTER EASTERN EXTENSION**

Respondent	Response No.	Part of Document	Support /Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
								<p>evidence;</p> <ul style="list-style-type: none"> <li>➤ <b>Effective</b> – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; </li></ul> <p>and</p> <ul style="list-style-type: none"> <li>➤ <b>Consistent with National Policy</b> – enabling the delivery of sustainable development in accordance with the policies contained within the NPPF.</li> </ul> <p><b>4 LAND AT COMBERTON ROAD, KIDDERMINSTER</b></p> <p>4.1 Taylor Wimpey is currently in control of the land to the north of Comberton Road and to the south of the Birmingham to Worcester railway line, and a further area of land to the south of Comberton Road, as shown on the Site Location Plan appended to this representation (<b>Appendix 1</b>).</p> <p>4.2 Sites OC/6 and OC/13N form the majority of the proposed East of Kidderminster Urban Extension. Land to the south of Comberton Road represents an omission site previously identified as an Option ‘A’ site within the Preferred Options document.</p> <p>4.3 Land to the north of Comberton Road has been promoted as an infrastructure led residential development incorporating significant green infrastructure provision, land for a primary school and land for other community facilities that may be required.</p> <p>4.4 Whilst an area of land to the south of Comberton Road is promoted for development, this is promoted as a latter phase that could be delivered beyond the proposed plan period (safeguarded land).</p> <p>4.5 A Development Vision document has been prepared to introduce an initial concept master plan for the delivery of the site. This document attached at <b>Appendix 2</b>, pulls</p>			

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 32: KIDDERMINSTER EASTERN EXTENSION**

Respondent	Response No.	Part of Document	Support /Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
								<p>together a wide range of technical information collected to date that has been utilised in shaping the initial proposal and provides an indication of how the site could be delivered and will function as an eastern extension to the town of Kidderminster.</p> <p>4.6 Taylor Wimpey is committed to delivering on the following objectives for land north of Comberton Road:</p> <ul style="list-style-type: none"> <li>• Delivery of quality new homes;</li> <li>• Delivery of a choice of housing;</li> <li>• Provision of a quality design;</li> <li>• Maintenance and enhancement of connectivity and accessibility;</li> <li>• Provision of public open space;</li> <li>• Provision of community facilities;</li> <li>• Maintenance and enhancement of site characteristics;</li> <li>• Creation of an attractive and safe community; and</li> <li>• Achievement of sustainable and safe development.</li> </ul> <p>4.7 These objectives underpin a Development Framework for the site that identifies the following key features for land to the north of Comberton Road:</p> <ul style="list-style-type: none"> <li>• Approximately 1,400 dwellings;</li> <li>• Delivery of a new 20mph spine road, providing a new vehicular link between Birmingham Road (A456), via Husum Way, and Comberton Road/Stone Hill (A448);</li> <li>• Provision of new pedestrian/cycle links between the site and Tennyson Way and Borrington Road to provide permeability and integration with the existing urban edge of Kidderminster;</li> <li>• Provision of land for the delivery of a number of community uses, including the provision of a new Primary School, a community facility to accommodate a meeting room, potentially café and potentially a GP surgery;</li> <li>• Significant provision of Green Infrastructure to include a landscape mitigation strategy that has been developed in line with the Kidderminster East GI Concept Statement;</li> </ul>			

Local Plan Review Pre-Submission Consultation (September / October 2019)

Summary of Consultation Responses (Regulation 20(2) of the Town and Country Planning (Local Planning) (England) Regulations 2012

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 32: KIDDERMINSTER EASTERN EXTENSION**

Respondent	Response No.	Part of Document	Support /Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
								<ul style="list-style-type: none"> <li>• Provision of SuDS through the delivery of new attenuation features; and</li> <li>• A new enduring Green Belt boundary to the east of Kidderminster.</li> </ul> <p>4.8 Further consideration of the site is set out below having regard to the Council's evidence base and the technical information prepared on behalf of Taylor Wimpey to date. This analysis concludes that sites OC/6 and OC/13N, which are within the control of Taylor Wimpey, are both suitable and deliverable. This provides confidence that the proposed East of Kidderminster Urban Extension is 'soundly' based.</p> <p><b>Green Belt</b></p> <p>4.9 The land north of Comberton Road as shown on the submitted Site Location Plan (<b>Appendix 1</b>) currently lies within the West Midlands Green Belt. A Strategic Review of the Green Belt (September 2016) prepared by Amec Foster Wheeler forms part of the Local Plan Review evidence base, alongside a Part-Two Review which includes analysis of specific sites. The Part-Two Review assesses a number of parcels of land against the five purposes of the Green Belt as set out within the NPPF.</p> <p>4.10 Within this Review, sites are identified within the Green Belt Review as either making a 'significant contribution', a 'contribution' or a 'limited contribution' to the Green Belt purposes.</p> <p>4.11 Where sites make a 'contribution' to the purposes of the Green Belt, the Review advises that "...release (either in whole or part) would need to be balanced against various material planning considerations."</p> <p>4.12 Where sites make a 'limited contribution' to the purposes of the Green Belt, the Review advises that "...release (either in whole or part) could be considered in the context of other material planning considerations."</p> <p>4.13 The site is included within the Review as 'Land to the</p>			

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 32: KIDDERMINSTER EASTERN EXTENSION**

Respondent	Response No.	Part of Document	Support /Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
								<p>North of the A448' and concludes the site overall makes a 'contribution' to Green Belt purposes by virtue of its role as open countryside containing the built edge of Kidderminster.</p> <p>4.14 The likely effect of development of each parcel on the openness of the Green Belt, as set out in the Green Belt Review states, <i>"the site overall makes a contribution to Green Belt purposes by virtue of its role as open countryside containing the built edge of Kidderminster. In the absence of clear, significant boundaries, development would represent encroachment and sprawl into open countryside which could only be overcome through master planning which considered the development in a wider context which attended to the south-eastern edge of the town more generally. Whilst there are few visual receptors in this locality and the site is generally well screened from the A448, development would create a fundamentally new relationship between town and country."</i></p> <p>4.15 In light of the above and with particular regard to land to the north of Comberton Road, the Development Framework Plan includes significant reinforcement of the western boundary of the site, including the provision of significant amounts of public open space and landscaping, in order to contain the site in visual terms and limit the impact of the development upon the openness of the Green Belt.</p> <p>4.16 However, Taylor Wimpey has considered the release of the site from the Green Belt in the context of the five purposes of the Green Belt as set out in the NPPF and assert that it makes a 'limited contribution' rather than 'a contribution' to the purposes of the Green Belt, as explored below.</p> <p><i>1) To check the unrestricted sprawl of large built-up areas</i></p> <p>4.17 The site has intermittently strong, defensible boundaries, which would be reinforced by a proposed approximately 30 metre planting buffer along the length of the development. The site would accordingly have a significant landscape buffer, serving to 'round-off' the town</p>			

Local Plan Review Pre-Submission Consultation (September / October 2019)

Summary of Consultation Responses (Regulation 20(2) of the Town and Country Planning (Local Planning) (England) Regulations 2012)

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 32: KIDDERMINSTER EASTERN EXTENSION**

Respondent	Response No.	Part of Document	Support /Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
								<p>of Kidderminster on its eastern boundary. This would represent a strengthening of the existing urban edge, which simply terminates to the east of Kidderminster. To the north, the site is bounded by a railway line, adjacent to Husum Way. Similarly, the site is bounded by the A448 to the south.</p> <p>4.18 The site would therefore be well contained and not encourage sprawl beyond the period of the Local Plan Review.</p> <p>4.19 Accordingly, the release of the site from the Green Belt will not result in the unrestricted sprawl of Kidderminster; it will instead serve to 'round-off' the town's eastern boundary.</p> <p><i>2) To prevent neighbouring towns merging into one another</i></p> <p>4.20 There is a considerable green gap of over 10km between Kidderminster, Catshill and Bromsgrove to the east/south-east. The entirety of this gap is contained within the Green Belt, preventing coalescence. The site at Comberton Road is located immediately adjacent to the existing built-up area of Kidderminster and is clearly separated from nearby settlements by extensive agricultural land.</p> <p>4.21 Therefore, the release of this site will not result in the merging of any neighbouring towns, as a significant Green Belt gap will remain.</p> <p><i>3) To assist in safeguarding the countryside from encroachment</i></p> <p>4.22 The creation of strong, defensible boundaries is important in protecting the countryside from encroachment. While it is acknowledged that, in theory, the release of any land from the Green Belt could result in encroachment, it is considered that the site offers the opportunity to provide strong and defensible boundaries which will protect the countryside and maintain the visual</p>			

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 32: KIDDERMINSTER EASTERN EXTENSION**

Respondent	Response No.	Part of Document	Support /Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
								<p>and physical separation between Kidderminster and surrounding settlements. This is evidenced by the significant planting of a landscape buffer on the eastern boundary of the site, as shown on the Development Framework Plan.</p> <p>4.23 The release of this site from the Green Belt will not compromise the purpose of safeguarding the countryside from encroachment.</p> <p><i>4) To preserve the setting and special character of historic towns</i></p> <p>4.24 Whilst Kidderminster is a historic canal town which contains four conservation areas and associated listed buildings, these are not located within close proximity of the site and, as such, the site does not make a significant contribution to fulfilling this purpose of the Green Belt.</p> <p>4.25 Several listed buildings exist to the east of the site, in and around the village of Stone, including St Mary's Church. The sensitivity of these buildings will be considered as part of any development of the site. Nevertheless, these buildings are relatively isolated and therefore have a limited contribution towards the setting and special character of historic towns.</p> <p>4.26 As such, the release of this site from the Green Belt will not compromise the setting or special character of any historic towns.</p> <p><i>5) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land</i></p> <p>4.27 The release of this land from the Green Belt would not prevent the recycling of derelict and other urban land. The previous Core Strategy and Site Allocations and Policies Local Plan allocated a significant amount of brownfield land for redevelopment. However, the supply of suitable brownfield land is now reducing. Therefore, a Green Belt review is to be undertaken as part of the Local Plan Review, in order to meet its housing needs. The</p>			

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 32: KIDDERMINSTER EASTERN EXTENSION**

Respondent	Response No.	Part of Document	Support /Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
								<p>development of the site can be appropriately phased within the housing trajectory to take account of the availability and deliverability of brownfield sites across the District.</p> <p>4.28 The release of the site from the Green Belt will therefore not prejudice the recycling of derelict and other urban land. A Preliminary Landscape and Visual Appraisal prepared by Pegasus Environment provide further consideration and are attached to these representations at <b>Appendix 3</b>.</p> <p><i>Green Belt Summary</i></p> <p>4.29 It has been demonstrated that the release of the site from the Green Belt would not compromise the five purposes of Green Belt land as set out within the NPPF and is entirely in accordance with national policy regarding the release of land from the Green Belt. The site therefore makes a 'limited contribution' to the purposes of the Green Belt in the context of the Local Plan Green Belt Review.</p> <p>4.30 The site is capable of being well contained within strong, defensible boundaries and will, as a result, minimise encroachment into the countryside while maintaining the clear visual separation between Kidderminster and neighbouring settlements. It would not compromise the setting of the town and would not prejudice the recycling of derelict and other urban land. Therefore, it is considered that the site represents appropriate Green Belt release to deliver residential development in a sustainable location.</p> <p><b>Landscape Sensitivity</b></p> <p>4.31 Pegasus Environment has undertaken a Preliminary Landscape and Visual Appraisal (LVA) to determine the various landscape and visual constraints and opportunities of the wider site area and its context. This includes how these factors might serve to influence the potential for development in respect of a strategic master plan, and to influence an inherent landscape strategy as part of that</p>			

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 32: KIDDERMINSTER EASTERN EXTENSION**

Respondent	Response No.	Part of Document	Support /Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
								<p>master plan. This report is set out at <b>Appendix 3</b> to these representations.</p> <p>4.32 The LVA identifies the key constraints and opportunities present in the site and surrounding landscape, and also the nature of the likely impacts that may arise from the proposed development. The LVA has analysed the baseline information in the context of the proposed development and has informed the proposals for landscape mitigation.</p> <p>4.33 The development consequently incorporates a landscape mitigation strategy which will avoid, reduce or remedy adverse impacts.</p> <p>4.34 These over-arching principles set the framework for the areas which are proposed for development. Each of these can be subject to a greater level of detail regards master planning to identify constraints and opportunities at a more detailed level.</p> <p>4.35 The site is broadly contained to the west by the urban edge of Kidderminster which is characterised by residential estates, set on east and south-east facing slopes along with a belt of trees and woodland associated with the route of a local watercourse. Further east, as part of a transition to the wider landscape, the eastern and south-eastern edges of the wider site area are defined by a changes to the landform which create a localised ridgeline and highpoint. Together these contain the majority of the site and create capacity for development, where this can be implemented alongside a robust and enduring strategy for green infrastructure and open space. The site is of a sufficient scale that a development envelope can be brought forward that retains a substantial buffer on its eastern and southern edges; the treatment of this green infrastructure and open space will then provide an enduring and robust buffer between the settlement edge and the surrounding landscape context (including its Green Belt status).</p> <p>4.36 Given the scale of the requirement for development, any location for growth in the District is likely to result in</p>			

Local Plan Review Pre-Submission Consultation (September / October 2019)

Summary of Consultation Responses (Regulation 20(2) of the Town and Country Planning (Local Planning) (England) Regulations 2012

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 32: KIDDERMINSTER EASTERN EXTENSION**

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								<p>some harm in relation to landscape and visual matters. However, this analysis shows that the site can accommodate a substantial proposal with only limited landscape and visual effects at a localised level and those impacts can successfully be avoided or reduced through effective mitigation.</p> <p>4.37 Effects on landscape character will occur at a site level and its immediate landscape context and have little influence on the wider character of the wider landscape context to Kidderminster. The nature of visual effects is such that the greatest degree of effect will be from locations on, or directly adjacent to the site; from the wider countryside the effects will be much reduced due to the limited visibility, existing context of the settlement edge and mitigation inherent in the proposed development which, over time, will help to integrate the proposed development into the landscape.</p> <p>4.38 The preliminary development and landscape strategy aims to maintain and significantly enhance the existing green infrastructure network and provides a series of proposals for existing and green infrastructure and open space that respond to local landscape characteristics such as landform, field boundaries, tree belts etc; all physical and enduring features in the landscape. Consequently, the use of existing landscape components to guide the landscape strategy and subsequent augmentation of these components can set an appropriate, robust and enduring boundary to the Green Belt.</p> <p>4.39 The Development Framework Plan, set out in the Development Vision Document (<b>Appendix 2</b>) has been led by this development and landscape strategy.</p> <p><b>Accessibility to Amenities</b></p> <p>4.40 Land north of Comberton Road, is adjacent to the current built up area of Kidderminster with good access to services as well as to the town centre via a number of different routes. Schools, shops, neighbouring communities and leisure facilities are all accessible by a</p>			

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 32: KIDDERMINSTER EASTERN EXTENSION**

Respondent	Response No.	Part of Document	Support /Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
								<p>choice of means of transport, including walking and cycling.</p> <p>4.41 The majority of town's higher order services are located in the town centre and include supermarkets, shops, restaurants, pubs and number of recreation uses. However, there also exist a number of out of town services in the vicinity of the site, including Kidderminster Industrial Estate, Hoo Farm Industrial Estate, Greenhill Industrial Estate, Worcester Road Retail Park and Crossley Retail Park.</p> <p>4.42 There are a number of local facilities and services, including local shops, public houses, pharmacy and a doctor's surgery located within 2km walking distance of the site. Further, detailed consideration of the sustainability and accessibility of the site is set out within a Transport Report prepared by Vectos attached at <b>Appendix 4</b>.</p> <p>4.43 The Development Framework Plan also includes potential land for a new 2FE primary school and allows for the delivery of other community uses that would assist in ensuring a level of self-containment and sustainability within the site. To provide a level of permeability between new development and existing services and facilities the Development Framework Plan identifies a number of potential new pedestrian/cycleway links through to Tennyson Way and Borrington Road, providing the opportunity for sustainable trips to access day to day services and facilities.</p> <p><b>Access Strategy</b></p> <p>4.44 Access to the site can be achieved from the A448 (Comberton Road) towards the south-western extent of the site. This can be achieved by joining Comberton Road at the Spennells Valley Road roundabout and creating a priority junction with the northern arm of (old) Comberton Road. A preliminary junction arrangement is demonstrated at Figure 3.1 within the Transport Report at <b>Appendix 4</b>.</p> <p>4.45 To the northern element of the site, two options for</p>			

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 32: KIDDERMINSTER EASTERN EXTENSION**

Respondent	Response No.	Part of Document	Support /Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
								<p>access from Husum Way have been explored at the request of Worcestershire County Council. These options comprise of a signalised junction and a second option of a roundabout. The signalised junction allows for safe operation of all movements allowing for the vertical crest to the north, abutting the railway bridge, and provides safe and controlled facilities for pedestrians and cyclists. Both options are contained within the Transport Report at Figures 3.2 and 3.3 contained within <b>Appendix 4</b>.</p> <p><b>Flood Risk and Drainage</b></p> <p>4.46 The majority of the development site lies in Flood Zone 1, the area at least risk from flooding. However, the Hoo Brook situated at the southern end of the site results in some areas of land falling within flood zones 2 and 3. The Development Framework Plan demonstrates how these areas can be left undeveloped and utilised effectively as public open space.</p> <p>4.47 In addition to the Hoo Brook, a number of smaller watercourses, drains and ponds are noted within the site. These can similarly be managed and incorporated in open space as required. Onsite above-ground attenuation features would likewise be included. It is anticipated the majority of this storage would be delivered through balancing ponds, however, swales and linear features adjacent to the watercourse may also be considered.</p> <p>4.48 The site naturally drains to the western boundary with the south-western area of the site being the lowest point above sea level. The bedrock geology of the site is sandstone with some superficial deposits of sand and gravel identified around the watercourse areas; therefore, it is likely that the ground will soak effectively. Further work would be required to establish the best form of attenuation for the site.</p> <p><b>Heritage</b></p> <p>4.49 A Heritage Desk Based Assessment has been prepared by CSA Environmental and is attached at</p>			

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 32: KIDDERMINSTER EASTERN EXTENSION**

Respondent	Response No.	Part of Document	Support /Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
								<p><b>Appendix 5</b> to these representations. The report presents the results of an assessment of the potential effects on heritage assets that may be brought about by residential development on land to the north of Comberton Road.</p> <p>4.50 It concludes that the development would not adversely impact Grade II Listed buildings in the vicinity, including the Grade II Listed Glebe House and the Grade II Listed Church of St Mary to the east of the site.</p> <p>4.51 In respect of Historic Landscape considerations, the site was historically part of a catchwork water meadow system known as Lord Foley’s Irrigation Scheme. This Irrigation Scheme, including associated features within the Site, is not a designated heritage asset, and the assessment did not identify any evidence to indicate that it is sufficiently well preserved or of sufficient rarity to be considered of the highest significance. As such Lord Foley’s Irrigation Scheme should be considered as non-designated heritage asset. Associated features within the site comprise ditches (extant and removed) and sluice locations as well as water management features associated with Heathy Mill. Where ditches are extant along field boundaries it is anticipated that these will be retained by the proposed development and interpretation provided, but below-ground remains elsewhere may be removed. The introduction of built form and loss of below-ground features would result in some overall harm to Lord Foley’s Irrigation System but it is anticipated this would be less than substantial.</p> <p>4.52 In respect of archaeology, there is no evidence to suggest significant Prehistoric, Roman or Medieval below-ground archaeological remains are located within the site.</p> <p><b>Noise</b></p> <p>4.53 Noise is unlikely to be a significant issue for the proposed development. The Development Framework Plan indicates how dwellings would be set back from main roads, including Comberton Road. Similarly, dwellings would be set back from the railway lines to the northern</p>			

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 32: KIDDERMINSTER EASTERN EXTENSION**

Respondent	Response No.	Part of Document	Support /Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
								<p>and south-western boundaries.</p> <p>4.54 Furthermore, landscaping would be included throughout the development in conjunction with carefully orientated and sited dwellings to minimise noise impact and preserve residential amenity.</p> <p>4.55 Consequently, it is unlikely noise will have a significant adverse impact on the development of this site.</p> <p><b>Ground Conditions</b></p> <p>4.56 The British Geological Map for the area indicates the site is underlain by Holt Heath Sand and Gravel (River Terrace Deposits) over Kidderminster Formation (Former Bunter Pebble Beds).</p> <p>4.57 An initial Phase I Environmental Risk Assessment for the site has been undertaken which identifies that it is unlikely that the site would be classified as contaminated land.</p> <p><b>Utilities</b></p> <p>4.58 Sewers are present in the vicinity of the site, including adjacent to the existing roundabout off the A448. Accordingly, diversions/reinforcement/new connections are likely to be required in order to connect the site to the network. Whilst no sewers are located within the site, surface water outfalls into the watercourse along the western boundary are noted and a foul sewer is located to the west of the watercourse.</p> <p>4.59 Similarly, water mains are present in the vicinity of the site, including adjacent to the existing roundabout off the A448 and therefore diversions/reinforcement/new connections are likely to be required. No water mains are located within the development area.</p> <p>4.60 Regarding electricity cables, gas mains and phone lines, no apparatus is present within the development area. As a result, diversions/reinforcement/new</p>			

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 32: KIDDERMINSTER EASTERN EXTENSION**

Respondent	Response No.	Part of Document	Support /Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
								<p>connections will again be required.</p> <p>4.61 The capacity of all of these utilities need to be determined but are unlikely to present any issues of deliverability in respect of the site.</p> <p><b>Agricultural Land Classification</b></p> <p>4.62 Natural England’s Land Classification Map for the West Midlands Region (ALC004) shows that the majority of the site comprises Grade 3 ‘Good to Moderate’ quality agricultural land, with the remainder comprising Grade ‘Very Good’ quality land. It is noted that the majority of land around Kidderminster also comprises Grade 2 and 3 agricultural lands.</p> <p>Whilst it is acknowledged that the loss of Grade 2 agricultural land is undesirable, the majority of the site comprises Grade 3 land, and that the scale of development required within Wyre Forest District will necessitate the loss of an amount of Grade 2 land under any reasonable option.</p> <p><b>Suitability</b></p> <p>4.63 The information set out above, read in conjunction with the appended Development Vision Document and technical reports, demonstrate that land at Comberton Road is a suitable site. Taylor Wimpey is pleased that this has been recognised through the Pre-Submission Local Plan as these sites forms part of the proposed Kidderminster Urban Extension.</p> <p><b>Deliverability</b></p> <p>4.64 There is an agreement in place between the landowner and Taylor Wimpey to facilitate the development of the site.</p> <p>4.65 A considerable amount of technical work has been undertaken to demonstrate the deliverability of land to the north of Comberton Road. Taylor Wimpey can confirm that</p>			

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 32: KIDDERMINSTER EASTERN EXTENSION**

Respondent	Response No.	Part of Document	Support /Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
								<p>this work concludes that there are no physical or other constraints likely to render the site undeliverable within the Plan period. The site is available now.</p> <p>4.66 There are no existing uses that would require relocation and no issues of contamination that would require remediation. Many of the potential impacts of the development of the site can be mitigated through design and in many cases a positive outcome can be achieved, such as the strengthening of Kidderminster’s eastern boundary through landscaping and providing significant new Green Infrastructure to benefit new and existing residents.</p> <p>4.67 The site is deliverable and immediately available and, subject to allocation and removal of the land from the Green Belt, could start to deliver homes and associated community benefits within the next 5 years</p> <p><b>5. CONCLUSION</b></p> <p>5.1 Taylor Wimpey is in control of land at Comberton Road, Kidderminster. The land is sustainably located adjacent to the existing urban area of Kidderminster which is identified as the Main Town and focus for large scale housing provision within the District.</p> <p>5.2 Land to the north of Comberton Road is promoted as a suitable, deliverable and available land, subject to its release from the Green Belt and land to the south of Comberton Road is considered both suitable and developable. The development of the Kidderminster Urban Extension, whether this includes the further Option ‘A’ land would constitute sustainable development.</p> <p>5.3 The suitability of land to the north of Comberton Road is recognised through the Council’s own evidence base and further complementary evidence commissioned by Taylor Wimpey.</p>			

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 32: KIDDERMINSTER EASTERN EXTENSION**

Respondent	Response No.	Part of Document	Support /Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
								<p>5.4 Taylor Wimpey fully support the Council’s decision to allocated sites OC/6 and OC/11N within the emerging Local Plan, however wish to raise the following concerns:</p> <ul style="list-style-type: none"> <li>• The recommended options for improving viability of sites set out within the Viability Note should be explored by the Council and further viability modelling undertaken once this is complete.</li> <li>• Further work is necessary to allow for scrutiny of the proposed infrastructure projects set out within the Infrastructure Delivery Plan and how costs have been apportioned to proposed allocations.</li> <li>• Further consideration needs to be given to alternative funding sources for the delivery of strategic infrastructure projects as it is wholly unrealistic to expect the development industry to fund the entire infrastructure burden.</li> <li>• The identification of a separate and distinct requirement for C2/Institutional/Care Homes need is supported; however it will be important to separate the supply of these units when undertaking any land supply calculations.</li> <li>• The employment land requirement of 29ha does not take account of land that could be required in the event of stronger economic growth to assist in meeting the economic aspirations of the Worcestershire LEP Strategic Economic Plan.</li> <li>• Housing land should be increased within the emerging Local Plan to ensure a 20% buffer in supply. Therefore, for a housing requirement of 5,520, a further buffer of land, equivalent to the delivery of an additional 1,140 dwellings should be identified.</li> <li>• The District Council should publish a site-specific housing trajectory to allow for further scrutiny, through EiP, in respect of delivery and build out assumptions utilised.</li> <li>• Kidderminster will continue to play a primary role in meeting the District’s needs beyond the plan period. It is necessary therefore to identify further safeguarded land attributed to this town, which ever option is progressed, to ensure the permanence of the Green Belt boundary. The</li> </ul>			

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 32: KIDDERMINSTER EASTERN EXTENSION**

Respondent	Response No.	Part of Document	Support /Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
								<p>proposed safeguarded land to be carried forward relates to other, less sustainable settlements.</p> <ul style="list-style-type: none"> <li>A number of the housing policies, as currently drafted, are too prescriptive and should be amended to provide greater flexibility to allow for new development to reflect local character and needs. This includes policies that seek to accelerate requirements beyond those established through building regulations and policies relating to custom/self build dwellings.</li> </ul>			
Offmore Comberton Action Group - Local Plans Alan Totty	<a href="#">RLPPS167</a>	Policy 32 Kidderminster Eastern Extension	Object	Yes	No	Yes	Positively Prepared Justified Effective	<p>If the proposals for Blakedown Station go ahead then the proposed route through the East of Kidderminster extension will become an effective eastern by pass. If this happens the proposed junction with Husum Way just above its junction with Shakespeare Drive will be extremely dangerous and cause serious deterioration in quality of life for existing residents of Offmore.</p> <p>We believe that the ONLY way to make these proposals safe is to construct an additional Railway Bridge to link the proposed traffic island at Husum Way/Birmingham Rd</p>	<p>To construct an additional railway bridge at Husum Way/Birmingham Toad junction to development.</p> <p>Planting at rear of the existing Offmore Estate must be a minimum of 30 metres.</p>	Yes	Residents off the Offmore area have asked that there views be put personally at the public inquiry.

Local Plan Review Pre-Submission Consultation (September / October 2019)

Summary of Consultation Responses (Regulation 20(2) of the Town and Country Planning (Local Planning) (England) Regulations 2012

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 32: KIDDERMINSTER EASTERN EXTENSION**

Respondent	Response No.	Part of Document	Support /Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
								<p>Junction to the proposed "Spine Road" through the proposed Kidderminster Eastern Extension. We are pleased that some additional planting is proposed to the rear of the existing Offmore Estate but believe that this MUST be a minimum of 30 metres wide to protect the quality of life of existing residents.</p> <p>Also we believe that the development to the east of the existing Offmore Estate fails to protect the wildlife, specifically nesting curlews, badgers, bats and foxes in that area and will destroy the historic irrigation system installed by the Earl of Dudley over 100 years ago and still functional.</p> <p>We believe that the 300 properties proposed on this site could be accommodated elsewhere in the District and the remaining 1000 properties proposed for Stone Hill North could have their Primary School needs adequately catered for by extensions at Offmore and Comberton Primary Schools.</p> <p>Residents of Offmore feel that it is completely wrong to load all the pressure on to the east of Kidderminster and believe that areas with access to the Wolverley Rd. have good access to the A449 North East of Kidderminster.</p>	300 properties on site could be accommodated elsewhere in district. Remaining 1000 properties could have primary school needs catered by extensions to Offmore and Comberton schools.		
Pre-submission Anonymous	<a href="#">RLPPS228</a>	Policy 32 Kidderminster Eastern Extension	Object					<p>We strongly object to the proposed access from the new development onto Husum Way near to Shakespeare Drive. Having lived on Shakespeare Drive for 47 years the traffic problems this will cause will be insurmountable. Since the closure of Sladen School and the alterations to the A456, the junction onto the A456 is at peak times a nightmare. The volume of traffic is always increasing, and once this development is complete it would be too late to change the access. I strongly recommend you to look to either construct another bridge or road to access in a different location so as to prevent this happening. If doing this is too expensive may I suggest you look into developing land between the A456 and A451 with the upgrading of Hurcott Land this has now become a rat run and would benefit from an improved road.</p>	I strongly recommend you to look to either construct another bridge or road to access in a different location so as to prevent this happening. If doing this is too expensive may I suggest you look into developing land between the A456 and A451 with the upgrading of Hurcott Land this has now become a rat run and would benefit from an improved road		
Siobhan	<a href="#">RLPPS37</a>	Policy 32.1	Object	No	No	No		The increased traffic around the area from the	New railway bridge or	No	

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 32: KIDDERMINSTER EASTERN EXTENSION**

Respondent	Response No.	Part of Document	Support /Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
Brownlee								development and additional spaces proposed at Blakedown Station would lead to considerable congestion. Surely a new railway bridge would be needed to accommodate this increase in traffic	widening of bridge on Husum Way		
Martin Green	<a href="#">RLPPS204</a>	Policy 32.1 - OC5	Object	Yes	No	Yes	Effective	<p>The updated plan still shows a dangerous road junction on Husum Way, Shakespeare Drive. Situated below the railway bridge fast moving traffic will take a queue of stationary vehicles. Also traffic will build up on the black spot junction on the Birmingham road.</p> <p>The proposed tree bund is not deep enough, mature trees must be planted. It doesn't say who will be responsible for the upkeep of the orchard etc. The new plan has no considerations for the existing wildlife, including nesting curlews, badgers, bats, owls etc.</p> <p>I feel that the concerns of residents are being ignored. The new plan does not seem to understand the danger of the proposed road junctions, the damage to wildlife, the visible effect of buildings on high ground, and the robbery of Green field land from future generations.</p>	A new railway bridge would be essential if a spine road was built. Instead of destroying Green Belt fields, there are available sites at Ferndale and Marlpool, which is flat land.	No	
Peter Smith	<a href="#">RLPPS211</a>	Policy 32.1 - OC5	Comment	No	No	Yes	Justified	<p>The proposed road linking the Spennells Valley Road and Husum Way is unsound regarding the installation of a roundabout on Husum Way. This would have to be in the locality of Shakespeare Drive and pose a real danger to standing traffic by moving traffic coming over the railway bridge from the A456. There would be insufficient time for this traffic to slow down due to a lack of visibility until the bridge has been crossed.</p> <p>I would propose a buffer zone of mature planted trees, at least 20 metres wide to protect the character of Offmore Court. If there were no buffer zone the impact of the</p>	The link road referred to in section 9 should join the A456 between Husum Way and the barn development/farmhouse by creating a roundabout on the A456 opposite Hurcott Lane. This would involve crossing the railway via a new bridge.	No	

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 32: KIDDERMINSTER EASTERN EXTENSION**

Respondent	Response No.	Part of Document	Support /Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
								proposed development would be devastating to the residents of the above. Also the WWII mission hut must be preserved as an historical link to WWII.			
Anthony Simmons	<a href="#">RLPPS226</a>	Policy 32.1	Object		No		Justified	<p>Proposed access from new development onto Husum Way at Shakespeare Drive side of rail bridge would create a very dangerous junction. In particular with regard to vehicles coming from A456 Birmingham Road. Any traffic control measures, lights or otherwise, would fail to address the problem. The new access would inevitably become an unofficial "Eastern Bypass" increasing traffic onto an already busy road at peak times. The outcome is totally unacceptable.</p> <p>The proposed tree bund/break between proposed and existing development is inadequate for protecting the quality of life of existing and potential residents.</p> <p>I question the validity of traffic volume figures: from personal observation it would seem that elements of vehicle count and movement were undertaken during schools half term and not during peak hours. If this is the case then figures obtained are seriously flawed.</p> <p>Unless rail companies increase the minimum of trains stopping at Blakedown the increased parking proposed is of limited value.</p>	<p>The construction of a new (additional) rail bridge to connect the proposed spine road and new roundabout directly should be considered as being essential for this development to be practical - regardless of cost involved.</p> <p>The width of the proposed tree break/bund should be increased to at least 20 metres and densely planted.</p>		
Anthony and Norma Kettle	<a href="#">RLPPS213</a>	Policy 32.1 - OC5	Object	Yes	No	Yes	Justified	<p>The local plan is unsound due to the access road to the new development. The proposed access/exit from and into Husum Way is truly dangerous - it just lends itself for incidents and accidents to happen.</p> <p>The tweaking of the Shakespeare Drive junction is ill thought out and unacceptable. Turning into Husum Way from Birmingham Road towards the end of the approach to the railway bridge is 'blind' and thereafter a descent to Shakespeare Drive.</p> <p>The road from Tennyson Way to Shakespeare Drive bends,</p>	<p>Much more thought must be given (let there not be hindsight) to the long term plan. There must be no cost cutting short cuts by Local District and County Councils or Developers. You are planning for a 'Greater Kidderminster'. Worcester has been granted a new railway bridge - Wyre Forest</p>	No	

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 32: KIDDERMINSTER EASTERN EXTENSION**

Respondent	Response No.	Part of Document	Support /Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
								<p>cars park on the road and the visual distance is restricted.</p> <p>The railway bridge may currently be sound but for how many years? What would happen for existing development residents when, with HGVs, accidents, climate change and pollution etc, the bridge goes into disrepair?</p> <p>Highways England pride themselves with road planning safety, there is no pride to safety with this proposed junction off Husum Way to the new development.</p> <p>The distance between the existing development and the new development is of concern. Reconsideration must be given/afforded to homeowners on the existing boundary line. We consider there should be at least a 30 metre distance between boundaries. This to act as a 'buffer' for noise, light and traffic pollution for the existing boundary homeowners losing their extended 'back garden' from a farmland setting to an urban one.</p> <p>Between the boundaries an environmentally friendly strip will also be essential to encourage disturbed wildlife to re-establish itself within a fruit, berry and nut orchard with wild flowers for bees, insects etc. To bring back a little of their lost environment.</p> <p>The state of nature 2019 report confirms the decline of curlews - these ground-nesting birds are around the proposed land development. Also around are yellowhammers, linnets and tree sparrows (very much on the decline) owls and bats, badgers, field mice, pheasants, hares, muntjac deer and foxes. Their habitat will be disturbed - they too need their compensation.</p>	<p>must assert itself and insist, for road safety purposes, that a new railway bridge for the Eastern Development is of necessity.</p> <p>The only way to make your revised plan completely acceptable to us is to make the new development a completely 'stand alone' one - a separate entrance to a new road Birmingham Road, over a new railway bridge and across to Spennells Valley roundabout. The new road would then lend itself for future development to the East in the latter part of the century - provided Planning Officers approved appropriate Housing Development plans with cul-de-sacs etc.</p>		
Joanne Banfield	<a href="#">RLPPS248</a>	Policy 32.1 - OC/5	Object	No	No	No		<p>We do not believe the Local Plan to be legally compliant or sound. The proposed new development and its planned access is not in the best interests of the local people and will increase pollution levels, increase danger and risk of traffic and collisions.</p> <p>The construction of a new railway bridge to direct traffic to the new development not bypassing the current road system.</p>			

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 32: KIDDERMINSTER EASTERN EXTENSION**

Respondent	Response No.	Part of Document	Support /Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
								Not enough protection of existing wildlife in the area e.g. badgers, owls, bats and nesting curlews plus other species of insects in the meadows at present.			
Laila Smith	<a href="#">RLPPS244</a>	Policy 32.1 - OC/5	Object		No			<p>I believe the revised plans to be unsound for the reasons stated below:</p> <ul style="list-style-type: none"> <li>- The proposed access from the new development onto Husum Way on the Shakespeare Drive side of the railway bridge is totally unacceptable even with traffic lights as the traffic coming from the Birmingham Road is at risk of colliding with stationary traffic stopped at red light.</li> <li>- The proposed tree bund between the existing properties and the new development is not wide enough.</li> <li>- Due care and consideration should be given to the wildlife</li> <li>- nesting curlews, badgers, owls and bat roost.</li> </ul>	<ul style="list-style-type: none"> <li>- New railway bridge to connect the spine road through the new development directly to the proposed traffic island at the Husum Way junction. This will prevent Offmore and Comberton be used at a rat run for traffic to Birmingham Road.</li> <li>- The tree bund needs to be at least 20-30 metres wide and densely planted.</li> <li>- There is plenty of space for 300 houses on the "onion fields" on Ferndale.</li> </ul>	No	
Austin Caulfield	<a href="#">RLPPS246</a>	Policy 32.1 - OC/5	Object	No	No		Positively Prepared	<p>This plan is not compliant or sound. It is just convenient that the landowner has said that the land is for sale very debatable. No consideration is given to the fact it is on the Green Belt land. In fact the general attitude is well we've got to have a plan and it's got to go somewhere. No thought is given to Brownfield sites available in the Wyre Forest area.</p> <p>Any access going to be sited on Husum Way is totally unsafe, Husum Way is a residential road not a bypass, it is on a school run and has a railway bridge unsiting on coming traffic and therefore like to represent the residents voice of Husum Way.</p> <p>Yes it's quite evident on looking at empty Brownfield locations in the district and empty sites which have come available. In recent years, that the planners haven't even</p>	<p>This plan is not compliant or sound. It is just convenient that the landowner is said that the land is for sale very debatable. No consideration is given to the fact it's on the Green Belt land. In fact the general attitude is well we've got to have a plan and it's got to go somewhere. No thought is given to Brownfield sites available in the Wyre Forest area.</p>	Yes	Any access going to be sited on Husum Way is totally unsafe, Husum Way is a residential road not a bypass, it is on a school run and has a railway bridge unsiting on coming traffic and therefore like to represent the residents voice of Husum Way.

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 32: KIDDERMINSTER EASTERN EXTENSION**

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								looked at. Kidderminster needs regenerating more town centre buildings should become dwelling to boost the economy then people would use the town centre because they live there and hopefully work there so reducing pollution levels. Building on rural Green Belt increases travel and pollution and is against government policy.			
Dana Anderson	<a href="#">RLPPS38</a>	Policy 32.1	Object	No	No	No		<p>The proposed access from the new development on Husum Way on the Shakespeare Drive side of the railway bridge is unacceptable and dangerous as vehicles coming from Birmingham Road will at high risk of colliding with vehicles stopping at a red light. This junction will cause congestion on a busy route.</p> <p>Increased parking at Blakedown station will attract greater amount traffic from this side of town.</p> <p>The proposed tree bund between the proposed new development and existing properties is too narrow. In order to protect the quality of life of existing residents it must be a minimum of 20 metres wide and densely planted.</p> <p>Due care must be paid to wildlife in the area. In particular: nesting curlews, badgers, owls and bat roosts amongst others. Most important is the insect life as most are declining in number. Also the Oak trees which line Husum way and are part of the Wyre Forest in which we live. These provide habitat and a corridor for wildlife.</p> <p>The proposed access from the new development on Husum Way on the Shakespeare Drive side of the railway bridge is unacceptable and dangerous as vehicles coming from Birmingham Road will at high risk of colliding with vehicles stopping at a red light. This junction will cause congestion on a busy route.</p> <p>Increased parking at Blakedown station will attract greater amount traffic from this side of town.</p> <p>The proposed tree bund between the proposed new development and existing properties is too narrow. In order to protect the quality of life of existing residents it</p>	<p>In regards to the duty to co-operate using on line forms to make comments is very difficult when asked for specific paragraph's or parts of a plan. Especially when you do not have a hard copy.</p> <p>Also the form for comments does not make sense to me almost as if comments from ordinary people are not important.</p> <p>The only way to prevent the existing Offmore and Comberton estates becoming a bypass (increasing the already congested roads and making some junctions very dangerous) would be to construct a new railway bridge to connect the spine road through the new development to the directly proposed traffic island at the Husum Way junction. Developers should not use the excuse of amendments being too expensive if</p>	Yes	Not sure what you mean by this question?

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 32: KIDDERMINSTER EASTERN EXTENSION**

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								<p>must be a minimum of 20 metres wide and densely planted.</p> <p>Due care must be paid to wildlife in the area. In particular: nesting curlews, badgers, owls and bat roosts amongst others. Most important is the insect life as most are declining in number. Also the Oak trees which line Husum way and are part of the Wyre Forest in which we live. These provide habitat and a corridor for wildlife.</p> <p>In regards to the duty to co-operate using on line forms to make comments is very difficult when asked for specific paragraph's or parts of a plan. Especially when you do not have a hard copy.</p> <p>Also the form for comments does not make sense to me almost as if comments from ordinary people are not important.</p>	they affect resident's quality of life and very importantly safety.		
Eileen Green	<a href="#">RLPPS210</a>	Policy 32.1 - OC5	Object	Yes	No	Yes	Positively Prepared Justified Effective	<p>It will be very dangerous if a junction is built on Husum Way at Shakespeare Drive. Traffic coming into Husum Way from Birmingham Road will collide as it goes over the railway bridge to the junction; Husum Way is a very fast road. Traffic is likely to back up Birmingham road and cause accidents.</p> <p>A deeper tree bund should be planted. They should be mature to create a screen straight away. It needs to be made clear who and how they will be managed in the orchard and who will maintain it.</p> <p>We need to know what will happen to the existing wildlife that lives here. Bats, badgers, owls and nesting curlews need a home. Due consideration must be made.</p> <p>The concerns and worries of local residents have been ignored. If this plan goes ahead, good agricultural land with an abundance of wildlife will be destroyed.</p> <p>The plan will cause great inconvenience to the area.</p>	<p>A new railway bridge must be built. This will take traffic from the development to the planned new island at Hurcott junction on Birmingham Road.</p> <p>Land at Ferndale and Marlpool could be used to build houses and take some of the destruction. This area is flat unlike land at Offmore which is sloping and high. Also it wouldn't cause as much disruption to the area.</p>	No	

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 32: KIDDERMINSTER EASTERN EXTENSION**

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								<p>I think getting information about the plans has been very difficult.</p> <p>The website is extremely confusing and impossible for many people to navigate.</p>			
Vicki Seymour	<a href="#">RLPPS212</a>	Policy 32.1 - OC5	Object		No			<p>1) The access to the new development via Hussum Way is not a viable option as it is unsafe and will result in an accident black spot. The access via Hussum Way would not accommodate the volume of traffic from the new development and would cause gridlock on an already busy junction to the Offmore Estate and the Birmingham Road. The increased parking at Blakedown train station would also impact significantly on the traffic flow through Offmore Estate and add to the unacceptable traffic gridlock potential with the link to the Birmingham Road.</p> <p>The only safe access route would be via a new railway bridge to take the traffic from the new development, directly to the Birmingham Road.</p> <p>2) There is also the flood risk from the stream at the lower field at the rear of Chaucer Crescent which already floods. The run off from the new development would significantly increase the floor risk and result in major flooding.</p> <p>3) The tree bund around existing properties is insufficient and should be increased to a minimum of 40m to be densely planted to include evergreen trees and shrubs to help protect the existing wildlife which includes badgers, owls, curlews, bats and a variety of newts. The development should also include significantly sized wildlife corridors.</p>			
Mark Smith	<a href="#">RLPPS223</a>	Policy 32.1	Object		No			<p>1) Husum Way will not take the volume of traffic flow from the new development. There is already congestion with the traffic coming through the estate and will the Birmingham Road junction. An access route via Husum Way would create gridlock especially with proposed increased traffic flow through Offmore estate. The new development would need a new railway bridge to allow traffic flow safely from the new development to the</p>			

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 32: KIDDERMINSTER EASTERN EXTENSION**

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								<p>Birmingham Road.</p> <p>2) Increased flood risk at the rear of the properties in Chaucer Crescent. As the new development would increase run off which would result in major flooding.</p> <p>3) Increase the tree bund around existing properties to a min of 40m which should be densely planted to include evergreen trees and shrubs. This will help to protect existing wildlife which includes curlews, bats, badgers, owls and newts. Also requires wildlife corridors to support the wildlife.</p> <p>4) Reinstatement of all permitted development for the Offmore Court properties.</p>			
Adrian and Sandra Fletcher	<a href="#">RLPPS243</a>	Policy 32.1 - OC/5	Object	Yes	No	Yes	Justified	<p>The proposed traffic light junction in Husum Way would be extremely dangerous. The position is totally wrong just over the brow of the hill. You will be filtering all traffic onto Husum Way from the new estate; it will cause endless queues up and down Husum Way and onto the Birmingham Road. It's an accident Black spot in the making.</p> <p>The proposed cycle path in Offmore Close is highly dangerous. The proposed entrance is in a private driveway used for access to the Offmore Nursing home and for the residents of Offmore Court, both parties having right of way. It is constantly being used and would be dangerous to both pedestrians and cyclists.</p> <p>The proposed tree bund around the existing properties is not wide enough to give existing residents some degree of privacy.</p> <p>The 300 houses planned to be built behind Offmore Nursery Home and Barns is a travesty. The farmer himself said it was his best growing land.</p> <p>We both feel that building homes in Kidderminster on good growing lands is totally wrong. It seems very short sighted in these very unsure times. We may all live to regret building houses when we have no food and nowhere to</p>	<p>A new bridge needs to be built over the railway. Not such a great ask as several have appeared almost overnight at the new Parkway railway station. Traffic from the new estate could be directed straight on to the Hussum Way/Birmingham Road; it would speed the through traffic on its way and reduce congestion for Offmore residents. It would also slow traffic down before it reaches Husum Way.</p>	No	

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								grow any!!!			
Julie Totty	<a href="#">RLPPS245</a>	Policy 32.1 - OC/5	Object	Yes	No	Yes	Effective	The junction on Husum Way Birmingham Road is very unsafe there is a lot of wildlife in the field for planning on building. School traffic will be a big problem.		No	
Offmore Comberton Action Group - Local Plans Alan Totty	<a href="#">RLPPS247</a>	Policy 32.1 - OC/5	Object	Yes	No	Yes	Effective	I consider that junction on Husum Way and Shakespeare Drive to be unsound and dangerous, although it will have traffic lights, traffic coming over the railway bridge will meet a queue of traffic. The bridge is a blind summit. Exiting school is already crowding out the roads at school time. The nearest doctors are full. Nesting curlews have been discovered on farmland incorporated in the plan.			
Valerie Badger	<a href="#">RLPPS250</a>	Policy 32.1 - OC/5	Object	Yes	No	No	Effective	The development beside Offmore Estate. The proposed access onto Husum Way is not only ill considered it is potentially dangerous. The amount of traffic that uses Husum Way - not only as a 'rat run' to the Birmingham Road - it is the route that leads to Offmore Primary School, King Charles School and the local shops and post office. This school traffic is not just motor traffic; it is children and parents walking to the schools. The proposed access is too near the summit of the bridge, which is already a 'blind spot' if something is parked, either side of the summit.	For there to be only one exit/ entry to this new development, onto the Bromsgrove Road/ Spennells Valley Road roundabout, where traffic could then use the Bromsgrove Road A448 to go towards Birmingham or Worcester and the Spennells Valley Road to go towards Worcester, Stourport etc and the Comberton Road to go into town. Or the second entry/exit to be onto Tennyson Way using one of the existing roads on that side of the Offmore Estate. I realise this might be unacceptable to the existing residents, but it would be safer.		
Lee Charles Cordery	<a href="#">RLPPS57</a>	32.3 (OC/6)	Comment		No			The access off Husum Way can not be implemented safely. Traffic from the A456 over the bridge frequently exceed speed limit. The distance from the brow of the hill and visibility to what is before you and to the proposed		No	

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								<p>junction is far too short; especially at the speeds vehicles travel. In the event of the slightest congestion at the new junction traffic backing up towards the bridge will be in grave danger. This road is already a busy rat run from the Spennells Valley island, especially if there are incidents on the Bromsgrove road. The new proposed road from spennells valley island through the new developments is intended to be 20 mph, so traffic will still use the Borrington/Tennyson route.</p> <p>The intended extension of Blakedown station will also increase traffic through Comberton and Offmore, as the Chester Road route up to the land oak junction is already an over busy route.</p> <p>An addition Spine road is needed to connect the development that does not use the Husum way bridge, unfortunately that would mean a new bridge over the railway.</p> <p>The planned development would cause irreversible damage to habitats of the diverse wildlife. There is a healthy population of bats, birds of prey including peregrine falcons. The proposed 20m bund is too narrow to retain the existing ecological balance between birds, mammals, insects and plant species.</p>			
Taylor Wimpey West Midlands	<a href="#">RLPPS280</a>	.Policy 32.3 (OC/6 and OC/13N)	Support				Justified	<p>To avoid any confusion, this representation provides a comprehensive response and therefore is intended to <u>replace</u> that previously submitted in December 2018.</p> <p>This representation relates to land off Comberton Road, Kidderminster (see Site Location Plan at <b>Appendix 1</b>) which is within the control of Taylor Wimpey.</p> <p>Land off Comberton Road forms a significant element of the proposed East of Kidderminster Urban Extension, which Policy 32 (Kidderminster Eastern.</p> <p><b>Policy 32.3 Land East of Offmore (OC/6) and Land at Stone Hill North (OC/13N) Overall Vision</b></p> <p>3.83 Policy 32.3 relates to the sites under the control of</p>		Yes	<p>Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan.</p> <p>Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern extension in the overall spatial strategy contained</p>

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								<p>Taylor Wimpey. The overall vision is supported and reflects the emerging proposal for the site as introduced through the Development Vision document appended to this representation.</p> <p><b>LAND AT COMBERTON ROAD, KIDDERMINSTER</b></p> <p>4.1 Taylor Wimpey is currently in control of the land to the north of Comberton Road and to the south of the Birmingham to Worcester railway line, and a further area of land to the south of Comberton Road, as shown on the Site Location Plan appended to this representation (<b>Appendix 1</b>).</p> <p>4.2 Sites OC/6 and OC/13N form the majority of the proposed East of Kidderminster Urban Extension. Land to the south of Comberton Road represents an omission site previously identified as an Option 'A' site within the Preferred Options document.</p> <p>4.3 Land to the north of Comberton Road has been promoted as an infrastructure led residential development incorporating significant green infrastructure provision, land for a primary school and land for other community facilities that may be required.</p> <p>4.4 Whilst an area of land to the south of Comberton Road is promoted for development, this is promoted as a latter phase that could be delivered beyond the proposed plan period (safeguarded land).</p> <p>4.5 A Development Vision document has been prepared to introduce an initial concept master plan for the delivery of the site. This document attached at <b>Appendix 2</b>, pulls together a wide range of technical information collected to date that has been utilised in shaping the initial proposal and provides an indication of how the site could be delivered and will function as an eastern extension to the town of Kidderminster.</p> <p>4.6 Taylor Wimpey is committed to delivering on the</p>			therein.

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								<p>following objectives for land north of Comberton Road:</p> <ul style="list-style-type: none"> <li>• Delivery of quality new homes;</li> <li>• Delivery of a choice of housing;</li> <li>• Provision of a quality design;</li> <li>• Maintenance and enhancement of connectivity and accessibility;</li> <li>• Provision of public open space;</li> <li>• Provision of community facilities;</li> <li>• Maintenance and enhancement of site characteristics;</li> <li>• Creation of an attractive and safe community; and</li> <li>• Achievement of sustainable and safe development.</li> </ul> <p>4.7 These objectives underpin a Development Framework for the site that identifies the following key features for land to the north of Comberton Road:</p> <ul style="list-style-type: none"> <li>• Approximately 1,400 dwellings;</li> <li>• Delivery of a new 20mph spine road, providing a new vehicular link between Birmingham Road (A456), via Husum Way, and Comberton Road/Stone Hill (A448);</li> <li>• Provision of new pedestrian/cycle links between the site and Tennyson Way and Borrington Road to provide permeability and integration with the existing urban edge of Kidderminster;</li> <li>• Provision of land for the delivery of a number of community uses, including the provision of a new Primary School, a community facility to accommodate a meeting room, potentially café and potentially a GP surgery;</li> <li>• Significant provision of Green Infrastructure to include a landscape mitigation strategy that has been developed in line with the Kidderminster East GI Concept Statement;</li> <li>• Provision of SuDS through the delivery of new attenuation features; and</li> <li>• A new enduring Green Belt boundary to the east of Kidderminster.</li> </ul> <p>4.8 Further consideration of the site is set out below having regard to the Council's evidence base and the</p>			

Local Plan Review Pre-Submission Consultation (September / October 2019)

Summary of Consultation Responses (Regulation 20(2) of the Town and Country Planning (Local Planning) (England) Regulations 2012

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								technical information prepared on behalf of Taylor Wimpey to date. This analysis concludes that sites OC/6 and OC/13N, which are within the control of Taylor Wimpey, are both suitable and deliverable. This provides confidence that the proposed East of Kidderminster Urban Extension is 'soundly' based.			
Taylor Wimpey West Midlands	<a href="#">RLPPS281</a>	.Policy 32.4	Support				Justified	<p>To avoid any confusion, this representation provides a comprehensive response and therefore is intended to <u>replace</u> that previously submitted in December 2018.</p> <p>This representation relates to land off Comberton Road, Kidderminster (see Site Location Plan at <b>Appendix 1</b>) which is within the control of Taylor Wimpey.</p> <p>Land off Comberton Road forms a significant element of the proposed East of Kidderminster Urban Extension, which Policy 32 (Kidderminster Eastern.</p> <p><b>Policy 32.4 Site Specific Principles of Development</b></p> <p>3.84 Again, Policy 32.4 is supported by Taylor Wimpey as 'sound.' Work has been undertaken to demonstrate how these principles can be incorporated within a deliverable scheme. These principles underpin the Framework Development Plan introduced through the Development Vision document.</p> <p><b>LAND AT COMBERTON ROAD, KIDDERMINSTER</b></p> <p>4.1 Taylor Wimpey is currently in control of the land to the north of Comberton Road and to the south of the Birmingham to Worcester railway line, and a further area of land to the south of Comberton Road, as shown on the Site Location Plan appended to this representation (<b>Appendix 1</b>).</p> <p>4.2 Sites OC/6 and OC/13N form the majority of the proposed East of Kidderminster Urban Extension. Land to the south of Comberton Road represents an omission site previously identified as an Option 'A' site within the</p>		Yes	<p>Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan.</p> <p>Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern extension in the overall spatial strategy contained therein.</p>

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								<p>Preferred Options document.</p> <p>4.3 Land to the north of Comberton Road has been promoted as an infrastructure led residential development incorporating significant green infrastructure provision, land for a primary school and land for other community facilities that may be required.</p> <p>4.4 Whilst an area of land to the south of Comberton Road is promoted for development, this is promoted as a latter phase that could be delivered beyond the proposed plan period (safeguarded land).</p> <p>4.5 A Development Vision document has been prepared to introduce an initial concept master plan for the delivery of the site. This document attached at <b>Appendix 2</b>, pulls together a wide range of technical information collected to date that has been utilised in shaping the initial proposal and provides an indication of how the site could be delivered and will function as an eastern extension to the town of Kidderminster.</p> <p>4.6 Taylor Wimpey is committed to delivering on the following objectives for land north of Comberton Road:</p> <ul style="list-style-type: none"> <li>• Delivery of quality new homes;</li> <li>• Delivery of a choice of housing;</li> <li>• Provision of a quality design;</li> <li>• Maintenance and enhancement of connectivity and accessibility;</li> <li>• Provision of public open space;</li> <li>• Provision of community facilities;</li> <li>• Maintenance and enhancement of site characteristics;</li> <li>• Creation of an attractive and safe community; and</li> <li>• Achievement of sustainable and safe development.</li> </ul> <p>4.7 These objectives underpin a Development Framework for the site that identifies the following key features for land to the north of Comberton Road:</p> <ul style="list-style-type: none"> <li>• Approximately 1,400 dwellings;</li> </ul>			

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								<ul style="list-style-type: none"> <li>• Delivery of a new 20mph spine road, providing a new vehicular link between Birmingham Road (A456), via Husum Way, and Comberton Road/Stone Hill (A448);</li> <li>• Provision of new pedestrian/cycle links between the site and Tennyson Way and Borrington Road to provide permeability and integration with the existing urban edge of Kidderminster;</li> <li>• Provision of land for the delivery of a number of community uses, including the provision of a new Primary School, a community facility to accommodate a meeting room, potentially café and potentially a GP surgery;</li> <li>• Significant provision of Green Infrastructure to include a landscape mitigation strategy that has been developed in line with the Kidderminster East GI Concept Statement;</li> <li>• Provision of SuDS through the delivery of new attenuation features; and</li> <li>• A new enduring Green Belt boundary to the east of Kidderminster.</li> </ul> <p>4.8 Further consideration of the site is set out below having regard to the Council’s evidence base and the technical information prepared on behalf of Taylor Wimpey to date. This analysis concludes that sites OC/6 and OC/13N, which are within the control of Taylor Wimpey, are both suitable and deliverable. This provides confidence that the proposed East of Kidderminster Urban Extension is ‘soundly’ based.</p>			

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RESPONSES TO CHAPTER 33: STOURPORT-ON-SEVERN**

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Bourne	<a href="#">RLPPS249</a>	Policy 33	Object	No	No	Yes	Justified Effective Consistent with National Policy	<p>The Council's claimed housing land supply position as at 1st April 2019 is 7.18 years. There are a number of issues regarding the Council's Five-Year Housing Land Supply report at April 1st 2019, which are outlined below:</p> <ul style="list-style-type: none"> <li>• The report does not provide any details regarding the lead in times and build rates applied to the sites without planning permission, therefore it is not possible to determine if the assumptions being applied are realistic or not;</li> <li>• The report provides no commentary or transparency on the proforma responses from developers / promoters.;</li> <li>• Further to this no evidence is provided of the Council making their own judgments on deliverability based on the proforma responses;</li> <li>• With reference to the Annex 2 of the 2019 Framework), the revised Planning Practice Guidance (specifically ID: 3-036-20180913) and the Woolpit appeal decision (APP/W3520/W/18/3194926), the Council need to review their claimed deliverable supply and ensure that current national policy and guidance is complied with. With a recent failure to meet Housing Delivery Test requirements, due to under supply, it is more important than ever that WFDC actually prove the sites included are deliverable. The PPG expects any undersupply to be made up within the first five years of the plan;</li> <li>• The Lea Hospital Site only had the S106 signed in June 2019, this therefore post-dates the base date of the assessment therefore it is unclear why this has been included;</li> <li>• The Lea Hospital site is assumed to provide 350 completions on this site within the five-year period. This is optimistic and very much unrealistic, particularly given the fact that average net completions in the whole of Wyre Forest is 185dpa for 2016-2019 period as a comparison.</li> </ul> <p>The Housing and Economic Need PPG chapter</p>	WFDC need to provide robust justification that the sites which they are relying upon for the delivery of housing/their 5YHLS are viable, and deliverable in accordance with the definitions within the NPPF. There needs to be flexibility in housing sites, a robust review mechanism with clear structure during the plan period and a stronger emphasis on smaller sites than removal of extremely large parcels of land from the Green Belt. Removal of sustainable brownfield sites from the Green Belt should be a key part of the housing sites available along with an increased supply in order to ensure affordable housing can be delivered.	No	

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								<p>requires an assessment of whether total affordable housing need is likely to be met by the plan. If it is not, an increase in overall housing requirement may need be considered where this would help with the deliverability of affordable housing. Additional Market Housing often assists in funding affordable provision.</p> <p>In May 2017 WFDC commissioned a Local Plan Viability Assessment. The report expressed concern about the deliverability of sites (strategic sites under the then Option A and Option B) if they were expected to bear the full S106 payments as none of the sites were above the viability threshold. The conclusions of this assessment could not be clearer – the ability to bear developer contributions is likely to be limited at higher rates of affordable housing. It was recommended that with contributions of £5000 - £10,000 per household the affordable housing would likely need to be reduced to around 20% or so. In an update to this report, in October 2018, has similar conclusions but notably recommends that affordable housing targets are reduced to 25%.</p> <p>The affordable housing need in Wyre Forest is a very large proportion of the total housing need (57%). It would be prudent to increase the overall housing requirement further to help ensure the delivery of much needed affordable housing across Wyre Forest. It would be reasonable for the Council to consider further housing allocations in sustainable settlements such as Stourport-on-Severn as the current affordable housing targets will not meet the large affordable housing need noted.</p> <p>It is essential that flexibility is provided to enable a rolling five-year housing land supply to be maintained. It is considered that in order to avoid significant shortfalls in housing provision, additional housing allocations will be required together with flexible local plan</p>			

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								<p>policies and a clear monitoring and review framework that requires the Council to respond rapidly to changes in circumstances.</p> <p>Policy 6B seeks to encourage the effective use, and re-use, of accessible, available and environmental acceptable brownfield land. It also states that most development should be focused in and adjacent to urban areas, where both housing needs and accessibility to more effective public service provision are greatest. We agree with, and support, this element of the policy.</p> <p>Stourport is a Main Market Town within the Local Plan and suitable development includes the re-use of suitable brownfield and greenfield sites.</p> <p>Bournewood Nurseries, LI/6/7, if brought forward for housing, would not extend the development boundary any closer to Bewdley/Blackstone than The Paddocks which stretches beyond the boundary of this site nor any further than the existing housing to the North.</p> <p>The site is immediately on to a main road, with a well-established traffic light system at Burlish Crossing, as well as access to services including electricity and drainage. Future occupiers of the site are on the outskirts of the town where they have a choice of routes by car to Kidderminster, Bewdley and two routes to Stourport Town assisting in management of traffic. This is a direct contrast to the sites in the town centre, which already regularly has notable congestion issues due to parking either side of the high street and slow traffic around Gilgal. Locating housing on a site such as this, at Bournewood Nurseries, removes pressure on town centre infrastructure yet still allows as sustainable development with strong public transport links and services to reduce reliance on the private car.</p>			

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								<p>As previously stated there are bus links (15, 294) adjacent to Garland Road, to the South, and bus links on Bewdley Road North (16, S15) which provide bus links to Stourport, Bewdley and Worcester all within a few hundred meters which is walking distance of the proposed site. There are footpath links, with a footpath (570 (C)) adjacent to the site and pavement links, allowing access to a variety of open space including the River Severn, Blackstone Rock, Burlish Top Nature Reserve, Rifle Range Nature Reserve and Devil's Spittleful Nature Reserve. Furthermore within the local area there are schools (Lickhill Primary School, Burlish Park Primary School and Stourport High/Sixth Form Centre), community centres, a sports ground and a park as well as local services within walking and cycling distance.</p> <p>The site is located on the outskirts of Stourport on one of two main roads to Kidderminster and Bewdley. Traffic from this site would be onto Lickhill Road North, however, it should be noted that traffic from other proposed sites will still come out onto Lickhill Road and use this route to Burlish Crossing. Bournemouth Nurseries is an existing business site which already generates traffic on a daily basis and is a site which could intensify its current use without control from the LPA or highway authority. Indeed at many times of the year the traffic to and from the site is very high, such as Christmas Tree sale, and the road network has not experienced issues. Crashmap data indicates no incidents on the stretch of Lickhill Road onto which the Bournemouth Nursery site gains access. There is no reasonable evidence to exclude this deliverable, sustainably located, brownfield site from the Green Belt review on Highway grounds.</p> <p>The 2019 Framework is clear that there is a requirement for a sufficient supply and mix of sites, taking into account availability and</p>			

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								economic viability. The re-development of previously utilised, brownfield, sites should take precedence over green field sites and in light of the fact the LPA are already seeking to remove land from the green belt – brownfield land should take precedent. The current approach is not justified or effective nor is it sound.			
Canal & River Trust	<a href="#">RLPPS92</a>	Policy 33.2	Comment	Yes	No	Yes	Consistent with National Policy	<p>We note the allocation of this former manufacturing site within the Stourport-on-Severn No.1 Conservation Area. The character of this Conservation Area was formed by the construction of a group of canal basins from the late eighteenth century, many of which still exists and forms the southern part of the historic core of the town. One such basin existed in the area bordered by Cheapside, the River Severn and the Angel Public House but has since been infilled. As acknowledged within the policy wording, parts of the basin, including the retaining walls, exist to this day.</p> <p>We welcome the inclusion of Point 5 of Policy 33.2 which notes the need for proposals to preserve or enhance the character of the Conservation Area, but feel this is partially undermined by the wording of point 7 which notes that future proposals should only ‘aim’ to retain the most significant surviving elements of the former canal basin. We believe that point 7 does not go far enough in requiring proposals to consider the positive contribution made by the remnants of the basin to the Conservation Area as required by the National Planning Policy Framework 2019 (NPPF) .</p> <p>Paragraph 201 of the NPPF notes that the “<i>Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area...should be treated either as substantial harm under paragraph 195 or less than substantial harm under paragraph 196</i>”.</p>	<p>We believe the suggested wording for point 7 would ensure the policy complies with paragraph 201 of the National Planning Policy Framework 2019:</p> <p>“Policy 33.2 Cheapside AKR/2</p> <p>Proposals should:</p> <p>... 7. <del>Aim to</del> Retain the most significant surviving elements of the Vinegar Works, the Gas Works and the former canal basin (e.g.: retaining walls) in order to preserve some industrial characteristics of the Conservation Area and incorporate these into new development”</p>	No	

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								Even if the harm was considered to be less than substantial, Paragraph 196 would still require an assessment of whether its loss is outweighed by the public benefits of the proposal. Therefore, we consider the policy should carry an expectation that the remaining remnants of the historic basin would be retained, placing the onus on developers to assess the level of harm to the Conservation Area and, if applicable, show how this is outweighed by the public benefits.			
Dunley Park Residents	<a href="#">RLPPS176</a>	Policy 33.5 - AKR/14	Object	No	No	No	Justified	<p>Oppose development of fields on Pearl Lane, Areley Kings (AKR14) on the grounds of:</p> <ul style="list-style-type: none"> <li>- Loss of habitats for wildlife</li> <li>- Roman Remains</li> <li>- Increase in air dioxins along Dunley Road</li> <li>- More traffic congestion at Stourport bridge</li> <li>- History of flooding</li> <li>- Loss of walking areas</li> <li>- Both Stourport and Kidderminster still have several areas of Brownfield land lying undeveloped.</li> <li>- Only 1 road in/out from Stourport and Kidderminster via bridge</li> <li>- Traffic hold ups through Summer Fridays with Wobley Wheel car boot sales on</li> <li>- Area contains lots of elderly people/bungalows with open views (Quality of life issues)</li> </ul>		Yes	Represent residents views
Carolyn Spurgin	<a href="#">RLPPS21</a>	Policy 33.5 Pearl Lane AKR/14	Object					This is the first chance I have had to see any plans for over 2 years as I was not given notification of where I could/view/comment on the local plan October 2018. I object to the		No	

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 33: STOURPORT-ON-SEVERN**

Respondent	Response No.	Part of Document	Support/Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
								250 houses to be built on Pearl Lane. If this goes ahead another 500 cars will need to cross the river in Bridge Street. The traffic congestion there and round the one way system in Stourport has already led to poor air quality. In addition if the doctors surgeries are moved to the Old Beams there will be already be even more traffic congestion than currently. Areley Kings should not be expected to take a development of this size until a new road and bridge is built over the river.			
Susan Wright	<a href="#">RLPPS24</a>	Policy 33.7 Former Carpets of Worth AKR/20	Comment	Yes	Yes	Yes		Whilst the use of this land for the development of housing is welcome, the road infrastructure around Lichfield Street, Severn Road and Mitton Street is, in my opinion, unsuitable to cope with the additional daily traffic which will inevitably occur once the buildings are occupied. This together with the other housing developments proposed within the town location will cause even more traffic jams than are currently experienced on a daily basis. In this particular area however this is primarily due to the volume of traffic entering the town via Mitton Street, trying to exit Severn Road and access Vale Road. Are there any plans to assist with the flow of traffic in this triangle? I suspect road widening is not an option due to the number of dwellings in Mitton Street, have more traffic lights with sophisticated synchronised controls been considered to encompass Worcester Road island (by redundant Parsons chain site where further houses are proposed), Mitton Street, Severn Road, bottom of vale road? enlargement of traffic island by Parsons Chain site and widening or entry points to island to allow traffic to flow more quickly in all directions at this pinch point.		No	
Burlish Concerned Residents Tim Hollis	<a href="#">RLPPS43</a>	Policy 33.8 L1/11	Object	No	No	No	Positively Prepared Justified Effective Consistent with	<b>LI/11 - Land west of former school site Coniston Crescent</b> - this land was removed from Green Belt without proper public consultation and specifically without consulting residents of Burlish Park Estate who are most affected by this land re-categorisation. It is not	<b>LI/11 - Land west of former school site Coniston Crescent</b> - this land should have its Green Belt status restored and any	Yes	I would wish to exercise my democratic right to ensure that our comments

APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
 RESPONSES TO CHAPTER 33: STOURPORT-ON-SEVERN

Respondent	Response No.	Part of Document	Support/Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
							National Policy	<p>the only former green belt land included in the Local Plan but it is by far the largest site in Stourport to be downgraded.</p> <ul style="list-style-type: none"> <li>Traffic pressures resulting from vehicles associated with 200 houses here would be unacceptable given the nature of the roads and junctions serving the site (just as with the land at Burlish Crossing which was removed from the Local Plan for this same reason). The road infrastructure is inadequate to cope with the extra traffic associated with hundreds of additional houses. The wholly inadequate vehicular access is proposed to be via Buggy Lane/Kingsway and would either join the Stourport Road or have to go via Burlish Crossing, both of which are pinch points. There are also two schools and a sixth form all contributing both traffic and pedestrians to the transport overload twice a day during term-time.</li> <li>The WFDC Ranger Service has now been given stewardship of almost all of the remaining/adjoining golf course (and, usefully have now installed a fence which marks the extent of the land earmarked for housing in the Local Plan). They have dubbed the land that they now manage 'Burlish Meadows' which, together with Burlish Top, Devil's Spittleful and Rifle Range constitute the <i>largest Local Nature Reserve in the country</i> according to Paul Allen the Head Ranger. They will actively manage Burlish Meadows to create rare acid grassland and help native species of flora and fauna to become established and thrive. The remaining golf course land LI/11 earmarked for housing they are tasked with 'lightly managing' which, in practice means using cattle to graze the area. The land at LI/11 cannot help but increase in biodiversity even under 'light management' and subsequent house building would therefore destroy many valuable habitats at some future date. Even now and for many decades, skylarks prefer to nest here rather than on other parts of the former golf</li> </ul>	<p>proposed future change of status should be the subject of proper public consultation.</p> <p><b>MI/38 - School site Coniston Crescent</b> - the school should be compelled to comply with the requirements of the planning consent 15/0583/OUTL ["(6) <i>The existing sixth form block shall be demolished and completely removed from site and the site laid out for the provision of playing fields within three months of the date of first occupation of the replacement sixth form block. Reason: To ensure that the external appearance of the development is satisfactory and that it accords with Policies"</i>] and restore this site to playing field status.</p>		are heard, considered and recorded.

APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
 RESPONSES TO CHAPTER 33: STOURPORT-ON-SEVERN

Respondent	Response No.	Part of Document	Support/Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
								<p>course.</p> <ul style="list-style-type: none"> <li>developing this land would further undermine the distinct 'three towns' character of Wyre Forest which has been eroded recently with the building of Zortech, Wyre Forest House, Finepoint and the Crematorium and had a narrow escape with the decline in the fortunes of Kidderminster Harriers resulting in them shelving their over-ambitious plans for a stadium at Zortech Avenue.</li> <li>Many older residents remember returning German bombers dropping their unused ordnance over the land at LI/11 describing at least one bomb not exploding on impact and, there, to the best of their knowledge it remains to this day.</li> </ul> <p><b>MI/38 - School site Coniston Crescent</b> - this land was to be restored to playing field quality/status as a quid-pro-quo condition of the planning consent 15/0583/OUTL [“(6) The existing sixth form block shall be demolished and completely removed from site and the site laid out for the provision of playing fields within three months of the date of first occupation of the replacement sixth form block. Reason: To ensure that the external appearance of the development is satisfactory and that it accords with Policies”] awarded for the building of the new 6th form block on part of the school's playing fields to ensure no net loss of playing fields; not, as stated in Para 33.30 'This site is surplus to educational requirements.' Not only has the school reneged on their agreement to this condition of the planning consent by not complying with it within the agreed timeframe, it is now attempting to build 105 houses on the land! The school's failure to comply with the conditions associated with the planning consent has also subjected local residents to</p>			

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 33: STOURPORT-ON-SEVERN**

Respondent	Response No.	Part of Document	Support/Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
								<p>years of vandalism, anti-social behaviour and, when the former Middle School was set alight, airborne pollution as a result of their failure to demolish the old school buildings and remediate the land as required.</p> <ul style="list-style-type: none"> <li>Traffic pressures resulting from vehicles associated with 105 houses here would be unacceptable given the nature of the roads and junctions serving the site (just as with the land at Burlish Crossing which was removed from the Local Plan for this same reason). The road infrastructure is inadequate to cope with the extra traffic associated with so many additional houses. The wholly inadequate vehicular access is proposed to be via Buggy Lane/Kingsway and would either join the Stourport Road or have to go via Burlish Crossing, both of which are pinch points. There are also two schools and a sixth form contributing both traffic and pedestrians to the transport overload twice a day during term-time.</li> </ul>			
Robert Green	<a href="#">RLPPS23</a>	Policy 33.8 Land West of Former School Site Coniston Crescent LI/11	Object		No	No	Positively Prepared Justified Effective	<p>Removal of green belt land when brown field sites were available. The road structure is completely inadequate to deal with this size development there are also local schools contributing to the extreme overload of traffic and creating severe pinch points at Burlish crossing and buggy lane also Windermere way. Most of the developments removed from the local plan were removed because of the traffic problems I have just outlined, why wasn't the same criteria applied to this development? There is already a development proposal from Stourport high school for a 100 houses on an adjacent site. The rangers are involved in managing vital</p>	Removal of housing proposal to the old golf course site completely.	No	

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 33: STOURPORT-ON-SEVERN**

Respondent	Response No.	Part of Document	Support/Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
								habitat next to this project This house building would destroy a lot of that vital work being carried out. Skylarks that are on the endangered list have been nesting on this site in great numbers this proposal would destroy there nesting sites.			
Roger Quiney	<a href="#">RLPPS99</a>	Policy 33.8 Land West of former school Coniston Crescent Ll./11	Object	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	<p>I submitted comments for your consideration regarding the Wyre Forest District Local Plan Consultation in 2018. I made a number of references in those comments to The National Planning Policy Framework current at that time. I have since checked my comments against the now revised NPPF and believe they still stand. The pdf document attached and submitted at that time was referenced LPPS168. Below are additions to the previously made comments.</p> <p>Traffic:</p> <p>School Locale:</p> <p>The two schools and 6<sup>th</sup> form college already create considerable traffic and serious road safety issues especially in close proximity to the schools. Further housing will exacerbate these issues either by virtue of the extra pupils from such housing attending their school or by transporting to them to schools elsewhere. Better use of some of the proposed housing land could be put to better use by creating a safe drop off zone for cars and buses. It has to be noted though that this would not provide any relief for the current traffic pinch points let alone in the proposed future.</p> <p>General area:</p> <p>Adding nearly half as many homes again into an area already at capacity at its traffic pinch points will have a significant impact on traffic flow at all times of the working day. The proposed access utilising the Kingsway will still impact on the Bewdley crossroads junction,</p>		Yes	Yes I would like to speak at the examination

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 33: STOURPORT-ON-SEVERN**

Respondent	Response No.	Part of Document	Support/Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
								<p>the very reason other areas were removed from the original Local Plan. The long awaited Stourport relief road also proposed to use the Kingsway as part of its route. Current proposals suggest that any forward planning to that end would be compromised.</p> <p>Nature Reserve:</p> <p>The rangers who now have charge of the Nature Reserve management have said how The Burlish Park Nature Reserve will be the biggest in the country. This, with the many other attractions of Bewdley, Stourport and Kidderminster gives the area another accolade for folk to visit and enjoy. We have witnessed how extra wildlife has 'moved in' as the area became the golf course and again more recently, while fallow, how other wildlife have taken up residence. Muntjac, for example, is now a frequently noted species beside many others. As I understand it, the proposed area for building is to be 'lightly managed', with no efforts to be allowed on the part of the Rangers to enhance its biodiversity. Mother Nature will take advantage of this and will enhance the area regardless.</p> <p>Recreational:</p> <p>We have long considered how the youngsters of Burlish Park are short changed when it comes to recreational faculties. The memorial park is an excellent facility for all ages. It is well subscribed for all types of activities with convenient parking available. Even the ex-power station housing area, with fewer homes than Burlish, has a youngster's activity/play area and grassland. Burlish has nothing of this. To get to the Memorial Park from the Burlish estate you have to cross Windermere Way (depending on which side you live) then through the alley way so as to cross the Bewdley Road and then down through the alley way to the top of the Park. Clearly parents</p>			

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 33: STOURPORT-ON-SEVERN**

Respondent	Response No.	Part of Document	Support/Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
								<p>are not allowing even the more safety conscious children to attempt this. Surely a park type is in order. Located exactly where the proposed housing is being suggested would be a better line of thinking. It doesn't necessarily need to be the size of the Memorial Park. The 'park' area could perhaps be integrated with the Nature Reserve in some way, making it part of the wider Reserve attraction. The schools could also have some arrangement with it by way of parking and the above mentioned safe drop off zone.</p> <p>Open Space:</p> <p>The open nature of the combined areas of the new Reserve offers a pleasant open dog walking area. The panoramic horizon views even those at lower levels are excellent, providing less able walkers to enjoy them.</p> <p>Other:</p> <p>I have read recently about the long held belief regarding unexploded munitions being possibly present in the proposed area. I first heard speak of this in the early 60's from elderly folk who were living in Stourport during WW2. To a much lesser degree I've also heard speak of the copse area in the lightly managed area of the reserve, being used to bury amputated limbs as a product of medical procedures carried out while the area was being used as the American Hospital Army Base. It was certainly marked on older maps as a sewage farm, so there might be some credence. Some sort of investigation regarding unexploded munitions might be warranted.</p>			
Sport England Stuart Morgans	<a href="#">RLPPS170</a>	Policy 33.8, Land West of Coniston Crescent,	Object		No		Positively Prepared Consistent with	Sport England has previously objected to housing allocations LI/11 (land west of former school site Coniston Crescent).	If the site is to be taken forward as an allocation for housing, Sport England remains	No	

APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
 RESPONSES TO CHAPTER 33: STOURPORT-ON-SEVERN

Respondent	Response No.	Part of Document	Support/Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
		LI/11					National Policy	<p><u>LI11 – Land west of former school site Coniston Crescent LI/11</u></p> <p>In respect of Sport England explains in its previous comments on the 2018 Pre-submission draft that the site forms part of former Burlish Golf Course resulting in the loss of an existing sports facility. Sport England commented that neither the Council's Playing Pitch Strategy (PPS) nor its Built Sports Facilities Strategy assesses the need for golf courses, and that no evidence had been prepared to demonstrate that the golf course facility is surplus to requirements.</p> <p>to address paragraph 97a of the NPPF Sport England put forward the case that the PPS identifies shortfalls of provision to meet quantitative needs for football (including 3G artificial grass pitches) and rugby union, both now and in the future to take into account population growth where existing shortfalls of provision are maintained and exacerbated.</p> <p>Sport England set out that the site adjoins existing playing fields and that the site provides potential for additional playing field provision to make a positive contribution to addressing identified needs set out in the PPS (in the event that the golf course was demonstrated to be surplus to requirements). Sport England also commented on the need for qualitative improvements to existing sports halls and swimming pools, and potential improvements at Stourport Sports Club close to the golf course site, explaining that there was potential to invest in alternative sports provision that would align with the Council's evidence base.</p> <p>The Council have since undertaken an assessment of golf provision in the District. The document has been subject to consultation with England Golf.</p> <p>The assessment makes the case that the</p>	<p>firmly of the view that in order to accord with para 97 of the NPPF, that the policy should be modified to secure mitigation in quantity and quality that is equitable to the 3.4 hectares of playing field loss. The following wording is put forward to modify Policy 33.8 as follows:</p> <p><i>This site is removed from the Green Belt and allocated for residential development, subject to :</i></p> <p><i>Provision of replacement playing field, of the required standard to be provided in a suitable nearby location prior to the development taking place, that is of equivalent or better quality and quantity, or where it can be demonstrated through a robust up to date assessment of need that the playing field is surplus to requirements for all pitch sports for which there is a local need.</i></p>		

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 33: STOURPORT-ON-SEVERN**

Respondent	Response No.	Part of Document	Support/Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
								<p>existing level of golf provision across the District at various Golf Clubs is sufficient to meet demand, in the context of falling membership numbers in recent years. The report explains that the course closed in 2017, and that after a period of marketing no suitable assignee could be found to take on the running of the course, that the clubhouse has suffered from arson attacks and is in a poor condition. The assessment states that the course is now overgrown and would require an unsustainable large amount of investment.</p> <p>In consultation with England Golf, Sport England has made representations on the Golf Assessment, the main point being that whilst it is generally accepted that there is no longer a need to provide a traditional 18 hole golf course, that further consideration should be given to an alternative golf offer as opposed to retaining a traditional golf course. Eg. Adventure golf, pitch and putt, footgolf etc.</p> <p>Whilst the assessment has given some consideration to alternative golf play, this focuses on listing other facilities outside of Wyre Forest and does not explain why these are relevant to serving Wyre Forest residents. The assessment does not consider the potential of the former Burlish Golf Course site to provide an alternative golf offer on the site, or part of the site, which could be complementary to the Council's proposals to develop a cycle trail.</p> <p>A further point to make is that the former Burlish course provided the only entry level municipal facility in the District, with all other courses essentially providing golf club membership which will tend to be more attractive to established participants. Whilst the report sets out that there are flexible membership packages available at some other courses, this stops short of considering the cost of green fees, which may deter some more</p>	<p>To support this modification to the policy it is recommended that the reasoned justification be expanded to make reference to the key findings of the Council's Playing Pitch Strategy which include that there are shortfalls of provision for football and rugby, that there are qualitative improvements required to pitches and the need for investment in ancillary changing room facilities, and that proposed mitigation for the loss of playing field should be agreed in discussion with stakeholder partners including Sport England and the relevant National Governing Bodies for sport, including the FA, ECB, RFU and England Hockey.</p>		

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 33: STOURPORT-ON-SEVERN**

Respondent	Response No.	Part of Document	Support/Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
								<p>casual participants.</p> <p>So, whilst Sport England does not wish to object the loss of the Golf Course, we wish to raise concern that the assessment does not fully consider the potential alternative golf provision. It is considered that the evidence is insufficient to demonstrate compliance with para 97a of the NPPF.</p> <p>Whilst Sport England notes that the Council have been in discussion with British Cycling to create a new cycling facility, with potential s106 match funding, the need for this facility is not demonstrated in the Council's evidence base in the Playing Pitch Strategy/Built Sports Facilities Strategy. Whilst Sport England has no objection to the proposals to develop a new facility for cycling, the loss of the golf course to provide residential development cannot be justified under para 97c of the NPPF since this is not a replacement sports facility.</p> <p>Sport England's view is that in order to accord with para 97b of the NPPF, that mitigation for the loss of the golf course should be secured within policy 33.8, in the form of a financial contribution towards investment priorities identified in the PPS. The contribution should be equitable to the loss.</p> <p>Whilst Sport England does not wish to object the loss of the Golf Course, we wish to raise concern that the assessment does not fully consider the potential alternative golf provision. It is considered that the evidence is insufficient to demonstrate compliance with para 97a of the NPPF.</p>			
C Westcott	<a href="#">RLPPS174</a>	Policy 33.8 and Policy 33.16	Object					If houses are built on the golf course and the Kingsway is closed off to traffic this will mean that the traffic that now uses the Kingsway will use Windermere Way. Windermere Way is already used as a short cut. There is already a speeding problem - in Windermere Way and		No	

APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
 RESPONSES TO CHAPTER 33: STOURPORT-ON-SEVERN

Respondent	Response No.	Part of Document	Support/Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
								many cars cannot keep to their side of the road on bends. Any extra houses in this area will be a bigger problem. Bewdley Road North would have been a much better site for extra houses L1/5.			
Jan Carr	<a href="#">RLPPS263</a>	Policy 33.8 and Policy 33.16	Object	No	No	No		<p><b>LI/11 Land west of former school site Coniston Crescent.</b> I am very concerned about the proposal to build 200 houses on this site, which has been removed from the Green Belt. Many residents believe this site should not have been removed from the Green Belt, and therefore should not be included in the Local Plan. I am particularly concerned about the impact a large housing development would have on this area, creating extra traffic, noise &amp; air pollution through the Burlish Park estate, which is already more than busy enough.</p> <p>Also, local residents would lose the peace &amp; quiet of this unspoilt piece of land, which we have enjoyed for many years. In a tightly-packed estate, this open area is of real benefit to residents and to wildlife. Importantly, this land is a known &amp; established nesting site for the skylark, which is 'red listed', making it a species of high conservation concern &amp; protected under the European Birds Directive.</p> <p><b>MI/38 School site Coniston Crescent.</b> This site has also been misguidedly removed from the Green Belt, &amp; for the above reasons, should not be included in the Local Plan. Surely it must be possible for Stourport High School/Severn Academies Education Trust to find the money they require for repair work without selling off this greenfield land for housing &amp; to fund an 'all weather sports pitch'. Building over 100 houses on this site would deprive residents, schools, &amp; future generations, of the benefit of these green fields, &amp; have a serious impact on the pleasant, open aspect of this area of Stourport.</p> <p>I believe many Burlish Estate residents will still</p>	<p><b>LI/11 - Land west of former school site Coniston Crescent</b> - this land should have its Green Belt status restored.</p> <p>I believe many Burlish Estate residents will still be unaware of how the Local Plan might affect them. A simpler consultation response form &amp; more direct information would have encouraged more residents to have their say.</p> <p>Residents will be hoping their concerns will be carefully looked into. The best possible outcome would be for alternative, more suitable brownfield sites to be sourced for this amount of housing, &amp; for these Green Belt sites to be removed from the Local Plan &amp; restored</p>	No	

APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
 RESPONSES TO CHAPTER 33: STOURPORT-ON-SEVERN

Respondent	Response No.	Part of Document	Support/Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
								<p>be unaware of how the Local Plan might affect them. A simpler consultation response form &amp; more direct information would have encouraged more residents to have their say.</p> <p>Residents will be hoping their concerns will be carefully looked into. The best possible outcome would be for alternative, more suitable brownfield sites to be sourced for this amount of housing, &amp; for these Green Belt sites to removed from the Local Plan &amp; restored to the Green Belt.</p>	<p>to the Green Belt.</p> <p><b>MI/38 - School site Coniston Crescent</b> - the school should be compelled to comply with the requirements of the planning consent 15/0583/OUTL and restore this site to playing field status.</p> <p>I believe many Burlish Estate residents will still be unaware of how the Local Plan might affect them. A simpler consultation response form &amp; more direct information would have encouraged more residents to have their say.</p> <p>Residents will be hoping their concerns will be carefully looked into. The best possible outcome would be for alternative, more suitable brownfield sites to be sourced for this amount of housing, &amp; for these Green Belt sites to removed from the Local Plan &amp; restored to the Green Belt.</p>		
Adrian Voysey	<a href="#">RLPPS3</a>	33.8	Object	Yes	No	Yes	Justified Effective	The area should stay as Green Belt and be used for recreational activities. Additional houses will be detrimental to the existing residents of the Burlish Estate.		No	

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 33: STOURPORT-ON-SEVERN**

Respondent	Response No.	Part of Document	Support/Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
Julia Hunt	<a href="#">RLPPS260</a>	Policy 33.8 and Policy 33.16	Object	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	<p><b>LI/11 - Land west of former school site Coniston Crescent</b> - This land was removed from the Green Belt without proper public consultation and specifically without consulting the residents of Burlish Park Estate, who are most affected by this land re-categorisation. Although it is not the only former green belt land included in the Local Plan, it is by far the largest site in Stourport to be downgraded. I have been led to believe there is written and signed agreement that if ever the land should discontinue from being used as a golf course, then the land will be returned to the Green Belt. In line with the NPPF guidance, land should only ever be removed from the Green Belt in exceptional circumstances. There are numerous brownfield sites in and around Stourport which could and should be used instead.</p> <ul style="list-style-type: none"> <li>Traffic pressures resulting from vehicles associated with 200+ houses here would be unacceptable given the nature of the roads and junctions serving the site (just as with the land at Burlish Crossing which was removed from the Local Plan for the very same reason). The road infrastructure is inadequate to cope with the extra traffic associated with hundreds of additional houses. The wholly inadequate vehicular access is proposed to be via Buggy Lane/Kingsway and would either join the Stourport Road or have to go via Burlish Crossing, both of which are pinch points. There are also two schools and a sixth form all contributing both traffic and pedestrians to the transport overload at least twice a day during term-time.</li> <li>The schools are near full capacity and any additional rise in the number of children seeking places will undoubtedly force the catchment area to reduce and families living further away from the school to unjustly fall out of the catchment area.</li> <li>The WFDC Ranger Service has now</li> </ul>	<p><b>LI/11 - Land west of former school site Coniston Crescent</b> - this land should have its Green Belt status restored, as per the agreement put in place in the event of the land no longer being required as a golf course.</p> <p><b>MI/38 - School site Coniston Crescent</b> - the school should be compelled to comply with the requirements of the planning consent 15/0583/OUTL ["(6) <i>The existing sixth form block shall be demolished and completely removed from site and the site laid out for the provision of playing fields within three months of the date of first occupation of the replacement sixth form block. Reason: To ensure that the external appearance of the development is satisfactory and that it accords with Policies"</i>] and restore this site to playing field status.</p>	No	

APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
 RESPONSES TO CHAPTER 33: STOURPORT-ON-SEVERN

Respondent	Response No.	Part of Document	Support/Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
								<p>been given stewardship of almost all of the remaining/adjoining golf course (and have already installed a fence which marks the extent of the land earmarked for housing in the Local Plan). They have dubbed the land that they now manage 'Burlish Meadows' which, together with Burlish Top, Devil's Spittleful and Rifle Range constitute the <i>largest Local Nature Reserve in the country</i> according to Paul Allen the Head Ranger. They will actively manage Burlish Meadows to create rare acid grassland and help native species of flora and fauna to become established and thrive. The remaining golf course land LI/11 earmarked for housing they are tasked with 'lightly managing' which, in practice means using cattle to graze the area. The land at LI/11 cannot help but increase in biodiversity even under 'light management' and subsequent house building would therefore destroy many valuable habitats at some future date. Even now and for many decades, skylarks, which are endangered, prefer to nest here rather than on other parts of the former golf course. Pipistrelle bats have also resided here for many years.</p> <ul style="list-style-type: none"> <li>• Developing this land would further undermine the distinct 'three towns' character of Wyre Forest which has been eroded recently with the building of Zortech, Wyre Forest House, Finepoint and the Crematorium and had a narrow escape with the decline in the fortunes of Kidderminster Harriers resulting in them shelving their over-ambitious plans for a stadium at Zortech Avenue.</li> <li>• Many older residents remember returning German bombers dropping their unused ordnance over the land at</li> </ul>			

APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
 RESPONSES TO CHAPTER 33: STOURPORT-ON-SEVERN

Respondent	Response No.	Part of Document	Support/Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
								<p>LI/11 describing at least one bomb not exploding on impact and, there, to the best of their knowledge it remains to date.</p> <p><b>MI/38 - School site Coniston Crescent</b> - this land was to be restored to playing field quality/status as a quid-pro-quo condition of the planning consent 15/0583/OUTL ["(6) The existing sixth form block shall be demolished and completely removed from site and the site laid out for the provision of playing fields within three months of the date of first occupation of the replacement sixth form block. Reason: To ensure that the external appearance of the development is satisfactory and that it accords with Policies"] awarded for the building of the new 6th form block on part of the school's playing fields to ensure no net loss of playing fields; not, as stated in Para 33.30 'This site is surplus to educational requirements.' Not only has the school reneged on their agreement to this condition of the planning consent by not complying with it within the agreed timeframe, it is now attempting to build 105 houses on the land! The school's failure to comply with the conditions associated with the planning consent has also subjected local residents to years of vandalism, anti-social behaviour and, when the former Middle School was set alight, airborne pollution as a result of their failure to demolish the old school buildings and remediate the land as required.</p> <ul style="list-style-type: none"> <li>Traffic pressures resulting from vehicles associated with 105 houses here would be unacceptable given the nature of the roads and junctions serving the site (just as with the land at Burlish Crossing which was removed from the Local Plan for the very same reason). The road infrastructure is inadequate to cope with the extra traffic associated with so many additional houses. The wholly inadequate vehicular access is proposed to be via Buggy</li> </ul>			

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 33: STOURPORT-ON-SEVERN**

Respondent	Response No.	Part of Document	Support/Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
								<p>Lane/Kingsway and would either join the Stourport Road or have to go via Burlish Crossing, both of which are pinch points. There are also two schools and a sixth form contributing both traffic and pedestrians to the transport overload at least twice a day during term-time.</p> <p>Prior to the local elections earlier this year (2<sup>nd</sup> May 2019) the Liberal Democrats, the Labour Party and Independent Community and Health Concern all committed to getting the green space used by the former golf course reinstated within the designated Green Belt, promising to reverse the decision to change LI/11 and MI/28 to land to be used for housing development, if they were subsequently elected.</p> <p>It was therefore somewhat disappointing to see that at the consultation event at Stourport Civic Hall on Saturday 28<sup>th</sup> September 2019, during the hour we attended, there were no councillors in attendance to listen to our concerns or to answer any questions. Instead all visitors were met with an exhibition of what is due to go ahead and would be forgiven, therefore, for getting the impression that this is already a 'fait accompli'.</p> <p>Indeed, the very fact that a fence has already been erected to differentiate between the new 'Burlish Meadows' and the land earmarked for housing development seems to suggest that the newly elected progressive alliance has no intention of listening to the concerns of residents or overturning this decision, as they all promised to do in their respective parties' pre-election leaflets in the Spring of 2019.</p>			
Adrian Voysey	<a href="#">RLPPS4</a>	33.16	Object	Yes	No	Yes	Justified Effective	Kingsway is not a good road and would need significant investment to support additional houses. I do not agree with the decision to take this out of Green Belt and build residential houses. It will have a negative impact on the		No	

APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
 RESPONSES TO CHAPTER 33: STOURPORT-ON-SEVERN

Respondent	Response No.	Part of Document	Support/Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
								existing residents of Burlish. What will happen to the allotments?			
Julia Hunt	<a href="#">RLPPS261</a>	Policy 33.8 and Policy 33.16	Object	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	<p><b>LI/11 - Land west of former school site Coniston Crescent</b> - This land was removed from the Green Belt without proper public consultation and specifically without consulting the residents of Burlish Park Estate, who are most affected by this land re-categorisation. Although it is not the only former green belt land included in the Local Plan, it is by far the largest site in Stourport to be downgraded. I have been led to believe there is written and signed agreement that if ever the land should discontinue from being used as a golf course, then the land will be returned to the Green Belt. In line with the NPPF guidance, land should only ever be removed from the Green Belt in exceptional circumstances. There are numerous brownfield sites in and around Stourport which could and should be used instead.</p> <ul style="list-style-type: none"> <li>Traffic pressures resulting from vehicles associated with 200+ houses here would be unacceptable given the nature of the roads and junctions serving the site (just as with the land at Burlish Crossing which was removed from the Local Plan for the very same reason). The road infrastructure is inadequate to cope with the extra traffic associated with hundreds of additional houses. The wholly inadequate vehicular access is proposed to be via Buggy Lane/Kingsway and would either join the Stourport Road or have to go via Burlish Crossing, both of which are pinch points. There are also two schools and a sixth form all contributing both traffic and pedestrians to the transport overload at least twice a day during term-time.</li> <li>The schools are near full capacity and any additional rise in the number of children seeking places will undoubtedly force the catchment area to reduce and families living further</li> </ul>	<p><b>LI/11 - Land west of former school site Coniston Crescent</b> - this land should have its Green Belt status restored, as per the agreement put in place in the event of the land no longer being required as a golf course.</p> <p><b>MI/38 - School site Coniston Crescent</b> - the school should be compelled to comply with the requirements of the planning consent 15/0583/OUTL ["(6) <i>The existing sixth form block shall be demolished and completely removed from site and the site laid out for the provision of playing fields within three months of the date of first occupation of the replacement sixth form block. Reason: To ensure that the external appearance of the development is satisfactory and that it accords with Policies</i>"] and restore this site to</p>	No	

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 33: STOURPORT-ON-SEVERN**

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								<p>away from the school to unjustly fall out of the catchment area.</p> <ul style="list-style-type: none"> <li>The WFDC Ranger Service has now been given stewardship of almost all of the remaining/adjoining golf course (and have already installed a fence which marks the extent of the land earmarked for housing in the Local Plan). They have dubbed the land that they now manage 'Burlish Meadows' which, together with Burlish Top, Devil's Spittleful and Rifle Range constitute the <i>largest Local Nature Reserve in the country</i> according to Paul Allen the Head Ranger. They will actively manage Burlish Meadows to create rare acid grassland and help native species of flora and fauna to become established and thrive. The remaining golf course land LI/11 earmarked for housing they are tasked with 'lightly managing' which, in practice means using cattle to graze the area. The land at LI/11 cannot help but increase in biodiversity even under 'light management' and subsequent house building would therefore destroy many valuable habitats at some future date. Even now and for many decades, skylarks, which are endangered, prefer to nest here rather than on other parts of the former golf course. Pipistrelle bats have also resided here for many years.</li> <li>Developing this land would further undermine the distinct 'three towns' character of Wyre Forest which has been eroded recently with the building of Zortech, Wyre Forest House, Finepoint and the Crematorium and had a narrow escape with the decline in the fortunes of Kidderminster Harriers resulting in them shelving their over-ambitious plans for a stadium at Zortech Avenue.</li> </ul>	playing field status.		

APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
 RESPONSES TO CHAPTER 33: STOURPORT-ON-SEVERN

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								<ul style="list-style-type: none"> <li>Many older residents remember returning German bombers dropping their unused ordnance over the land at LI/11 describing at least one bomb not exploding on impact and, there, to the best of their knowledge it remains to date.</li> </ul> <p><b>MI/38 - School site Coniston Crescent</b> - this land was to be restored to playing field quality/status as a quid-pro-quo condition of the planning consent 15/0583/OUTL ["(6) The existing sixth form block shall be demolished and completely removed from site and the site laid out for the provision of playing fields within three months of the date of first occupation of the replacement sixth form block. Reason: To ensure that the external appearance of the development is satisfactory and that it accords with Policies"] awarded for the building of the new 6th form block on part of the school's playing fields to ensure no net loss of playing fields; not, as stated in Para 33.30 'This site is surplus to educational requirements.' Not only has the school reneged on their agreement to this condition of the planning consent by not complying with it within the agreed timeframe, it is now attempting to build 105 houses on the land! The school's failure to comply with the conditions associated with the planning consent has also subjected local residents to years of vandalism, anti-social behaviour and, when the former Middle School was set alight, airborne pollution as a result of their failure to demolish the old school buildings and remediate the land as required.</p> <ul style="list-style-type: none"> <li>Traffic pressures resulting from vehicles associated with 105 houses here would be unacceptable given the nature of the roads and junctions serving the site (just as with the land at Burlish Crossing which was removed from the Local Plan for the very same</li> </ul>			

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 33: STOURPORT-ON-SEVERN**

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								<p>reason). The road infrastructure is inadequate to cope with the extra traffic associated with so many additional houses. The wholly inadequate vehicular access is proposed to be via Buggy Lane/Kingsway and would either join the Stourport Road or have to go via Burlish Crossing, both of which are pinch points. There are also two schools and a sixth form contributing both traffic and pedestrians to the transport overload at least twice a day during term-time.</p> <p>Prior to the local elections earlier this year (2<sup>nd</sup> May 2019) the Liberal Democrats, the Labour Party and Independent Community and Health Concern all committed to getting the green space used by the former golf course reinstated within the designated Green Belt, promising to reverse the decision to change LI/11 and MI/28 to land to be used for housing development, if they were subsequently elected.</p> <p>It was therefore somewhat disappointing to see that at the consultation event at Stourport Civic Hall on Saturday 28<sup>th</sup> September 2019, during the hour we attended, there were no councillors in attendance to listen to our concerns or to answer any questions. Instead all visitors were met with an exhibition of what is due to go ahead and would be forgiven, therefore, for getting the impression that this is already a 'fait accompli'.</p> <p>Indeed, the very fact that a fence has already been erected to differentiate between the new 'Burlish Meadows' and the land earmarked for housing development seems to suggest that the newly elected progressive alliance has no intention of listening to the concerns of residents or overturning this decision, as they all promised to do in their respective parties'</p>			

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 33: STOURPORT-ON-SEVERN**

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								pre-election leaflets in the Spring of 2019.			
Roger Quiney	<a href="#">RLPPS100</a>	Policy 33.16 School Site Coniston Crescent MI/38	Object	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	<p>I submitted comments for your consideration regarding the Wyre Forest District Local Plan Consultation in 2018. I made a number of references in those comments to The National Planning Policy Framework current at that time. I have since checked my comments against the now revised NPPF and believe they still stand. The pdf document attached and submitted at that time was referenced LPPS168. Below are additions to the previously made comments.</p> <p>Traffic:</p> <p>School Locale:</p> <p>The two schools and 6<sup>th</sup> form college already create considerable traffic and serious road safety issues especially in close proximity to the schools. Further housing will exacerbate these issues either by virtue of the extra pupils from such housing attending their school or by transporting to them to schools elsewhere. Better use of some of the proposed housing land could be put to better use by creating a safe drop off zone for cars and buses. It has to be noted though that this would not provide any relief for the current traffic pinch points let alone in the proposed future.</p> <p>General area:</p> <p>Adding nearly half as many homes again into an area already at capacity at its traffic pinch points will have a significant impact on traffic flow at all times of the working day. The proposed access utilising the Kingsway will still impact on the Bewdley crossroads junction, the very reason other areas were removed from the original Local Plan. The long awaited Stourport relief road also proposed to use the Kingsway as part of its route. Current proposals suggest that any forward planning to that end</p>		Yes	Yes I would like to speak at the examination

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 33: STOURPORT-ON-SEVERN**

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								<p>would be compromised.</p> <p>Nature Reserve:</p> <p>The rangers who now have charge of the Nature Reserve management have said how The Burlish Park Nature Reserve will be the biggest in the country. This, with the many other attractions of Bewdley, Stourport and Kidderminster gives the area another accolade for folk to visit and enjoy. We have witnessed how extra wildlife has 'moved in' as the area became the golf course and again more recently, while fallow, how other wildlife have taken up residence. Muntjac, for example, is now a frequently noted species beside many others. As I understand it, the proposed area for building is to be 'lightly managed', with no efforts to be allowed on the part of the Rangers to enhance its biodiversity. Mother Nature will take advantage of this and will enhance the area regardless.</p> <p>Recreational:</p> <p>We have long considered how the youngsters of Burlish Park are short changed when it comes to recreational faculties. The memorial park is an excellent facility for all ages. It is well subscribed for all types of activities with convenient parking available. Even the ex-power station housing area,, with fewer homes than Burlish, has a youngster's activity/play area and grassland. Burlish has nothing of this. To get to the Memorial Park from the Burlish estate you have to cross Windermere Way (depending on which side you live) then through the alley way so as to cross the Bewdley Road and then down through the alley way to the top of the Park. Clearly parents are not allowing even the more safety conscious children to attempt this. Surely a park type are is in order. Located exactly where the proposed housing is being suggested would be a better line of thinking. It doesn't</p>			

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 33: STOURPORT-ON-SEVERN**

Respondent	Response No.	Part of Document	Support/Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
								<p>necessarily need to be the size of the Memorial Park. The 'park' area could perhaps be integrated with the Nature Reserve in some way, making it part of the wider Reserve attraction. The schools could also have some arrangement with it by way of parking and the above mentioned safe drop off zone.</p> <p>Open Space:</p> <p>The open nature of the combined areas of the new Reserve offers a pleasant open dog walking area. The panoramic horizon views even those at lower levels are excellent, providing less able walkers to enjoy them.</p> <p>Other:</p> <p>I have read recently about the long held belief regarding unexploded munitions being possibly present in the proposed area. I first heard speak of this in the early 60's from elderly folk who were living in Stourport during WW2. To a much lesser degree I've also heard speak of the copse area in the lightly managed area of the reserve, being used to bury amputated limbs as a product of medical procedures carried out while the are was being used as the American Hospital Army Base. It was certainly marked on older maps as a sewage farm, so there might be some credence. Some sort of investigation regarding unexploded munitions might be warranted.</p> <p>Oppose development of MI/38 on grounds of traffic access and location of school. Unexploded munitions possibly being present in area.</p>			
Sport England Stuart Morgans	<a href="#">RLPPS171</a>	Policy 33.16 School Site Coniston Crescent MI/38	Object		No		Positively Prepared Consistent with National Policy	Sport England has previously objected to housing allocations MII/38 (school site Coniston Crescent).  <u>MI/38 School Site Coniston Crescent</u>	Sport England's view is that in order to accord with para 97b of the NPPF, that mitigation for the loss of the golf course should be	No	

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 33: STOURPORT-ON-SEVERN**

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								<p>In respect of site MI/38, Sport England explains in its previous comments on the 2018 Pre-submission draft that this allocation results in the loss of existing school playing fields. Sport England commented that the site has not been demonstrated to be surplus to requirements for playing pitches, given that there are identified shortfalls of provision for football and rugby as set out in the Council's Playing Pitch Strategy (PPS). Sport England explained that the site has been used by the local community in the past for football and that the PPS also reports that there is a cricket pitch used by the school, with a recommendation to retain the pitches, to improve their quality and to secure community use to meet future needs. Sport England have therefore expressed the view that the site does not accord with Para 97a of the NPPF because there is no evidence to demonstrate its surplus, and that Para 33.16 fails to secure mitigation for the loss of the playing field in line with Para 97b of the NPPF.</p> <p>Since the 2018 Pre-submission draft, the Council have produced an addendum to the PPS and have obtained a letter from the school regarding their use of the playing field. Page 14 of the addendum comments on the playing field at Stourport High School, the key points made are:</p> <p>1) The PPS incorrectly listed the school as having 1 non turf cricket pitch (NTP) and two junior football pitches. The school have since advised that they have only one 11v11 football pitch, and that the NTP has not been used due to its poor condition.</p> <p>2) The condition of the cricket outfield was dangerous having not been maintained for several</p> <p>Years and is prohibitively expensive to repair</p>	secured within policy 33.8, in the form of a financial contribution towards investment priorities identified in the PPS. The contribution should be equitable to the loss.		

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 33: STOURPORT-ON-SEVERN**

Respondent	Response No.	Part of Document	Support/Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
								<p>and maintain.</p> <p>3) Cricket is well catered for at the school with indoor cricket nets and they use facilities at Stourport Cricket Club for matches</p> <p>4) The school have a long lease to use the facilities at Stourport Sports Club which includes three hockey pitches, cycling track, indoor netball dome. The school can meet its needs for cricket lessons and practices on the hockey pitches.</p> <p>5) The school intends to install a 3G artificial grass pitch to replace its existing grass pitch to offer greater capacity for use during evening.</p> <p>Sport England does not accept that this provides an acceptable justification for the loss of playing field to meet the guidance in para 97 of the NPPF. In terms of the points made, the following response is provided:</p> <p>1) It is noted that the school consider there is an error in the PPS regarding the existing playing field being marked out to provide only one football pitch rather than two, and that the NTP has not been used due to its poor condition. Nonetheless, in the application of para 97 of the NPPF it is the loss of playing field (in its capacity to provide playing pitches) that needs to be considered. Sport England wishes to point out that whilst the school may have recently marked out one football pitch, the playing field has capacity to provide more pitches, and has done so in the past. To demonstrate this further Sport England provides the following additional information.</p> <p>The school have implemented a planning consent for a new 6th form block that occupies part of the school's playing field. There is a planning condition attached to the consent that requires the former 6th form block to be</p>			

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 33: STOURPORT-ON-SEVERN**

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								<p>demolished and the land laid out as playing field to offset the loss. The proposed housing allocation would develop a larger area of playing field land that includes the former 6th form block and some of the playing field around it (amounting to approximately 3.4 hectares in total), for residential development.</p> <p>The image above shows there to be a football pitch and a cricket pitch on the area of the site proposed to be developed for housing. This part of the playing field could accommodate an adult or youth sized football pitch with a cricket pitch overmarked. When the area of the old 6th form block is laid out as playing field to meet the terms of the existing planning consent, the resulting playing field area could then be marked out to provide a 2nd adult or youth football or rugby pitch to reinstate for the loss of the existing pitch that has been displaced by the new 6th form block. So, in total there would be the loss of playing field capacity equivalent to two football/rugby pitches and a cricket pitch as a result of the proposed housing allocation. In order to address para 97 of the NPPF mitigation for the loss of 3.4 hectares of playing field is required.</p> <p>2) Sport England does not accept the view expressed by the school that the cost of replacing and maintaining a cricket pitch would be prohibitively expensive. A new tarmac based NTP would cost about £8k and last for about 20 years and requires little or no maintenance. It is not clear why the grass cannot be cut to allow the playing field to be used for cricket?</p> <p>3) The availability of indoor nets does not replace a match pitch. Reliance on a cricket club to provide access to their pitch is not considered to be acceptable mitigation for not looking after a school playing field with an NTP on it.</p>			

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 33: STOURPORT-ON-SEVERN**

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								<p>4) It is accepted that the school have access to other sports facilities, and this meets many of their sports facility needs, however this does not justify the loss of playing field, without securing appropriate equitable mitigation.</p> <p>5) The school's proposals for a 3G AGP would result in the further loss of playing field that would need to be justified in accordance with para 97c of the NPPF. Whilst there is an identified need for 3G pitches in Stourport to serve football, a 3G pitch would not constitute mitigation for the loss of playing field for the proposed housing allocation; this needs to be separately justified and appropriately mitigated. It is Sport England's understanding that additional funding would be required to deliver an AGP. It is unlikely that there would be grant assistance available from Sport England or the Football Foundation to fund the construction of a 3G pitch as mitigation for the loss of playing field for new housing. The siting of a new 3G AGP with sports lighting adjacent to the proposed housing allocation would potentially generate issues of noise and lighting and so there can be no certainty that this proposed sports facility will obtain planning consent. The provision of a 3G AGP would serve to provide a new facility for football, but would not be an appropriate surface to play cricket, and would not mitigate the loss of the cricket pitch.</p> <p>Sport England remains of the view that whilst the school and the Council consider that the site is surplus for education needs, this does not mean that it is surplus playing field in accordance with para 97a of the NPPF. The evidence in the Council's PPS demonstrates that there are currently shortfalls of pitches, and that if the site were to be made available for community use it could make a positive contribution to meeting local needs for pitches for local teams. Sport England remains firmly of the view that para 97a has not been</p>			

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 33: STOURPORT-ON-SEVERN**

Respondent	Response No.	Part of Document	Support/Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
								<p>demonstrated and that the policy as currently worded does not require such evidence to be provided to meet para 97a), nor does it secure mitigation in line with para 97b of the NPPF and is therefore unsound.</p> <p>The Council have since undertaken an assessment of golf provision in the District. The document has been subject to consultation with England Golf.</p> <p>The assessment makes the case that the existing level of golf provision across the District at various Golf Clubs is sufficient to meet demand, in the context of falling membership numbers in recent years. The report explains that the course closed in 2017, and that after a period of marketing no suitable assignee could be found to take on the running of the course, that the clubhouse has suffered from arson attacks and is in a poor condition. The assessment states that the course is now overgrown and would require an unsustainable large amount of investment.</p> <p>In consultation with England Golf, Sport England has made representations on the Golf Assessment, the main point being that whilst it is generally accepted that there is no longer a need to provide a traditional 18 hole golf course, that further consideration should be given to an alternative golf offer as opposed to retaining a traditional golf course. Eg. Adventure golf, pitch and putt, footgolf etc.</p> <p>Whilst the assessment has given some consideration to alternative golf play, this focuses on listing other facilities outside of Wyre Forest and does not explain why these are relevant to serving Wyre Forest residents. The assessment does not consider the potential of the former Burlish Golf Course site to provide an alternative golf offer on the site, or part of the site, which could be complementary to the Council's proposals to</p>			

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RESPONSES TO CHAPTER 33: STOURPORT-ON-SEVERN**

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								<p>develop a cycle trail.</p> <p>A further point to make is that the former Burlish course provided the only entry level municipal facility in the District, with all other courses essentially providing golf club membership which will tend to be more attractive to established participants. Whilst the report sets out that there are flexible membership packages available at some other courses, this stops short of considering the cost of green fees, which may deter some more casual participants.</p> <p>So, whilst Sport England does not wish to object the loss of the Golf Course, we wish to raise concern that the assessment does not fully consider the potential alternative golf provision. It is considered that the evidence is insufficient to demonstrate compliance with para 97a of the NPPF.</p> <p>Whilst Sport England notes that the Council have been in discussion with British Cycling to create a new cycling facility, with potential s106 match funding, the need for this facility is not demonstrated in the Council's evidence base in the Playing Pitch Strategy/Built Sports Facilities Strategy. Whilst Sport England has no objection to the proposals to develop a new facility for cycling, the loss of the golf course to provide residential development cannot be justified under para 97c of the NPPF since this is not a replacement sports facility.</p> <p>Sport England's view is that in order to accord with para 97b of the NPPF, that mitigation for the loss of the golf course should be secured within policy 33.8, in the form of a financial contribution towards investment priorities identified in the PPS. The contribution should be equitable to the loss.</p> <p>Objection to allocation of site MI/38.</p>			

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RESPONSES TO CHAPTER 33: STOURPORT-ON-SEVERN**

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								Sport England remains firmly of the view that para 97a has not been demonstrated and that the policy as currently worded does not require such evidence to be provided to meet para 97a), nor does it secure mitigation in line with para 97b of the NPPF and is therefore unsound.			
C Westcott	<a href="#">RLPPS175</a>	Policy 33.8 and Policy 33.16	Object					If houses are built on the golf course and the Kingsway is closed off to traffic this will mean that the traffic that now uses the Kingsway will use Windermere Way. Windermere Way is already a speeding problem - in Windermere Way and many cars cannot keep to their side of the road on bends. Any extra houses in this area will be a bigger problem. Bewdley Road North would have been a much better site for the extra houses. L1/5		No	
Jan Carr	<a href="#">RLPPS262</a>	Policy 33.8 and Policy 33.16	Object	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	<p><b>LI/11 Land west of former school site Coniston Crescent.</b> I am very concerned about the proposal to build 200 houses on this site, which has been removed from the Green Belt. Many residents believe this site should not have been removed from the Green Belt, and therefore should not be included in the Local Plan. I am particularly concerned about the impact a large housing development would have on this area, creating extra traffic, noise &amp; air pollution through the Burlish Park estate, which is already more than busy enough.</p> <p>Also, local residents would lose the peace &amp; quiet of this unspoilt piece of land, which we have enjoyed for many years. In a tightly-packed estate, this open area is of real benefit to residents and to wildlife. Importantly, this land is a known &amp; established nesting site for the skylark, which is 'red listed', making it a species of high conservation concern &amp; protected under the European Birds Directive.</p> <p><b>MI/38 School site Coniston Crescent.</b> This site has also been misguidedly removed from the Green Belt, &amp; for the above reasons, should not be included in the Local Plan. Surely it must</p>	<p><b>LI/11 - Land west of former school site Coniston Crescent</b> - this land should have its Green Belt status restored.</p> <p><b>MI/38 - School site Coniston Crescent</b> - the school should be compelled to comply with the requirements of the planning consent 15/0583/OUTL and restore this site to playing field status.</p>	No	

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 33: STOURPORT-ON-SEVERN**

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								<p>be possible for Stourport High School/Severn Academies Education Trust to find the money they require for repair work without selling off this Green Belt land for housing &amp; to fund an 'all weather sports pitch'. Building over 100 houses on this site would deprive residents, schools, &amp; future generations, of the benefit of these green fields, &amp; have a serious impact on the pleasant, open aspect of this area of Stourport.</p> <p>I believe many Burlish Estate residents will still be unaware of how the Local Plan might affect them. A simpler consultation response form &amp; more direct information would have encouraged more residents to have their say.</p> <p>Residents will be hoping their concerns will be carefully looked into. The best possible outcome would be for alternative, more suitable brownfield sites to be sourced for this amount of housing, &amp; for these Green Belt sites to removed from the Local Plan &amp; restored to the Green Belt.</p>			
Fisher German LLP	<a href="#">RLPPS230</a>	Policy 33.18 Parsons Chain MI/3	Comment					<p>Fisher German LLP have been formally instructed to provide the following comment in relation to site allocation MI/3 detailed under Policy 33.18 of the pre-submission document.</p> <p>The site is currently allocated by local plan policy SAL.EA3 of the Site Allocations and Policies Local Plan (adopted July 2013). This allocation differs from the allocation as now proposed due to the removal of land associated with the former railway embankment.</p> <p>As a result of shrinking the proposed allocation but maintaining a requirement for a 'new link' to ease congestion at the nearby traffic island, the council should be minded that they are reducing the available developable area of the site which may impact viability moving</p>			

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 33: STOURPORT-ON-SEVERN**

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								<p>forward.</p> <p>It is therefore our considered view that the proposed allocation should continue to mirror the existing site allocation therefore allowing the railway embankment to be considered and, if required, possible help to facilitate improved linkage/connectivity between the Worcester and Hartlebury Roads.</p> <p>The above recommendation is not to suggest the complete loss of the green corridor but would potentially allow some of the corridor to be considered, if required, subject to satisfactory biodiversity preservation/enhancement.</p> <p>If the above cannot be facilitated, and linkage between the two roads is required through the allocation as suggested, we would recommend this is best achieved via a full residential scheme inclusive of C2 care home provision.</p>			

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 34: BEWDLEY**

Respondent	Response No.	Part of Document	Support /Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
Paul Carpenter	<a href="#">RLPPS5</a>	Policy 34	Comment					I would like to propose that my property, Blackstone Meadow Holiday Park DY12 1PU is removed from the Green Belt for tourism & enterprise		Yes	
Richard Brine	<a href="#">RLPPS16</a>	34.5 and Policy 34.1	Object						One of the issues raised in the local plan concerns poor air quality, particularly in Welch Gate. There are options to review the traffic arrangements in the town centre that may alleviate this particular issue and until that is resolved development of the site should be postponed. In addition the town badly needs extra car parking and coach drop off areas that this space could provide.	No	
Richard Brine	<a href="#">RLPPS17</a>	34.3	Object						There is an opportunity to use this land for the benefit of the community in terms of revised traffic flows in Bewdley town centre that may improve air quality in Welch Gate, provide additional much needed car parking to support local traders and also to provide coach drop off areas. Development should be postponed until this has been discussed with all stakeholders.	No	
Richard Brine	<a href="#">RLPPS18</a>	Policy 34.2	Comment						The traffic in this area is a nightmare at school drop off and pick up times. Before the development is allowed to proceed, this issue needs to be addressed.	No	
Persimmon Homes Limited	<a href="#">RLPPS93</a>	Policy 34.3 Catchem's End WA/BE/3	Object		No		Justified Effective	RPS suggests that Policy 34.3 be modified to take into account the recommended modifications submitted to the Pre-Submission Plan in Dec 2018.	RPS suggests that Policy 34.3 be modified to take into account the recommended modifications submitted to the Pre-Submission Plan in Dec 2018.	Yes	In order to properly represent the interests of the client.
Julie Jones	<a href="#">RLPPS179</a>	Policy 34.3 - WA/BE/3	Object	Yes	No	Yes	Effective	(1) Plan WA/BE/5 Land South of Habberley Road; red line at NE boundary is not accurate, please see land registry Plan WR62388 attached.  (2) Policies map (July 2019) should show removal of Green Belt between sites WA/BE/5 and	(1) Amend red lines (part) at North - East end of site WA/BE/15 to align with fence line an O.S Base map.  (2) Amend Policies Map (July 2019) by amending Green Belt boundary.	No	

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 34: BEWDLEY**

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								Eastern site WA/BE/3 with new boundary running along main road edge.			
Anthony Saunders	<a href="#">RLPPS12</a>	34.3.2	Object	Yes	Yes	Yes		<p>The plan states that access for 75 houses will be from Kidderminster Road. Since the junction with Habberley Road was altered some years ago, the traffic has increased dramatically along this section of Kidderminster Road with regular congestion due to there being left turn only from Habberley Road onto Kidderminster Road for traffic going to the town centre. This traffic now has to go to the bypass roundabout and return along Kidderminster Road. 75 houses could generate 75 to 150 car movements a day which would be horrendous for road users and residents.</p> <p>My proposal is to construct a new roundabout on the bypass for access which would alleviate the problem.</p>	<p>The plan states that access for 75 houses will be from Kidderminster Road. Since the junction with Habberley Road was altered some years ago, the traffic has increased dramatically along this section of Kidderminster Road with regular congestion due to there being left turn only from Habberley Road onto Kidderminster Road for traffic going to the town centre. This traffic now has to go to the bypass roundabout and return along Kidderminster Road. 75 houses could generate 75 to 150 car movements a day which would be horrendous for road users and residents.</p> <p>My proposal is to construct a new roundabout on the bypass for access which would alleviate the problem.</p>	Yes	To make sure that my voice is heard
Martyn Guest	<a href="#">RLPPS177</a>	Policy 34.3 - WA/BE/3	Object	Yes	Yes	Yes		<p>The proposal of 70 plus dwellings in the open space opposite our home. Would bring with it entry/exit issues for the possible 140/200 vehicles that would accompany the dwellings causing more fuel to gridlock and polluted air situation.</p> <p>Our beautiful tourist town attracts people because of its open green spaces. As well as its Georgian nucleus. Bewdley needs to be careful not to morph into a commuter suburb. As there is only so much local business, more people will mean more local business; more people will mean more commuting to work. Thereby affecting real community. The addition of so many dwellings will put immense pressures on local resources. Causing crowded schools and crippling the transport network. The town would have its tourist industry affected by not being</p>			

Local Plan Review Pre-Submission Consultation (September / October 2019)

Summary of Consultation Responses (Regulation 20(2) of the Town and Country Planning (Local Planning) (England) Regulations 2012)

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 34: BEWDLEY**

Respondent	Response No.	Part of Document	Support /Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
								able to visit when roads are gridlocked.  Also hear reports that the predicted growth of population in Wyre Forest is wrong and that we are not on trend with the rest of the country. We need to make sure predictions are fact.			
Richard Brine	<a href="#">RLPPS20</a>	Policy 34.4	Comment					Modifications proposed.	Concern here is the impact on the already stretched capacity at peak times on the section of the B4190 between the Habberley Road Island and the WMSP island of the by-pass. To alleviate the issue a link road should be considered between the Habberley Road (between the 30mph limit and the Mercure hotel entrance) and the WMSP island, possible using a double island arrangement. WFDC traffic study already indicated that this section of road is at capacity and is exacerbated by the enforced left turn at the T junction on the B4190.	No	
Richard Brine	<a href="#">RLPPS19</a>	Policy 34.3 and 34.4	Comment					Modification proposed.	Concern here is the impact on the already stretched capacity at peak times on the section of the B4190 between the Habberley Road Island and the WMSP island of the by-pass. To alleviate the issue a link road should be considered between the Habberley Road (between the 30mph limit and the Mercure hotel entrance) and the WMSP island, possible using a double island arrangement. WFDC traffic study already indicated that this section of road is at capacity and is exacerbated by the enforced left turn at the T junction on the B4190.	No	
Graham Wire	<a href="#">RLPPS46</a>	Policy 34.4, Para 2	Object	Yes	No	Yes	Effective	As it stands, this proposal would adversely affect the traffic congestion and accident risk that exists at and around the Catchems End junction where Habberley Road joins Kidderminster Road whereas an alternative road arrangement within the development area would still allow housing need to be satisfied whilst actually improving	The proposed access to the "Land South of Habberley Road WA/BE/5 (1.71Ha)" from Habberley Road is likely to exacerbate the traffic congestion and conflict which already occurs at the Catchems end (Habberley Road / Kidderminster	No	

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 34: BEWDLEY**

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								traffic management of the area even with the housing developments proposed at this site and in the Catchems End area.	<p>Road) and between there and the By-Pass Roundabout adjacent to New Road. This could and should be alleviated by utilising the proposed development to divert the main flow along Habberley Road to the A456 roundabout. This would then result in the additional flow of traffic to the new housing, as well as a significant amount of that currently routed via Catchems End. This would have the effect of removing the double back route for traffic from Habberley Road towards Bewdley thus considerably reducing the flow of traffic on the affected section of Kidderminster Road between Catchems End and the roundabout. It would also eliminate the need for most right turn moves from Kidderminster Road into Habberley Road which causes significant hazard and conflict especially given the proximity of the busy fish and chip shop at that junction. There would then be the opportunity amend the section of Habberley Road from the proposed site to Catchems End to a more appropriate use as a local feeder road and potentially remove its function as a through route.</p> <p>Whilst this proposal may slightly reduce the number of houses that can be built on this site, the overall benefit to traffic flow in the area and to its wider residential environment would be a better overall result.</p>		
Owl Homes	<a href="#">RLPPS225</a>	Policy 24B	Comment	Yes	Yes	Yes		Owl Homes is working with the landowners of land off Habberley Road, Bewdley to support proposals for residential development. The site is a proposed allocation in the emerging Local Plan to which these representations relate. Owl Homes supports the Council in proactively	The allocation should be altered to increase the number of dwellings to approximately 50.	Yes	To demonstrate to the Inspector that the Site is suitable

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 34: BEWDLEY**

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								<p>seeking growth in its area and in preparing a new Local Plan to enable this.</p> <p>Owl Homes support Policy 34.4 in allocating land of Habberley Road, Bewdley for residential development (Site reference WA/BE/5).</p> <p>Land at Habberley Road, Bewdley is a highly sustainable site, currently located in the Green Belt however featuring strong defensible boundaries on all sides. Physical boundaries to the site are created by Habberley Road to the north, Kidderminster Road to the south, built residential development to the west and the Heath Hotel and its grounds to the east.</p> <p>The Site comprises approximately 1.6ha of agricultural land with mature landscaping along the site boundaries. A wide range of facilities are available in Bewdley within a 25 minute walk of the site including a primary and secondary school, medical centre, supermarkets and sports and leisure facilities. A bus route services the site with bus stops on Kidderminster Road and Trimpley Lane, both under 150m walk of the site boundary.</p> <p>In terms of access, the proposal seeks the main access of Habberley Road where the appropriate visibility splays can be secured, as well as the provision of a footpath link into Bewdley. Further evidence relating to the highways impact and access of the proposal will be provided as the proposal progresses.</p> <p>The site is within an area at low risk of flooding and appropriate drainage will be incorporated including the use of SUDs.</p> <p>We submit a Vision Document to support the allocation of site which sets out our vision for the site and supports its allocation. The Site is sustainable and deliverable in accordance with the NPPF, as demonstrated in the Vision</p>			and deliverable over the Plan Period.

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 34: BEWDLEY**

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								<p>Document.</p> <p>The proposal as shown in the Vision Document has been informed by the existing landscape which will be enhanced with the provision of an area of public open space and the retention of important trees.</p> <p>The Site has the potential to provide 50 high quality homes, set within a high quality landscaped area, well connected to local services and facilities. It is noted however that the allocation currently only provides for 35 dwellings. As demonstrated in these representations and the Vision Document, the potential of the site to provide 50 dwellings should be recognized within the allocation by increasing the number of homes that can be achieved from 35 to approximately 50. This will help ensure the Council meets the minimum housing requirement and the potential to achieve a high quality development is demonstrated within the submitted Vision Document.</p>			

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 35:PREVIOUSLY DEVELOPED SITES IN THE GREEN BELT**

Respondent	Response No.	Part of Document	Support /Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
Horton Estates Ltd	<a href="#">RLPPS87</a>	Policy 35	Object	Yes	Yes	Yes		<p>Hortons' Estate Ltd ("Hortons") supports the allocation of Cursley Distribution Park (Site ref. WFR/ST/9) as a Previously Development Site (PDL) in the Green Belt under Policy 35.</p> <p>This is a substantial PDL site which provides c.22,500 sq m of industrial floorspace and with opportunities for infilling and/or redevelopment – some of the buildings are reaching the end of their economic life and Hortons is considering options to redevelop and modernise the site to ensure it offers attractive facilities for the market. This approach to infill/redevelopment will accord with para. 145 criterion g) of the Framework, and it is therefore important that the site is specifically identified under Policy 35.</p> <p>Support allocation of Cursley Distribution Park, WFR/ST/9 in the pre submission plan.</p> <p>Hortons' Estate Ltd is the owner of Cursley Distribution Park which is proposed for allocation in the Local Plan under Policy 35. This is a substantial previously-developed site in the Green Belt and Hortons therefore wishes to participate in the Examination Hearings</p>		Yes	

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 36: RURAL WYRE FOREST**

Respondent	Response No.	Part of Document	Support /Comment/ Object	Legally Compliant ?	Sound ?	DTC ?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination ?	Reason for Attending
Mr & Mrs Pulford	<a href="#">RLPPS110</a>	Policy 36 Rural Wyre Forest	Object	No	No	No	Justified Effective Consistent with National Policy	<p>I wish for WFDC to acknowledge further environmental concerns on the fore mentioned site, now that two TPO's and after a third round of constructive consultations and discussions with planning consultation officers update our objection.</p> <p><b>SETTLEMENT BOUNDARY CHANGES IN FAR FOREST SITE REF BR/ RO/4/6</b></p> <p>Movement of the settlement boundary does not meet the soundness test as WFDC fail to acknowledge Addendum (2) Preliminary Ecological Appraisal of potentially ecologically sensitive sights on WFDC's list of sites for allocation in the 2018 Local Plan. October 2018 BR/RO/4/6 Adjacent to Tolland Bungalow</p> <p>Summary of conclusions and recommendations Page 3 States:</p> <p>'The presence and positions of ancient fruit trees and tree lines on two boundaries restricts developable area and layout. Due to the nature of the ecological constraints we caution that WFDC consider removing this site from allocation in its entirety' In 2019 2 tree preservation orders where placed on the trees in this plot.</p> <p>Removing this site from the settlement boundary is supported by:</p> <ul style="list-style-type: none"> <li>• Policy 11 B Historic environment ii</li> <li>• Policy 11D- Protecting and Enhancing Biodiversity 2 iv</li> </ul> <p>This site as a whole provides a unique wildlife corridor for a multitude of species to be able to access surrounding areas, <b>there is no alternative corridor</b>. The area is a Biodiversity Area Action Plan in Worcestershire, any changes would have serious impact and local SSI sites should be taken into consideration.</p> <p><b>Policy 18B - Residential Infill Development i , ii, iv</b> -Infill of the proposed area with dwellings would be uncharacteristic in this part of the village. Locally properties are detached and scattered. WFDC local plan officers have suggested up to 18 dwellings on the site. This density would be more than expected in town planning let alone village planning. Being mindful of the fact that mainly bungalows or low set cottages border the boundary for the proposal, 2 storey buildings would impact hugely on light and lead to over shadowing and not be in keeping.</p> <p><b>Policy 27A Quality design and local distinctiveness vii, viii</b> - Access to the A4117 for the proposed dwellings adjacent to Tolland bungalow and Orchard house would have to be made via Plough lane or the entrance currently used to service Orchard House. This short section of road already contains several busy junctions including:</p> <p>The Plough Inn serving more than 1200 meals per week</p> <p>The bus stops allowing outside the Plough Inn, when travelling towards Cleobury Mortimer causing traffic to overtake adjacent to Plough Lane. Similarly, towards Bewdley it stops at the</p>	<p>The settlement boundary review has failed to take into account Addendum (2 )- Preliminary Ecological Appraisal of potentially ecologically sensitive sites on the WFDC list of sites for allocation in the 2019 plan, No acknowledgement has been made of 2 tree preservation orders or English Nature concerns regarding the site BR/RO/4/6</p> <p>The only sound outcome would be to remove this site from the New Settlement boundary and ring fence it against development. Effectively standing up for the policy's set out by WFDC to protect sensitive areas and species that lead to the essential diversity and habitat,</p>	NO	

Local Plan Review Pre-Submission Consultation (September / October 2019)

Summary of Consultation Responses (Regulation 20(2) of the Town and Country Planning (Local Planning) (England) Regulations 2012

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 36: RURAL WYRE FOREST**

Respondent	Response No.	Part of Document	Support /Comment/ Object	Legally Compliant ?	Sound ?	DTC ?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination ?	Reason for Attending
								<p>junction with New Road and the Village hall.</p> <p>Far Forest Stores, although a car park is provided for customer use it cannot accommodate HGVs and tractors resulting in them parking on pavements and verges.</p> <p>Far Forest Methodist Chapel has parking for 2 cars with other congregation members parking on road and pavement.</p> <p><b>New Road</b></p> <p>Visibility out of Plough lane is often restricted; accidents and near misses are common. Plough lane is a foot path, an increase in traffic would put walkers at risk</p> <p><b>Policy 13 - Transport and Accessibility in Wyre Forest A i, iii,iv</b> - There is insufficient work opportunities in Far Forest to support the proposed number of extra households. The bus service currently runs 2hrly with plans to review this service again imminently. It does not facilitate use for commuting to work.</p> <p>Far Forest Lea Memorial Primary school is full in most years; any extra children would need to be driven to other schools to in the locality.</p> <p>At peak times traffic on the A4117 is at a standstill with the junction on the A456, this is a recognised accident blackspot, a further rise in vehicles will no doubt jeopardise safety and increase noise and pollution to the immediate area. We would urge for a highways assessment to be undertaken.</p>	<p>acknowledging the movement that takes place in this wildlife corridor.</p> <p>This site needs to be removed from potential development completely with the settlement boundary pushed back.</p> <p>No extra amenity is required in this area, development of caravan sites to include residents being on site for a full 12 months have not been considered, the school cannot accommodate more pupils, the shop and pub are thriving too.</p>		
Ken Moss	<a href="#">RLPPS71</a>	POLICY 36	Comment	Yes	Yes	Yes	Consistent with National Policy	<p>Clows Top Garage &amp; Land. Housing Development to be reconsidered PLEASE.</p> <p>Current application ref : 19/0283/PiP</p> <p>A CATEGORY TWO Village which is deemed as moderately sustainable.</p> <p>On behalf of the majority shareholders of Conquer Properties Limited and being the First Chargee of the site; I have to support the <b>dual allocations</b> for the land. Although it is of course preferred to become a small housing development and in-keeping with the village once our soon to be planning proposal submission is made.</p> <p>I also understand that this (housing development) is indeed supported by the majority of all</p>	<p>My planning agent: will make all applications and is fully knowledgeable of all legal matters with regard to planning.</p>	NO	My agent would like to promote this site please

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 36: RURAL WYRE FOREST**

Respondent	Response No.	Part of Document	Support /Comment/ Object	Legally Compliant ?	Sound ?	DTC ?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination ?	Reason for Attending
								<p>within the village parish, but commercial pressures must allow us this reserve of alternative use.</p> <p>Historical Brownfield site still awaiting determination of planning application 19/0283/PIp</p> <p>Previously passed for 21 homes.</p>			
RG Timmis	<a href="#">RLPPS75</a>	Policy 36.1 - BR/RO/2	Object	No	No	No	Consistent with National Policy	<p>We are against this plan due to the boundary policy which does not comply with the national policy guidelines.</p> <p>We have three (at least) permanent caravan parks in far forest. 1 has a capacity of 200 people. 1 can accommodate at least 70 people and the 3rd one has a capacity of over 100, surely for a small village, we have our national capacity for housing.</p>	<p>Take out these plans as it does not meet with the National Policy Planning Framework.</p> <p>We have three (at least) permanent caravan parks in far forest. 1 has a capacity of 200 people. 1 can accommodate at least 70 people and the 3rd one has a capacity of over 100, surely for a small village, we have our national capacity for housing.</p>	NO	
Nick Hodgkiss	<a href="#">RLPPS73</a>	Policy 36.1 - BR/RO/2	Object	No	No	No	Consistent with National Policy	<p>Building here is outside the WFDC village/settlement boundary and would go against WFDC own policy on building allowance. It does not comply with National Planning Policy guidelines.</p> <p>The land is relatively unspoilt these past 20 plus years and together with its surroundings provides valuable habitat for local wildlife which would be destroyed by the proposed development.</p> <p>Transport facilities are very poor and there is only one small corner shop and the development will mean more and more traffic through the village to access more established facilities.</p>	<p>Take this land out of the plan as it does not meet National Policy Planning Framework.</p> <p>The development of this site on the A4117 would require loss of</p>	NO	

Local Plan Review Pre-Submission Consultation (September / October 2019)

Summary of Consultation Responses (Regulation 20(2) of the Town and Country Planning (Local Planning) (England) Regulations 2012)

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 36: RURAL WYRE FOREST**

Respondent	Response No.	Part of Document	Support /Comment/ Object	Legally Compliant ?	Sound ?	DTC ?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination ?	Reason for Attending
								Is it of concern that the chair of the Development Committee is also the owner of this land	<p>established hedgerow at access points with loss of established habitat. It would bring inevitable light pollution to further deplete our dark skies (particularly important for out wildlife)</p> <p>Transport facilities are very poor and there is only one small corner shop and the development will mean more and more traffic through the village to access more established facilities.</p> <p>Is it of concern that the chair of the Development Committee is also the owner of this land</p>		
Lesley Oram	<a href="#">RLPPS106</a>	Policy 36.1 Lem Hill Nurseries BR/RO/2	Comment					No comments		NO	

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 36: RURAL WYRE FOREST**

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Alistair Scott	<a href="#">RLPPS104</a>	Policy 36.1 - BR/RO/2	Object	No	No	No	Consistent with National Policy	Boundary policy is not to WFDC guidelines and does not meet National Policy  This land is outside settlement boundary. Amount of houses disproportionate to areas needs. Bill's nursery provides employment for Far Forest which this area needs. Dark skies very important for ecology. A pond in this provides a breeding site.	This land needs to be removed from the plan as it does not meet National Policy Planning Framework.	NO	
Anna Coleman	<a href="#">RLPPS95</a>	Policy 36.1 BR/RO2	Object	No	No	No	Consistent with National Policy	I believe it does not comply with policy as it has now been amended to include a site which is outside the settlement area being Lem Hill Nursery.  Inclusion of this rural site is not supported by the required evidence base. There is no evidence that this site can be made compatible with the requirements of Government policy in relation to the environment and biodiversity; in particular it contradicts policy 6B in that it does not promote sustainable community.  The location of this site gives very poor access to local services and employment opportunities. This location is not connected to any higher order settlements.	Exclusion of this site from being allocated and allocate sites which are adjacent to urban areas in the locality.		
Joy Sutton	<a href="#">RLPPS102</a>	Policy 36.1 Lem Hill Nurseries BR/RO/2	Object	No	Yes	No	Consistent with National Policy	Development of this site falls outside the council own policy as new build will be outside the newly defined settlement boundary.	Proposed development of 20 new houses is not appropriate for this village location. This high density development is not in keeping with the character of the village. It would set a precedent for further houses on adjacent fields. There would be significantly increased traffic on an already busy road.	NO	
Nina Potter	<a href="#">RLPPS109</a>	Policy 36.1 - BR/RO/2	Object	No	No	No	Consistent with National Policy	Against own policy - boundary  Does not comply with National Policy Guidelines	Take this land out of the plan as it does not meet - National	NO	

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 36: RURAL WYRE FOREST**

Respondent	Response No.	Part of Document	Support /Comment/ Object	Legally Compliant ?	Sound ?	DTC ?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination ?	Reason for Attending
									Policy Planning Framework.		
Olivia Harris	<a href="#">RLPPS114</a>	Policy 36.1 - BR/RO/2	Object	No	No	No	Consistent with National Policy	Against own boundary policy  Does not comply with National Policy Guidelines	Take this land out of the plans as it does not meet - National Policy Planning Framework.	NO	
Sally Watkins	<a href="#">RLPPS122</a>	Policy 36.1 - BR/RO/2	Object	No	No	No	Consistent with National Policy	This does not meet with WFDC own boundary policy  It does not comply with National Policy Guidelines  This land is outside settlement boundary. It is overdevelopment and not in keeping with the area. It heightens pollution to the area - drainage/flood risks to Dowles Brook tributaries. Threatens dark skies. Impact on both the village as well as wildlife. A4117 extremely busy, position of land raises string concern over safety in and out of the site. Alternatives needed to maintain safety. Would need to be considerable altering the look of the village at that end. Houses here also threaten the rest of the field/meadow at that area.	This land needs to be removed from the plan as it does not meet the National Policy Planning Framework.	NO	
Joan Woodhouse	<a href="#">RLPPS74</a>	Policy 36.1 - BR/RO/2	Object	No	No	No	Consistent with National Policy	Against own boundary policy  Does not comply with National Policy guidelines  Children will have no where to play its on the side of a very busy A4117 - the pavements are not safe - no street lights which are not WANTED - we need our dark skies for the bats and owls	Take this land out and off the plan as it does not meet National Policy Planning Framework.  Out of the village settlement. Disruptive to the wildlife as it is field - it must have a fully detailed ecology report before anything.  Children will have no where to play its on the side of a very busy A4117 - the pavements are	NO	

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 36: RURAL WYRE FOREST**

Respondent	Response No.	Part of Document	Support /Comment/ Object	Legally Compliant ?	Sound ?	DTC ?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination ?	Reason for Attending
									not safe - no street lights which are not WANTED - we need our dark skies for the bats and owls		
Fay Hodgkiss	<a href="#">RLPPS72</a>	Policy 36.1 - BR/RO/2	Object	No	No	No	Consistent with National Policy	<p>Building at Lemhill Nurseries is against WFDC own policy. It is outside the village boundary. It does not comply with the National Policy guidelines. Any development of the land would not just affect the land itself but a significant area adjacent to it with removal of hedges etc to form a visibility splay. This will have a serious effect on the wildlife in the area. It would also bring light pollution to the area which is also detrimental to wildlife.</p> <p>Developing Lemhill Nurseries into a housing estate of 20 houses is totally inappropriate. The facilities in the village could not service the houses. The A4117 access is inadequate and would be damaging to the environment/wildlife.</p>	Lemhill Nurseries should be removed from the plan as an area for development as it does not meet the criteria for the National Policy Planning Framework.	NO	
Josephine Priest	<a href="#">RLPPS103</a>	Policy 36.1 - BR/RO/2	Object	No	No	No	Consistent with National Policy	<p>Against own boundary policy</p> <p>Does not comply with National Policy Guidelines</p> <p>Any building here is outside the village/settlement boundary this is against Wyre Forest's councils own policy on building allowance.</p> <p>Land adjacent to fields and ancient woods, home to many species of wildlife, including owls, foxes, goldfinches, squirrels, rabbits, frogs, mice, deer, bats, moths, woodpeckers, hedgehogs.</p> <p>Flooding in Church Lane by Severn Trent Pumping Station creates polluted and smelling water at regular intervals. Pollution to tributary watercourses across fields and woodland would be greatly increased by building 20 houses.</p> <p>Light pollution, this area is natural countryside as has no need or tolerance for artificial lighting especially at night. I.e. street lights, security lighting, this area by its name explains i.e. Far Forest! Dark skies to be retained also for wildlife patterns, a must.</p> <p>No more power lines acceptable in this area.</p> <p>School not large enough for more intakes.</p> <p>More single developments would be more suitable.</p>	Take land out of plans as it does not comply with the National Policy Planning Framework.	NO	

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 36: RURAL WYRE FOREST**

Respondent	Response No.	Part of Document	Support /Comment/ Object	Legally Compliant ?	Sound ?	DTC ?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination ?	Reason for Attending
								It is a dangerous location  Increased human noise, disturbing home life to existing residents and wildlife. Far forest is a small village and should remain so. It should be safeguarded as an area of 'outstanding beauty ' in all respects.			
Jonathan Priest	<a href="#">RLPPS101</a>	Policy 36.1 - BR/RO/2	Object	No	No	No	Consistent with National Policy	This proposal is against the boundary policy and does not comply with national policy guidelines.  Take this land out of plans as it does not comply with National Policy Planning Framework.  My main reasons are:  1. Very dangerous location due to access onto fast road. 30-40 cars on and off each day.  2. Light pollution associated with large number of houses close together, wildlife will suffer.  3. This would remove the small village aspect.  4. Flooding is already an issue around Church Lane and this will increase the problem.  5. Smaller single development would spread impact whilst increasing housing stock to the area as opposed to a large scale development like this.  6. Pollution of watercourses is likely with a concentrated development and associated roads and paths.  7. Additional power supplies will be required as new rules covering fossil fuels coming into force. More overhead lines will be removed.	Take this land out of plans as it does not comply with National Policy Planning Framework.	NO	
Gerald Lewis	<a href="#">RLPPS76</a>	Policy 36.1 - BR/RO/2	Object	No	No	No		Against own boundary policy  Does not comply with National Policy guidelines  The A4117 Road by the nursery? Is it Bill White or Lem Hill nursery? It is very congested with heavy lorries going up and down very frequently with cars trying to get out opposite from Willow Park Homes Estate. My local independent Councillor resisted development in Far Forest - New Road with a very good argument not to have houses there as quoted in this letter as attached this development is only 2 small fields away.	Take this land off the plans as it does not meet - National Policy Planning Framework.  The A4117 Road by the nursery? Is it Bill White or Lem Hill nursery? It is very congested with heavy lorries going up	NO	

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 36: RURAL WYRE FOREST**

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									and down very frequently with cars trying to get out opposite from Willow Park Homes Estate. My local independent Councillor resisted development in Far Forest - New Road with a very good argument not to have houses there as quoted in this letter as attached this development is only 2 small fields away.		
Diane Middlemore	<a href="#">RLPPS105</a>	Policy 36.1 Lem Hill Nurseries BR/RO/2	Object	No	No	No	Consistent with National Policy	Against own boundary policy. Does not comply with national policy guidelines.	Take this land out of the plans as it does not meet the National Policy Planning Framework.		
John Parkes	<a href="#">RLPPS121</a>	Policy 36.1 - BR/RO/2	Object	No	No	No	Consistent with National Policy	Against own Boundary policy  Does not comply with National Policy Guidelines  Impact on Wildlife  No need for extra development adding to commuter miles	Take this land off the plans as it does not meet:  National Policy Planning Framework  Outside village boundary	NO	
Sandra Woodhouse	<a href="#">RLPPS119</a>	Policy 36.1 Lem Hill Nurseries	Object	No	No	No	Consistent with National	Against own settlement boundary policy.	Take this land out of the plan as it does not	NO	

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 36: RURAL WYRE FOREST**

Respondent	Response No.	Part of Document	Support /Comment/ Object	Legally Compliant ?	Sound ?	DTC ?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination ?	Reason for Attending
		BR/RO/2					Policy	Does not comply with National Policy Guidelines  Why is BR/RO/2 still referred to as Lem Hill Nurseries this is misleading to the general public? You are going against your own policies by trying to build outside the settlement boundary. Entrance to the site would have to be changed to accommodate how quick the A4117 is for safety reasons; this would mean the removal of some well established hedgerow. No research has been carried out regarding the wildlife around the site. Local knowledge will inform you of the frog and toad migration from the named site to a pond in Church Lane some yards away. Snakes are around this area. Especially as it appears that the site is being left to its "own devices". The deer need these areas to move around the Wyre Forest. The European Habitat Directory requires an assessment to be made of the possible effects of certain plans on the integrity of the site before a plan can be adopted. This is not being taken seriously enough. Any kind of building will increase light pollution be it house or security lighting, potential street lighting. Dark skies are crucial to our bats and moths in particular. Any form of building here heightens the risk of water pollution. Due to the lay of the land any water pollutants would run down hill into Church Lane. Tributaries to Dowles Brook and SSSI sites all running cross fields into woodland could potentially be extremely damaging to flora and fauna.	meet with National Policy Planning Framework (BR/RO/2).		
David and Nona Barker	<a href="#">RLPPS124</a>	Policy 36.1 - BR/RO/2	Object	No	No	No	Consistent with National Policy	Against own Boundary Policy  Does not comply with National Policy Guidelines  1. Removal of hedgerow and trees - endangering insects, birds etc and important food source.  2. More traffic coming out on busy A4117	Take this land out of the plans as it does not meet – National Policy Planning Framework.		
John and Madeline Haywood	<a href="#">RLPPS120</a>	Policy 36.1 - BR/RO/2	Object	No	No	No	Consistent with National Policy	Against own boundary policy  Does not comply with National Policy Guidelines  - Outside village/settlement boundary  - Land next to very busy A4117 on steep gradient  - No employment in area	Take this land out of the plans as it does not meet - National Policy Planning Framework.  - Outside village/settlement boundary  - Land next to very busy A4117 on steep	NO	

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 36: RURAL WYRE FOREST**

Respondent	Response No.	Part of Document	Support /Comment/ Object	Legally Compliant ?	Sound ?	DTC ?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination ?	Reason for Attending
									<p>gradient</p> <p>- No employment in area</p> <p>- Flooding already occurs in Church Lane by pumping station. Houses above the lane with consequent run off would only make this worse.</p> <p>- Impact on wildlife in area - adders, grass snakes, deer.</p> <p>- No safe place for children to play.</p>		
Beryl Lewis	<a href="#">RLPPS112</a>	Policy 36.1 - BR/R0/2	Object	No	No	No	Consistent with National Policy	<p>Against own boundary policy</p> <p>Does not comply with National Policy Guidelines</p>	Take land out of the plans as it does not meet - National Policy Planning Framework.	NO	
Judith Ford	<a href="#">RLPPS126</a>	Policy 36.1 - BR/R0/2	Object					<p>Against own Boundary Policy</p> <p>Does not comply with National Policy Guidelines. Junction is very dangerous at Ranters Bank and A4117. Any additional build nearby will further add to this.</p>	Take this land out of the plans as it does not meet – National Policy Planning Framework.		
Stuart Caldicott	<a href="#">RLPPS128</a>	Policy 36.1 - BR/R0/2	Object	No	No	No	Consistent with National Policy	<p>Against own Boundary Policy</p> <p>Does not comply with National Policy Guidelines</p> <p>Using this land to build houses will increase traffic in the area. It will also be detrimental to</p>	Take this land out of the plans as it does not meet – National Policy Planning	NO	

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 36: RURAL WYRE FOREST**

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								wildlife and have a severe impact on the landscape.	Framework.		
Jason Lewis	<a href="#">RLPPS130</a>	Policy 36.1 - BR/R0/2	Object	No	No	No	Consistent with National Policy	Against own Boundary Policy  Does not comply with National Policy Guidelines  We already flood in this area. New housing would add to this problem. There is so much beauty and wildlife in the area which we need to preserve for future generations and the ecological systems.	We feel very strongly that we bought a home in the country on the edge of the village. Building what is essentially a full housing estate! There are plenty of places within Kidderminster that would complement its surrounding areas.  The local bus services don't cope now with coming out this far.	NO	
Michael Dowling	<a href="#">RLPPS133</a>	Policy 36.1 - BR/R0/2	Object	No	No	No	Consistent with National Policy	Against own Boundary Policy  Does not comply with National Policy Guidelines  The junction at Ranters Bank - Church Lane and Kinlet Road is hazardous at present. The proposal will further cause the danger to traffic and pedestrian.	Take this land out of the plans as it does not meet – National Policy Planning Framework.	NO	
Jennifer Hine	<a href="#">RLPPS135</a>	Policy 36.1 - BR/R0/2	Object	No	No	No	Consistent with National Policy	Against own Boundary Policy  Does not comply with National Policy Guidelines  - To lose the nurseries would be a loss of employment in the area.  - Any building on this site would heighten the risk of pollution to the many important watercourses that run through the area.  - Housing on the nursery site would increase rainwater run off and cause an increase in flooding that already occurs in Church Lane and further into Sugars Lane.	Take this land out of the plans as it does not meet – National Policy Planning Framework.	NO	- To lose the nurseries would be a loss of employment in the area.  - Any building on this site

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 36: RURAL WYRE FOREST**

Respondent	Response No.	Part of Document	Support /Comment/ Object	Legally Compliant ?	Sound ?	DTC ?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination ?	Reason for Attending
								- Increased traffic on the already busy Cleobury Road where there is a tendency for cars and lorries to exceed the 30 MPH speed limit.			<p>would heighten the risk of pollution to the many important watercourses that run through the area.</p> <p>- Housing on the nursery site would increase rainwater run off and cause an increase in flooding that already occurs in Church Lane and further into Sugars Lane.</p> <p>- Increased traffic on the already busy Cleobury Road where there is a tendency for cars and lorries to exceed the 30 MPH</p>

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 36: RURAL WYRE FOREST**

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											speed limit.
Jason Tolliday	<a href="#">RLPPS137</a>	Policy 36.1 - BR/R0/2	Object	No	No	No	Consistent with National Policy	Against own Boundary Policy  Does not comply with National Policy Guidelines	Take this land out of the plans as it does not meet – National Policy Planning Framework.	NO	
Joan Woodhall	<a href="#">RLPPS108</a>	Policy 36.1 - BR/R0/2	Object	No	No	No	Consistent with National Policy	Against own boundary policy  Does not comply with National Policy Guidelines  Why build more houses where people have to use cars to get to work/shops/schools? New housing (preferably eco friendly) needs to be as near good road/rail infrastructure or within towns with jobs as possible. We only have an infrequent bus service since moving here 25 years ago, night sky pollution over Bewdley has increased. In the direction of Clee Hill we can still star gaze - any new housing would have street lights and this will no longer be a dark sky area, even in part.	Take this land out of the plan as it does not meet - National Planning Policy Framework.	NO	
Jacqueline Bunday	<a href="#">RLPPS113</a>	Policy 36.1 - BR/R0/2	Object	No	No	No	Consistent with National Policy	Against own boundary policy  Does not comply with National Policy  Take land out of plans as it does not meet national policy planning framework  1. The proposed development is outside of the village settlement boundary.  2. It is situated next to the A4117 and on a steep hill. The road is very busy and is used by private and commercial traffic. The latter includes delivery lorries and a constant flow of trucks travelling to and from Clee Hill quarry throughout the day.  3. There is a long established hedge and this is supporting nesting birds alongside the A4117 road. This would be under threat from any development.  4. Wildlife frequents the area. This includes frogs, toads, snakes (grass snakes and adders) The proposed development land has supplied wildlife for many years. Also, the land is adjacent to fields and woodland. These help to sustain wildlife within the area.  5. Light pollution  At present, the proposed building area has no lighting. Any development would cause light pollution. E.g. security lights, house lights and potential street lights. This would have an adverse effect on wildlife (especially bats, moths and owls)	Take land out of plans as it does not meet national policy planning framework.	NO	

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 36: RURAL WYRE FOREST**

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								6. Surface Water  Pollution of water courses would be of concern. Flooding already occurs in Church Lane (near to the Severn Trent pumping station) There is also a risk of pollution to the Dowles Brook in the Wyre Forest.			
Grahame Pulford	<a href="#">RLPPS123</a>	Policy 36.1 - BR/R0/2	Object	No	No	No	Consistent with National Policy	Against own boundary policy  Does not comply with National Policy guidelines	Take this land out of the plans as it does not meet – National Policy Planning Framework.  Building in this area will result in people having to use cars due to the inadequate public transport. Houses should be built where there is access to regular bus and train services to reduce carbon emissions.	NO	
Michael Roberts	<a href="#">RLPPS125</a>	Policy 36.1 - BR/R0/2	Object	No	No	No	Consistent with National Policy	Against own Boundary Policy  Does not comply with National Policy Guidelines  Due to the proposed location of this site we feel that this has the potential for a serious accident just waiting to happen. If this was to go ahead and an accident was to occur then the road closures could be very disruptive to a lot of people on their daily commute.	Take this land out of the plans as it does not meet – National Policy Planning Framework.  Due to the proposed location of this site we feel that this has the potential for a serious accident just waiting to happen. If this	NO	

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 36: RURAL WYRE FOREST**

Respondent	Response No.	Part of Document	Support /Comment/ Object	Legally Compliant ?	Sound ?	DTC ?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination ?	Reason for Attending
									was to go ahead and an accident was to occur then the road closures could be very disruptive to a lot of people on their daily commute.		
Jonathan Duigenan	<a href="#">RLPPS127</a>	Policy 36.1 - BR/R0/2	Object	No	No	No	Consistent with National Policy	Against own Boundary Policy Does not comply with National Policy Guidelines	Take this land out of the plans as it does not meet – National Policy Planning Framework.	NO	
David Brookes	<a href="#">RLPPS129</a>	Policy 36.1 - BR/R0/2	Object	No	No	No	Consistent with National Policy	Against own Boundary Policy Does not comply with National Policy Guidelines	Take this land out of the plans as it does not meet – National Policy Planning Framework.	NO	
Steven Kirk	<a href="#">RLPPS132</a>	Policy 36.1 - BR/R0/2	Object	No	No	No	Consistent with National Policy	Against own Boundary Policy Does not comply with National Policy Guidelines I object to the development of my village because of its effect to local wildlife and the increased pollution it would provide.	Take this land out of the plans as it does not meet – National Policy Planning Framework.	No	
Rod Beddows	<a href="#">RLPPS134</a>	Policy 36.1 - BR/R0/2	Object	No	No	No	Consistent with National Policy	Against own Boundary Policy Does not comply with National Policy Guidelines In addition to the above, I would point out that this area is very important habitat for butterflies. I have personally recorded 2 examples of the wall butterfly, once common but now rare, very close to this site.	Take this land out of the plans as it does not meet – National Policy Planning Framework.	No	
Dale Evans	<a href="#">RLPPS139</a>	Policy 36.1 - BR/R0/2	Object	No	No	No	Consistent with National Policy	Against own Boundary Policy Does not comply with National Policy Guidelines This part of Cleobury Road has 2 very sharp bends. The drive we depart from is opposite the	Take this land out of the plans as it does not meet – National Policy Planning	No	

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 36: RURAL WYRE FOREST**

Respondent	Response No.	Part of Document	Support /Comment/ Object	Legally Compliant ?	Sound ?	DTC ?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination ?	Reason for Attending
								proposed site; there are 25 residents (all elderly) here. We have difficulty getting out of the driveway with a bend and a hill decline and very fast moving traffic lorries in particular so for another 20 houses to be descending onto Cleobury Road is disastrous, especially opposite each other as well as the noise and lighting from the proposed site to all us elderly residents and the natural habitat disappearing and all the other points the local Councillors have made.	Framework.		
Martin Jackson	<a href="#">RLPPS141</a>	Policy 36.1 - BR/R0/2	Object	No	No	No	Consistent with National Policy	Against own Boundary Policy  Does not comply with National Policy Guidelines	Take this land out of the plans as it does not meet – National Policy Planning Framework.	No	
Annette Whitehouse	<a href="#">RLPPS143</a>	Policy 36.1 - BR/R0/2	Object	No	No	No	Consistent with National Policy	Against own Boundary Policy  Does not comply with National Policy Guidelines  With the amount of properties up for sale in the area and surrounding area, I feel this does not warrant another 20 properties.  I am deeply concerned on the impact this will have on the wildlife. The amount of visitors visiting the Wyre Forest, this is pushing the wildlife out and these fields offer a safe haven for our wildlife. We have protected species we need to protect.  I feel we do not need to over populate this small village.	Take this land out of the plans as it does not meet – National Policy Planning Framework.	No	
Peter Glover	<a href="#">RLPPS145</a>	Policy 36.1 - BR/R0/2	Object	No	No	No		Against own Boundary Policy  Does not comply with National Policy Guidelines	Take this land out of the plans as it does not meet – National Policy Planning Framework.	No	
Patricia Kemp	<a href="#">RLPPS147</a>	Policy 36.1 - BR/R0/2	Object	No	No	No	Consistent with National Policy	Against own Boundary Policy  Does not comply with National Policy Guidelines	Take this land out of the plans as it does not meet – National Policy Planning Framework.	No	
Robert Hughes	<a href="#">RLPPS149</a>	Policy 36.1 - BR/R0/2	Object	No	No	No	Consistent with National Policy	Against own Boundary Policy  Does not comply with National Policy Guidelines	Take this land out of the plans as it does not meet – National	No	

Local Plan Review Pre-Submission Consultation (September / October 2019)

Summary of Consultation Responses (Regulation 20(2) of the Town and Country Planning (Local Planning) (England) Regulations 2012)

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 36: RURAL WYRE FOREST**

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								Keep it for growing Roads just not suitable	Policy Planning Framework.		
Pamela Stuart-White	<a href="#">RLPPS151</a>	Policy 36.1 - BR/R0/2	Object	No	No	No	Consistent with National Policy	Against own Boundary Policy Does not comply with National Policy Guidelines	Take this land out of the plans as it does not meet – National Policy Planning Framework.	No	
Geraldine Doolittle	<a href="#">RLPPS153</a>	Policy 36.1 - BR/R0/2	Object	No	No	No	Consistent with National Policy	Against own Boundary Policy Does not comply with National Policy Guidelines	Take this land out of the plans as it does not meet – National Policy Planning Framework.	No	
John Collett	<a href="#">RLPPS155</a>	Policy 36.1 - BR/R0/2	Object	No	No	No	Consistent with National Policy	Against district councils own Boundary Policy Does not comply with National Policy Guidelines	Take this land out of the plans as it does not meet – National Policy Planning Framework	No	
Simon Oakley	<a href="#">RLPPS136</a>	Policy 36.1 - BR/R0/2	Object	No	No	No	Consistent with National Policy	Against own Boundary Policy Does not comply with National Policy Guidelines  1. The Dowles Brook and tributaries and salmon waters (support trout and salmon). There is a stream arising on the proposed site at SO72599 74875 which flows directly into the Dowles Brook. Pollution arising during or post site development would adversely affect fish species.  2. The junction created by Church Lane, Ranters Bank, Kinlet Road and the main A4117 already requires extreme caution and creating a new access /egress for the proposed site will worsen this. A real possibility is that traffic would 'rat-run' up Church Lane and New Road and try to exit onto the A4117 opposite the village hall - a partially blind junction.  3. There is very poor public transport in Far Forest and therefore, most of the potential inhabitants of the proposed site would significantly add to the vehicular traffic in the village, leading to deleterious effects on air quality, in an area with several SSSI's.  4. There have been ongoing issues with the foul drainage system in Far Forest. As a former employee of the water board, I offered an opinion on the size of the sewer pipe laid down Plough Lane (during installation) to the new pumping station: what has been installed is 150mm in diameter and it should really have been 300mm for the existing population, plus a	Take this land out of the plans as it does not meet – National Policy Planning Framework.	No	

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 36: RURAL WYRE FOREST**

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								little growth. An additional 20 houses will overload this.  5. In addition to comments in the main document about development outside the settlement boundary, I think that if the Lem Hill site were to go ahead, it would only be short time before infill of the land between the site and New Road would be proposed - this would have further ramifications for the comments above.			
Derek Miller	<a href="#">RLPPS138</a>	Policy 36.1 - BR/R0/2	Object	No	No	No	Consistent with National Policy	Against own Boundary Policy  Does not comply with National Policy Guidelines	Take this land out of the plans as it does not meet – National Policy Planning Framework.	No	
Paul Jones	<a href="#">RLPPS140</a>	Policy 36.1 - BR/R0/2	Object	No	No	No	Consistent with National Policy	Against own Boundary Policy  Does not comply with National Policy Guidelines	Take this land out of the plans as it does not meet – National Policy Planning Framework.	No	
Karen Jackson	<a href="#">RLPPS142</a>	Policy 36.1 - BR/R0/2	Object	No	No	No	Consistent with National Policy	Against own Boundary Policy  Does not comply with National Policy Guidelines	Take this land out of the plans as it does not meet – National Policy Planning Framework.	No	
Christopher Woolley	<a href="#">RLPPS144</a>	Policy 36.1 - BR/R0/2	Object	No	No	No	Consistent with National Policy	Against own Boundary Policy  Does not comply with National Policy Guidelines  We are faced in Far Forest with two choices, one we keep and protect our beautiful village and resist further development, or do we allow it to become an urban sprawl and turn our backs on our beautiful countryside. Personally I think enough is enough and we resist further development and consider with building work at other sites in this area we do not need anymore. Please consider this a village and should remain so, we have a number of properties for sale. Why can't you people consider wildlife and the environment for once and the impact your plans cause on it, study the protected species we have and protect them	Take this land out of the plans as it does not meet – National Policy Planning Framework.	No	
Paul Mills	<a href="#">RLPPS146</a>	Policy 36.1 - BR/R0/2	Object	No	No	No	Consistent with National	Against own Boundary Policy	Take this land out of the plans as it does not	No	

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 36: RURAL WYRE FOREST**

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							Policy	Does not comply with National Policy Guidelines	meet – National Policy Planning Framework.		
Richard Martin	<a href="#">RLPPS148</a>	Policy 36.1 - BR/R0/2	Object	No	No	No	Consistent with National Policy	Against own Boundary Policy Does not comply with National Policy Guidelines	Take this land out of the plans as it does not meet – National Policy Planning Framework.	No	
Elizabeth Richards	<a href="#">RLPPS150</a>	Policy 36.1 - BR/R0/2	Object	No	No	No	Consistent with National Policy	Against own Boundary Policy Does not comply with National Policy Guidelines This would be the thin end of an ever expanding wedge. We DO NOT want street lighting in the village.	Take this land out of the plans as it does not meet – National Policy Planning Framework.	No	
Shirley Lush	<a href="#">RLPPS152</a>	Policy 36.1 - BR/R0/2	Object	No	No	No	Consistent with National Policy	Against own Boundary Policy Does not comply with National Policy Guidelines This proposed development would spoil the village which has always been considered as one of outstanding beauty. The land, located on a curve, is next to the A4117 which is a very busy road. The amount of extra traffic involved would cause a safety hazard. Far Forest, being on the edge of Wyre Forest, has lots of wild life which would be lost if this development was allowed.	Take this land out of the plans as it does not meet – National Policy Planning Framework.	No	
Hilda Hinton	<a href="#">RLPPS157</a>	Policy 36.1 - BR/R0/2	Object	No	No	No	Consistent with National Policy	Against own Boundary Policy Does not comply with National Policy Guidelines	Take this land out of the plans as it does not meet – National Policy Planning Framework.	No	
Fiona Cook	<a href="#">RLPPS159</a>	Policy 36.1 - BR/R0/2	Object	No	No	No	Consistent with National Policy	Against own Boundary Policy Does not comply with National Policy Guidelines	Take this land out of the plans as it does not meet – National Policy Planning Framework.	No	
Sandra Thackaberry	<a href="#">RLPPS161</a>	Policy 36.1 - BR/R0/2	Object	No	No	No	Consistent with	Against own Boundary Policy	Take this land out of the plans	No	

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 36: RURAL WYRE FOREST**

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							National Policy	Does not comply with National Policy Guidelines  Increase in light pollution to the detriment of our disappearing wildlife e.g. bats and moths.  Damage to the ecology of the site and surrounding areas.  Spreads the boundary of Far Forest well beyond its current limits and sets a precedent for future expansion to a size in excess of capability of current infrastructure. Reducing productive farming land and employment. No good public transport links so the development of this site can lead to increased air pollution from increased traffic levels.	as it does not meet – National Policy Planning Framework.		
Susan Limbrey	<a href="#">RLPPS255</a>	Policy 36.1 - BR/RO/2	Object	No	No	No	Positively Prepared Justified	Far Forest village boundary has not been modified to exclude the small traditional orchard, land adjacent to Tolland bungalow. This site is therefore still identified as a potential site for infill housing (Policy 18B). Since my earlier comments, Tree Preservation Orders have been applied by the District Council to two trees in the orchard, and an adder has been sighted within 100 metres.  This valuable wild-life habitat is still at risk of destruction prior to planning applications for housing. To exclude it from the village boundary will not only protect it but save the District Council the cost of handling a planning application which would be opposed by the bodies and individuals which have provided evidence against the allocation of this site for potential development.  Housing development on this site would not be compliant with the Natural Environment and Rural Communities Act 2006, being a habitat listed as requiring local authorities to '..have regard to the purpose of conserving biodiversity..'  Adjustment of Far Forest Village Boundary to exclude the traditional orchard identified as Land Adjacent to Tolland bungalow, BR/RO/4/6.	Adjustment of Far Forest Village Boundary to exclude the traditional orchard identified as Land Adjacent to Tolland bungalow, BR/RO/4/6.	No	
Rock Parish Council  Stephen Clee	<a href="#">RLPPS214</a>	Policy 36.1 BR?RO/2	Object	No	No	No		Also see comments in box above 3b  The Parish Council <b>RESOLVED to totally oppose this site</b> moving forward in the process. The Lem Hill Nursery Site has always been known as Bill White Nurseries. It is completely outside the Far Forest Settlement Boundary which should be respected. The site has poor access off the busy A4117 with no Street Lighting existing at Far Forest.  It's against NPPF policy to allow development outside a settlement boundary on land that has never previously been developed on. It's also against the Wyre Forest DC current and emerging Local Plan to develop outside settlement boundaries.	Do not include the Lem Hill Site within your emerging Local Plan.	YES I would like to participate at the oral examination.	Represent the Parish Councils views.
Stephen Price	<a href="#">RLPPS163</a>	Policy 36.1 - BR/RO/2	Object	No	No	No	Consistent with National Policy	Against own Boundary Policy  Does not comply with National Policy Guidelines	Take this land out of the plans as it does not meet – National Policy Planning Framework	No	

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 36: RURAL WYRE FOREST**

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Jeanette Lowe	<a href="#">RLPPS154</a>	Policy 36.1 - BR/RO/2	Object	No	No	No	Consistent with National Policy	Against own Boundary Policy Does not comply with National Policy Guidelines	Take this land out of the plans as it does not meet – National Policy Planning Framework.	No	
Brian Hinton	<a href="#">RLPPS156</a>	Policy 36.1 - BR/RO/2	Object	No	No	No	Consistent with National Policy	Against own Boundary Policy Does not comply with National Policy Guidelines	Take this land out of the plans as it does not meet – National Policy Planning Framework.	No	
Brian Parkinson	<a href="#">RLPPS158</a>	Policy 36.1 - BR/RO/2	Object	No	No	No	Consistent with National Policy	Against own Boundary Policy Does not comply with National Policy Guidelines Far too much traffic for the road currently. Church Lane and Ranters Bank cross roads is an accident waiting to happen, without more vehicles existing Church Lane	Take this land out of the plans as it does not meet – National Policy Planning Framework.	No	
Phil Rudlin	<a href="#">RLPPS160</a>	Policy 36.1 - BR/RO/2	Object	No	No	No	Consistent with National Policy	Against own Boundary Policy Does not comply with National Policy Guidelines The proposed building site is within close proximity to the national important Wyre Forest, much of which is site of special scientific interest (SSSI) or National Nature Reserve (NNR). The site is connected to the forest via a series of mature hedgerows which may contain dormice and if so, it is likely that the conifer plantation within Lem Hill Nurseries will also be populated. It is almost certain that Great Crested Newts will be breeding in the pond which I believe is in the area. Both these European Protected Species (EPS) would need to be searched for and protected if present.	Take this land out of the plans as it does not meet – National Policy Planning Framework.	No	
Judith Clark	<a href="#">RLPPS209</a>	BR/RO/2	Object	Yes	No	No	Justified	The site at Lem Hill Nurseries is not suitable for a housing development for the following reasons :  There is no employment in the hamlet and therefore any additional residents will be commuting, putting greater impact on local roads and public transport(of which there are no services that would support working people as they are so irregular)  There are no services in Far Forest except a small local shop, this will again add to road traffic use and pollution.  New road is used for school traffic and additional housing will increase traffic and safety.	Remove BR/RO/2 Lem Hill Nurseries from the local plan.	YES I would like to participate at the oral examination.	So the panel understand the local point of view

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 36: RURAL WYRE FOREST**

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								<p>There is no footpath on Church road so pedestrian and traffic are sharing the road</p> <p>The school has no more places for new children.</p> <p>The A4117 and the Church Road Ranters Bank intersection is already dangerous with little visibility of traffic coming from Cleobury Mortimer. Additional traffic from the housing will increase this dangerous intersection</p> <p>The road next to the proposed development has no footpath and is used by locals to access a community woodlands, many people walk dogs in the woodlands and with increased traffic this would increase the probability of accidents</p> <p>The area and surrounding area is Green Belt and as such supports a wide array of wildlife, including deer, frogs, slow worms, and grass snakes</p> <p>The hamlet, as stated above, has no services, no doctor, no police, one small primary school, one small shop, useless public transport, limited sewerage, limited broadband, no employment.</p> <p>I cannot think of one good reason to use this site for 20 houses, circa 60 additional residents in a hamlet that doesn't even have the services to support the existing population.</p> <p>If additional housing is required in Wyre Forest then use Brown Field sites that have services for that population in walking or cycling distance or good public transport links, none of which Far Forest has.</p>			
Sally Warrington	<a href="#">RLPPS162</a>	Policy 36.1 - BR/R0/2	Object	No	No	No	Consistent with National Policy	<p>Against own Boundary Policy</p> <p>Does not comply with National Policy Guidelines</p> <p>I find the wording on this form quite hard to understand. Therefore I may not have filled in all the boxes. However the point I would like to make as a simple minded lay person is - surely this lands falls outside local planning boundaries and the Cleobury Road footpath etc us already very unkempt and is heaving with traffic from 5.30am onwards. The ever increasing campsites, holiday homes etc have increased the wear and tear on the much worn out footpaths and I presume there is no funding to maintain these facilities? Road signs are worn out, so would more development increase the stretch on these budgets. The bottom field on the plan for Bill White/Lem Hill Nursery, I think would easily become an un-policed playing field should the development in the top field go ahead.</p>	Take this land out of the plans as it does not meet – National Policy Planning Framework.	No	
Norman Hyde	<a href="#">RLPPS164</a>	Policy 36.1 - BR/R0/2	Object	No	No	No	Consistent with National Policy	<p>Against own Boundary Policy</p> <p>Does not comply with National Policy Guidelines</p>	Take this land out of the plans as it does not meet – National Policy Planning	No	

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 36: RURAL WYRE FOREST**

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									Framework.		
Holmes	<a href="#">RLPPS44</a>	36.7	Object	No	No	No	Consistent with National Policy	This Green Belt development extends the impact of the recent Shropshire redevelopment of the Red Lion PH into 4 new dwellings. The impact will be of ribbon development. The diminutive site does not provide scope for landscaping and future garden structures will further clutter the A442 roadside aspect. Such a development could only be justified if local house needs were served.		No	
Jim Long	<a href="#">RLPPS184</a>	Policy 36.6 Station Yard Blakedown WFR/CB/2	Comment					I have no issue with the concept of Callows Yard as an 80 space car park (WFR.CB.2), although maybe not all at once. This would have to be subject to conditions to safeguard residents' amenity. I am a Parish Councillor for Blakedown Ward in Churchill and Blakedown. I spoke at WFDC Planning Committee on behalf of the PC in 2009 in support of a previous application from the Callow family for just such a car park (but smaller - 34 spaces) because even then there were street parking issues with commuters. Permission was granted with conditions to protect residents' amenity such as lighting restrictions and certain hours of use, but in the end the applicants did not go ahead ostensibly for commercial reasons.		No	
Fiona Mellor	<a href="#">RLPPS258</a>	Policy 36.6	Object	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	<p>The evidence has not been appropriately tested and in some cases is contradictory – see LTP figures compared to the SLC Rail Report</p> <p>SLC Rail report is a fundamental part of the revised policy.</p> <p>I am not aware that this Report has been formally approved/adopted by Worcestershire County Council yet it is being used to justify a significant change in Wyre Forest District Council's Policy.</p> <p>I do not believe that these Amendments have been Positively Prepared, or are Justified, Effective, Consistent with National policy</p> <p><b>1. Untested and unreliable evidence</b></p> <p>SLC Rail's figures and growth/forecasts have not been verified or tested</p> <p>Worcestershire County Council's LTP4 Report uses more recent evidence that SLC Rail have not considered.</p> <p>It embellishes the need for further parking in Blakedown in addition to that at Station Yard as it can be "developer funded" by 50 new houses (that are not required) instead of providing parking facilities at the busier and more sustainable transport hubs in the District/County (i.e. the failure to obtain funding for a multi storey car park at Kidderminster Station).</p> <p>The "need" for spaces also masks the underlying unsustainability in transport terms of the proposed eastern Kidderminster and Lea Castle developments.</p>		No	

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
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								<p><b>2. Blakedown is a village station. Kidderminster is an urban/town centre stations.</b></p> <p>Kidderminster has more frequent and varied services, hence its greater use and popularity. Blakedown has a need for station parking but not of the scale proposed.</p> <p>Moving a questionable parking requirement to the next nearest station is not sustainable.</p> <p><b>3.Effect on infrastructure of Kidderminster’s proposed eastern extension and Lea Castle</b></p> <p>The Council clearly has sustainability concerns over the Kidderminster to support such growth from a transport point of view. The Council have been unable to obtain funding for adequate parking at Kidderminster. They are therefore pushing the additional growth and transport pressures on to Blakedown.</p> <p>Using a small scale village such as Blakedown to overcome the sustainability issues of the District overall totally undermines the sustainability credentials of this Local Plan Review.</p> <p><b>4.Plan is contrary to NPPF</b></p> <p>A proper assessment of alternative sites has not been carried out, especially in co-operation with neighbouring Authorities.</p> <p>The Council has not demonstrated proper regard to travel impacts, loss of amenity. In particular Hartlebury Station (Wychavon District Council) is arguably more accessible many parts of the District.</p> <p><b>5.Over intensification of use of site and loss of amenity to neighbouring residents</b></p> <p>The lapsed planning consent for Station Yard 08/0430/FULL - Change of use to car park, landscaping and associated works was for only 34 cars, so the current proposal is a significant increase.</p> <p>That permission contained numerous conditions to safeguard the amenity of neighbouring residents including landscaping, lighting, hours of use, and retention of boundary trees – many of which have now been removed</p> <p><b>6.Compromised Access</b></p> <p>Network Rail commented in the refused application at Station Yard for residential development 14/0661/OUTL that “One thing to consider though is that if the access road directly adjacent to the level crossing is being converted into parking as part of the same scheme then the risk of blocking back over the crossing is still possible. With that in mind Network Rail still propose that the original mitigations that were suggested (keep crossing</p>			

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								<p>clear signs, yellow box markings) are retained and funded by the developer”</p> <p>There was also concern by the Planning Officer about significant loss of amenity to residents of neighbouring houses on Lynwood Drive and Swan Close. This view was shared by the Planning Inspector at Appeal.</p> <p><b>7. No mention of the Churchill &amp; Blakedown Neighbourhood Plan (Adopted 26/7/17)</b></p> <p><b>8.Lack of detail and consideration of highways issues, access and proximity to level crossing</b></p> <p>Junction layouts, in particular the proximity to A456/Station Drive, Lynwood Drive and proximity to level crossing will cause significant access issues into and out of the site</p> <p><b>9.Requirements for traffic calming and on street parking management have not been considered</b></p> <p><b>10.Concern over use of unsuitable country lanes or already congested A and B road network to reach station:</b></p> <p>From North West/Lea Castle - via Hurcott Lane, Perriford Lane, Waggon Lane, Churchill Lane, Stakenbridge Lane, Mill Lane</p> <p>From North East/Hagley via A456</p> <p>Worcestershire County Council is also proposing improvement measures to the A450 between Black Bridge and Hagley. These could impact movements from the South/East via B4188 Belbroughton Road/junction with A456 and Deansford Lane, Sandy Lane/New Wood Lane, Thicknall Lane</p> <p><b>11.Safe pedestrian access to platforms from car park has not been considered</b></p> <p>No consideration how increased numbers of commuters/drivers will walk over level crossing to access Platform 2 (to Birmingham)</p> <p><b>12. Loss of amenity to neighbouring houses due to traffic and pollution.</b></p> <p>Residents of Station Drive, Lynwood Drive and Mill Lane will suffer from</p> <ul style="list-style-type: none"> <li>• increased traffic,</li> <li>• intensification of use of a redundant industrial site</li> <li>• Significantly higher level of vehicle movements compared to its historic use</li> <li>• light pollution</li> <li>• noise pollution</li> </ul>			

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 RESPONSES TO CHAPTER 36: RURAL WYRE FOREST

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								<ul style="list-style-type: none"> <li>potential anti-social behaviour</li> </ul> <p>All during current rail operating hours of circa 06.00 to 23.30 - i.e. anti-social residential hours in mornings and evenings based in the current rail timetable which we anticipate could be changed to reflect the increased use of the Station</p> <p><b>13.Road network in immediate vicinity of sites is inappropriate for such an intensification of use</b></p> <p>It serves a small residential area. Lynwood Drive is a cul de sac of circa 35 houses. If Station Yard becomes an 80 space car park, Lynwood Drive/Station Drive will have 160+ additional vehicle movements per day.</p> <p>The area is also busy at peak times with the local Primary School. This has a current roll of about 160 with many children brought to school by car due to the rural nature of the local area and lack of suitable alternative transport. A significant number of children also reside in or near the neighbouring villages and settlements of Belbroughton and Hagley.</p>			
Paul Mellor	<a href="#">RLPPS259</a>	Policy 36.6	Object	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	<p>The evidence has not been appropriately tested and in some cases is contradictory – see LTP figures compared to the SLC Rail Report</p> <p>SLC Rail report is a fundamental part of the revised policy.</p> <p>I am not aware that this Report has been formally approved/adopted by Worcestershire County Council yet it is being used to justify a significant change in Wyre Forest District Council's Policy.</p> <p>I do not believe that these Amendments have been Positively Prepared, or are Justified, Effective, Consistent with National policy</p> <p><b>1.Untested and unreliable evidence</b></p> <p>SLC Rail's figures and growth/forecasts have not been verified or tested</p> <p>Worcestershire County Council's LTP4 Report uses more recent evidence that SLC Rail have not considered.</p> <p>It embellishes the need for further parking in Blakedown in addition to that at Station Yard as it can be "developer funded" by 50 new houses (that are not required) instead of providing parking facilities at the busier and more sustainable transport hubs in the District/County (i.e. the failure to obtain funding for a multi storey car park at Kidderminster Station).</p> <p>The "need" for spaces also masks the underlying unsustainability in transport terms of the proposed eastern Kidderminster and Lea Castle developments.</p>		No	

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 36: RURAL WYRE FOREST**

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								<p><b>2. Blakedown is a village station. Kidderminster is an urban/town centre stations.</b></p> <p>Kidderminster has more frequent and varied services, hence its greater use and popularity. Blakedown has a need for station parking but not of the scale proposed.</p> <p>Moving a questionable parking requirement to the next nearest station is not sustainable.</p> <p><b>3.Effect on infrastructure of Kidderminster’s proposed eastern extension and Lea Castle</b></p> <p>The Council clearly has sustainability concerns over the Kidderminster to support such growth from a transport point of view. The Council have been unable to obtain funding for adequate parking at Kidderminster. They are therefore pushing the additional growth and transport pressures on to Blakedown.</p> <p>Using a small scale village such as Blakedown to overcome the sustainability issues of the District overall totally undermines the sustainability credentials of this Local Plan Review.</p> <p><b>4.Plan is contrary to NPPF</b></p> <p>A proper assessment of alternative sites has not been carried out, especially in co-operation with neighbouring Authorities.</p> <p>The Council has not demonstrated proper regard to travel impacts, loss of amenity. In particular Hartlebury Station (Wychavon District Council) is arguably more accessible many parts of the District.</p> <p><b>5.Over intensification of use of site and loss of amenity to neighbouring residents</b></p> <p>The lapsed planning consent for Station Yard 08/0430/FULL - Change of use to car park, landscaping and associated works was for only 34 cars, so the current proposal is a significant increase.</p> <p>That permission contained numerous conditions to safeguard the amenity of neighbouring residents including landscaping, lighting, hours of use, and retention of boundary trees – many of which have now been removed</p> <p><b>6.Compromised Access</b></p> <p>Network Rail commented in the refused application at Station Yard for residential development 14/0661/OUTL that “One thing to consider though is that if the access road directly adjacent to the level crossing is being converted into parking as part of the same scheme then the risk of blocking back over the crossing is still possible. With that in mind Network Rail still propose that the original mitigations that were suggested (keep crossing</p>			

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								<p>clear signs, yellow box markings) are retained and funded by the developer”</p> <p>There was also concern by the Planning Officer about significant loss of amenity to residents of neighbouring houses on Lynwood Drive and Swan Close. This view was shared by the Planning Inspector at Appeal.</p> <p><b>7.No mention of the Churchill &amp; Blakedown Neighbourhood Plan (Adopted 26/7/17)</b></p> <p><b>8.Lack of detail and consideration of highways issues, access and proximity to level crossing</b></p> <p>Junction layouts, in particular the proximity to A456/Station Drive, Lynwood Drive and proximity to level crossing will cause significant access issues into and out of the site</p> <p><b>9.Requirements for traffic calming and on street parking management have not been considered</b></p> <p><b>10.Concern over use of unsuitable country lanes or already congested A and B road network to reach station:</b></p> <p>From North West/Lea Castle - via Hurcott Lane, Perriford Lane, Waggon Lane, Churchill Lane, Stakenbridge Lane, Mill Lane</p> <p>From North East/Hagley via A456</p> <p>Worcestershire County Council is also proposing improvement measures to the A450 between Black Bridge and Hagley. These could impact movements from the South/East via B4188 Belbroughton Road/junction with A456 and Deansford Lane, Sandy Lane/New Wood Lane, Thicknall Lane</p> <p><b>11.Safe pedestrian access to platforms from car park has not been considered</b></p> <p>No consideration how increased numbers of commuters/drivers will walk over level crossing to access Platform 2 (to Birmingham)</p> <p><b>12. Loss of amenity to neighbouring houses due to traffic and pollution.</b></p> <p>Residents of Station Drive, Lynwood Drive and Mill Lane will suffer from</p> <ul style="list-style-type: none"> <li>• increased traffic,</li> <li>• intensification of use of a redundant industrial site</li> <li>• Significantly higher level of vehicle movements compared to its historic use</li> <li>• light pollution</li> <li>• noise pollution</li> </ul>			

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Rachel James	<a href="#">RLPPS257</a>	Policy 36.6 Station Yard Blakedown WFR/CB/2	Object		No		Justified Effective Consistent with National Policy	<p>The local plan is not sustainable; the proposed expansion for Kidderminster is reliant on Blakedown effectively becoming a car park.</p> <p>The noise and traffic pollution will have a significant impact on our village and quality of life. The increase of vehicles on what is already a busy and unsafe walk to school will be increased further by attracting more cars into the village.</p> <p>Lynwood Drive is a cul de sac and not a suitable access road to an 80 space car park. We will become more of a target for anti social behaviour and crime. Car crime within the village is already on the increase.</p> <p>The proximity of the car park to the level crossing is dangerous with potentially queuing traffic. There is no consideration in the plan for any traffic calming. The roads in our village were designed to support a small residential area and a village station. The safety of all residents will be impacted by this proposal and in particular our children.</p> <p>There have been an increase of the amount of trains operating through the village stopping at the station between 0600 and 2300 with the increase of station users these times are going to create disturbances at unsocial times and with the times potentially extending into the future this will increase any further.</p> <p>The station needs for Blakedown were identified as 10 spaces in all documents relating to the</p>	Extend the car park at Kidderminster. Create a sustainable transport plan.  It would be better to spend transport investment in improving links from both Blakedown itself and other villages by bus, which would tackle social inclusion, as well as providing links to the rail station.	No	

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
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								plan until July of this year. Where are all the additional drivers coming from? Data from the Housing Needs Objective Assessment 2017 does not suggest there is such a growth.			
C Rowberry	<a href="#">RLPPS242</a>	Policy 36.7 Fold Farm Chaddesley y Corbett WFR/CC/8	Support	Yes	Yes	Yes		<u>Fold Farm- Chaddesley Corbett</u>  Landowner's attitude towards development is positive. The site is deliverable.			
Adrian Carloss	<a href="#">RLPPS253</a>	Policy 36.10	Object	No	No	No	Effective	1. The housing proposed is of outdated design & fails to embrace modern, efficient forward-looking methodology.  The site is to be entirely gas central heating & will require residents to pay towards the site upkeep. This is ludicrous as 40% of the 600 houses will in some way or another be "affordable housing" or similar. There is no provision for solar power; there is no provision for carbon neutral construction. Reference should be drawn from the RIBA Sterling Prize development "Goldsmith Street" & Stephen Lawrence Prize for the "Cork House". Why is WFDC 20 yrs out of date when other councils in the UK are adopting a more modern approach in an era of critical change?	Please refer to point 9	No	
Rosalinda Caseley	<a href="#">RLPPS254</a>	Policy 36.10	Object	No	No	No	Effective	On wildlife, what we have will leave & never return. There is minimal benefit to going through the motions of tunnels, etc when creatures have moved on due to the noise & vibrations of the demolition process, let alone the construction traffic etc.  Housing - this is backward & outdated. The proposed housing is well below the sizes set out by post WW2 policy & will only lead to stereotypical "low cost slums & trouble spots" as people find day to day living a massive impact on mental health due to over crowding.  Cycle path - we are told that the plans require a cycle route into town. This is pointless as what the town currently has is disjointed, most of it up hill & generally was set up to simply comply with previous Government policy that simply stipulated x-miles of cycle route had to be put in place. What point is this new addition if it only goes to Broadwaters & then joins up with a grossly inadequate existing network?  Green Belt - The plan looks to use areas of Cookley as reserve areas to build. These areas are GREEN BELT. I strongly object on all levels to this or any other Green Belt development. Such areas have been promoted by Homes England in their assessment as being "very sensitive" - this has been ignored.	Consultation - this should be made known to ALL households in Wyre Forest & any such documents sent out should be observing the Plain English Campaign principles.  Wildlife - Various species have been identified in the surrounding areas as in great need of protection. Close liaison with Worcestershire Wild Life Trust	No	

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									<p>etc is required to ensure best practice.</p> <p>Housing - plans should require all parties competing for contracts to provide plans in accordance with the ideas &amp; methodology promoted by the winners of the RIBA Sterling Prize development "Goldsmith Street" &amp; Stephen Lawrence Prize for the "Cork House".</p> <p>Cycle paths - DC / CC should put in place modernisation plans to totally revamp the entire cycle network in an efficient &amp; timely manner, liaising with national cycling bodies to ensure said routes are fit for purpose.</p> <p>Green Belt - reference is made to the CPRE Brownfield</p>		

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									report 2019 which identifies sufficient brown field sites nationally to accommodate the entire Government housing strategy. NO GREEN BELT should even be considered until such Brown Field stocks are totally depleted & then only after full & easy-to-understand consultation has been held.		

**APPENDIX C: LOCAL PLAN PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - RE-OPEN CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER 37: MONITORING AND IMPLEMENTATION FRAMEWORK**

THERE WERE NO RESPONSES TO THIS SECTION