

# Statement of Common Ground between Wyre Forest District Council and Worcestershire County Council

## 1) Introduction

Under the National Planning Policy Framework (NPPF, 2019), strategic policy making authorities, such as local planning authorities, should produce, maintain and keep up to date a Statement of Common Ground (SofCG) to highlight agreement on cross boundary strategic issues with neighbouring local authorities and other relevant bodies.

This SofCG has been produced to support the emerging Wyre Forest District Local Plan Review. It sets out how Wyre Forest District Council has engaged with Worcestershire County Council in order to fulfil its Duty to Cooperate requirements.

## 2) Parties Involved

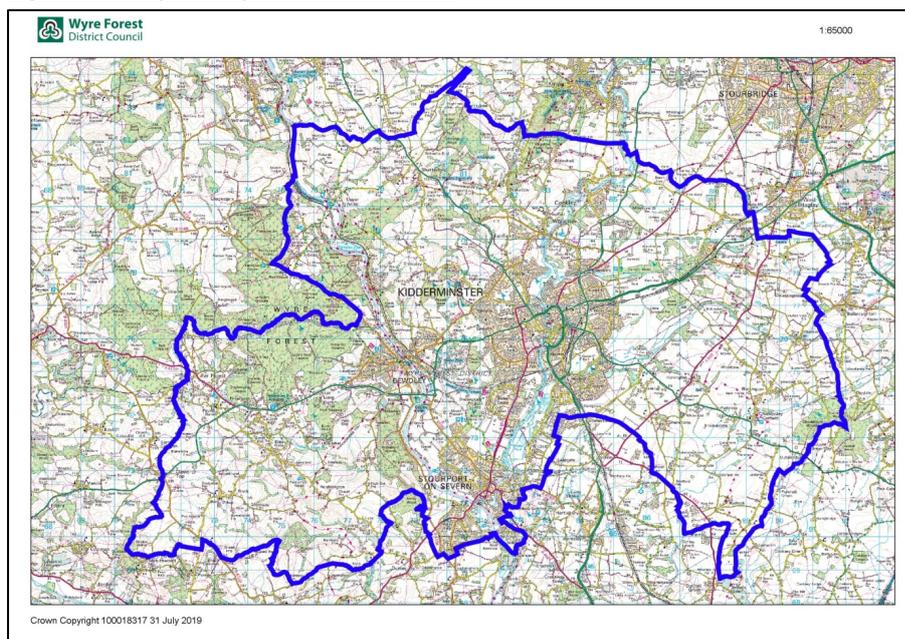
This Statement of Common Ground (SofCG) has been prepared jointly by Wyre Forest District Council (WFDC) and Worcestershire County Council (WCC). Wyre Forest District is located within Worcestershire County in the north western area of the County.

The SofCG covers those matters agreed and disagreed by the parties with regards to the proposed Wyre Forest District Local Plan (2016-2036), in order to fulfil the Duty to Cooperate requirements as outlined in paragraph 27 of the NPPF.

## 3) Strategic Geography

This SofCG covers all of the Wyre Forest District and has been produced for the purposes of the Wyre Forest District Local Plan 2016-2036, which is due to be submitted to the Planning Inspectorate in Spring 2020. Figure 1 below shows the district boundary of Wyre Forest District.

**Figure 1: Map of Wyre Forest District**



#### 4) Background / Duty to Cooperate

There has been ongoing engagement between WFDC and WCC throughout the preparation of the WFDC Local Plan Review. WFDC has consulted with WCC at every stage of plan making. The Local Plan Review consultation periods were as follows:-

- Issues and Options Consultation – September / October 2015
- Preferred Options Consultation – June / August 2017
- Pre-Submission Consultation – November / December 2018
- Pre-Submission Consultation (re-opening) – September / October 2019

Duty to Cooperate meetings have also taken place on the following dates:-

- 31<sup>st</sup> January 2019
- 20<sup>th</sup> November 2019

Minutes of the meetings can be viewed in Appendix 1.

In addition to the above meetings, there have also been a number of Worcestershire Planning Officer meetings throughout the plan making period, at which lead Planning Policy Officers from each of the Worcestershire Local Authorities attended to discuss Local Plan Reviews and duty to cooperate issues.

There has also been a number of joint Duty to Cooperate meetings with WFDC, WCC and Bromsgrove District Council (BDC) to discuss Local Plan cross-boundary transport issues. The outcome of these duty to cooperate discussions will be presented in a separate Statement of Common Ground prepared jointly between WFDC, WCC and BDC.

There have also been several officer meetings between WFDC and WCC to discuss the potential site allocations during the various stages of plan making.

#### 5) Strategic Matters Identified

Worcestershire County Council responded to the WFDC Local Plan Pre-Submission consultation that was undertaken in November / December 2018. Table 1 shows a summary of the responses received from WCC (the full response can be viewed in Appendix 4).

Table 1: Worcestershire County Council response to WFDC Local Plan Pre-Submission (October 2018)

	<b>Issues raised by Worcestershire County Council</b>	<b>Suggested Modification to Plan</b>
WCC response 2018	WCC believe their comments made in the 2018 response can be worked through as part of the Duty to Cooperate between WCC and WFDC and in preparation for the WFDC Statement of Common Ground, prior to the submission of the plan to the Inspectorate, and for any subsequent changes to be part of draft modification plan prepared for the Examination in Public.	

WCC response 2018	<p><u>Duty to Co-operate</u></p> <p>The WFDC pre-submission plan is not currently supported by Duty to Co-operate agreements or a Statement of Common Ground. However, WCC understand that WFDC propose to produce these to support the submission of the plan. WCC will work jointly with WFDC on the Duty to Co-operate statement with WCC, and to address the issues outlined in the WCC 2018 consultation response prior to submission of the plan.</p>	
WCC response 2018	<p><u>Infrastructure Delivery Plan</u></p> <p>WCC is one of the main infrastructure providers for the county, in its role as a Local Highway Authority, transport authority and education authority.</p> <p>The two authorities have worked jointly on the development of the Infrastructure Delivery Plan which sets out the infrastructure required to support the development aspirations of the plan. Works completed so far have included an initial assessment of the sites proposed at Preferred Options and detailed assessment of the sites for the current Pre-submission Plan, to outline the transport impacts and potential mitigation schemes, with some initial costings. For the Pre-submission Plan this included the transport modelling of the impacts of the proposals. A similar process was undertaken for education, to set out the impacts of any increase in school age population in the district and the mitigations which will be required. Unfortunately, the site list which was provided to support this work for the Infrastructure Delivery Plan is not the same site list as was included in the Pre-submission Plan itself. WCC will, therefore, need to undertake the detailed transport modelling and assessment again, with further consideration of the required transport mitigation.</p>	
WCC response 2018	<p><u>Viability</u></p> <p>WCC note that, in line with the recommendations of the viability assessment which supports the WFDC pre-submission plan, the affordable housing requirement of the plan has been reduced to 25%. However, not all of the included highways schemes have been costed, or can be costed accurately at this stage as there are a number of dependencies including timescale, and interactions with other schemes and local plan aspirations.</p> <p>These matters notwithstanding, it is clear that the</p>	

	<p>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 fund through their own resources. WCC do not have the resources to 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>Additionally, the viability assessment, where based on specific sites, appears to be at odds with the site numbers and allocations in the Pre-submission Plan itself. This may or may not have a material impact, but for the avoidance of any confusion and doubt, the site data should be consistent. Further work is required to address this issue.</p>	
<p>WCC response 2018</p>	<p><u>Minerals and Waste</u></p> <p><u>Policy 16B</u> – Part 3 of policy 16B should not be included. Mineral development, and the development of policy relating to mineral development, is a County Matter and, as such, is beyond the remit of the Wyre Forest Local Plan. Policies on protecting and enhancing the environment and amenity will be included in the emerging Worcestershire Minerals Local Plan, and this section of the policy should be deleted.</p> <p><u>Policy 16C</u> – WCC welcome the recognition of waste matters and the reference to the Waste Core Strategy in paragraphs 16.22 – 16.29. However, WCC do not consider that the policy is sound as currently drafted. The points included in the reasoned justification, such as expecting future developments to implement the waste hierarchy and address the waste implications of the development, and safeguarding existing and permitted waste management facilities, as well as the issue of incorporating facilities for storage and separation of waste in new development which is included in policy 16C, are already addressed within the adopted Development Plan in policies WCS16 and WCS17 of the Waste Core Strategy. WCC suggest that the section could be retained to direct developers to the requirements of the Waste Core Strategy, but that it is unnecessary to include Policy 16C itself. If, however, Policy 16C is retained, the wording of the policy is not sound. It currently states that “Waste</p>	

	<p>management facilities should be well-designed”, and if this is taken as it reads – in that it applies to applications for waste management development – we consider that this is beyond the remit of the Wyre Forest Local Plan and should be deleted. However, it may be that the intention is for the point to relate to the earlier sentence of the policy requiring all new development to incorporate facilities for the storage and separation of waste for recycling and recovery and that these should be well-designed. If so, WCC would suggest replacing “Waste management facilities” with “Such facilities”.</p>	
<p>WCC response 2018</p>	<p><u>Site Allocations</u></p> <p>Not all allocated sites should be fully exempt from mineral safeguarding requirements and, as such, the footnote in Policy 16B should either be removed or amended. The allocations and their individual policies as drafted do not optimise require partial extraction or incidental recovery of mineral resources either in advance of development taking place or in phases alongside it. This is contrary to paragraph 206 of the NPPF, which states that “Local planning authorities should not normally permit other development proposals in Mineral Safeguarding Areas if it might constrain potential future use for mineral working.” The emerging Minerals Local Plan (Fourth Stage Consultation) will state that “Site allocations which do not make reference to safeguarding, or where requirements for safeguarding infrastructure are outlined, will not exempt.” As the Mineral Planning Authority, we seek to work with Local Planning Authorities to review potential site allocations and ensure that the requirements for partial extraction or incidental recovery will be delivered for sites within Mineral Safeguarding Areas. The list of allocations which need to take account of safeguarding issues is too long for this comment box, so is attached as an Appendix (see Appendix 4).</p>	
<p>WCC response 2018</p>	<p><u>Sustainable Transport</u></p> <p>Throughout the development of the plan, WCC has worked with Wyre Forest to develop the sustainable transport policy for the plan and the growth it proposes. There have been multiple elements of this work, including draft policies, transport modelling and site allocations.</p> <p>WCC is content with the transport policies in the plan, which prioritise sustainable transport and include some</p>	

	<p>critical schemes for the district.</p> <p>However, the sustainable approach to rail is undermined by failure to allocate land for the further phase 2 expansion of Blakedown station and associated car parking provision. Although this may appear to be a minor matter, the consequence of this is to undermine the sustainable transport strategy which WCC have sought to achieve through the Local Transport Plan 4 and the Rail Investment Strategy, and its impact may be wider than WFDC itself.</p> <p>Rail travel offers an alternative to road-based travel, particularly for local commuting into and out of the West Midlands conurbation, not only for existing and new residents, but more widely, and is an opportunity to deliver modal shift from car to rail transport which is more sustainable and will assist in reducing congestion. Delivering the phase 1 and 2 expansion of Blakedown station is critical, because to secure future funding from Government – directly or indirectly – for road improvement schemes, WCC must be able to demonstrate that all reasonable alternatives have been explored and the opportunities for sustainable travel prioritised and delivered. Failure to allocate land for the phase 2 of Blakedown station totally undermines this case.</p> <p>A suitable area of land was submitted to the plan through the call for sites, but unfortunately has not been included in the draft plan, despite it being (with regard to transport) a sustainable location. This requirement was outlined in WCC’s adopted Local Transport Plan 4, and has been discussed with Wyre Forest DC officers at a number of meetings concerning the Local Plan. Through the Duty to Co-operate we would like to work together to address this omission, and to develop a solution which enables us to deliver the required expansions and sustainable transport aspirations of the Wyre Forest Local Plan and the Local Transport Plan.</p>	
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Worcestershire County Council also responded to the WFDC re-opening of the Local Plan Pre-Submission consultation that was undertaken in September / October 2019. Table 2 shows a summary of the responses received from WCC (the full response can be viewed in Appendix 5).

Table 2: Worcestershire County Council response to WFDC Local Plan Pre-Submission (September 2019)

	<b>Issues raised by Worcestershire County Council</b>	<b>Suggested Modification to Plan</b>
WCC Response 2019	WCC are pleased to note that some of the comments they made in response to the previous Pre-Submission consultation in 2018 have been taken into account. In particular, WCC welcome the allocation of land for the further expansion of Blakedown station and associated car parking, in line with WCC recommendations. This reflects the opportunity that rail offers to mitigate existing and future generated demand on strategic highway corridors (especially the A456), enabling genuinely sustainable growth opportunities in the Wyre Forest.	
WCC Response 2019	WCC regret, however, that other recommendations WCC made to ensure the plan is sound have not yet been addressed. As such, WCC 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 17 <sup>th</sup> December 2018 remain extant and should be taken into account.	
WCC Response 2019	<p><u>Minerals and Waste</u></p> <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. WCC will also expect this to be reflected in a Duty to Co-operate agreement/Statement of Common Ground between WCC and WFDC.</p> <p>For the avoidance of doubt, the agreed list showing minerals and waste requirements for proposed site allocations policies is reproduced at the end of this response in Appendix 5.</p>	

	<p>WCC are pleased to note that the site-specific policy AM30.30 for the new allocation “Land off Zortech Avenue LI/13”, proposed as part of the current consultation, includes a requirement for a minerals resource assessment.</p>	
<p>WCC Response 2019</p>	<p><u>Ecology</u></p> <p>WCC support the proposed wording of Policies 11D and 14 and find this broadly consistent with guidance on Biodiversity Net Gain as published by CIEEM, CIRIA and IEMA.</p> <p>WCC note that proposed site FPH/1 has been deleted, however we also note that some areas of the FPH/1 site, specifically those comprising Wilden Marsh and Meadows SSSI, fall within the South Kidderminster Enterprise Park (SKEP). To ensure clarity and provide certainty for developers, WCC recommend that the footprint of the SSSI is excluded from the policies map and additional wording is inserted into paragraph 30.74 to ensure appropriate environmental consideration and to secure environmental betterment through development of the abutting PDL. WCC has suggested a modification to the Plan as shown opposite.</p>	<p>WCC suggest the following wording to Paragraph 30.74:-</p> <p><i>“Although the area of the SKEP covers some natural features and Green Belt land, development will only be permitted on previously developed sites. The site designation <b><u>lies adjacent to Wilden Marsh and Meadows SSSI and the associated, former settling ponds west of Wilden Lane. Impacts on this land are</u></b> to be considered as part of any application for development and <b><u>positive benefits consistent with policy 11(d) secured to enhance this area.</u></b>”</i></p>
<p>WCC Response 2019</p>	<p><u>Health and wellbeing</u></p> <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, WCC 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>WCC Response 2019</p>	<p><u>Viability</u></p> <p>WCC’s 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 WCC wish to reiterate its 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</p>	

	<p>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. WCC will continue to work with WFDC to address these matters but caution that WCC may not be able to support individual planning applications if alternative funding sources are not available to support infrastructure delivery.</p>	
WCC Response 2019	<p><u>Statement of Common Ground/Duty to Co-operate</u></p> <p>The WFDC pre-submission plan is not currently supported by Duty to Cooperate agreements or a Statement of Common Ground. However, WCC understand that WFDC propose to produce these to support the submission of the plan. WCC will work jointly with WFDC on the Duty to Co-operate statement with WCC, and will work with WFDC to address the issues outlined in the consultation response prior to submission of the plan.</p>	
WCC Response 2019	<p><u>Conclusion</u></p> <p>Although the current Pre-Submission version of the WFDC Local Plan does not fully accord with WCC recommendations made in 2018, WCC officers continue to work with officers from WFDC on proposed main and minor modifications to address the outstanding matters. WCC are confident that, if the Local Plan Inspector agrees to these modifications, they would address any soundness concerns they may have. WCC and WFDC are working towards a Duty to Cooperate Statement and Statement of Common Ground.</p>	
WCC Response 2019	<p>On a more minor point, WCC note that paragraph AM1.2 of the consultation document implies that the Local Transport Plan is part of the development plan, which is not the case.</p>	

## 6) Matters that parties agree on

Table 3 and 4 show the matters that both parties agree on from the consultation responses.

Table 3: Matters that both parties agree on from the 2018 consultation response

	<b>Issues raised by Worcestershire County Council</b>	<b>Suggested Modification to Plan</b>	<b>WFDC Response</b>
WCC response 2018	WCC believe the comments made in the 2018 response can be worked through as part of the Duty to Cooperate between WCC and WFDC and in preparation for the WFDC Statement of Common Ground, prior to the submission of the plan to the Inspectorate, and for any subsequent changes to be part of draft modification plan prepared for the Examination in Public.		WFDC agree to this approach and have prepared this Statement of Common Ground (SofCG) between WFDC and WCC. This SofCG will be published and made available at Submission stage of the Local Plan, as discussed at the DtC meeting on 31 <sup>st</sup> January 2019.
WCC response 2018	<u>Duty to Co-operate</u> The WFDC pre-submission plan is not currently supported by Duty to Co-operate agreements or a Statement of Common Ground. However, WCC understand that WFDC propose to produce these to support the submission of the plan. WCC will work jointly with WFDC on the Duty to Co-operate statement with WCC, and to address the issues outlined in the WCC 2018 consultation response prior to submission of the plan.		WFDC agree that a Statement of Common Ground should be prepared between WFDC and WCC. This SofCG will be published and made available at Submission stage of the Local Plan, as discussed at the DtC meeting on 31 <sup>st</sup> January 2019.
WCC response 2018	<u>Infrastructure Delivery Plan</u> WCC is one of the main infrastructure providers for the county, in its role as a Local Highway Authority, transport authority and education authority.  The two authorities have worked jointly on the development of the Infrastructure Delivery Plan which sets out the infrastructure required to support the development aspirations of the plan. Works completed so far have included an initial assessment of the sites proposed at Preferred Options and detailed assessment of the sites for the		The Infrastructure Delivery Plan (IDP) and the transport modelling work was updated and published in June 2019. These updates used the correct site list. Both the IDP and the Transport Evidence Papers were consulted on during the Local Plan consultation in September/October 2019.

	<p>current Pre-submission Plan, to outline the transport impacts and potential mitigation schemes, with some initial costings. For the Pre-submission Plan this included the transport modelling of the impacts of the proposals. A similar process was undertaken for education, to set out the impacts of any increase in school age population in the district and the mitigations which will be required. Unfortunately, the site list which was provided to support this work for the Infrastructure Delivery Plan is not the same site list as was included in the Pre-submission Plan itself. WCC will, therefore, need to undertake the detailed transport modelling and assessment again, with further consideration of the required transport mitigation.</p>		
<p>WCC response 2018</p>	<p><u>Viability</u></p> <p>WCC note that, in line with the recommendations of the viability assessment which supports the WFDC pre-submission plan, the affordable housing requirement of the plan has been reduced to 25%. However, not all of the included highways schemes have been costed, or can be costed accurately at this stage as there are a number of dependencies including timescale, and interactions with other schemes and local plan aspirations.</p> <p>These matters notwithstanding, 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 fund through their own resources. WCC do not have the resources to fund the infrastructure needs it has identified directly, and although funding may be available for transport, through either LEP or other government funding for</p>		<p>A Viability update was published in June 2019. This update used the correct site list. The Viability update was consulted on during the Local Plan consultation in September/October 2019.</p> <p>WCC and WFDC will work together, alongside the developers to access the full range of funding sources to support the local plan as discussed at the DtC meeting on 20<sup>th</sup> November 2019.</p>

	<p>example, the funding pots for new schools or to expand schools arising from local plan growth are very limited.</p> <p>Additionally, the viability assessment, where based on specific sites, appears to be at odds with the site numbers and allocations in the Pre-submission Plan itself. This may or may not have a material impact, but for the avoidance of any confusion and doubt, the site data should be consistent. Further work is required to address this issue.</p>		
<p>WCC response 2018</p>	<p><u>Minerals and Waste</u></p> <p><u>Policy 16B</u> – Part 3 of policy 16B should not be included. Mineral development, and the development of policy relating to mineral development, is a County Matter and, as such, is beyond the remit of the Wyre Forest Local Plan. Policies on protecting and enhancing the environment and amenity will be included in the emerging Worcestershire Minerals Local Plan, and this section of the policy should be deleted.</p>	<p>Delete Part 3 of Policy 16B, as shown below:</p> <p><del><b>3. Minerals development and extraction should not have an unacceptable impact, including cumulative impact, upon:</b></del></p> <p><del><b>i. The historic environment including heritage and archaeological assets. Restoration of minerals extraction sites which impact on heritage assets or their settings should be appropriate to the maintenance of and the significance of those assets.</b></del></p> <p><del><b>ii. The natural environment including biodiversity and ecological conditions for habitats and species.</b></del></p> <p><del><b>iii. Amenity including noise, air pollution (including dust), water levels and water quality.</b></del></p>	<p>WFDC are agreeable to the suggested deletion of Part 3 of Policy 16B of the Local Plan. This suggested deletion will be progressed as a suggested modification to the Local Plan.</p>

<p>WCC response 2018</p>	<p><u>Minerals and Waste</u></p> <p><u>Policy 16C</u> – WCC welcome the recognition of waste matters and the reference to the Waste Core Strategy in paragraphs 16.22 – 16.29. However, WCC do not consider that the policy is sound as currently drafted. The points included in the reasoned justification, such as expecting future developments to implement the waste hierarchy and address the waste implications of the development, and safeguarding existing and permitted waste management facilities, as well as the issue of incorporating facilities for storage and separation of waste in new development which is included in policy 16C, are already addressed within the adopted Development Plan in policies WCS16 and WCS17 of the Waste Core Strategy. WCC suggest that the section could be retained to direct developers to the requirements of the Waste Core Strategy, but that it is unnecessary to include Policy 16C itself. If, however, Policy 16C is retained, the wording of the policy is not sound. It currently states that “Waste management facilities should be well-designed”, and if this is taken as it reads – in that it applies to applications for waste management development – we consider that this is beyond the remit of the Wyre Forest Local Plan and should be deleted. However, it may be that the intention is for the point to relate to the earlier sentence of the policy requiring all new development to incorporate facilities for the storage and separation of waste for recycling and recovery and that these should be well-designed. If so, WCC would suggest replacing “Waste management facilities” with “Such facilities”.</p>	<p>Amend Policy 16C to read:</p> <p>“Proposals for new development should incorporate adequate facilities into the design to allow occupiers to separate and store waste for recycling and recovery unless existing provision is adequate. <del>Waste management</del> <u>Such</u> facilities should be well-designed.”</p> <p>Amend also the Reasoned Justification at Paragraph 16.27:</p> <p>“The Waste Core Strategy requires that on-site facilities for separating or storing waste should be adequate to meet the needs of occupiers of any proposed new development. <del>Waste management</del> <u>Such</u> facilities should be well designed so that they do not act as an eyesore.”</p>	<p>WFDC are agreeable to the suggested amendment to Policy 16C and Paragraph 16.27 of the Local Plan to read "such facilities" rather than "waste management facilities". This suggested amendment will be progressed as a suggested modification to the Local Plan.</p>
<p>WCC response 2018</p>	<p><u>Site Allocations</u></p> <p>Not all allocated sites should be fully exempt from mineral safeguarding requirements and, as such, the footnote in Policy 16B should either be removed</p>	<p>Amend Policy 16B, Footnote 18 to read:</p> <p>“Excluding ‘exempt</p>	<p>WFDC are agreeable to the suggested amendment to Policy 16B, Footnote 18 of</p>

	<p>or amended. The allocations and their individual policies as drafted do not optimise require partial extraction or incidental recovery of mineral resources either in advance of development taking place or in phases alongside it. This is contrary to paragraph 206 of the NPPF, which states that “Local planning authorities should not normally permit other development proposals in Mineral Safeguarding Areas if it might constrain potential future use for mineral working.” The emerging Minerals Local Plan (Fourth Stage Consultation) will state that “Site allocations which do not make reference to safeguarding, or where requirements for safeguarding infrastructure are outlined, will not exempt.” As the Mineral Planning Authority, we seek to work with Local Planning Authorities to review potential site allocations and ensure that the requirements for partial extraction of incidental recovery will be delivered for sites within Mineral Safeguarding Areas. The list of allocations which need to take account of safeguarding issues is too long for this comment box, so is attached as an Appendix (see Appendix 5).</p>	<p>development’, <b>namely householder applications; development already allocated in the Local Plan; infilling in existing built-up areas, as defined in the Minerals Local Plan.”</b></p>	<p>the Local Plan. This suggested amendment to Footnote 18 will be progressed as a suggested modification to the Local Plan.</p> <p>WCC has shared the Mineral Safeguarded Areas and the Mineral Consultation Areas for the currently adopted Minerals Local Plan with WFDC. The WFDC Local Plan Policies Map was updated to include the adopted Minerals Safeguarding Areas in July 2019 and was consulted on in the re-opening of the WFDC Pre-Submission consultation in September/October 2019. It is agreed that when the WCC Minerals Local Plan becomes adopted, the WFDC Local Plan Policies Map should be updated with the newly adopted Minerals Safeguarded Areas, providing the adoption of the Minerals Local Plan takes place before the adoption of the WFDC Local Plan.</p> <p>Amendments should also be made to the Local Plan to include reference to minerals safeguarding requirements where necessary as suggested by WCC (see WCC response in</p>
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			<p>Appendix 5). These proposed amendments will be progressed as suggested modifications to the Local Plan 'Chapter 37 – Monitoring and Implementation Framework' and are shown in Appendix 6. In addition, a suggested modification to Chapter 16 – Pollution Minerals and Waste should be made as follows to paragraphs 16.15 and 16.26:</p> <p>Paragraph 16.15 – additional sentence as follows:</p> <p><b><u>Allocations where mineral resource safeguarding has been highlighted and those potentially affecting minerals infrastructure are listed in Chapter 37 – Monitoring and Implementation Framework.</u></b></p> <p>Paragraph 16.26 – additional sentence as follows:</p> <p><b><u>Allocations affecting these facilities are listed in Chapter 37 – Monitoring and Implementation Framework.</u></b></p> <p>It is also proposed that an additional paragraph should be added to the Site</p>
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			<p>Allocations introduction (Chapter 29) after paragraph 29.10 as follows:</p> <p><b><u>Minerals and Waste</u></b></p> <p><b><u>Allocations where minerals resource safeguarding has been highlighted together with those potentially affecting minerals infrastructure and waste management facilities are listed in Chapter 37 – Monitoring and Implementation Framework</u></b></p>
WCC response 2018	<p><u>Sustainable Transport</u></p> <p>Throughout the development of the plan, WCC has worked with Wyre Forest to develop the sustainable transport policy for the plan and the growth it proposes. There have been multiple elements of this work, including draft policies, transport modelling and site allocations.</p> <p>WCC is content with the transport policies in the plan, which prioritise sustainable transport and include some critical schemes for the district.</p> <p>However, the sustainable approach to rail is undermined by failure to allocate land for the further phase 2 expansion of Blakedown station and associated car parking provision. Although this may appear to be a minor matter, the consequence of this is to undermine the sustainable transport strategy which WCC have sought to achieve through the Local Transport Plan 4 and the Rail Investment Strategy, and its impact may be wider than WFDC itself.</p> <p>Rail travel offers an alternative to road-</p>		<p>The site known as 'Land off Station Road, Blakedown (WFR/CB/3)' has now been included in the Local Plan as a parcel of land to be removed from the Green Belt and allocated for a mix of station car parking and residential development (50 dwellings). This modification to the Local Plan was consulted on during the re-opening of the WFDC Pre-Submission consultation in September /October 2019.</p>

	<p>based travel, particularly for local commuting into and out of the West Midlands conurbation, not only for existing and new residents, but more widely, and is an opportunity to deliver modal shift from car to rail transport which is more sustainable and will assist in reducing congestion. Delivering the phase 1 and 2 expansion of Blakedown station is critical, because to secure future funding from Government – directly or indirectly – for road improvement schemes, WCC must be able to demonstrate that all reasonable alternatives have been explored and the opportunities for sustainable travel prioritised and delivered. Failure to allocate land for the phase 2 of Blakedown station totally undermines this case.</p> <p>A suitable area of land was submitted to the plan through the call for sites, but unfortunately has not been included in the draft plan, despite it being (with regard to transport) a sustainable location. This requirement was outlined in WCC’s adopted Local Transport Plan 4, and has been discussed with Wyre Forest DC officers at a number of meetings concerning the Local Plan. Through the Duty to Co-operate we would like to work together to address this omission, and to develop a solution which enables us to deliver the required expansions and sustainable transport aspirations of the Wyre Forest Local Plan and the Local Transport Plan.</p>		
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Table 4: Matters that both parties agree on from the 2019 consultation response

	<b>Issues raised by Worcestershire County Council</b>	<b>Suggested Modification to Plan</b>	<b>WFDC Response</b>
WCC Response 2019	WCC are pleased to note that some of the comments they made in response to the previous Pre-Submission consultation in 2018 have been taken into account. In particular, WCC welcome the allocation of land for the		WFDC is supportive of this site allocation and has included it in the Local Plan. This modification to the Local Plan was

	<p>further expansion of Blakedown station and associated car parking, in line with WCC recommendations. This reflects the opportunity that rail offers to mitigate existing and future generated demand on strategic highway corridors (especially the A456), enabling genuinely sustainable growth opportunities in the Wyre Forest.</p>		<p>consulted on during the re-opening of the WFDC Pre-Submission consultation in September /October 2019.</p>
<p>WCC Response 2019</p>	<p>WCC regret, however, that other recommendations WCC made to ensure the plan is sound have not yet been addressed. As such, WCC 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 17<sup>th</sup> December 2018 remain extant and should be taken into account.</p>		<p>The 2018 WCC issues have been addressed in this Statement of Common Ground. See table 3 above.</p>
<p>WCC Response 2019</p>	<p><u>Minerals and Waste</u></p> <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. WCC will also expect this to be reflected in a Duty to Co-operate agreement/Statement of Common Ground between WCC and WFDC.</p> <p>For the avoidance of doubt, the agreed list showing minerals and waste requirements for proposed site allocations policies is reproduced at the end of this response in Appendix 5.</p>		<p>WFDC is agreeable to the suggested amendments by WCC and this Statement of Common Ground sets out the agreed amendments to the Local Plan. These agreed amendments will be progressed as modifications to the Local Plan.</p>

	<p>WCC are pleased to note that the site-specific policy AM30.30 for the new allocation “Land off Zortech Avenue LI/13”, proposed as part of the current consultation, includes a requirement for a minerals resource assessment.</p>		
<p>WCC Response 2019</p>	<p><u>Ecology</u></p> <p>WCC support the proposed wording of Policies 11D and 14 and find this broadly consistent with guidance on Biodiversity Net Gain as published by CIEEM, CIRIA and IEMA.</p> <p>WCC note that proposed site FPH/1 has been deleted, however we also note that some areas of the FPH/1 site, specifically those comprising Wilden Marsh and Meadows SSSI, fall within the South Kidderminster Enterprise Park (SKEP). To ensure clarity and provide certainty for developers, WCC recommend that the footprint of the SSSI is excluded from the policies map and additional wording is inserted into paragraph 30.74 to ensure appropriate environmental consideration and to secure environmental betterment through development of the abutting PDL. WCC has suggested a modification to the Plan as shown opposite.</p>	<p>WCC suggest the following wording to Paragraph 30.74:-</p> <p><i>“Although the area of the SKEP covers some natural features and Green Belt land, development will only be permitted on previously developed sites. The site designation <u>lies adjacent to Wilden Marsh and Meadows SSSI and the associated, former settling ponds west of Wilden Lane. Impacts on this land are to be considered as part of any application for development and positive benefits consistent with policy 11(d) secured to enhance this area.</u>”</i></p>	<p>WFDC welcomes the support from WCC for Policies 11D and 14.</p> <p>WFDC are agreeable to the suggested amendments to Paragraph AM30.74 for Policy AM30.31 South Kidderminster Enterprise Park (SKEP), and the suggested changes to the policies map. These amendments were discussed at the DtC meeting on 20<sup>th</sup> November 2019 and included an agreement to update the Policies Map to remove the SKEP annotation from Wilden Marsh and Meadows SSSI and adjacent site ‘FPH/1 – Former British Sugar Settling Ponds, Wilden Lane Kidderminster’. These changes will be progressed as a suggested modification to the Local Plan.</p>
<p>WCC Response 2019</p>	<p><u>Health and wellbeing</u></p> <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, WCC believe that HIA thresholds for residential and mixed-used developments should be lowered to include all major</p>		<p>WFDC has worked with WCC to update and improve the policy wording for Policy 9: Health and Wellbeing. This amendment to Policy 9 is shown in Appendix 7, and will be progressed as a suggested</p>

	<p>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>modification to the Local Plan.</p> <p>WCC Public Health has also produced a background paper on hot food takeaways to support Policy 22G – Hot Food Takeaways in the Local Plan.</p>
<p>WCC Response 2019</p>	<p><u>Viability</u></p> <p>WCC's 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 WCC wish to reiterate its 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. WCC will continue to work with WFDC to address these matters but caution that WCC may not be able to support individual planning applications if alternative funding sources are not available to support infrastructure delivery.</p>		<p>A Viability update was published in June 2019. This update used the correct site list. The Viability update was consulted on during the Local Plan consultation in September/October 2019.</p> <p>WCC and WFDC will work together, alongside the developers to access the full range of funding sources to support the local plan as discussed at the DtC meeting on 20<sup>th</sup> November 2019.</p>
<p>WCC Response 2019</p>	<p><u>Statement of Common Ground/Duty to Co-operate</u></p> <p>The WFDC pre-submission plan is not currently supported by Duty to</p>		<p>WFDC agree that a Statement of Common Ground should be prepared between WFDC and</p>

	Cooperate agreements or a Statement of Common Ground. However, WCC understand that WFDC propose to produce these to support the submission of the plan. WCC will work jointly with WFDC on the Duty to Cooperate statement with WCC, and will work with WFDC to address the issues outlined in the consultation response prior to submission of the plan.		WCC. This SofCG will be published and made available at Submission stage of the Local Plan, as discussed at the DtC meeting on 31 <sup>st</sup> January 2019.
WCC Response 2019	<p><u>Conclusion</u></p> <p>Although the current Pre-Submission version of the WFDC Local Plan does not fully accord with WCC recommendations made in 2018, WCC officers continue to work with officers from WFDC on proposed main and minor modifications to address the outstanding matters. WCC are confident that, if the Local Plan Inspector agrees to these modifications, they would address any soundness concerns they may have. WCC and WFDC are working towards a Duty to Cooperate Statement and Statement of Common Ground.</p>		This Statement of Common Ground has been prepared to show that the issues WCC raised in their consultation responses have now been addressed by WFDC to satisfy WCC's concerns.
WCC Response 2019	On a more minor point, WCC note that paragraph AM1.2 of the consultation document implies that the Local Transport Plan is part of the development plan, which is not the case.	<p>Amend Paragraph AM1.2 to read:</p> <p>“Wyre Forest District Council (WFDC) is the local planning authority responsible for producing the Local Plan; town and parish councils can produce neighbourhood plans, and Worcestershire County Council is responsible for producing the minerals and waste local plans. <del>and also the Local Transport Plan.</del></p> <p>Together these plans make up the Development Plan, which sets out where development can take place, or where it</p>	WFDC agree that this correction should be made to the Local Plan. This correction will be progressed as a suggested modification to the Local Plan.

		should be avoided, and what form and type of development should take place.”	
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**7) Matters that parties disagree on**

There are no matters that parties disagree on.

**8) Other Strategic Matters discussed at Duty to Cooperate meetings**

WFDC has updated Policy 24A ‘Telecommunications and Broadband’ following Duty to Cooperate discussions with Worcestershire County Council at the DtC meeting on 20<sup>th</sup> November 2019. The amended wording to Policy 24A is shown in Appendix 8, and will be progressed as a suggested modification to the Local Plan. Both WFDC and WCC are agreeable to these proposed suggested changes to Policy 24A.

**9) Governance Arrangements**

The governance arrangements are key to the effectiveness and implementation of the Statement of Common Ground. The table below sets out the requirements for the authorities involved.

<b>Local Authority</b>	<b>Method of Approval</b>
Wyre Forest District Council	Delegated sign off by Corporate Director: Economic Prosperity and Place
Worcestershire County Council	Delegated sign off by Director of Economy and Infrastructure

**10) Timetable for agreement**

The table below sets out the timetable arrangement for the Statement of Common Ground to be agreed.

<b>Local Authority</b>	<b>Timetable for approval</b>
Wyre Forest District Council	- Overview & Scrutiny – 6 <sup>th</sup> February 2020 - Cabinet Meeting – 11 <sup>th</sup> February 2020 - Extraordinary Council Meeting – 20 <sup>th</sup> February 2020
Worcestershire County Council	- 4 weeks required.

**11) Conclusions**

The parties agree that:

- i) WFDC has fulfilled its Duty to Cooperate with WCC.
- ii) WCC is satisfied that all matters raised in its representations to the WFDC Local Plan Review (2016-2036) have been addressed.
- iii) The parties will continue to work positively together, including with other authorities where relevant on strategic cross boundary issues.



## Duty to cooperate meeting

### Mineral and waste matters in relation to the Wyre Forest Local Plan Review

10:30 on 31<sup>st</sup> January 2019  
Room E2-05, County Hall, Worcester

## Minutes

### Attendees:

- Helen Smith – Spatial Planning Manager, Wyre Forest District Council
- Marianne Pomeroy – Team Leader (Minerals and Waste Planning Policy), Worcestershire County Council
- Emily Barker – Planning Services Manager, Worcestershire County Council

### Purpose of the meeting

The meeting was held to discuss Worcestershire County Council's representations on the Wyre Forest Local Plan review pre-submission publication (Regulation 19) consultation which ran from 01 November 2018 to 17 December 2018.

In order to facilitate progression of the Wyre Forest Local Plan to successful adoption, whilst also ensuring that mineral and waste matters are appropriately considered and addressed, officers from both authorities sought to find mutually acceptable solutions to the issues which had been raised.

### Policy 16B - Minerals

WCC's representation suggested that part 3 of this policy should not be included. Officers agreed that this section of policy was beyond the remit of the Wyre Forest Local Plan and would be covered by the emerging Minerals Local Plan. **Agreed: Part 3 of Policy 16B to be deleted.**

WCC's representation suggested that not all allocated sites should be fully exempt from mineral safeguarding requirements, and that footnote 18 in Policy 16B could lead to ambiguity on the types of development which should be considered to be exempt once both the Wyre Forest Local Plan and Minerals Local Plan are adopted. Officers agreed that the detail of the types of development which should be exempt from mineral safeguarding requirements should be set out in the Minerals Local Plan. **Agreed: Footnote 18 to be amended to "Excluding 'exempt development' as defined in the Minerals Local Plan".**

### Policy 16C – Waste

WCC's representation suggested that this policy and some of the accompanying reasoned justification went beyond the remit of a lower-tier Local Plan in referring to the design of waste management facilities. Officers agreed that the requirement for good

design should refer to the facilities for separation and storage of waste as part of new development. **Agreed: final sentence of policy 16C and paragraph 16.27 should be amended to read "such facilities" rather than "waste management facilities".**

### Site allocations

WCC's representation suggested that not all allocated sites should be fully exempt from mineral safeguarding requirements, and that the policies for each allocation were not clear about any mineral or waste safeguarding implications or requirements. WCC had included a schedule of the site allocations showing which were within the proposed Mineral Consultation Areas (MCA) in the Fourth Stage Consultation on Minerals Local Plan, within 250m of a mineral site or supporting infrastructure site proposed to be safeguarded in the Fourth Stage Consultation on the Minerals Local Plan, or within 250m of a waste site as shown on the webmap accompanying the Waste Core Strategy. This schedule also suggested changes to the relevant site allocation policies.

Officers discussed this schedule, and whether any of the issues highlighted were "absolute showstoppers" which would stop a site allocation being suitable or deliverable, and whether any would make it difficult for the sites to be delivered within the first 5 year land supply period. Helen Smith also shared local knowledge about sites are redevelopment of brownfield land, and could therefore be considered that mineral resources had already been compromised.

In view of these discussions, WCC reassessed the proposed site allocations (following the meeting) and confirmed that there are no absolute "show-stoppers", and the issues can be addressed through additions to the site allocations policies.

The proposed site allocations therefore fall into the following categories:

No minerals or waste matters of concern	No action required	AS/1 Comberton Place AS/3 Chester Road South Service Station AS/5 Victoria Carpets Sports Ground AS/6 Lea Street School AS/20 North of Bernie Crossland Walk BHS/2 Bromgrove Street BHS/18 Blakebrook School BHS/39 Boucher Building BW/1 Churchfields BW/2 Limekiln Bridge BW/3 Sladen School FHN/11 BT building Mill Street FPH/15 Severn Grove Shops Rifle Range Estate FPH/18 Naylor's Field FPH/19 164/5 Sutton Park Road BHS/10 Frank Stone Green Street FPH/24 Romwire FPH/29 VOSA site MI/34 Oakleaf, Finepoint BW/4 (Green Gap) Stourbridge Road
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		<p>ADR  AKR/2 Cheapside  AKR/7 Swan Hotel / Working Men's Club  AKR/10 Queens Road Shops, Areley Kings  AKR/20 Carpets of Worth  MI/1 County Buildings  MI/5 Baldwin Road  MI/6 Steatite Way  MI/7 Worcester Road car sales (southern part)  MI/11 3 Sandy Lane Titton  MI/3 Parsons Chain Site Hartlebury Road  MI/33 Wilden Industrial Estate  BR/BE/1 Bewdley Fire Station  BR/RO/2 Lem Hill Nurseries Far Forest  BR/RO/21 Alton Nurseries, Long Bank  WA/UA/1 Bellman's Cross Shatterford  WA/UA/4 Allotments, Upper Arley  WA/UA/6 Red Lion Car Park Bridgnorth Road  WFR/CB/2 Station Yard, Blakedown  WFR/CC/8 Fold Farm Chaddesley Corbett  WFR/WC/22 Land off Lowe Lane Fairfield</p>
Waste management site safeguarding implications which need to be addressed	Change needed to site allocation policies to refer to policy WCS 16 (New development proposed on or near to existing waste management facilities) and require the developer to demonstrate that as the 'agent of change' (NPPF paragraph 182) the proposed development will not prevent, hinder or unreasonably restrict the operation of the existing waste management site and will include any necessary mitigation to ensure that the operation of the existing business will not have a significant adverse effect on the new development.	<p>BHS/16 Timber Yard, Park Lane  BHS/38 Kidderminster Fire Station  FPH/10 (housing) Silverwoods phase 2  FPH/10 (Employment) Silverwoods phase 2  BHS/11 Green Street Depot  BHS/17 Rock Works, Park Lane  FPH/8 SDF and adjacent land  FPH/28 Land at Hoobrook  MI/36 Firs Yard Wilden Lane</p>
Mineral <u>infrastructure</u> safeguarding implications which need to be addressed	Change needed to policies to refer to the safeguarding policies of the emerging Minerals Local Plan (or NPPF paragraph 204e) and require the developer to	<p>FPH/5 Ambulance Station  FPH/23 (housing) Silverwoods phase 1  FPH/23 (Employment) Silverwoods phase 1  FPH/10 (Employment) Silverwoods</p>

	<p>demonstrate that as the 'agent of change' (NPPF paragraph 182) the proposed development will include any necessary mitigation to ensure that the operation of the existing business will not have a significant adverse effect on the new development.</p>	<p>phase 2 FPH/8 SDF and adjacent land</p>
<p>Mineral <u>resource</u> safeguarding requirements have been <u>ruled out</u> but explicit reference is required</p>	<p>Following Duty to Cooperate discussions, officers agreed that the majority of the mineral resource underlying these sites is already sterilised (in most cases because the sites are regeneration of brownfield land).</p> <p>Policies or the supporting reasoned justification should clearly state that the need for safeguarding mineral resources at this site has been ruled out through the Duty to Cooperate so that it is clear that the exemptions in the emerging Minerals Local Plan would apply.</p>	<p>BW/4 (Housing) Stourbridge Road ADR OC/11 Stourminster School site WFR/WC/18 Sion Hill School site AKR/18 Yew Tree Walk MI/10 Four Acres Caravan Park MI/24 Adj. Rock Tavern Wilden Lane MI/38 School site Coniston Crescent MI/36 Firs Yard Wilden Lane WFR/WC/36 Rock Tavern Car Park Caunsall LI/10 Land r/o Zortech Avenue LI/11 Land west of former school site Coniston Crescent LI/12 Former Burlish Golf Course Clubhouse</p>
<p>Mineral <u>resource</u> safeguarding implications which need to be addressed</p>	<p>Change needed to policies to refer to the safeguarding policies of the emerging Minerals Local Plan (or NPPF paragraph 204 parts c and d) and require the developer to undertake a minerals resource assessment to inform design and to optimise opportunities for the partial extraction or incidental recovery of the underlying mineral resource either in advance of development taking place or in phases alongside it.</p> <p>By highlighting to the developer that this is one of the requirements which needs to be addressed, we consider that if the developer addresses this alongside other requirements, it should not have a significant impact on the delivery timescales for the site.</p>	<p>WA/KF/3 Land at Low Habberley FPH/27 Adj. Easter Park, Worcester Road WFR/WC/15 Lea Castle Hospital WFR/WC/32 Lea Castle East WFR/WC/33 Lea Castle West WFR/WC/34 Lea Castle North OC/5 Land at Husum Way OC/6 Land east of Offmore OC/12 Comberton Lodge Nursery OC/13N Stone Hill North AKR/14 Pearl Lane, Areley Kings MI/18 Land north of Wilden Industrial Estate WA/BE/1 Stourport Road Triangle WA/BE/3 Catchem's End WA/BE/5 Land south of Habberley Road WFR/WC/37 Land at Caunsall Road, Caunsall</p>

**Agreed: changes to be made to policies as per the table above.**

With regard to the proposed allocations at Lea Castle, officers agreed that as the proposed site allocation is larger than that previously allocated, the wider site should not be exempt from mineral safeguarding requirements. This should not have a significant impact on the delivery timescales for the site if the developer does not delay undertaking a minerals resource assessment to inform design and to optimise opportunities for the partial extraction or incidental recovery of the underlying mineral resource either in advance of development taking place or in phases alongside it.

### **Mapping**

Officers discussed how mineral safeguarding areas should be displayed on the district's policies map to meet the requirements of National Planning Practice Guidance (Paragraph: 005 Reference ID: 27-005-20140306). Officers agreed that the most up-to-date layers from the emerging Minerals Local Plan should be used, but that these may need to be updated if any changes emerge through the examination of the Minerals Local Plan. **Agreed: WCC to share MSA and MCA shapefiles once finalised for the Publication version of the Minerals Local Plan.**

### **Statement of common ground**

Officers discussed the need for Statements of Common Ground (SoCG) in relation to mineral safeguarding matters. This had also been discussed at the safeguarding workshop attended by WFDC on 24 January 2019, at which it was **agreed that WCC would prepare a draft SoCG and circulate to the city, borough and district councils in Worcestershire.**

## Duty to Co-operate Meeting for Wyre Forest District Local Plan Review

Date: 20<sup>th</sup> November 2019

Present:

Emily Barker (Worcestershire County Council)	Marianne Pomeroy (Worcestershire County Council)
Helen Smith (Wyre Forest District Council)	
<b>Apologies:</b>	
None	
	Actions
1.	<b>Introductions</b>
2.	<p><b>Local Plan review progress and timetables</b></p> <p>HS ran through the LP timetable for WFDC. The re-opening of the Local Plan Pre-submission consultation closed on 14<sup>th</sup> October 2019. The EiP is expected to commence in Spring 2020 and adoption in late 2020, based on the current LDS timetable which was approved by Cabinet in June 2019.</p> <p>MP gave an update of the WCC Minerals Local Plan timetable. The MLP will be submitted to the Planning Inspectorate in mid-December 2019. The EiP will then commence and WCC are hoping the plan will be adopted by end of 2020 or during the first quarter of 2021.</p>
3.	<p><b>WFDC draft Statement of Common Ground</b></p> <p>HS presented to the group the draft Statement of Common Ground (SofCG) between WFDC and WCC for the WFDC Local Plan Review. The following issues were discussed:-</p> <p>a) Minerals and Waste – Chapter 16 of Local Plan was discussed. WFDC has agreed to make all suggested changes to Chapter 16 of the Local Plan as requested by WCC in their consultation responses to the WFDC Pre-Submission Plan consultation in 2018 and 2019. This includes the deletion of Part 3 of Policy 16B, an amendment of Policy 16C and RJ to say “<b>Such facilities</b>” rather than ‘Waste management facilities’, and an amendment to Policy 16B, footnote 18 to read: “<b>Excluding ‘exempt development’, as defined in the Minerals Local Plan.</b>” With regards to the Site Allocation policies, it was agreed that the proposed table of modifications would be sent to WCC to show the proposed changes to policy wording to include requirement for minerals and waste where necessary as requested by WCC. The agreed changes will be progressed as main/minor modification to the Local Plan.</p> <p>b) Health and Wellbeing – Policy 9 of the Local Plan was discussed. The revised policy wording for Policy 9: Health and Wellbeing was</p>
	<p>ACTION – HS to send MP the table of mods for site allocations showing the proposed amendments for minerals and waste.</p> <p>SofCG to include</p>

	<p>acceptable to both WFDC and WCC and will be included in the SofCG. In particular, the Housing Impact Assessment (HIA) criteria was discussed and it was decided that the policy wording should be changed to say HIA's would be required for proposals for residential and mixed use '<b>major development sites</b>'.</p> <p>c) Telecommunications and Broadband – Following advice from WCC, Policy 24A 'Telecommunications and Broadband' has been updated to simplify the policy and make it easier to interpret. The technical jargon has been moved to the RJ and footnotes have been included for an explanation and updates on the government's latest position. The revised wording of Policy 24A was agreeable and supported by officers at the DtC meeting and will be included in the SoCG.</p> <p>d) Viability issues – WCC stated in their 2019 consultation response to WFDC that <i>"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."</i> The viability issue was discussed at the DtC meeting. WCC will use other funding sources where possible to support the plan. The Government is starting a pilot scheme for new schools – developers can apply for funding to build a new school. If this pilot scheme is successful, the Government may roll this out across the country – this would be useful for Wyre Forest. Highways – WCC will use major road network funding and pinch point funding to help fund highways infrastructure requirements. The phasing of strategic development sites will be critical. Phasing is a tool that can be used to bring a school forward at the correct time, build affordable homes and highway improvements, etc. It is important that the developer provides funding at the most appropriate phasing stage also, so that infrastructure is provided in the phase that it is needed.</p> <p>e) South Kidderminster Enterprise Park (SKEP) Policy AM30.31 and RJ paragraph AM30.74 – it was agreed at the DtC meeting that the Policies Map should be updated to remove the SKEP annotation from Wilden Marsh and Meadows SSSI and adjacent site 'FPH/1 – Former British Sugar Settling Ponds, Wilden Lane Kidderminster'. The amendment of the wording of para AM30.74 to reflect these changes was also agreed.</p>	<p>revised wording for Policy 9: Health and Wellbeing.</p> <p>SofCG to include revised wording for Policy 24A: Telecommunications and Broadband.</p> <p>SofCG to make reference to the requested changes to Policy AM30.31 and RJ para AM30.74, and Policies Map update.</p>
4.	<p><b>Conclusions of SofCG and any other strategic issues</b></p> <p>WCC confirmed that they were happy with the conclusions of the draft SofCG.</p>	

5.	<p><b>Governance arrangements and timetable for WCC sign off for SofCG</b></p> <p>It was agreed that the SofCG should be prepared ready for Submission Stage of the Wyre Forest Local Plan so that it is available for the examination.</p> <p>WCC – the SoCG will require delegated sign off by the Director of Economy and Infrastructure. They will require at least 4 weeks.</p> <p>WFDC – the SofCG will need to be agreed by Members. Dates for Members meetings are as follows:-</p> <ul style="list-style-type: none"> <li>• Overview and Scrutiny – 6<sup>th</sup> February 2019</li> <li>• Cabinet Meeting – 11<sup>th</sup> February 2019</li> <li>• Extraordinary Council Meeting – 20<sup>th</sup> February 2019</li> </ul>	<p>HS to update SoCG with governance arrangements for WCC.</p>
6.	<p><b>Ongoing engagement with DtC partners</b></p> <p>The Statement of Common Ground to be finalised by end of December 2019 so that it is ready for sign off by WCC and WFDC in Jan/Feb 2020.</p> <p>It was agreed that WFDC and WCC will continue to keep each other informed of plan progress as both the WFDC Local Plan and WCC Minerals Local Plan progress through the next stages of plan making.</p>	<p>WFDC to send final version of SofCG to WCC by December 2019.</p>
7.	<p><b>AOB</b></p> <p>It was agreed that transport issues would be included in the SofCG that is being produced jointly between WFDC, WCC and Bromsgrove District Council.</p>	



**worcestershire**  
county council

[Redacted]  
[Redacted]  
Wyre Forest District Council  
Wyre Forest House  
Finepoint Way  
Kidderminster  
Worcestershire  
DY11 7WF

26 October 2015                      BY EMAIL

Dear Rebecca,

**Wyre Forest Local Plan Review: Issues and Options Consultation**

Worcestershire County Council welcomes the opportunity to comment on the above consultation. The following officer-only response is from our Transport Policy and Strategy, Archive and Archaeology, Minerals and Waste Planning Policy, Children's Services, and Public Health teams. Other Worcestershire County Council teams may choose to make their own response.

If you would like to discuss any of these comments please do not hesitate to contact Ben Horovitz (email: [bhorovitz@worcestershire.gov.uk](mailto:bhorovitz@worcestershire.gov.uk), telephone 01905 766097) in the first instance.

**Emily Barker**  
**Strategic Planning**  
**and Environmental**  
**Policy Manager**

County Hall  
Spetchley Road  
Worcester  
WR5 2NP

Yours Sincerely,

[Redacted Signature]

Strategic Planning and Environmental Policy Manager

## **Transport Policy & Strategy**

We welcome the opportunity to work with Wyre Forest District Council on the Local Plan review.

The District Council should be aware that the existing urban areas within the Wyre Forest district currently suffer from congestion and certain areas have poor air quality. This should be taken into account when considering the potential locations for future development. Improvements to the Transport Network will be necessary to protect the economic viability of the district.

The County Council will work closely with the District Council and provide information on congestion hot spots and also identify the necessary transport improvements to support the growth.

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## Landscape and the Historic Environment

We recommend that the wording in paragraph 9.1 be amended as follows:

"The local environment, be it natural, historic or built, is one of Wyre Forest's strengths. The District contains a rich variety of assets, from historic landscapes, settlements, historical buildings and conservation areas, to the Staffordshire and Worcestershire Canal and the Rivers Severn and Stour and their tributaries together with the ancient Wyre Forest and several regionally important habitats".

### Question 35

**What approach do you think should be taken to protect the landscape in Wyre Forest District?**

**Should we have different policies for each Landscape Character type?**

The approach should be thematic and cross-cutting in terms of recognising that landscape is integral to all other development and environmental policies. Therefore, an approach that develops policies for each landscape character type is not recommended. The landscape character broad types provide a useful framework for understanding the baseline character, however, there are many common attributes and overlapping themes shared between the six types as well as distinctions. Duplication in policy is therefore a risk, which could also lead to a lack of adequate recognition of the key landscape diversities that are distinctive across the district (such as areas of rare lowland heath and small enclosed ancient woodlands, and sinuous, sunken lanes often with high hedgerows, associated with wayside settlement).

### Question 36

**What are your views on the options set out for chalet provision? Are there any other options which should be considered?**

Chalets have been a developing feature of the Severn Valley landscape since the early 20<sup>th</sup> century with the greatest expansion taking place in the last 50 years. Earlier 20<sup>th</sup> century chalets were dispersed or isolated, and were close to the river. Later 20<sup>th</sup> century developments were more densely ordered in form, common with static caravan sites. Chalet developments are typically located within pre-existing field boundaries and are, by their nature, single storey buildings. In one sense the landscape impact is therefore not significant unless the developments are on sloping/terraced ground when the density of the site and its infrastructure can become visible. The options suggested highlight the difficulties faced in trying to achieve a balance between landscape impact and the provision of leisure developments. Option A, therefore, offers the most comprehensive control, yet restricts opportunities to generate economic benefits. Option B offers expansion within the setting of existing provision. The character of expansion would presumably match the plan and design of existing developments. Option C perhaps offers the best solution in terms of allowing leisure development that will encourage economic activity in the district while at the same time controlling impact through restriction of

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scale. The current high density of rural grid-based chalet developments has created a uniform character that is at odds with the dispersed character of settlement across the area. One enhancement that could be part of Option C would be to not only limit the scale of developments, but also set design parameters that control the density and arrangement of new chalets, site-intrinsic landscaping and the choice of construction materials. This could deliver lower-density, more dispersed chalet developments, more sympathetic to the inherited landscape character. It would also reduce pressure on local infrastructure with a more dispersed impact and access to roads, shops and other facilities.

### **Question 37**

**Do you consider that any of these proposals are the correct approach or is planning policy too restrictive on equine development?**

As with chalets, it should be possible to promote more appropriate design guidance to help to ensure stables and their associated infrastructure respect the local landscape and its wider setting. Solutions for lower-impact lighting should be part of this, to promote wider-ranging benefits that include reduced light pollution and reduced impact on light-sensitive species. Therefore, a hybrid of Options A and B with appropriate design guidance offers flexibility for equine-related development, but within parameters that will create a more sustainable and place-sensitive outcome.

We suggest amending the title before section 9.14 to "Historic Environment and Built Heritage", and amending the wording at the start of section 9.14 to read "Wyre Forest contains large numbers of designated and undesignated heritage assets including..."

### **Question 40**

**How do you think the Council should weigh the balance between harm to designated heritage assets against the public benefits of a development proposal including securing the optimum viable use?**

This question should really be about designated and undesignated assets. The risk of focusing on designated assets is that it creates a bias in representation and is now an outmoded approach. Non-designated heritage assets vastly outnumber designated assets and make a major contribution to the character of landscape, settlement and place. There is also a direct relationship between designated and non-designated assets, particularly in terms of setting and wider inherited character. Option B broadly frames the right approach. Site-specific policies will be unnecessarily complex and the temptation will be to focus on designated sites. An over-arching policy for the historic environment and built heritage can address district-specific issues sufficiently to avoid repeating national policy. Site-specific issues can then be approached through Neighbourhood Plans, but also through appropriate site-specific assessment (as directed in NPPF) that can respond to the diversity of local historic and built heritage assets present on that site and within its setting.

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**Question 41**

**How should the local plan ensure that Local Distinctiveness is reinforced? Are there other potential options that need to be considered?**

Option A has merit in terms of promoting a responsive approach to local distinctiveness in a given site. This could be delivered by stating in policy that developers must commission appropriate assessments of the site in its local environmental context (as required by NPPF), but must ensure this informs design that responds to inherited character through a holistic approach to place-making. This approach does not have to stifle innovation, but rather it sets parameters where site masterplanning, landscaping to meet Green Infrastructure objectives and the choice of materials can reflect existing character, thereby reinforcing local distinctiveness in a context of positive change.

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## **Minerals and Waste Planning Policy**

### **Waste**

#### **Geographic hierarchy and compatible land uses**

The Waste Core Strategy has a spatial strategy covering the whole of Worcestershire, with a "Geographic Hierarchy". This means that we expect the majority of waste management development for re-use, recycling, "other recovery" and disposal other than landfill to take place at the highest level of the hierarchy in Level 1. Wyre Forest District includes part of the "Kidderminster Zone" in level 1 which surrounds Kidderminster and Stourport, and the "Bewdley Zone" in level 3. The remainder of the district is at the lowest level of the geographic hierarchy, in level 5.

Policy WCS 6 identifies types of land considered to be compatible for waste management development. Depending on the specific type of development proposed, this includes:

- existing or allocated industrial land,
- contaminated or derelict employment land (including former airfields),
- redundant agricultural or forestry buildings or their curtilage,
- sites with current use rights for waste management purposes,
- active mineral workings or landfill sites,
- land within or adjoining a waste water treatment works,
- co-location with producers, end users or other complementary activities, and
- greenfield land (in very limited circumstances).

The implications of this for the development of the Wyre Forest Local Plan are that consideration needs to be given to the fact that some land is likely to be required for waste management development, particularly within the Kidderminster Zone, and this needs to be factored in to any calculations of land requirements for industrial or employment uses.

With regard to landfill, the Waste Core Strategy does not identify a requirement for new landfill capacity during the life of the plan (to 2027), and therefore no locations for new landfill facilities have been identified. The geographic hierarchy would not apply to proposals for landfill sites should they be put forward, as geological suitability of the location is considered to be the key factor.

#### **Safeguarding waste management capacity**

Existing waste management facilities should be seen as critical infrastructure for Worcestershire, as they are key to the sustainability of other types of development, ensuring that waste products from households, commerce, industry and construction can be properly managed.

There are a number of existing waste management facilities in Kidderminster and Stourport. These are shown on the waste sites [web-map](#) accompanying the Waste Core Strategy. Some waste sites are seen as relatively low value land uses and

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could therefore be vulnerable to redevelopment for other uses if not properly protected. Relocating a waste management operation can be difficult, and we have a "capacity gap" in the county meaning that we do not currently have enough waste management capacity to manage the amount of waste which arises in the county. This means that it is extremely important that existing facilities are safeguarded from development for non-waste-related uses. Policy WCS 16 of the Waste Core Strategy sets out to do this, both by preventing the sites being redeveloped for other uses and by seeking to minimise the potential for conflict with any new land uses or sensitive receptors adjacent to sites.

It will be critical for the Wyre Forest Local Plan to consider this issue when allocating sites for housing or employment uses, and we would urge the District Council to make use of the [web-map](#) to ensure awareness of the location of waste management facilities in the district. We would be happy to enter into discussions on this issue as and when required.

### **Making provision for waste in all new development**

The Wyre Forest Local Plan should provide opportunities for communities and businesses to reduce, re-use and recycle waste. In order to support this aim and to drive waste up the waste hierarchy, the waste implications of all new development should be considered.

Whilst the Waste Core Strategy, and in particular Policy WCS 17 "Making provision for waste in all new development", is part of the Development Plan, it is often not identified and considered by applicants for non-waste developments. It would be useful if the Wyre Forest Local Plan could either cross-refer to the Waste Core Strategy or perhaps even include the requirements of policy WCS 17 for developments to incorporate facilities to separate and store waste for recycling and recovery, make contributions where it is more appropriate than provision of on-site facilities, or show that existing provision is adequate.

In addition, the ADEPT report "Making Space for Waste" (June 2010) sets out specifications for the minimum standards for the type and scale of facilities and vehicular manoeuvrability needed for new residential, commercial and mixed use developments, and it would be useful if this was considered in the development of the Wyre Forest Local Plan.

### **Inappropriate disposal of waste**

Excavation activities, a normal part of the construction process, can result in considerable arisings of subsoils. In some cases, this type of waste can usefully be re-used for purposes such as flood management schemes, landscaping, levelling of sites, the construction of bunds or embankments, or features for noise attenuation. However, to prevent inappropriate development, the Waste Core Strategy requires these kinds of proposals to be considered against **Policy WCS 5: Landfill and disposal**. The decision on whether proposals are a form of disposal should be guided by the Environment Agency's advice. This is currently set out in Regulatory Guidance Note (RGN) 13 "Defining waste recovery - permanent deposit of waste on

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land" <https://www.gov.uk/government/publications/rgn-13-defining-waste-recovery-permanent-deposit-of-waste-on-land>.

As most applications which include the use of subsoils on-site will normally be decided by the District rather than the County Council, we would request that the Wyre Forest Local Plan includes policies to manage this type of waste in order to ensure the sustainable management of subsoils and prevent inappropriate disposal in artificial mounds.

## **Minerals**

### **Geology of the district**

According to maps provided by the British Geological Survey (BGS), Wyre Forest District is underlain by the solid sands of the Kidderminster Formation and the Wildmoor Formation, as well as several types of clay, and some surface deposits of terrace and glacial sand and gravel.

There are several Local Geological Sites in the district and some adjacent to the District boundary which will need to be protected by the policies in the Wyre Forest Local Plan. The Herefordshire and Worcestershire Earth Heritage Trust would be able to provide you with data on their locations, and you can contact them on 01905 855184 or [eht@worc.ac.uk](mailto:eht@worc.ac.uk).

There are also a small number of Sites of Special Scientific Interest in the district which are designated either for geological interest or geological interest alongside biological interest, and these will need to be protected by the policies in the Wyre Forest Local Plan.

You should also be aware that the Earth Heritage Trust has been undertaking a project "A Thousand Years of Building with Stone", looking at links between stone buildings and the potential source quarries of the stone. The outcomes of this project are being recorded on a dedicated building stones website, <http://www.buildingstones.org.uk/>. The building stones which occur in the Wyre Forest District contribute towards the character of the area, and we would recommend that you consider the findings of this project in developing the Wyre Forest Local Plan.

### **Minerals Local Plan**

The saved policies of the County of Hereford and Worcester Minerals Local Plan 1997 form part of the current Development Plan for the county, and the proposals map identifies minerals deposits.

However, as you are aware, we are in the process of developing a new Minerals Local Plan for Worcestershire. This will set out what minerals we have in the county, how much we need to provide over the life of the plan, how minerals sites should be worked and restored, and how we should safeguard minerals for future use. A significant amount of background work has been done to inform the development of the plan, looking at the mineral deposits in the county and identifying which of these

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are likely to be significant. An [interactive webmap](#) has been published along with an Analysis of Mineral Resources (available from [www.worcestershire.gov.uk/mineralsbackground](http://www.worcestershire.gov.uk/mineralsbackground)). This identifies the solid sands around Stourport, Kidderminster and up to the county boundary in the north as key resources, with some significant terrace and glacial sand and gravel and mercia mudstone clay also being considered important. This assessment will form the basis of the spatial strategy for the new Minerals Local Plan.

Whilst still very much in development, we are pursuing a green infrastructure approach, seeking to integrate green infrastructure considerations and restoration outcomes throughout the life of minerals sites, with the aim that minerals development will leave a positive legacy for people, the environment and the economy. This will also be a key component of the spatial strategy for the new Minerals Local Plan.

As outlined above, Wyre Forest District contains considerable amounts of mineral resource, and it is likely that some mineral working may take place in the district in future.

We have undertaken "calls for sites", and some sites in Wyre Forest District have been proposed by landowners, minerals operators or agents for future minerals development. These lie to the north of Kidderminster. We are still undertaking a process to assess the sites which have been proposed to determine whether they should be included as site allocations for mineral working in the Minerals Local Plan, and we have previously consulted you on these sites as part of this process.

Should any of the sites put forward for mineral working also be under consideration for allocation in the Wyre Forest Local Plan, we would be keen to develop a coordinated approach to enable mineral resources to be extracted in advance of other forms of development.

## **Minerals Safeguarding**

The importance of safeguarding mineral resources of local and national importance is recognised in the National Planning Policy Framework. There are a number of aspects to this which will need to be considered in developing the Wyre Forest Local Plan:

### *Safeguarding resources:*

Resources which are identified as nationally or locally important should be safeguarded from other forms of development which could sterilise the resource, by either:

- refusing the other development and retaining the mineral resource *in situ* so that it remains available for future use,
  - extracting all or some of the resource prior to other forms of development taking place, or
  - through incidental recovery of material removed as part of groundworks for the other development.
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Where development is proposed within areas of identified mineral resources, we would expect the developer to undertake a Minerals Resource Assessment to determine the quantity, quality and commercial viability of the resource.

*Safeguarding existing sites and site allocations:*

Similarly to waste sites, existing quarries and minerals site allocations need to be safeguarded from the introduction of additional sensitive receptors which might be impacted by the minerals operations and we would seek to minimise the potential for conflict with any new land uses or sensitive receptors adjacent to sites.

*Safeguarding infrastructure*

National policy requires that we safeguard "existing, planned and potential rail heads, rail links to quarries, wharfage and associated storage, handling and processing facilities for the bulk transport by rail, sea or inland waterways of minerals, including recycled, secondary and marine-dredged materials". These types of minerals infrastructure do not currently exist in Wyre Forest District, but the Wyre Forest Local Plan will need to recognise that such infrastructure may be developed in future and would then need to be safeguarded from conflict with any new land uses or sensitive receptors, or from development by higher-value land uses.

In addition, national policy requires that we safeguard "existing, planned and potential sites for concrete batching, the manufacture of coated materials, other concrete products and the handling, processing and distribution of substitute, recycled and secondary aggregate material". We are aware that concrete batching plants exist on Lisle Avenue and on the Vale Industrial Estate in Kidderminster. The Minerals Local Plan will address safeguarding these facilities, but they are most often permitted by District Councils and, because other forms of development likely to impact on their continued use are also most likely to be assessed by the District Council, it would be prudent for the Wyre Forest Local Plan to address this issue.

*Minerals safeguarding versus site allocations in the Wyre Forest Local Plan*

Whilst we are keen to safeguard mineral resources and infrastructure for future use, we also recognise the need to enable other forms of development in a timely manner and with the minimum burden which could impact on the viability of site allocations coming forward. We would suggest that, as site allocations are being considered, minerals safeguarding issues should be addressed at that point. We are still drafting our minerals safeguarding policies, but we will consider a policy exemption for sites allocated in Local Plans where minerals safeguarding issues have been considered at plan-making stage. We would be keen to discuss this with you further at the earliest possible stage as potential site allocations are considered.

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## **Children's Services**

We are not currently in a position to comment in detail on specific options without undertaking some feasibility work to look at options for extending schools in the areas and seeing details of the number of dwellings to be accommodated. The current maximum off-site education contribution in the Wyre Forest area is £4,736 per 2/3 bed open market dwelling and £7,104 for 4/5 beds. However, if developments are large enough to require on-site school provision, we would expect the development to fully fund the new school.

### **Response to questions 51 and 52**

Worcestershire Children's Services look forward to working with Wyre Forest District Council to deliver the education infrastructure required to support planned housing growth.

All but one of the secondary schools and some of the primary schools in the Wyre Forest district are academies and therefore outside of the control of the Education Authority. However the authority retains the responsibility for ensuring sufficiency of places and works in partnership with all schools to meet this duty. Under current regulations any new schools created are required to be free schools.

It is important that housing development continues to contribute to delivering education infrastructure. Section 106 funding currently forms an important part of the capital funds available to the Education Authority to invest in ensuring that there are sufficient school places available. Without these contributions, it will be difficult to deliver the volume of good quality school places required to ensure that children in the Wyre Forest district have a good start in life.

It is noted that some brownfield sites may have issues with viability. Although development of such sites may be desirable it is important that sites can deliver the necessary infrastructure, including additional school places where needed.

Average yield in Wyre Forest district as calculated from the 2011 census is 2.4 children per year group for every 100 households. This is lower than the average across Worcestershire as a whole and reflects the older population profile. This means that a development of over 1,000 homes is needed in order to support a whole additional class per year group in a school.

Should urban extensions be needed to meet housing requirements, their location in relation to existing schools and the capacity in those schools will be key in determining the infrastructure requirements. Urban extensions in areas where there is little existing infrastructure will need to have good viability to support the contributions required to deliver new infrastructure.

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## **Public Health**

Worcestershire County Council's Public Health team welcomes this opportunity to comment on the Wyre Forest Local Plan Review Issues & Options.

## **Evidence Base**

Firstly, we would like to highlight the need to use the Joint Strategic Needs Assessment (the Assessment) of health and well-being as part of the evidence base for the Local Plan. This work is a continuous assessment designed to inform decisions made locally about what services should be commissioned. The core aim is to improve the public's health and reduce inequalities. The Assessment contains summary reports such as the Viewpoint Residents' Survey, thematic assessments and profiles as well as a Data Mapping Tool. The Assessment can be accessed on the County Council's webpages:

[http://www.worcestershire.gov.uk/info/20122/joint\\_strategic\\_needs\\_assessment](http://www.worcestershire.gov.uk/info/20122/joint_strategic_needs_assessment).

The Local Plan should reflect the priorities of Worcestershire's Joint Health and Well-being Strategy (the Strategy). The Strategy states the Worcestershire Health and Wellbeing Board's<sup>1</sup> vision, priorities and goals for 2013-16, based on the findings of the Joint Strategic Needs Assessment. Currently, it focuses on four priorities:

- Older people and management of long term conditions
- Mental health
- Obesity
- Alcohol

Please note that the Strategy is currently being revised to reflect the ever-changing population make-up and health needs. The revised document is expected to be finalised in spring 2016.

## **Health Impact Assessment**

### ***Background***

A Health Impact Assessment (HIA) is undertaken to predict the health implications on a population from the implementation of a plan, policy, programme or project, and

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<sup>1</sup> The **Health and Well-being Board** is made up of the leader, chief executive and cabinet members of Worcestershire County Council, South Worcestershire Clinical Commissioning Group, NHS Commissioning Board, District Councils and the Voluntary and Community Sector.

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in so doing aids decision-making. HIA should aim to enhance the potential positive aspects of a plan, policy, programme or project while avoiding or minimising any negative impacts, with particular emphasis on disadvantaged sections of affected communities.

The importance of planning for health and the use of HIAs in planning is promoted through national planning policy and guidance. The National Planning Policy Framework recognises the need to understand and "*take account of the health status and needs of the local population including expected future changes, and any information about relevant barriers to improving health and well-being.*" Additionally, the national Planning Practice Guidance (PPG) recognises that, in relation to planning applications, HIA is a useful tool to identify where significant impacts on the health of local people are expected.

In Worcestershire, the Health and Wellbeing Board oversees the new system for local health commissioning and leads on the strategic planning of various health services. Its sub-group, the Worcestershire Health Improvement Group<sup>2</sup>, has adopted HIAs as an approach to embed health into various projects across the county. The Public Health team at Worcestershire County Council (WCC) is taking this approach forward through policy and delivery routes.

In 2014, a HIA Steering Group was set up to champion and disseminate the use of HIAs. The Group is chaired by the Public Health team at WCC and consists of health professionals, transport representatives and district and county planners. Its current focus is on embedding HIAs into planning policy and decision making.

### ***An Assessment***

The Public Health team envisages that an HIA should be undertaken on the policies of the Wyre Forest District Local Plan. This process will help in identifying the local health needs across all population groups in the district. It would test how various policy proposals are likely to affect residents in both a positive and negative way. As a result, these policies would be refined and strengthened to support the health and wellbeing of local communities.

The Public Health team, with support from the HIA Group, is currently preparing a HIA Toolkit which will help this process. The final document is planned to be completed by the end of 2015.

### ***HIA Requirement***

The HIA Steering Group is currently looking at how HIAs could be better embedded into planning policy to ensure that they become common practice for planning proposals. A strong recommendation or requirement for HIAs in the Local Plan could help to foster the use of HIA in development management practices.

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<sup>2</sup> The **Health Improvement Group** is chaired by the County Council Cabinet Member for Health and Well-being and includes elected members from each of Worcestershire's district councils, as well as officer support from district councils, Clinical Commissioning Groups, and other organisations.

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The need for HIA can be incorporated into various policies, such as health or sustainable development policies. Annex A includes examples of a selection of HIA policies in Local Plans from around the country.

## **Policies**

We welcome objectives 12 and 13 of the document which talk about healthy and active lifestyles, community cohesion and improved health care. We also welcome the various policies which directly or indirectly aim to improve the health and wellbeing of local residents, such as green infrastructure policies and encouraging sustainable transport modes. Notwithstanding the above, we feel that the Local Plan could be strengthened in terms of references to public health.

### ***Healthy foods***

As rightly identified in the Local Plan, one of the greatest challenges for the district is obesity, in particular excessive weight amongst young children.<sup>3</sup> The Open Space, Sport and Recreation policy suggests that all apartment schemes should provide communal garden space for food production. We are supportive of this policy, as this would encourage healthy food-growing at the local scale, as well as providing for local community cohesion.

However, we would like to see policies which aim to reduce the proliferation of hot food takeaways in the district. In particular, we would welcome policies to restrict the concentration and clustering of hot food takeaways/restaurants in towns and local centres and restrictions on hot food takeaways in close proximity to schools. Some hot food takeaways offer 'energy-dense' or 'fast food' with high levels of fat, sugar and salt which are linked to obesity and related health conditions including cardiovascular disease, type 2 diabetes, stroke and some cancers. Of particular concern is the effect of fast food consumption on children's diets and eating behaviour, as significant health problems related to obesity start to develop at primary school age and behaviour established in early life has been shown to track into adulthood. It is considered that the proliferation, availability and accessibility of takeaways link to greater consumption of unhealthy food by children and adults.

### ***Physical Activity***

We also support the various references to active lifestyles and sustainable transport. Physical activity is key to prevention and partial treatment of many health conditions, such as diabetes or cardiovascular problems, and can be a base for people's wider wellbeing. The built environment can contribute to increased physical activity in multiple ways. We encourage any local policies in Wyre Forest to reflect the following principles:

- Provision of sustainable transport routes which are connected, attractive and safe. It is important that these routes support people at different levels of current activity and confidence, for example through providing separate and

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<sup>3</sup>□ Wyre Forest has a significantly higher percentage of 4-5 year olds that are classified as overweight or obese than the National average. Wyre Forest still has the highest rate of excess weight in 4-5 year olds out of the six Worcestershire districts.

low-speed cycling routes to encourage cycling amongst families but also to ensure that those who are regular and confident cyclists can continue cycling as part of their daily routine.

- Provision of informal and formal green spaces and play areas. It is important that this provision responds to the local need. For example, wild and dark wooded areas in proximity of areas classed as deprived can put people off using it due to the perception of being unsafe. The state and practicality of these assets will also have an impact on whether they are going to be utilised.
- Provision of indoor and outdoor sport and recreation facilities. Again, these should cater for the needs of local people.
- Ensuring that new development is well-served by sustainable transport and that green spaces, local facilities and services are accessible to encourage the use of sustainable transport modes.

### ***Housing and healthy communities***

We would encourage any policies relating to housing design and masterplanning to take into account the health and wellbeing of local residents. In particular, policies should ensure that:

- The housing provision includes relevant types and tenures to cater for the needs of local residents;
- Any new homes are warm and safe for everyone;
- New sites have easy and safe access to the local and wider green spaces;
- Any new site design supports community cohesion, offering communal meeting area spaces and access to community facilities;
- Ensure age-friendly environments – built and natural environments which cater for the needs of all people.

### ***Dementia-friendly communities***

The concept of "*dementia friendly communities and environments*" links to a shift in the approach to dementia which is moving away from treating it in the context of care homes and health care only. People are often happier if they can live independently in their own homes for longer. This is the case for the majority of dementia sufferers (particularly during early stages of dementia) in the UK. These numbers will also increase over the coming years and decades, with an ageing population. This raises questions over how the built and natural environment can support people's safe and healthy lives in our towns, cities and villages.

The Public Health team would encourage Wyre Forest District Council to reflect some basic principles for planning and designing dementia-friendly environments in the Local Plan policies. Some of these principles are summarised in Appendix B.

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## **Annex A Health Impact Assessments in Local Plan policies**

### **Draft Central Lincolnshire Local Plan**

#### **Policy LP9: Health and Wellbeing**

*"The Central Lincolnshire authorities will expect new development proposals to promote, support and enhance physical and mental health and wellbeing, and thus contribute to reducing health inequalities. This will be achieved by [inter alia] In the case of proposals which include residential development, developers preparing a fit for purpose Health Impact Assessment (HIA), and demonstrating how the conclusions of the HIA have been taken into account in the design of the scheme. The HIA should be commensurate with the size of the development and the anticipated impact".*

### **The London Plan (March 2015)**

#### **Policy 3.2 Improving Health and Addressing Health Inequalities**

**C)** *"The impacts of major development proposals on the health and wellbeing of communities should be considered, for example through the use of Health Impact Assessments (HIA)".*

### **Draft South Cambridgeshire Local Plan**

#### **Policy SC/2 Health Impact Assessment**

*"New development will have a positive impact on the health and wellbeing of new and existing residents. Planning applications for developments of 20 or more dwellings or 1,000 m<sup>2</sup> or more floorspace will be accompanied by a Health Impact Assessment to demonstrate this.*

- a) For developments of 100 or more dwellings or 5,000 m<sup>2</sup> or more floorspace a full Health Impact Assessment will be required;*
  - b) For developments between 20 to 100 dwellings or 1,000 to 5,000 m<sup>2</sup> or more floorspace the Health Impact Assessment will take the form of an extended screening or rapid Health Impact Assessment".*
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## Annex B – Dementia-friendly environments

### What is dementia?

Dementia is the term for a group of diseases affecting the brain. Dementia is progressive and irreversible, affecting cognitive, social, emotional and physical functions. Many people with dementia are not able to take part in activities that they enjoyed before they developed the condition. Many feel constrained by the condition and are not confident to get out and engage in their community.

### Why plan for dementia friendly environments?

90% of people over retirement age and two-thirds of the 800,000 people with dementia in the UK live in the community<sup>4</sup>. Limitations, constraints and feelings of isolation experienced by dementia sufferers could be minimised by dementia-sensitive design and improvements to the places that we live in.

Dementia-friendly environments, including the built and natural environment, can be beneficial to the health and quality of life of people living with dementia. Planning should aim to create physical environments that foster informal social interactions among people and remove barriers to social interaction. Planning can also aim to reduce the negative impacts of the environment through, for example, good quality and considered place design and increased accessibility.

### How can planning contribute?

Creating dementia friendly places would depend on the dementia-sensitive masterplans for new developments and the carefully planned redevelopment of existing areas, villages and town centres. There is also an opportunity in the wider planning of our places, such as ensuring that care facilities for dementia sufferers are located appropriately (for example not next to a busy motorway) and ensuring that shops, hospitals, parks, etc. are provided and are accessible to dementia sufferers.

DEMENTIA FRIENDLY ENVIRONMENTS	
Street and development design	
Remove clutter from the streets including unnecessary street furniture or signage	Unnecessary street furniture and signage can confuse and cause unnecessary stress to people living with dementia.
Urban and built form should be varied - a need for hierarchy of street types, such as main streets, side streets, alleyways and passages	People living with dementia need some point of reference in the landscape. When places are uniform they may confuse one street for another.
Architectural features should be in a variety of styles, colours and materials	
Gentle slopes where unavoidable. Level changes should be clearly	Dementia affects people's perception of the surroundings

<sup>4</sup> Later life in the UK. Age UK (2011) and Dementia 2012: a national challenge. Alzheimer's Society (2012)

marked and well-lit with handrails and non-slip, non-glare surfaces	which can also affect their balance.
Spaces and buildings should be oriented to avoid creating areas of dark shadow or bright glare.	Dementia affects people's perception of the surroundings and surfaces. Dark areas might appear to them as a hole in the ground whilst glaring/shining surfaces can look like water and slippery surfaces.
Gentle curves and bends	Streets should be well connected and gently winding with open ended bends to enable visual continuity.
Streets should be short and fairly narrow	Shorter and narrower streets are easier to navigate.
Creating and maintaining landmarks	People living with dementia can use certain features in the natural and built environment such as canals, telephone boxes, etc. as points of reference.
Acoustic barriers, such as planting and fencing, reduce background noise	People living with dementia might perceive what they see and hear differently to others. Unknown and persistent sounds might make them feel confused, uneasy and stressed.
Accessible transport	People living with dementia might not be able to drive but should still be offered the possibility of accessing various facilities and participating in activities they used to enjoy prior to their diagnosis.
Shops, GPs, pharmacies, social infrastructure, etc. in proximity to homes	
Introducing change to the built environment slowly	People living with dementia might find it difficult to find themselves in new/unknown places.
<b>Signage</b>	
Avoid unnecessary signage	People living with dementia might feel confused when a lot of information is projected at them at the same time. They generally function better amongst objects and in the environment that they are familiar with.
Signs should be clear and in a simple font.	
They should use a tonal contrast rather than a variety of colours.	
Signs locating important places and buildings are perpendicular to the wall	
<b>Benches</b>	
Should be put in strategic places	To allow people suffering with dementia to rest when walking uphill.

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Place on the crossroads	People living with dementia might take a little bit longer to remember their destination or how to get there. Benches at a crossroads could give them a moment to think and make up their mind without feeling stressed and confused.
Places where activity can be looked at such as play areas, parks, etc.	People living with dementia should be offered places where they can relax and contemplate but also to feel part of the wider community.
<b>Footpaths</b>	
Provision of quiet side roads as alternative routes away from crowds/traffic	Quiet side roads and pedestrian segregated footpaths are safer and less confusing for people living with dementia.
Bicycle lanes are separate from footpaths	
Tree-lined or pedestrianised footpaths	
Footpaths are wide, well maintained and clean	Wider and well-maintained footpaths can reduce risk of falling.
Paving and tarmac should be plain and non-reflective in clear colour and textural contrast to walls	Dementia affects people's perception of the surroundings and different surfaces. Dark areas might appear to them as a hole in the ground whilst glaring/shining surfaces can look like water and slippery surfaces.
<b>Green spaces</b>	
Creating, welcoming and well-defined open, green spaces and playgrounds	People living with dementia find it difficult to cope with crowded noisy places. Parks could offer quiet and relaxing time spent amongst other people.
Providing quiet areas such as pocket parks	
<b>Residential care</b>	
Residential care homes to be located in quiet location away from traffic noise, etc.	People living with dementia might perceive what they see and hear differently to others. Living in a noisy environment might make them feel confused and stressed.
<b>Environmental Hazards</b>	
Air pollution reduction	Air pollutants may contribute to memory loss and dementia. Polluted air increases levels of brain inflammation which may play a role in Alzheimer's.

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**Sources:**

- Housing LIN Breaking New Ground: The Quest for Dementia Friendly Communities  
[http://www.housinglin.org.uk/library/Resources/Housing/Support\\_materials/Viewpoints/Viewpoint25\\_Dementia\\_Friendly\\_Communities.pdf](http://www.housinglin.org.uk/library/Resources/Housing/Support_materials/Viewpoints/Viewpoint25_Dementia_Friendly_Communities.pdf)
  - Kings Fund <http://www.kingsfund.org.uk/projects/enhancing-healing-environment/ehe-in-dementia-care>
  - Alzheimer's Society Building dementia-friendly communities: A priority for everyone
  - Joseph Rowntree Foundation: Creating a dementia friendly York
  - Neighbourhoods for Life: Designing dementia-friendly outdoor environments
  - Fisher Center for Alzheimer's Research Foundation at The Rockefeller University. Reviewed by William J. Netzer, Ph.D. (2015) *Air Pollution May Raise Dementia Risk* <https://www.alzinfo.org/articles/air-pollution-raise-dementia-risk/>
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Helen Smith  
Spatial Planning Manager  
Wyre Forest District Council  
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Worcestershire  
DY11 7WF

14 August 2017

BY EMAIL

Dear Helen,

### **Wyre Forest District Council Local Plan Review Preferred Options**

Worcestershire County Council welcomes the opportunity to comment on the above consultation. The following is an officer response from across all of the directorates at Worcestershire County Council endorsed by the Cabinet Member with responsibility for Economy and Infrastructure. Through our comments we have highlighted matters which are of concern to Worcestershire County Council given our range of responsibilities and the services which we deliver to Worcestershire. We welcome the opportunity to continue to work with Wyre Forest District Council on the ongoing development of the plan, particularly in relation to the comments we have raised.

**Nigel Hudson**

**Head of Strategic  
Infrastructure &  
Economy**

County Hall  
Spetchley Road  
Worcester  
WR5 2NP

Yours Sincerely,

**Head of Strategic Infrastructure & Economy**

## Introduction

Listed below are detailed comments compiled by Worcestershire County Council (WCC) officers on the Wyre Forest Local Plan Review Preferred Options Document, June 2017.

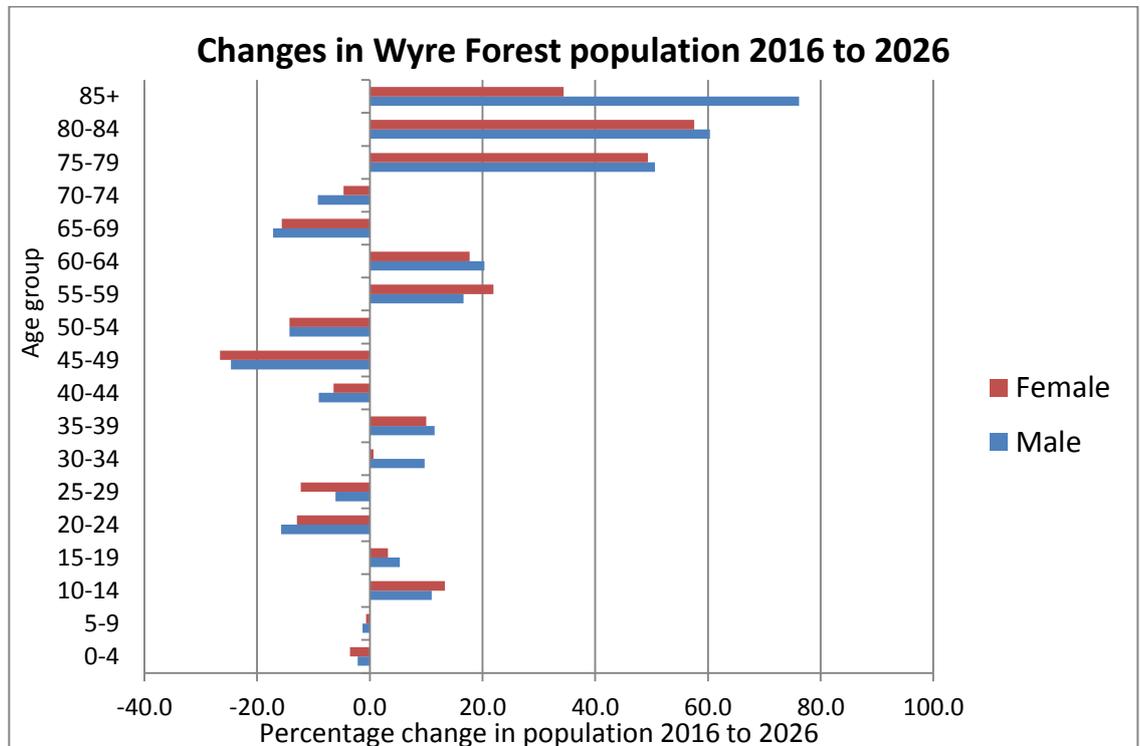
These comments are officer only comments from WCC, and reflect our current understanding of the WFDC Preferred Options consultation and its associated documentation.

Please note that if government decides to introduce permission in principle for allocated sites within plans, we would wish to talk to WFDC about requirements to support this approach especially given the county's role in education and as the local highway authority.

## 2.9

Table 2.0.1 in section 2.9 correctly highlights that population growth in Wyre Forest district is not going to be high over the next 20 years, and that a high proportion of residents are aged 65+.

As the graph below refines this further and illustrates that, between 2016 and 2026, there is likely to be a significant increase in people aged 75+. Due consideration therefore needs to be given to the needs of an ageing (and elderly) population and their needs particularly as people are not only living longer but are also living longer with poor health or complex health issues.



## Policy 5A

Item (v) under sub-section (c) in paragraph 5.4 refers to "*Protecting important historic buildings, monuments, sites of archaeological significance and the integrity of local planning designations*". This raises the question of what the definition of "*important*" is, as used here? What will constitute an important heritage asset? The NPPF consistently uses "*significance*", although "*importance*" is mentioned once in NPPF paragraph 128. In any event, what level of significance or importance does this policy imply is required to render these heritage assets and designations worthy of protection? Use of the word "*important*" here may unintentionally result in conflict/debate about the importance of any heritage assets that are affected by development proposals and, while the NPPF does specifically make reference to determining the "*value*" of heritage assets that would be affected by development proposals in paragraph 129, this is again couched in terms of "*significance*". We therefore suggest that consideration is given to either omitting the word "*important*", substituting it for "*significant*", or perhaps introducing some form of weighting/value in the reasoned justification as to what constitutes important. As an example, in this context important sites and designations could potentially include designated heritage assets (e.g. listed buildings, scheduled monuments, registered parks and gardens, or conservation areas), non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance to scheduled monuments, and heritage assets included on a Local List.

Part B of Policy 5A states that: "*Planning applications that accord with the policies in the Plan (and where relevant, with policies in Neighbourhood Plans) will be approved unless material considerations indicate otherwise*". We consider that the wording of this policy point requires some adjustment to reflect the fact that the Waste Core Strategy and Minerals Local Plan also form part of the Development Plan covering Wyre Forest District. We would suggest rephrasing the policy point as follows (additions in **bold**, deletions in ~~strikethrough~~): "*Planning applications that accord with the policies in the **Development** Plan (~~and where relevant, with policies in Neighbourhood Plans~~) will be approved unless material considerations indicate otherwise*", and referencing the Waste Core Strategy, Minerals Local Plan and Neighbourhood Plans in the supporting Reasoned Justification. For the same reasons, part C should also refer to the Development Plan.

## Policy 6A (Development Needs 2016-2034)

This policy states that 40 hectares of employment land is needed in Wyre Forest over the life of the plan. In "Duty to Co-operate" discussions we have previously highlighted the need to ensure any employment land provision is sufficient to enable some *Sui Generis* uses such as waste management facilities within the allocated areas. The Reasoned Justification supporting policy 6A focuses on housing provision, with little information provided about the requirements for employment land and we consider that there may be an opportunity to clarify this. However, we welcome the support given to "Waste Developments on

Employment Land" by Policy 21A (Urban Employment Land) and the supporting Reasoned Justification in paragraph 21.8.

We note that similar support is not included within Policy 21B (Rural Employment). The Waste Core Strategy includes a Geographic Hierarchy, and parts of Level 1 (Kidderminster Zone) and Level 2 (Droitwich Spa Zone) of this Geographic Hierarchy are within Wyre Forest District. These cover parts of the rural hinterland surrounding the urban areas, and as such it would be reasonable to expect that some waste development may take place on rural employment land. Policy 21B as worded currently does not appear to favour such development on any scale. We would welcome some amends to the supporting text to acknowledge this and ensure that there is no conflict between development plan documents.

### **Site allocations policy**

With regards the specific sites proposed for allocation, we are concerned that we have been unable to identify a background evidence base or work to consider these sites in relation to green infrastructure or its constituent elements of landscape assessment, biodiversity, blue infrastructure or historic environment, whether individually or holistically. It is therefore difficult to assess the potential for the sites individually or collectively to deliver sustainable development or for the plan to meet the requirement of NPPF paragraphs 109 and 110.

We recommend that ecological site assessment should be undertaken as early as possible in the planning process, prior to site allocation, and should be used to inform both the final site allocation and to develop a comprehensive and holistic approach to consideration of the impacts of the proposed development. The Worcestershire Green Infrastructure Partnership would welcome the opportunity to work with WFDC to develop a green infrastructure approach to site allocations within the plan, including desk based assessment and to discuss more detailed site assessment as appropriate.

With regards to green infrastructure we support neither option A or B, but instead a hybrid approach which removes from the final allocation those sites which have significant environmental constraints upon deliverability. This should be informed by further work including desk based assessment. The final allocation should cohesively treat the remaining sites in a manner which will facilitate the sustainable development aspirations as set out within the Plan's vision for the area.

We'd suggest this maximises the development quanta via the key strategic areas of: the East Kidderminster Corridor (including Option B); Urban Kidderminster and Stourport; the Kidderminster and Stourport Waterfront Sites; and the larger Lea Castle Complex (Options B).

In order to realise the quanta of development within such a 'hybrid' approach, it will be necessary to cohesively treat groups of sites which naturally sit together. The advantages of this approach go beyond securing an ecologically functional

landscape and would facilitate a quanta of growth required to trigger essential accompanying infrastructure as advocated by the Worcestershire Green Infrastructure Partnership.

This approach would work well if each cohesive 'cluster' of allocations were supported by tailored Green Infrastructure Concept Plans designed to maximise the environmental benefits for each group of allocations. Additionally, this would help achieve the aspirations of Policy 14 (see below).

### **Paragraph 16.6**

This paragraph states that adoption of the new Minerals Local Plan for Worcestershire is anticipated in late 2018. Please note that a revised Minerals and Waste Local Development Scheme has been approved by Worcestershire County Council, and adoption of the Minerals Local Plan is now anticipated in spring 2020.

### **Policy 6B**

The Worcestershire Archive and Archaeology service has no specific comments regarding the site allocations. A brief examination of the proposed allocations against the Worcestershire Historic Environment Record suggests that none of the proposed allocations would directly impact upon a designated heritage asset. On this basis any issues regarding the presence/absence of any undesignated heritage assets of archaeological interest, and any design or mitigation works that may be required as a consequence, could be dealt with as part of the normal planning and development process.

### **Policy 6F**

In practice, would the second bullet point under 'The Rural Economy' heading be too restrictive, given the amount of best and most versatile agricultural land in the district? 'Adverse impact' on best and most versatile could be argued for many different development proposals, and could be better expressed as direct and significant impact or a changing of the policy wording to reflect the need to look first to lower quality land wherever possible?

Also under 'The Rural Economy', it is not clear what "small scale" means in part (i) of the third bullet point. In part (iii), we question the use of use wording that differs from that used in the NPPF, which does not mention "integrity as this may result in intended debates over the nature of the Green Belt and its function and appearance.

### **6.41**

Suggest amend to last sentence to read, "The provision of superfast and ultrafast broadband in addition to the availability of mobile infrastructure able to provide 2G, 3G, 4G and increasingly 5G coverage will be essential in developing the economic base of the rural areas.

## 6.46

This paragraph usefully makes reference to the securing finance for the implementation of sufficient supporting infrastructure, and the need for a critical mass of development to enable the effective provision of sufficient infrastructure, which we support. This raises two additional issues:

1. Cross reference to comments on the infrastructure delivery plan and the viability assessment which provide evidence of both the infrastructure need and the financial challenge that exists in securing contributions. In particular that it is unlikely that development alone will pay for the delivery of infrastructure and external funding will be required from different sources.
2. Some of the infrastructure required may be outside of Wyre Forest District because of the impact of Wyre Forest residents and businesses on the wider transport network, for example. Whilst schemes outside of the district cannot be allocated in this local plan, they can be listed in the IDP and the second bullet on the provision of infrastructure could be expanded to include: "to enable effective provision of directly related infrastructure in the district and in neighbouring authorities".

The final sentence in 6.46 may risk raising unrealistic expectations, especially as the term "real benefit" is abstract, and would benefit from qualifying, such as real benefit to the district as a whole.

## 6.54 (Table 6.0.6)

In Table 6.0.6 the housing row states that "Large scale site releases more likely to enable viable provision of affordable housing". However, there is considerably evidence to the contrary, both in Worcestershire and nationally. The accompanying variability assessment indicates that small scale green field developments of between 30 and 75 homes are the most viable.

This may be too broad a statement, as the viability of affordable housing will depend on a range of factors, not least of which is location, as well as the scale of the development. Pockets of growth consisting of small-scale development will support existing infrastructure, but large-scale development will have a wider and more far-reaching impact on, for example, school places.

Infrastructure and roads: this line of the table appears to present the Kidderminster Eastern Relief Road as desirable in its own right which is contrary to discussions. The potential need for the relief road arises from the planned development to the east of Kidderminster. As the quantum of development is greater in option A it is the working assumption that this will be more supportive of the need for the road than option B, but we would also stress that no transport modelling has as yet taken place as we will undertake this once a development option has been chosen. Modelling will confirm (or not) the need for the road.

The results of the modelling notwithstanding, there are also concerns over the route of the relief road and the potential impact that this would have on protected sites in the district, including both SSSI's and Local Wildlife Sites in particular direct and indirect (notably severance) effects on Hurcott & Podmore Pools SSSI and Local Wildlife Sites, Captain's & Stanklyn Pools and Spennels Valley Local Wildlife Sites and Hoo & Barnett Brook Local Wildlife Sites. A complex of designated sites of nature conservation significance form biodiverse corridors which radiate into the open countryside from the peri-urban eastern fringes of Kidderminster. The Eastern Relief Road must address these effects in a manner which demonstrates net-gain for biodiversity; the quanta of mitigation will become a significant burden on the surrounding allocations. This is likely to far outweigh any opportunities for de-fragmentation/habitat creation or restoration which this new linear infrastructure might pose.

We would welcome further opportunity to discuss these issues with WFDC following completion of the transport modelling and its conclusions.

In the same table, the row for 'Green Infrastructure and Biodiversity' states that "The more dispersed nature of this approach will mean that more sites are affected. This, in combination with their typically smaller size (with the exception of the enlarged Lea Castle) will mean the delivery of Green Infrastructure requirements is more difficult"

We have some concerns about these comments about green infrastructure, and have impacts both locally and in combination on corridors. The Worcestershire Green Infrastructure partnership undertook an assessment of the site proposals at a high level, including some mitigation options in early 2017, and we would refer back to this document in assessing the green infrastructure impact of options A and B. We welcome the opportunity to work further with WFDC on green infrastructure.

### **Policy 7 - Strategic Green Belt Review**

The third and fourth bullet points set out the ADRs that are allocated or safeguarded, but neither the policy nor the reasoned justification explain why it is appropriate to allocate the Hurcott ADR.

#### **7.6**

The plan states that "minor changes to Green Belt boundaries may be appropriate to meet local needs or aspirations and to facilitate local and neighbourhood planning in the future". As national policy requires exceptional circumstances to justify alterations to green belt boundaries, and that green belt boundaries should be set for the plan period, we question whether local needs would be sufficient. As currently phrased this could result in both uncertainty and false expectations for local communities.

## **8.5/8.7/8.8**

We welcome the recognition of the need to provide homes to meet the needs of the elderly and those with disabilities.

### **Policy 8A - Housing Density & Mix**

Table 8.0.1 refers to 96.2% of affordable dwellings being one-bed or two-bed dwellings. This is an extremely high, particularly in comparison to 3% of 3 bed dwellings and it would be helpful to set out the local issues justifying such a proportion. Section 8.6 refers to the AMION report, which presumably sets out the more detailed evidence behind the figures, but from a cursory scan through this report, the relevant section wasn't immediately obvious. Given the proportion is so high, it may be worth summarising the evidence within the Local Plan itself.

### **Policy 8C - Addressing Rural Housing Needs**

The policy begins by referring to "small scale residential development". This is currently ambiguous as to whether this is referring to market or affordable dwellings or a combination of both.

The third sentence states that "Small scale residential schemes that take account of local housing needs on windfall sites will be proactively considered within the rural areas". It is unclear what "proactively considered" means. Would "positively considered" provide greater clarity if it is the intention that these sites would be looked upon favourably for a grant of planning permission (subject to meeting policy requirements, etc.)?

Under 'Rural Workers Dwellings', part (iii) refers to the "financial capabilities of the enterprise". It is unclear what this means and this could benefit from some supporting text or a footnote to provide clarity.

### **Policy 8D - Specialist Housing Requirements**

This policy would benefit from being divided into two, with Policy 8D concerning self-build and custom housing, and a new Policy 8E on housing for older people and others with special housing requirements (with consequent amendments to policy numbering for the current Policy 8E and 8F).

We welcome the policy's requirement for all major developments to consider bungalows and extra care needs within the overall housing mix. Specific policy support for accommodation for family members and carers is also welcomed. Specific support for those with disabilities should also be included in this policy. We would, however, encourage the Local Plan to require all new housing, or a proportion of new housing, to be built to design standards that allow people to remain in their own homes for as long as possible. The majority of people prefer to remain in their own homes as they grow older, where necessary making changes and adaptations to their properties should their needs change. New homes should be encouraged to meet the Lifetime Homes standard ([www.lifetimehomes.org.uk/](http://www.lifetimehomes.org.uk/)) which is intended to allow homes to meet changing needs over the course of people's lives. The application of such standards to

new build properties can help to realise some older people's aspirations to stay in their homes for longer.

### **Policy 8E - Gypsy and Traveller Site Provision**

The text at the end of the policy states that "Further small scale sites to meet the indicative need of 21 pitches to 2034 will be allocated in the Local Plan". Should the preferred options not seek to meet identified needs at this stage? There doesn't seem to be any evidence of why these additional pitches have not been identified.

### **Policy 9 - Health and Wellbeing**

We welcome the inclusion of a policy on health and wellbeing which will, subject to certain amendments, help to meet the health-related challenges facing Wyre Forest district, including high levels of obesity, mental health problems, and an ageing population. Given the particular challenges arising from an ageing population in Wyre Forest and the need to plan for dementia-friendly environments, consideration could be given to including a separate policy on these issues, or having separate parts within Policy 9.

The wide breadth of health and wellbeing matters included in the policy is generally welcomed, although this does mean that some parts of the policy duplicate other parts of the WFLP or are not specific enough. Much of the current content is too vague, and feels closer to a list of broad aims and objectives that would be more appropriate as introductory text. The following specific changes are recommended:

- We support Part 2 but feels that it would benefit from being made more specific. Building Regulations ensure that new developments meet a certain standard of energy efficiency. In addition if there is a desire to specific a requirement which is over and above the standard approach this needs to be specified.
- Part 3 would benefit from further detail to clarify whether it is seeking to improve availability of jobs or sustainable physical access to places of employment through the, for example provision of walking and cycling networks. This section could be expanded to include improvements to employment developments which can contribute towards health and wellbeing of employees. Developments should be designed to create opportunities for physical activity and working environments which support social interaction and relaxation of their employees. These measures could include the provision of open/green spaces, recreational facilities or on-site cycling storage/changing facilities etc.
- Part 4 would benefit from expansion as further details as it is unclear as to whether this is referring to domestic matters or business / industrial waste and recycling. This is critical because they have different health and well-being impacts and regulatory regimes. There is some potential for non-domestic matters for overlap with the Worcestershire Waste Core

Strategy which will need to be taken into account in refining and targeting this part of the policy.

- Improvement to accessibility relating to sections 5, 6, 8 and 9 of this policy.
- Accessibility is a major consideration in relation to health and wellbeing in the context of built environment. The provision of community uses, health services and facilities, green spaces or allotments can work for all the population groups only when they are accessible in terms of distance, ability and quality of their travel. This is why the creation of walkable environments to improve resident's access to these areas by foot is important. Further to these enhancing opportunities for the use of public transport should be encouraged through the Local Plan.
- Part 6 seems to cover two linked but separate issues, with the second section better matched to Part 10.
- We welcome Part 7 but suggest greater specificity over how and where these uses should be limited. Examples include:
  - The target limit of the overall proportion of units of particular uses in a given location;
  - Limit of particular types of premises in proximity to schools and community centres;
  - Limit of particular uses in proximity to areas of identified health deprivation and areas where obesity levels are higher than average;
  - Limiting those premises for which negative health impacts were identified in Health Impact Assessments.

Worcestershire County Council can provide good practice examples and would welcome further discussion on this issue as the policy develops.

- Part 8 may need more detail. Community orchards could also be included here.
- Most of Part 9 is already covered in Parts 5 and 6. The only element of Part 9 that is not covered elsewhere is social interaction. This is a valuable inclusion, and could be added to one of the other parts of the policy if 9 were to be deleted.
- Part 11 considers air quality, but we would welcome further attention being given to the links between air quality and health. In particular, reference should be made to the document 'Air pollution: outdoor air quality and health – June 2017' published by the National Institute for Health and Care Excellence. This document covers:
  - siting and designing new buildings, facilities and estates to reduce the need for motorised travel;
  - minimising the exposure of vulnerable groups to air pollution by not siting buildings (such as schools, nurseries and care homes) in areas where pollution levels will be high;

- siting living accommodation away from roadsides;
- avoiding the creation of street and building configurations (such as deep street canyons) that encourage pollution to build up where people spend time;
- including landscape features such as trees and vegetation in open spaces or as 'green' walls or roofs where this does not restrict ventilation;
- including information in the plan about how structures such as buildings and other physical barriers will affect the distribution of air pollutants;
- consider action to reduce and limit vehicle idling around schools and other vulnerable populations.

There are a variety of issues that may be too detailed for inclusion in the policy itself, but which should nevertheless be considered when planning for development. Many of these apply to the principles of planning and designing dementia-friendly environments, as many more people will live with dementia as the population of Wyre Forest ages, and we should act now to plan for these challenges. We recommend that these issues are taken into account as the WFLP develops, and it may also be helpful to outline some or all of those considered most relevant in the reasoned justification and/or in an accompanying SPD (discussed further below):

- The provision of accessible open spaces and walkable neighbourhoods can encourage and facilitate increased physical activity amongst the elderly and support their social interaction. It is crucial that these spaces and routes are safe and well-maintained.
- Public footpaths should also be well-lit and evenly surfaced.
- Where there are changes in ground levels, the transition should be gradual. Where steps are unavoidable, the provision of railings is necessary.
- Accessible public transport links, such as bus stops within walking distance from people's homes, are also crucial in maintaining the independence of the elderly.
- People living with dementia frequently stay at home because they do not feel safe to leave their house because the outdoor environment feels unsafe and unfamiliar. The provision of safe, well-lit, segregated and walkable routes connecting local green spaces and essential amenities could improve the likelihood of those with dementia continuing their everyday lives as part of the community. For example, being able to easily reach the park could offer the opportunity to spend quiet and relaxing time among other people.
- It is important that pathways contain seating areas in strategic places, such as at crossroads. People living with dementia might take a little bit

longer to remember their destination or how to get there. Circular routes provide opportunities to return to the same point if lost or confused. The design of street furniture should be kept simple and familiar to avoid it being mistaken for some other object. The positioning of street furniture, such as placing benches under street trees to allow shading during hot weather, is also important.

- Paving and tarmac should be plain and non-reflective and should contrast with walls in colour and texture. Dementia affects people's perception of their surroundings and different surfaces. Dark areas might appear to them as a hole in the ground, whilst glaring/shining surfaces can look like water or slippery surfaces.
- People living with dementia might feel confused when a lot of information is projected at them at the same time. They generally function better amongst objects in the environment that are simple and familiar. This is why sites should be well signed using a tonal contrast of colours with a clear and simple font.

### **Health Impact Assessments (HIAs)**

We would like to reiterate the value that HIAs can play in planning for healthy developments/environments. HIA ensures that the effects of development on both health and health inequalities are considered and addressed during the planning process. The importance of planning for health and the use of HIAs in planning is promoted through national planning policy and guidance. The National Planning Policy Framework recognises the need to understand and "take account of the health status and needs of the local population including expected future changes, and any information about relevant barriers to improving health and well-being."

Additionally, the national Planning Practice Guidance (PPG) recognises that, in relation to planning applications, HIA is a useful tool to identify where significant impacts on the health of local people are expected. A requirement for, or strong recommendation for, HIAs in the Local Plan could help to foster its use and lead to healthier developments. Worcestershire County Council can provide good practice examples and would welcome further discussion on HIA as the WFLP progresses.

### **Health Supplementary Planning Document**

We recommend that a Supplementary Planning Document is produced to support Policy 9 to provide detailed guidance on how developments can address the health and wellbeing challenges facing Wyre Forest district. Worcestershire County Council has a successful track record of working collaboratively with district councils on producing SPDs, including the 'Planning for Health in South Worcestershire' SPD, which provides guidance on interpreting the health-related policies of the SWDP. This SPD will be adopted late September 2017 and a draft can be accessed at [http://www.swdevelopmentplan.org/?page\\_id=12262](http://www.swdevelopmentplan.org/?page_id=12262).

Worcestershire County Council would like to discuss with WFDC the opportunity to develop a similar document.

## **9.5**

The first indicator in Table 9.0.1 is on GCSE achievement which is something that most people would not directly connect with health and well being. . A re-ordering of the table would be helpful to deliver the message. .

## **9.9**

The statement in Part E that "car parking provision should be minimised" should be amended to "car parking standards should be appropriate, and meet WCC car parking standards contained within the highways design guide available at: [http://www.worcestershire.gov.uk/download/downloads/id/1847/highways\\_design\\_guide.pdf](http://www.worcestershire.gov.uk/download/downloads/id/1847/highways_design_guide.pdf)". These standards are currently being updated and will be adopted from October 2017.

### **Policy 10B - Town Centre Development**

The second bullet point states that "New development for retail, commercial and leisure uses should follow a sequential approach and be directed to Kidderminster town centre as the strategic centre in the District first followed by Stourport-on-Severn and Bewdley". Would this mean that no new retail development could be considered in Stourport or Bewdley unless Kidderminster is considered first through a sequential test?

### **Policy 10D - Sustainable Tourism**

WCC support the approach to tourism outlined in policy 10D.

However, we feel that there is opportunity through the local plan review process to develop a revised and improved approach to car parking in the tourist towns of Bewdley and Stourport, where traffic congestion and lack of car parking are perceived to be limiting factors for the growth of the tourist industry, deter visitors and contribute to poor air quality in the towns, including within the AQMA.

Our proposal is that the car parks are comprehensively reviewed and that new locations are developed to reflect the predominant flows of the traffic and prevent it having to cross the towns, reducing traffic congestion and also providing more flexible car parking spaces. This is discussed in more detail in the attached document (Car Parking Review Bewdley and Stourport) and we welcome the opportunity to discuss these proposals in more detail with WFDC as the review of the local plan develops.

## **11.2**

The second sentence of para 11.2 states that, "The environment of Wyre Forest District is made unique by the valleys of the River Severn and River Stour and by the Staffordshire and Worcestershire Canal which all run through the District and help to shape the landscape". The Wyre Forest itself should be included as a major and distinctive landscape asset comparable to the rivers in terms of both character and significance within planning policy. It is the largest contiguous area of Ancient Woodland in England (source: Wyre Forest Landscape Partnership). The District shares approximately half of Wyre and its satellite woodlands with Shropshire, which is a significant area of landscape. Not least, the forest is a major Green Infrastructure hub in the district, which should be a material consideration in high quality design and reinforcing local distinctiveness.

The Wyre Forest Landscape Partnership has developed a suite of documents that sets out the strategic importance of the forest and its setting. This includes action areas for biodiversity, landscape, historic environment, forestry, access and education, economy and tourism, which should inform design opportunities, where appropriate, to deliver better connectivity to the forest.

### **Policy 11C - Landscape Character**

Reference to the Landscape Character Assessment Supplementary Guidance 2012 should be added to the second paragraph, such that it becomes "The Worcestershire County Council Landscape Character Assessment Supplementary Guidance (2012) and Historic Landscape Characterisation will be..."

#### **11.29**

Explicit reference should be made to the LCA Supplementary Guidance in paragraph 11.29. It is a document designed to inform planning and land management, and is a tool for planners, designers and local communities. The Supplementary Guidance is available here: [http://www.worcestershire.gov.uk/downloads/file/4788/landscape\\_character\\_assessment\\_supplementary\\_guidance](http://www.worcestershire.gov.uk/downloads/file/4788/landscape_character_assessment_supplementary_guidance)

### **Policy 11D - Protecting and Enhancing Biodiversity and Geological Conservation**

We strongly support the aspiration of the plan to deliver net-gain for biodiversity and would welcome the opportunity to work with WFDC to refine the policy as the local plan develops. To achieve this we recommend that preliminary ecological assessment or biodiversity impact assessments are undertaken as early as possible in the planning process (including prior to allocation) to establish the baseline biodiversity, evaluate each site's deliverability and to determine how net gain for biodiversity can be delivered. The policy refers to the "ecological network of wildlife corridors" which link "biodiversity areas", including areas identified for habitat restoration and creation.

These "ecological networks and wildlife corridors" should be explicit and clearly included within the Policies Map or other map, and the evidence base behind their definition clearly expressed and robustly defensible.

A clear definition of biodiversity net-gain should also be provided to accompany the policy and to ensure that net gain is clearly defined and a process for its determination is in place. A simple target should be established to demonstrate net-gain has been achieved for a given scheme. This could be, for instance, that post-development the baseline biodiversity unit value receives a 25% biodiversity unit uplift. This calculation would ideally be independently audited by a third party and confirmed in writing by the Local Planning Authority as part of the planning process pre-determination or through condition discharge. This approach would be similar to that adopted within the April 2014 Biodiversity & Development SPD supporting Lichfield District Council's adopted plan (February 2015).

We would recommend the Principles and Guidance for Biodiversity Net Gain (<https://www.cieem.net/biodiversity-net-gain-principles-and-guidance-for-uk-construction-and-developments>) as a source of information and guidance. It should be noted that further guidance on biodiversity net-gain is intended to be produced by CIEEM and partners in early 2018.

The following additional wording is proposed to be added to the reasoned justification: "In order to accurately determine whether no net loss and enhancement or net gain for biodiversity can be delivered by development, the LPA expects that, when requested, precise ecological assessment by suitably qualified people to accepted national standards is undertaken, sufficient to determine net impacts/change".

We would welcome further dialogue with regards whether a collaborative project could be initiated to formulate a locally tailored 'biodiversity metric' to help with this calculation. For instance, this could incentivise measures such as sustainable urban drainage (green roofs, living walls etc) which have both biodiversity value as well as contributing towards the aspirations for flooding and surface water drainage threaded throughout the Plan elsewhere. The aspirations for conservation of acid grassland, heathland and wetland networks could also be given greater weight through a locally tailored biodiversity calculator.

We strongly support the requirement for enhancement measures for biodiversity to be required at all scales of development (where appropriate to do so) and especially for enhancement features to be required within the built development. Inexpensive and valuable enhancement measures, especially when considered at this early and strategically cohesive manner, will enable small scale developments to also demonstrate how they have achieved net-gain for biodiversity.

Further cross-reference should be made to the emerging suite of Green Infrastructure Concept Plans (see comments under policy 14) which can provide more detailed and locally appropriate enhancement specifications.

Development should provide for the long term management and monitoring of biodiversity features retained and enhanced within the site and for those features created off-site to compensate for development impacts. It should be noted that the 2017 EIA Regulations place greater weight both on the requirement to monitor mitigation measures and for access (by both regulator and applicant) to suitable expertise in order to evaluate EIA proposals.

### **11.32**

The second sentence refers to sites being linked into a "detailed" network. The word "detailed" seems an unusual one; something like "more comprehensive and robust" may be better.

### **Policy 11E - Regenerating the Waterways**

The first two sentences of part A do not seem to be policy, and are more suited to the reasoned justification. A policy should not need to say that proposals should comply with its own contents or other policies.

### **Policy 12 - Strategic Infrastructure**

#### **Education Provision**

Current analysis of established households and child data, as at the population census 2011, derived a pupil yield of 0.28 pupils per dwelling.

At primary school level, known children data is only available for 4 years from the current date, as the data is based on actual births. At primary school level, there is localised surplus capacity within the area to support elements of housing growth but this will be insufficient to meet the needs of the proposed growth. However, this is not consistent and in some schools there are either no surplus places or insufficient surplus places to maintain an acceptable level of places for families moving in to the area or to absorb the additional places required as a result of housing development. Therefore, where there is a need for additional places within an area additional provision will be required to support the level of housing set out in the local plan.

At secondary school level, pupil numbers across Kidderminster are set to increase as a result of higher primary school numbers coming through the system and are set to rise to 649, exceeding the published admission number (or 'PAN', which sets out the number of pupils that can be admitted into each year group) of 635 in September 2021. Current forecast data suggests that pupil numbers will remain at or above PAN for the foreseeable future which may result in a need to expand secondary schools to accommodate pupil number growth from development. In Stourport, secondary school pupil numbers are set to increase and exceed the PAN of 224 from September 2018 onwards. Current forecasts suggest that pupil numbers will remain at or above PAN for the foreseeable future, again with the resultant need to expand secondary schools. In Bewdley, current forecasts suggest that secondary school pupil numbers are not anticipated to exceed the PAN for the foreseeable forecast period up to

2026, but this will be reviewed regularly and may change as a result of changing circumstances including development plan allocations and windfall.

In conclusion, there are currently sufficient school places within the area to maintain the current level of forecast pupil numbers before any development takes place. Where there is an identifiable need, for example in the secondary phase of education in Stourport, the Local Authority will continue to adapt to demographic change in ensuring there is a sufficient supply of statutory school-age places within the Wyre Forest area.

Children, Families and Communities (WCC) have no specific preference for the options put forward under Option A and Option B. However, pockets of growth consisting of small-scale development will support existing infrastructure in rural locations, although the accumulative impact of such development may result in a need for either school expansions or new schools. Any school expansions will be subject to discussion with existing schools. Large-scale development will have a wider and more far-reaching impact on school places and, depending on the outcomes of this consultation, it is most likely that a new primary school will be required to support the level of provision in the east of Kidderminster as set out under options A and B. The IDP provides further detail of options.

The Local Authority will continue to monitor pupil numbers and, where new infrastructure is required as a direct result of housing proposals, will seek to mitigate the impact of the development on education provision through s106 developer contributions.

## **12.6**

The Worcestershire and Greater Birmingham and Solihull LEPs are referred to here as "infrastructure providers". These bodies do not directly provide infrastructure, but rather seek and coordinate funding for others to deliver, so it may not be appropriate to refer to them in these terms.

### **Policy 13 - Transport and Accessibility in Wyre Forest**

Part C could also refer to Worcestershire's Parking Standards referenced above. Part F appears to be closer to background information than policy. Need to amalgamate with part G. The acronym "SWAT" should be explained. Question the value of the final bullet point in part F.

This policy is noted and supported. However, WCC note that the transport modelling for WFDC local plan has not been undertaken, and it is proposed that this exercise is undertaken once an agreed development option has been decided upon. The outputs of the modelling will be used to inform the transport schemes in the local plan and in policy 13F.

The transport modelling will also consider the impacts of the proposals on strategic routes outside of WFDC and options / proposals for enhancements or alternative provision. The modelling work will require a period of 6 months to complete once we have received a single set of sites. The modelling may

identify schemes required outside of the Wyre Forest district boundary. We understand schemes outside of the district cannot be allocated into the WFDC local plan; these will be included and referenced in the infrastructure delivery plan and in policy as required. We welcome the opportunity to work further with WFDC on this policy and the transport and accessibility proposals as the plan develops and to take forward the transport and infrastructure policies once a development option has been confirmed and further evidence-based modelling has been completed.

### **13.30**

The statement that "Kidderminster bus station ... has some shortcomings" is extremely vague. The plan should specify what these shortcomings are.

This statement could be changed to:

Kidderminster Bus Station is in private ownership (Hendersons), forming part of the Weavers Wharf development and is not widely utilised. The bus station is accessed via Corporation Street, and provides access directly into the town centre. Despite this facility being relatively well located, in recent years, local bus operators have increasingly forsaken the bus station in favour of bus stops in the vicinity of Exchange Square, as this reduces dwell time and operating costs, as well as being more popular with bus users. As a result, presently the bus station is only lightly used.

The proposed reopening of Worcester Street to through traffic is expected to further reduce demand to use the bus station, as new bus stops proposed in the location will enable 'through' bus services to avoid Kidderminster Ring Road, operating through the heart of the town centre instead.

### **13.35**

The wording of the final bullet point is awkward. Suggest changing to: "To deliver transport schemes to accommodate development growth set out in the Local Plan and any subsequent windfall development."

### **13.38**

The final sentence should form part of the policy requirements of policy number 13 and should be moved into the policy itself and not form part of the reasoned justification.

## **Policy 14 - Strategic Green Infrastructure**

The policy needs to be accompanied by a definition of green infrastructure, preferably the definition used in the Worcestershire GI Partnership. The policy also needs to clarify whether the policy will include gardens as part of the GI requirement. The standard GI approach in Worcestershire is to exclude gardens from assessment of GI on development sites because there is no certainty of their future management, limiting their GI value.

We welcome the recognition and mapping of biodiversity assets (including priority habitats) as GI assets. We would advocate that the semi-natural habitats which connect these GI assets are also critically important in ensuring their conservation (as echoed in Paragraph 11.32). This would benefit from further clarification and greater weight in Policy 11D and Policy 14.

We welcome the cross-referencing of Strategic GI Policy 14 within the contexts of Policy 11D, 27c (Diii) and 27E. We would encourage further cross-referencing within paragraphs addressing each of the key strategic development areas outlined earlier.

Currently, Policy 14 (Clause D) encourages developers to agree with Wyre Forest District Council the Green Infrastructure 'matters' prior to application. It would be beneficial to make a clear reference to the services available through WGIP in this process. We would therefore welcome inclusion, within the reasoned justification for Policy 14 of Green Infrastructure Concept Plans where these are available and have been endorsed by Wyre Forest District Council. While the production of Green Infrastructure Concept Plans has historically been at the behest of each Local Planning Authority, as indicated in Paragraph 14.4, the GI Partnership welcomes collaborative working with developers in developing GI Concept Plans for key allocations and in achieving the aspirations for strategic GI as otherwise set out in Policy 14.

In turn, WGIP will look to Wyre Forest District Council as both a GI Partner and key stakeholder in endorsing and/or adopting GI Concept Plans, and in the role of advocating with potential developers so that genuine engagement with GI Concept Plans is possible at the earliest possible stage.

Part A states that "The existing green infrastructure network within the District will be shown on the Policies Map and will be safeguarded from inappropriate development". We welcome this statement and will work with WFDC to undertake the necessary analysis of the green infrastructure network to include on the policies map. This will necessarily be high level and more detailed work will be required to ensure that individual development proposals do not have an adverse impact on the green infrastructure network.

Part C should aim to deliver 40% GI, notwithstanding site-by-site viability. 40% GI is an established, aspirational target for development across Worcestershire, whereby the capacity to deliver multifunctional GI and connectivity is maximised. For the standards in part C, there is also a need to specify whether this includes private gardens, communal spaces, etc. We understand that the figure of 35% was derived from the viability assessment. However, in our comments on the viability assessment we have questioned the understanding of green infrastructure that underpins this assessment and hence, query the need for the 35%. Delivery of green infrastructure has always been subject to viability, as with all other proposals in the plan. We also have concerns about the justification of a 35% target and how this could be evidenced at an EiP.

## **14.2**

The first sentence of this paragraph states that "The District has a unique environment formed from different landscape character areas". It should be noted that landscape character areas only cover the rural parts of the district. The environment is also important in urban areas.

In addition to the waterways, Wyre Forest and its landscape setting, plus other areas of woodland (e.g. Chaddesley Wood and Kingsford) offer opportunities for enhancing the currently fragmented areas of woodland that are a significant feature of the district's GI in need of better connectivity.

### **Policy 15A - Water Conservation and Efficiency**

Part (i) calls for develop that "Incorporates design features that will reduce water consumption". If this is to be included, more detail is needed on the level of reduction required if this is to be over and above existing Building Regulations. As part (ii) is not exclusive, everything in part (iii) would technically be covered by part (ii). However, there is a different emphasis in the two clauses which could be strengthened to benefit the policy and provide greater clarity.

#### **15.6**

The text here refers to Severn Trent Water's assumptions of increasing efficiency, but it is unclear how these relate to the proposed WFLP policy 15A. Will STW's anticipated reductions be achieved through national measures (e.g. Building Regulations), local measures (e.g. WFLP requirements) or simply by customer education and awareness about the need to use water more efficiently?

#### **15.12**

We question whether "strategies" is the right word to begin the first sentence. "Measures" may be a more appropriate alternative.

### **Policy 16A - Pollution and Land Instability**

Pollution and land instability seem unrelated, so it is unclear why they have both been included in the same policy. Part B refers to land contamination, which has obvious links to pollution, but land instability is a wholly distinct issue and including it here does not seem appropriate.

### **Policy 16B – Minerals**

#### **Minerals Safeguarding**

We welcome the inclusion of Policy 16B (Minerals). To accord with the requirements of national policy and to assist in the implementation of this policy, we suggest some adjustments to the policy and supporting Reasoned Justification.

Policy 16B could be strengthened by requiring applicants to assess the potential impacts on both mineral resources and minerals infrastructure. We suggest the following amendments to policy 16B to address this:

"1. Proposed development in Minerals Consultation Areas will be required to assess **the potential for the proposed development to sterilise locally or nationally important mineral resources, or impact on the operation of permitted mineral sites or supporting infrastructure** ~~the scope for minerals extraction before development takes place.~~ Planning permission will not be granted for non-mineral development that would lead to the unnecessary sterilisation of mineral resources **or unacceptable impacts on the operation of permitted minerals sites or supporting infrastructure** within a Minerals Safeguarding Area (MSA) unless:

a. The applicant can demonstrate that the mineral concerned is no longer of any value or potential value, **or the supporting infrastructure is no longer necessary**; or

~~b. The mineral can be extracted satisfactorily prior to the development taking place; or~~

~~e. b.~~ The development is of a temporary nature and can be completed and the site restored to a condition that does not inhibit extraction within the timescale that the mineral is likely to be needed; **or**

**c. Where sterilisation of a locally or nationally important mineral resource could occur, opportunities for extraction of the resource will be optimised; or**

**d. Where permitted mineral sites or supporting infrastructure could be compromised, sufficient mitigation measures will be put in place to ensure their continued operation.**

2. Developers will be encouraged to recycle and reuse construction waste on-site and use substitute or secondary and recycled minerals within development."

To support these changes, we would recommend including the following text within the Reasoned Justification:

- Development can "sterilise" mineral resources (make them inaccessible for potential extraction) or prejudice the operation of minerals sites and supporting infrastructure. This can be either directly, for example by building over land that contains minerals; or indirectly, for example though the introduction of sensitive land uses in close proximity to these resources or sites.
- In order that Worcestershire's limited natural resources are used prudently, planning applications within Mineral Consultation Areas should be accompanied by a Minerals Resource Assessment which evaluates how to optimise opportunities for extraction of any locally or nationally significant mineral resources. This should take a sequential approach to considering the following possible outcomes:

- 1) Extracting all of the resource within the proposed development site and in the area which would potentially be sterilised by the development, either in advance of development taking place or in phases alongside the development;
  - 2) Where extracting all of the resource would prevent a suitable landform for subsequent development, consider whether a proportion of the resource could be extracted; or
  - 3) As a last resort if neither (1) nor (2) is possible, consider whether any opportunities exist for "incidental recovery of the mineral resource".
- Permitted mineral sites and the supporting infrastructure of existing, planned and potential storage, handling and transport sites are important to delivering a steady and adequate supply of mineral resources in Worcestershire, and it is therefore important that they are not adversely impacted by sensitive or inappropriate development that would conflict with the use of sites identified for these purposes.
  - Different types of development may or may not conflict with the use of the mineral site or supporting infrastructure. The potential for conflict is a function of both the sensitivity of the land use or receptors at the proposed development and the techniques or processes employed at the minerals or infrastructure site. Applicants will need to assess whether the normal operation of the mineral site or supporting infrastructure could have adverse impacts on the proposed land use or any users of the proposed development. This should include consideration of issues such as (but not limited to) any noise, vibrations, dust, or fumes that may result from the normal operation of the site, and could lead to complaints which could jeopardise the continued operation of the mineral site or supporting infrastructure. Techniques such as considered design, site layout and landscaping or screening of the proposal may in some cases be adequate to mitigate any impacts.

Footnote 11 in part 1 of Policy 16B refers to exempt development. We support the concept of exempt development in order to avoid creating an unnecessary barrier to types of development which are unlikely to cause needless sterilisation of minerals, but we have some concerns over the definition included in Footnote 11. A number of exemptions were proposed in paragraph 8.4 of the recent Third Stage Consultation on the Minerals Local Plan. These have not yet been tested at examination but provide a more comprehensive list of exemptions. We would suggest that footnote 11 could include a caveat so that it reads: "Excluding 'exempt development', namely householder applications; development already allocated in the Local Plan; infilling in existing built-up areas; **or as defined in the Minerals Local Plan**".

We also have a slight concern over "development already allocated in the Local Plan" being totally exempt from mineral safeguarding requirements. We consider that mineral safeguarding needs to be considered in the selection of sites, and it may be the case that some sites will need to consider mineral safeguarding and

prior extraction but can still be allocated for future development. This is discussed further in relation to site allocations below.

Paragraphs 16.12 and 16.13 should refer to MCAs rather than MSAs.

Worcestershire County Council is currently taking into account comments on the Third Stage Consultation on the Minerals Local Plan, including those from Wyre Forest District Council. We would welcome continued engagement in developing the mineral safeguarding policies in the emerging plan and for these to align as closely as possible with the requirements in the Wyre Forest Local Plan.

We were pleased to have the opportunity to provide comments at an early stage during informal consultation on the potential site options. The table at Appendix 1 highlights cross-over between minerals safeguarding considerations and the proposed site allocations.

## **Coal**

Paragraph 16.19 refers to coal extraction. Whilst there are some coal deposits in the western parts of Wyre Forest, the Coal Authority no longer classifies these as a "surface coal resource" that is likely to attract further interest. However, former workings have left a legacy of mining features and hazards in parts of Wyre Forest district which are locally significant and may cause issues of land stability. We would recommend that you contact the Coal Authority to ensure you have the latest data, and that these areas are shown on the Proposals Map and referenced in the Reasoned Justification supporting policy 16A (Pollution and Land Instability).

## **Mineral Resource Consultation Areas**

WCC (as the Minerals Planning Authority) is not seeking the removal, on safeguarding grounds, of those proposed WFLP sites that fall within the adopted MLP's Mineral Consultation Areas or the emerging MLP's proposed Mineral Resource Consultation Areas. Similarly, WCC does not require full extraction to take place ahead of any proposed development. Based on the assessed need for housing and employment land in Wyre Forest District, we believe that there is a strong argument that the need for the non-mineral development (housing and employment land) which needs to be provided through site allocations in the Local Plan is such that it outweighs the long-term economic value of the mineral resource.

However, opportunities should still be optimised for partial extraction or incidental recovery of the resource, either in advance of development taking place or in phases alongside it.

We consider that this requirement should be highlighted as part of the site allocation information and the exemption either removed from or amended in footnote 11 in Policy 16B. A minerals resource assessment should be required for all sites within Mineral Consultation Areas to inform design at outline planning stage. Consideration from the outset could offer opportunities to integrate partial

extraction as part of ground works for footings, landscaping, SuDS schemes, integration of physical features and green infrastructure in the overall site design.

### **Mineral Infrastructure Consultation Areas**

The allocation of WFLP sites within the proposed Mineral Infrastructure Consultation Areas is not necessarily precluded, but consideration needs to be given as to whether the potential development would result in an unacceptable impact on the continued operation of the relevant supporting infrastructure or the successful restoration of the minerals site. Different types of development may or may not conflict with the use of the mineral site or supporting infrastructure. The potential for conflict is a function of both the sensitivity of the land use or receptors at the proposed non-exempt development and the techniques or processes employed at those sites.

In considering whether to allocate WFLP sites within these consultation areas, we consider that Wyre Forest District Council will need to assess whether the normal operation of the mineral site or supporting infrastructure could have adverse impacts on the proposed land use or any users of the proposed development. This should include consideration of issues addressed in the Development Management policies of the draft Minerals Local Plan, including but not limited to any noise, vibrations, dust, or fumes that may result from the normal operation of the site, and could lead to complaints which could jeopardise the continued operation of the mineral site or supporting infrastructure if potential impacts are not considered in advance.

It may be possible to mitigate any potential impacts through measures such as considered design, site layout and landscaping or screening of the proposal. Any necessary measures could be set out as part of the site allocation policies. If mitigation measures would not be sufficient to prevent an unacceptable impact on the continued operation of the batching plant or the restoration of the minerals site, then the potential site should not be allocated.

We would be happy to engage in further discussion on this as required.

### **Potential Mineral Site Allocations**

Whilst none of the MLP potential site allocations overlap with the potential WFLP sites, some are in close proximity. We would welcome further discussion on how to resolve any potential issues of sterilising mineral resources or negatively impacting on potential mineral sites through the introduction of additional sensitive receptors in close proximity, as well as the potential impact of any mineral development on the potential housing/employment allocations.

However, depending on when these developments come forward, there may be potential for any mineral resources excavated during the development of these sites (as required for mineral safeguarding purposes) to be processed at these potential minerals sites, and/or for the minerals sites to supply building materials for the developments.

## **Policy 16C – Waste**

We fully support Policy 16C and the supporting Reasoned Justification in paragraphs 16.22 to 16.29.

### **Safeguarding Waste Management Development**

There are a significant number of operational waste sites within Wyre Forest district. Some are seen as relatively low-value land uses and could therefore be vulnerable to redevelopment for other uses. Relocating a waste management operation can be difficult, therefore existing facilities should be safeguarded from development of non-waste related uses. Policy WCS 16 of the Waste Core Strategy seeks to safeguard these existing facilities and a web-map is available showing the sites and the 250m policy buffer around them:

<http://gis.worcestershire.gov.uk/website/WasteCoreStrategy/>

It is unlikely that this will be a significant factor in deciding between the two spatial options, but the relationship between the new and existing land uses should be considered before allocations are made or new permissions are granted. Any potential impacts should be considered in advance and included in any guidance on the design and development of the site allocations. This would mean that it will usually be possible to minimise conflict between the existing waste management facility and the proposed development.

## **Policy 18B**

This policy states that *"Small scale residential developments on infill plots within the settlement boundaries of the three main towns and the villages will be encouraged provided that they contribute to the existing character of the area in terms of design, density and layout"*. Infill proposals have the potential to harm the character and form of historic areas, and policies regarding infill development should be more specifically linked to policies that seek to preserve the existing character of an area, in order to avoid or minimise risk of conflict at an early stage in the planning process. Sub-sections (i) to (iv) of policy 18B contain no mention of conservation areas and historic character, etc. and would be better linked or referenced to policy 11B - Historic Environment. In particular, sub-sections A and B of policy 11B could be referenced, including items (i), (iii), (vi), (vii), (viii) and (ix), as well as policy 27A - Quality Design and Local Distinctiveness, sub-sections A and B including items (ii) and (iv).

## **Policy 20A - Built Communities**

The title of this policy should be changed from "Built Communities" to "Community Facilities".

## **Policy 20C - Provision for Green Space and Outdoor Community Uses in Development**

We suggest that the first paragraph in this policy is more appropriate for a reasoned justification.

New large-scale development can put strain on the existing public rights of way network which may not be fit for the increased use developments can bring. Some new developments may necessitate new public rights of way to be dedicated to link with the existing network, or necessitate improvements to be made to the existing network which we would expect developers to address.

Future applicants should obtain a Public Rights of Way Search for development sites, including a check of the Public Path Orders list and the Modification Orders register, in order to ascertain the location and status of any public rights of way recorded on the Definitive Map that may be affected and to check for any claims or changes to the public right of way network in the area.

Any future applications should demonstrate how the proposals will protect and enhance public rights of way and access in line with the National Planning Policy Framework.

If it is necessary to divert/extinguish/create public rights of way in order for permitted developments to take place, this should be completed to confirmation stage before any development affecting the public rights of way is started. Application should be made to the Planning Authority.

Applicants should note paragraph 75 of the National Planning Policy Framework, which states that "planning policies should protect and enhance public rights of way and access". Applicants should note that all public rights of way crossing or adjoining a proposed development site should be marked on the plan to be submitted with the planning application, while the information supplied by an applicant should make clear how the potential development will impinge on any rights of way.

Developers should also be aware of the Department of Environment Circular 1/09 (part 7) which explains that the effect of development on a public right of way is a material consideration in the determination of applications for planning permission and that the grant of planning consent does not entitle developers to obstruct a public right of way.

We would hope to see the above matters addressed in any future applications, along with information on how applicants have considered the following obligations toward any affected public rights of way:

- No disturbance of, or change to, the surface of the paths or part thereof should be carried out without our written consent.
- No diminution in the widths of the rights of way available for use by the public.
- Buildings materials must not be stored on the rights of way.

- Vehicle movements and parking to be arranged so as not to unreasonably interfere with the public's use of the rights of way.
- No additional barriers are placed across the rights of way. No stile, gate, fence or other structure should be created on, or across, a public right of way without written consent of the Highway Authority.
- The safety of the public using the rights of way is to be ensured at all times.

If developments cannot be carried out without temporarily closing public right/s of way for the safety of the public during construction, application should be made at least six weeks in advance to the Mapping Team of the Countryside Service at Worcestershire County Council.

### **Policy 22F - Specialist Retailing**

For the first point under main bullet point four, it should be noted that development in the green belt is subject to strict tests. The issue of visual amenity is included in the NPPF in relation to the enhancement of beneficial uses. As drafted, this element of the WFLP policy seems to slightly twist the NPPF approach to one of guiding the appropriate location for certain developments. Proposals for development in the green belt should be tested against the NPPF, in particular paragraphs 88 and 89, which state that, subject to limited exceptions, new buildings in the green belt will be inappropriate and will need to demonstrate very special circumstances. The WFLP bullet point, as drafted, could be seen to suggest a weaker level of protection.

### **Policy 24A - Telecommunications and Broadband**

Worcestershire County Council have made some suggested amendments to policy 24A below to better align the policy to the Worcestershire Local Broadband Plan and central government's national commitment to providing 10mbps broadband speeds as a minimum.

#### **Broadband and Mobile Infrastructure**

A. New development should be provided with ultrafast broadband infrastructure or alternative superfast solutions, where appropriate: e.g. mobile broadband, fixed wireless and/or Wi-Fi. Wherever practicable, ultrafast broadband capacity should be incorporated to agreed industry standards (15). Developers and infrastructure providers (16) should work to deliver the highest specification possible for each individual site.

i. Developers of new developments (residential and commercial) will be expected to facilitate the provision of a Full Fibre Network infrastructure (Fibre to the Premises (FTTP)). suitable to enable broadband service for all occupiers and to act as 'backhaul' for other technologies e.g. for mobile operators through network carriers that can design / provide materials for a bespoke duct network, for the development.

#### **Telecommunications and Broadband**

B. When considering telecommunications development proposals, developers will be expected to facilitate state of the art mobile coverage (up to and including 5G) and capacity for all occupiers of the development. The following factors will be taken into account:

- i. Operational requirements of the telecommunication networks and the limitations of the technology, including technical constraints on the location of telecommunications apparatus.
- ii. The need for ICNIRP Guidelines (17) (and/or any other relevant guidance in place at the time of the application) for safe emissions to be met.
- iii. The need to avoid interference with existing electrical equipment and air traffic services.
- iv. The potential for sharing existing masts, buildings and other structures. Such evidence and justification for any new site should accompany any application made to the local planning authority.
- v. Development should also consider the provision of in-building solutions.
- vi. The impact of the development on its surroundings with particular regard to the following criteria:

- The siting and appearance of the proposed apparatus and associated structures should seek to minimise the impact on the visual amenity, character, landscape or appearance of the surrounding area, particularly if is proposed in a Conservation Area.
- If on a building, apparatus and associated structures should be sited and designed in order to seek to minimise the impact on the external appearance.
- When choosing a suitable location for the apparatus ongoing access at appropriate and suitable times should be considered.

## 24.2

Please amend 3rd sentence to read "Increasingly the demand is for ultrafast FTTP broadband".

### **Additional Reasoned Justification Comments**

We propose two additional reasoned justification paragraphs which relate to the addition of paragraph i. under section A of the policy.

Some infrastructure providers have agreed to provide FTTP infrastructure to new developments of a certain size at no cost to the developer and for a contribution if below a certain size e.g. Openreach; whilst others will provide and deliver materials at zero cost to the developer, e.g. Virgin Media. Ideally, to encourage competition and future appeal of their site, a developer could choose to deploy at least two infrastructure providers on a site.

In some exceptional locations outside urban areas, an equivalent alternate solution may be acceptable if developers are unable to facilitate an FTTP solution, although FTTP is the preferred option and the burden of proof lies with the Developer as to why an alternate solution is required. In any case

Developers must, as a minimum, make sure that broadband services that meet the standards of the European Digital agenda are made available to all premises, at market prices and with a choice of UK service providers.

### **Policy 24B - Renewable and Low Carbon Energy**

Neither the policy nor the supporting text refers to the move towards smart technology, including smart meters and smart grids.

Part B requires new developments to include renewable or low-carbon energy generation. Where renewables are not installed (for reasons of viability or practicability), consideration could be given to allow for this renewable technology at a later date. Housing and associated infrastructure can be expected to be in use for 50 years+ and should continue to remain fit for purpose.

Part C requires large-scale development proposals to examine the potential for a decentralised energy and heating network. The plan does not explain, however, how this potential should be examined and what evidence should be provided to say whether or not a scheme is feasible. A stronger statement could be provided to determine the level of examination required to ensure heat networks are given due consideration. If a district heat network already exists, there could also be a requirement to connect to the network unless evidence demonstrates this is not practicable or viable.

Part E refers to appropriate consultation with the community regarding renewable energy. This could also be extended to consider the options for community shares in renewable energy schemes, offering members of the community opportunities to invest in local energy schemes. This could help with the funding of the installations and could improve community involvement in energy projects.

### **24.12**

Although the plan does refer to the "then" Department for Energy and Climate Change, it should note that this issue now falls under the Department for Business Energy and Industrial Strategy.

### **Policy 27A - Quality Design and Local Distinctiveness**

Part A of this policy promotes high levels of sustainability. It is important that developments remain fit for purpose over their lifetime as the climate changes. Consideration could be given to long-term suitability, taking into account the risk of higher temperatures and the possibility of overheating and excess rainfall. There may be opportunities for slowing excess water through the use of green infrastructure, and wider guttering can help to cope with higher-intensity rainfall. The risks infrastructure posed by changes in climate need to be considered to ensure continuity of services and to limit risks of disruption. Further advice and guidance can be sought from the UK Climate Change Risk Assessment, which covers risks to infrastructure and the built environment.

Part B (x) of this policy could consider the provision of electric vehicle infrastructure. The plan focusses on the road network and car travel, with the proposal for an additional highway to support housing development. Current government policy is to support the move to electric vehicles, as referred to in the 2017 Queen's Speech and the Industrial Strategy green paper. Government targets are for all new cars and vans to be ultra-low emissions by 2040 and all cars and vans on the road to be ultra-low emissions by 2050. This will be achieved through moving to a range of alternative fuels, including hydrogen and electricity, which can support improvements in air quality. Electric vehicle technology is more advanced and the number of manufacturers producing plug-in electric vehicles is increasing each year. The WFLPR doesn't appear to support this long-term vision with a commitment to charging infrastructure on commercial or residential developments.

It may be appropriate for policy 27A in conjunction with policy 11A to set out that developments should require the appropriate storage of waste and recycling bins for each property, along with safe access for waste disposal vehicles.

### **Policy 27C - Landscaping and Boundary Treatment**

We consider that Policy 27C could be strengthened by reflecting the Waste Core Strategy's policy WCS 5 and its Explanatory Text paragraphs 4.46 and 4.47, which seek to prevent the inappropriate disposal of excavated materials in artificial mounds unless the use of such material is fully justified as being necessary for purposes such as flood management schemes, levelling of sites, or features for noise attenuation. We suggest that this could be addressed through the inclusion of an additional point under part C of policy 27C such as "Landscape schemes must demonstrate that they: ... **Utilise any excavated materials on-site in an appropriate manner and any proposed artificial mounds or bunds are fully justified**". The Reasoned Justification could then refer to the Waste Core Strategy.

Part C (iii) should also take into account Historic Landscape Characterisation.

### **Minor issues (typos, etc.)**

#### **8.13**

In the third line, "housing rented" should be "rented housing".

### **Policy 8C - Addressing Rural Housing Needs**

Under 'Rural Exception Sites', the first three words of part (i) should be deleted. Under 'Replacement Dwellings in the Open Countryside', part (ii) should refer to "curtilage only being amended if required", rather than "of". Part (iii) should introduce the list with a colon, not a semicolon.

### **Policy 8E - Gypsy and Traveller Site Provision**

The text at the end of the policy should refer to "medium-term needs up to 2020".

### **Policy 9 Health and Well Being**

Some words should be deleted from the opening sentence, such that it becomes "Development should ~~help maximise opportunities to improve quality of life to~~ make it easier for people in Wyre Forest District to lead healthy, active lifestyles by".

#### **9.2**

In "peoples", the apostrophe should be before the "s", as "people" is already plural.

#### **9.6**

The fractions here should be written out in words.

#### **9.8**

In the second sentence, the comma after "locally" should be deleted.

#### **10.3**

In the second sentence, "initiative" should be "initiatives".

#### **10.11**

In the second sentence, it should be "The District's settlement hierarchy of towns is..." rather than "are".

#### **10.17**

In the second sentence, the apostrophe in "town's" should be deleted.

#### **10.18**

In the third sentence, the extra comma should be deleted. Also in this sentence, "as well" should be "as well as".

### **Policy 10D - Sustainable Tourism**

In the third bullet point, the final word should be "centres" rather than "centre".

### **Policy 11A - Quality Design and Local Distinctiveness**

Part C should be changed to become "...design processes set out within the latest adopted Design SPD ~~(June 2015)~~ and ~~adopted later revisions~~".

### **11.33**

This sentence should be amended as follows: "Two of the District's three main waterways: (the River Stour and the Staffordshire and Worcestershire Canal) pass..."

### **13.24**

"Department of Transport" should be "Department for Transport".

### **Policy 14 - Strategic Green Infrastructure**

Part D refers to "Worcestershire's" but it should be just "Worcestershire".

### **15.2**

In the fourth bullet point, "affect" should be "effect".

### **Policy 15C - Flood Risk Management**

Should the second sentence in part (v) be amended to become "...appropriately landscaped for biodiversity benefits"?

### **22.19**

Suggest deleting "roadside" from "roadside petrol stations".

### **23.10**

"passangers" should be "passengers".

### **24.9**

The explanation in brackets in the first sentence seems superfluous.

### **Policy 27C - Landscaping and Boundary Treatment**

In part C(vii), the word "too" should be "to".

### **Glossary**

The definition of Major Developments should introduce the two examples with a colon, not a semicolon.

**Appendix 1: Links between minerals safeguarding considerations and the proposed site allocations.**

WFLPR Policy	Core / Option A / Option B	Site ref	Site description	Proposed Use	Mineral Consultation Area in adopted County of Hereford and Worcester Minerals Local Plan?	Proposed Mineral <u>Resource</u> Consultation Area in Third Stage Consultation on Minerals Local Plan?	Proposed Mineral <u>Infrastructure</u> Consultation Area in Third Stage Consultation on Minerals Local Plan?	Within 500m of proposed minerals site allocation in Third Stage Consultation on Minerals Local Plan?
Policy 30 (Kidderminster Town Allocations)	Core site	AS/1	Comberton Place	M	-	-	-	-
	Core site	AS/5	Victoria Carpets Sports Ground	H	-	✓	-	-
	Core site	AS/6	Lea Street School	H	-	-	-	-
	Core site	BHS/2	Bromgrove Street	M	-	-	-	-
	Core site	BHS/11	Green Street Depot	E	-	✓	-	-
	Core site	BHS/16	Timber Yard, Park Lane	M	-	✓	-	-
	Core site	BHS/18	Blakebrook School	H	-	✓	-	-
	Core site	BW/1	Churchfields	M	-	✓	-	-
	Core site	BW/2	Limekiln Bridge	H	-	✓	-	-
	Core site	BW/3	Sladen School	H	-	✓	-	-
	Core site	FPH/6	Oasis, Goldthorn Road	H	-	✓	-	-
	Core site	FPH/8	SDF and adjacent land	E	-	✓	✓	-
	Core site	FPH/10	Silverwoods phase 2	M	-	✓	✓	-
	Core site	FPH/18	Naylor's Field	H	-	✓	-	-
	Core site	FPH/23	Silverwoods phase 1	E	-	✓	✓	-
	Core site	FPH/24	Romwire	E	-	✓	-	-
Core site	FPH/25	Rear of Vale	E	-	✓	✓	-	

WFLPR Policy	Core / Option A / Option B	Site ref	Site description	Proposed Use	Mineral Consultation Area in adopted County of Hereford and Worcester Minerals Local Plan?	Proposed Mineral Resource Consultation Area in Third Stage Consultation on Minerals Local Plan?	Proposed Mineral Infrastructure Consultation Area in Third Stage Consultation on Minerals Local Plan?	Within 500m of proposed minerals site allocation in Third Stage Consultation on Minerals Local Plan?
Stourminster Urban			Industrial Estate					
	Core site	FPH/28	Land at Hoobrook	E	-	✓	-	-
	Core site	FPH/29	VOSA site	E	-	✓	-	-
	Core site	OC/11	Stourminster School site	H	-	✓	-	-
	Core site	LI/1	Ceramaspeed	E	-	✓	-	-
	Core site	MI/26	Ratio Park, Finepoint	E	✓	✓	-	-
	Core site	MI/34	Oakleaf, Finepoint	E	-	✓	-	-
	Core site	WFR/WC/18	Sion Hill School site	H	-	✓	-	✓
	Option A	FPH/1	Settling Ponds	E	-	✓	-	-
	Option B	FPH/1	Settling Ponds	H	-	✓	-	-
Stourminster Urban	Core site	WFR/WC/15	Lea Castle Hospital	M	-	✓	-	✓
	Core site	BW/4	Hurcott ADR	H	✓	✓	-	✓

WFLPR Policy	Core / Option A / Option B	Site ref	Site description	Proposed Use	Mineral Consultation Area in adopted County of Hereford and Worcester Minerals Local Plan?	Proposed Mineral Resource Consultation Area in Third Stage Consultation on Minerals Local Plan?	Proposed Mineral Infrastructure Consultation Area in Third Stage Consultation on Minerals Local Plan?	Within 500m of proposed minerals site allocation in Third Stage Consultation on Minerals Local Plan?
	Core site	WFR/CB/7	East of Kidderminster (N)	M	✓	✓	-	-
		OC/4/5/6/12/13N			✓	✓	-	-
		WFR/ST/1			-	✓	-	-
		FPH/27			-	✓	-	-
	Option A	OC/13S	East of Kidderminster (S)	H	-	✓	-	-
		WFR/ST/2			-	✓	-	-
		AS/10			-	✓	-	-
	Option A	WFR/WC/16	Lea Castle Hospital extension (S)	H	-	✓	-	✓
	Option B	WFR/WC/32	Lea Castle Hospital extension (E)	H	-	✓	-	✓
	Strategic right-on- Severn Site Allocation	Core site	LI/2	Wyre Forest Golf Club, corner of Kingsway	H	✓	✓	-
Core site		LI/6/7	Lickhill Road North	H	✓	✓	-	-

WFLPR Policy	Core / Option A / Option B	Site ref	Site description	Proposed Use	Mineral Consultation Area in adopted County of Hereford and Worcester Minerals Local Plan?	Proposed Mineral Resource Consultation Area in Third Stage Consultation on Minerals Local Plan?	Proposed Mineral Infrastructure Consultation Area in Third Stage Consultation on Minerals Local Plan?	Within 500m of proposed minerals site allocation in Third Stage Consultation on Minerals Local Plan?
	Core site	AKR/1	Bridge Street Basins	H	-	✓	-	-
	Core site	AKR/2	Cheapside	M	-	✓	-	-
	Core site	AKR/7	Swan Hotel / Working Men's Club	M	-	✓	-	-
	Core site	AKR/20	Carpets of Worth	M	-	✓	-	-
	Core site	MI/1	County Buildings	H	-	✓	-	-
	Core site	MI/3	Parsons Chain	H	-	✓	-	-
	Core site	MI/5	Baldwin Road	H	-	✓	-	-
	Core site	MI/6	Steatite Way	H	-	✓	-	-
	Core site	MI/33	Wilden Industrial Estate	E	-	✓	-	-
	Option B	LI/5	Burlish Crossing	H	✓	✓	-	-
	Option B	MI/17	Stourport Manor	H	✓	✓	-	-
	Option B	AKR/14	Pearl Lane	H	-	✓	-	-
	Option B	AKR/15	Rectory Lane	H	-	✓	-	-
Policy 33 (Bewdley Site Allocations)	Core site	WA/BE/1	Stourport Road Triangle	H	-	✓	-	-
	Core site	WA/BE/5	Land south of Habberley Road	H	-	✓	-	-
	Core site	BR/BE/6	Land off Highclere	H	-	-	-	-

WFLPR Policy	Core / Option A / Option B	Site ref	Site description	Proposed Use	Mineral Consultation Area in adopted County of Hereford and Worcester Minerals Local Plan?	Proposed Mineral Resource Consultation Area in Third Stage Consultation on Minerals Local Plan?	Proposed Mineral Infrastructure Consultation Area in Third Stage Consultation on Minerals Local Plan?	Within 500m of proposed minerals site allocation in Third Stage Consultation on Minerals Local Plan?
	Option B	WA/BE/3	Catchem's End	H	-	✓	-	-
Site in the	Core site	-	Rushock Trading Estate	E	-	-	-	-

WFLPR Policy	Core / Option A / Option B	Site ref	Site description	Proposed Use	Mineral Consultation Area in adopted County of Hereford and Worcester Minerals Local Plan?	Proposed Mineral Resource Consultation Area in Third Stage Consultation on Minerals Local Plan?	Proposed Mineral Infrastructure Consultation Area in Third Stage Consultation on Minerals Local Plan?	Within 500m of proposed minerals site allocation in Third Stage Consultation on Minerals Local Plan?
	Core site	-	West Midlands Safari Park	M	-	-	-	-
and Rural Areas Site	Core site	WA/UA/4	Allotments, Upper Arley	H	-	-	-	-
	Core site	BR/RO/1	Land at Clows Top	H	-	-	-	-
	Core site	BR/RO/4/	Land adjacent	H	-	-	-	-

<b>WFLPR Policy</b>	<b>Core / Option A / Option B</b>	<b>Site ref</b>	<b>Site description</b>	<b>Proposed Use</b>	<b>Mineral Consultation Area in adopted County of Hereford and Worcester Minerals Local Plan?</b>	<b>Proposed Mineral Resource Consultation Area in Third Stage Consultation on Minerals Local Plan?</b>	<b>Proposed Mineral Infrastructure Consultation Area in Third Stage Consultation on Minerals Local Plan?</b>	<b>Within 500m of proposed minerals site allocation in Third Stage Consultation on Minerals Local Plan?</b>
		6	Tolland, Far Forest					
	Core site	BR/RO/7	New Road, Far Forest (S)	H	-	-	-	-
	Core site	BR/RO/21	Alton Nurseries, Long Bank	E	-	-	-	-
	Core site	BR/RO/26	Walnut Cottage, Bliss Gate	H	-	-	-	-
	Option B	BR/RO/7	New Road, Far Forest (N)	H	-	-	-	-

# Worcestershire County Council response to the Wyre Forest Local Plan Review Viability Assessment

## Summary

Overall the viability of this Local Plan review is challenging for both Wyre Forest District Council (WFDC) and Worcestershire County Council (WCC).

The Local Plan Review Viability Assessment presents some difficult issues for WFDC, if they are to deliver their local plan. The policy includes appropriate aspirations to facilitate sustainable growth of the district. From a review of the information it appears unlikely that all of the plan and infrastructure aspirations can be delivered as the viability review indicates that there is insufficient funding available through developer contributions to support this.

WCC have concerns that this means that delivery of infrastructure is vulnerable, which will in turn impact the sustainability of the local plan unless external funding can be secured to support delivery of the plan's infrastructure aspirations.

This funding is uncertain, due to changing funding streams and priorities, and its limited availability. A failure to secure it could result in the risks to Wyre Forest of housing being delivered without the associated infrastructure required which could result in a negative impact on the district and poor quality place making. It is also noted that delivery of wider strategic infrastructure has not been considered within the plan, but which may be needed to offset the impact of housing and employment growth in Wyre Forest in another district through the impact on highways for example.

This will be further refined as the plan is developed further and a final decision is made on the site allocations which will impact on the viability of the plan. However, given that there are some elements such as open space missing, it appears unlikely that this will be entirely favourable.

WCC will continue to work with WFDC to secure infrastructure and external funding in so far as this is possible, but recognise that there may still be an infrastructure gap arising, which places infrastructure delivery at risk based on the current assessment.

A full 'policy-on' position with the project specific infrastructure costs is unlikely to be achievable without a large increase in the underlying land values and subsequent sales values. Some elements of the Viability Assessment will need to be updated and reviewed once the final option is confirmed.

## Land values

The residential land value of £600,000 per hectare is low compared to other parts of Worcestershire. It does, however, more closely reflect values in the Black Country and Birmingham housing markets, with which Wyre Forest also has functional linkages. The industrial land value is not easy to establish and the suggested benchmark of £400,000 per hectare seems reasonable given the evidence. The agricultural figure is more easily evidenced and is appropriate.

The green field premium suggested in addition to the uplift will be difficult to realise. Contradictory figures for the additional premium attached to green field sites are given in paragraphs 6.29 and 6.40, with premiums of £300,000 and £350,000 per hectare quoted, respectively. This needs to be clarified and evidenced, as it affects the outputs of the tables contained within chapter 10 by reducing the viability. This figure is also higher than in Stafford of £250,000 per hectare<sup>1</sup> which is the nearest quoted authority and might prove a more realistic figure.

In general the land value uplift of 20% plus the premium will be difficult to realise in Wyre Forest district. This level of uplift is more than ten times higher than the Existing Use Value (EUV)<sup>2</sup>, which could serve to increase landowner expectations. Realising this level of uplift would mean very low levels of funding available for infrastructure and a difficulty in achieving the policy requirements

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<sup>1</sup> Stafford figure shown in table 6.3 and is sourced from the viability course of the Planning Advisory Service.

<sup>2</sup> The value of the land as it currently stands before development is taken into account.

highlighted in chapter 8 and paragraph 10.9. Indeed as mentioned within the document, some land owners may be willing to sell for an uplift of as little as 5% depending on the option agreement signed and the advice the landowner is receiving on the value of the land.

### **Differences between brownfield and green field sites**

Modelling of the brownfield sites within the study includes allowances to enable development, some of which may not be required. As an example, Lea Castle has an 'abnormal cost' allowance as well as an allowance for contingencies. In addition, an additional cost has been allocated for site clearance. This means there is a risk of 'double-counting' of certain development costs within the figures, thereby inflating the pressures on viability. It would be recommended for the report to clarify what is included in each category to remove this impression.

For greenfield development, the premium added to the proposed uplift of land values means that only minimal infrastructure contributions can be obtained, and on many sites it would render delivery of the proposed policy requirements unrealistic or challenging. This suggests that development may come forward that cannot comply with all Local Plan policies, and is not accompanied by the necessary supporting infrastructure, thereby compromising the sustainability aims of the Plan..

Reducing the premium and/or uplift percentage could improve viability, but such a reduction would need to be supported by appropriate evidence. The best evidence is land transactions which will increase as more development takes place in the area. Further analysis of neighbouring authorities' transactions may also aid this process. There is a mention that residential values are too low in 6.36 based on recent transactions which appear to be the reason for the increase but insufficient evidence is shown for the premium increase.

### **Policy costs**

The viability study has taken account of the Local Plan review's proposed policy requirement of 30% of all housing being affordable (on sites of 11 or more homes). The type of affordable housing making up this 30% can affect viability, and should reflect the particular needs within the district. The study suggests, at paragraph 8.3, that the greatest need is for social rented housing, but this type of housing delivers the lowest return to the developer and therefore could worsen viability. The current assessment of affordable housing appears to have been undertaken using a standardised mix of affordable housing targets, without reference to the particular needs of WFDC. Future viability work should align the type of affordable housing contained within the assessment of affordable housing need and types in the district.

WCC supports the 'Lifetime Homes' standards suggested for affordable dwellings. The document states meeting this standard would add an additional £11 per square metre to typical build costs. It is not clear if this cost has been applied for all types of affordable houses and how this relates to the viability outputs in chapter 10. It is unclear from paragraph 10.9 whether this cost has been added only to affordable housing, or to all dwelling types. The estimated additional cost of Lifetime Homes equates to around £1,320 on an average three bedroom house<sup>3</sup>, which will impact on site and plan-wide viability. The exact basis as to how lifetime standard is being applied to the viability outputs should be clearly defined, and match the emerging policy.

Green infrastructure policy requirements as drafted within the Local Plan review appear to have been accounted for within the net developable area. However, it would be beneficial for the reader if the policy requirements from part (c) of policy 14 were included in chapter 8. Table 9.8 shows how these policies affect the net developable area and density for the site typologies. It would be useful to have a similar table for the strategic sites to show adherence to the drafted policy.

Green infrastructure consideration within this document is disappointing as it does not reflect the adopted definition of green infrastructure which is stated in the Worcestershire Green Infrastructure

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<sup>3</sup> Based on a floor space of 120 square metres, referenced in <http://www.telegraph.co.uk/finance/property/advice/propertymarket/3307195/Square-up-to-the-21st-century.html>

Strategy which is concerned with the multi-functional benefits of a holistic consideration of landscape, biodiversity, surface water and flood risk etc. We would primarily expect that green infrastructure is delivered on development sites, and only off site in exceptional circumstances. The cost to the developer is primarily by reducing the land available for development, but this approach does reduce the need to consider each element individually and therefore result in a reduced land usage than through consideration of each element individually.

We understand that the approach taken to green infrastructure in the viability document has influenced the suggested percentages in the green infrastructure policy in the plan itself, where a figure of 35% is being used. We are uncertain as to the justification for this and believe that this needs to be supported by evidence as to why this figure was chosen and how this can be supported through planning policy.

We also recommend that this section on green infrastructure is revised to correlate to the accepted Worcestershire green infrastructure definition and approach, or if an alternative approach is to be used that this is justified and reflected in the associated strategic policy in the local plan.

The addition of £2,000 per dwelling to account for Section 106 costs in the event of CIL being adopted is sensible, as some contributions will still be required. It is assumed all the tables with varied contributions do not include this £2,000, as to do so would skew the results. If WFDC choose not adopt CIL in the future this figure can be dropped from future viability studies.

### **Infrastructure costs**

Infrastructure costs for Worcestershire County Council (WCC) infrastructure used in the viability calculations were supplied by WCC in February 2017.

### **Education**

In the case of education costs, the estimates were based on basic feasibility work and it was assumed that new schools would be on level green field sites. As the plan is still emerging, multiple options are reflected within the Wyre Forest Infrastructure Delivery Plan (WFIDP) and the highest costed option has been used to inform viability calculations to ensure that a pre-cautionary approach has been taken.

These costs may increase or decrease depending not only on the final option chosen, but also external factors such as build costs and inflation.

### **Transport**

Transport costs are based on an officer estimate and will change once an appropriate single option is modelled. This could positively or negatively affect viability.

### **Other infrastructure**

The viability figures do not include any costs for sports and recreation facilities. Typically these have been the third highest infrastructure cost behind transport and education and, once it is factored into the WFDC calculation, it will reduce the viability.

It is currently suggested that infrastructure costs may decrease when further transport modelling is undertaken. Given the evidence currently available, however, it is likely that overall infrastructure costs will actually increase.

Paragraph 10.39 states that an affordable housing requirement of 20% would allow developments to afford between £5,000 and £10,000 per dwelling in contributions. This statement only applies to small greenfield sites which are typically the most profitable, and the statement should be modified to reflect this. None of the strategic sites of 100 dwellings or above size where the greatest infrastructure need occurs fit into this small greenfield typology and in many cases are not viable even with lower levels of affordable housing. Table 10.15a suggests that affordable housing requirements would need to be

reduced to 5% to enable contributions between £5,000 and £10,000 to be viable on the majority of the strategic sites.

## Conclusions

The evidence presented within the viability document suggests an acute funding shortfall for infrastructure provided through WCC's statutory functions as the local highway authority and the local education authority.

Indicative calculations based on the modelling in this viability document and assuming that transport and education infrastructure is solely funded through developer contributions produces the following results:

### Potential infrastructure funding required

Option	Total cost of WCC infrastructure on tested sites <sup>4</sup>	Total number of dwellings in tested sites	Average funding required per dwelling
A	£54,370,730	4,010	£13,558
B	£63,479,127	3,330	£19,063 <sup>5</sup>

Securing this level of funding through developer contributions would be unprecedented in Worcestershire, and re-enforces our concern that to deliver the infrastructure required in the plan will require significant levels of external funding if the sustainability of the district is not to suffer and decline.

We are aware that these numbers will flex as the plan is developed further but feel that ongoing discussions with WFDC are important to consider the implications of this negative position on viability.

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<sup>4</sup> The infrastructure costs are only for sites modelled in the viability report and are based on estimated costs provided by WCC to SDH in February 2017. These costs are subject to change once transport modelling and a single set of sites are known. Tested sites are listed in Figure 7.1 of the SDH viability report.

<sup>5</sup> Figure is much higher due to the expensive road scheme listed against the Areley Kings development.

## **Interim Assessment of Car Parking in Bewdley and Stourport**

*This is an initial assessment of potential opportunities to address car parking capacity and location in Bewdley and Stourport. Further detailed analysis will be undertaken subject to further discussions between WCC and Wyre Forest DC*

There are a number of potential approaches to transport and car parking in the tourist towns of Bewdley and Stourport which we would welcome the opportunity to discuss with WFDC as they may offer opportunities to address some of the issues of through traffic and car parking in these towns which may currently be adversely impacting the tourist economy. In summary these are:

WCC consider it important to consider the specific car park issues associated with Stourport and Bewdley and in particular the different patterns of congestion associated with these towns. These attractive, historic towns of Stourport-upon-Severn and Bewdley benefit from strong visitor-focussed economies. However, both towns do not benefit from access to mainline rail services, and links to mainline rail services (Kidderminster and Hartlebury Stations) are poor, this economy is wholly reliant on access by the private car to support this important industry.

Indicative analysis shows that the majority of visitors to Stourport and Bewdley originate from the West Midlands Conurbation. Given the geography of the Wyre Forest, these visitors arrive and leave from the east. However, in both towns, public (visitor) car parking is provided in the west, which results in a range of issues.

### **Bewdley**

Bewdley is fully bypassed by the A456, but is still subject to significant congestion, particularly during peak visitor periods. The town has three surface public car parks:

- Dog Lane (152 Short, Medium and Long Stay spaces – main town centre car park)
- Gardners Meadow (142 Short, Medium and Long Stay spaces)
- Load Street (33 Short Stay Spaces – shoppers car park)

Given the potential scale of Bewdley's visitor economy, the town has only 300 parking spaces to offer visitors, which is low when compared with neighbouring competitors. When this car park capacity fills, queueing is often experienced as visitors jockey for available parking spaces. This results in severe and prolonged periods of congestion during peak visitor periods.

The location and small profile of Bewdley's public car parks results in a number of significant interrelated dis-benefits to Bewdley's economy:

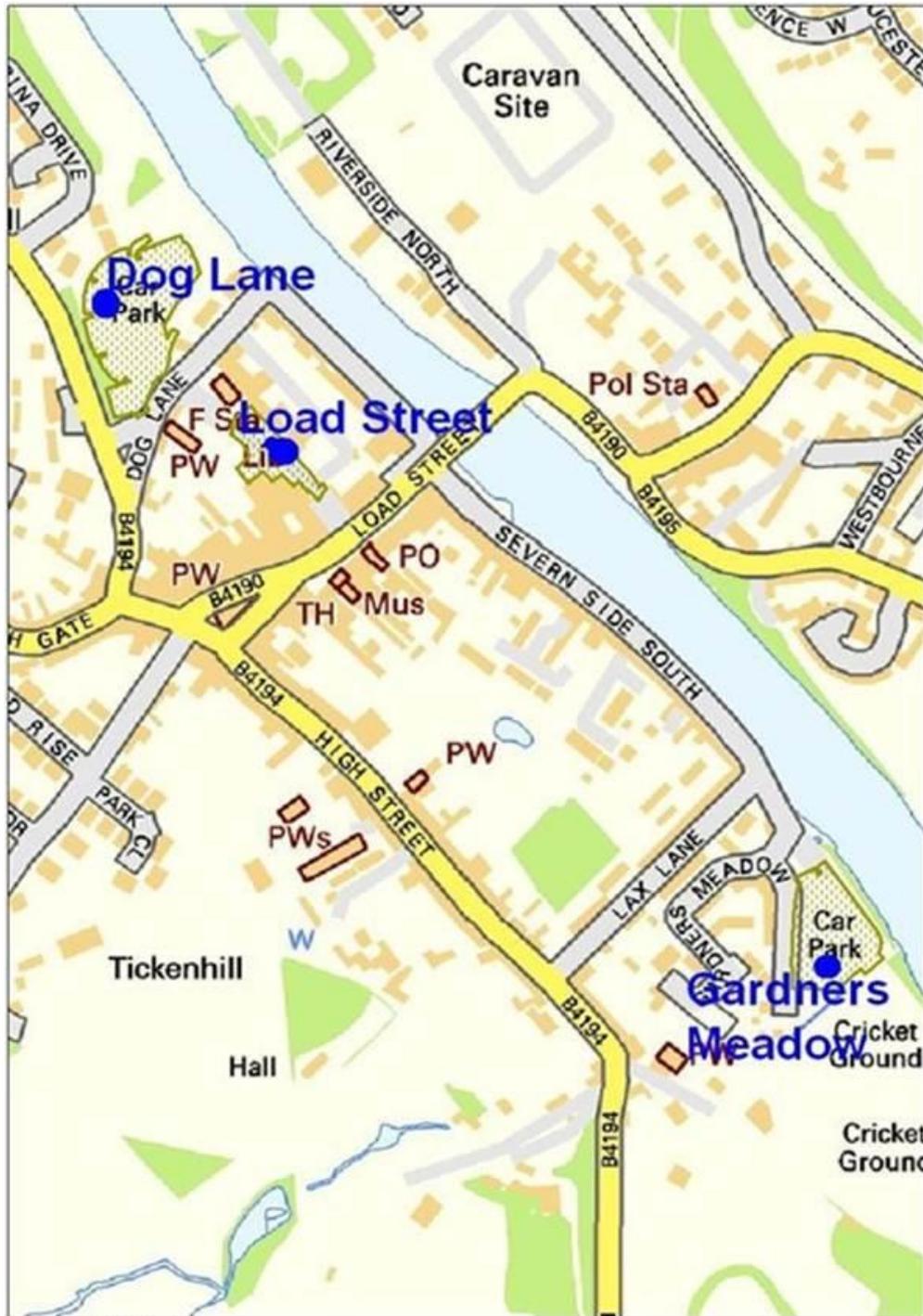
1. Damage to the visitor attraction of the town – congestion is symptomatic of poor accessibility. As visitors struggle to access the town (forced to queue for long periods for a car parking space) this puts off repeat visits and damages the reputation of the town as a visitor attraction. The lack of car parking capacity could reduce Bewdley's visitor economy, preventing further economic activity and growth.
2. Environmental degradation – Bewdley's narrow, historic streets are all 'street canyons' which prevent dispersal of emissions. Only a small number of queueing

vehicles are needed to see a marked deterioration in air quality. The designated Air Quality Management Area in Welchgate is exacerbated by visitor vehicle flows which prevent traffic movement.

There is an opportunity in the Local Plan review to address this issue, by releasing existing visitor (medium/long stay) car park capacity for redevelopment (Dog Lane, Gardner's Meadow) and pursuing the development of a new, larger visitor car park on the east bank of the River Severn (Riverside North). This option has been tabled for some time, but a previous technical assessment of the potential to enhance the Load Street/Riverside North junction to support this development found against this. This technical assessment has now been proven to have not taken account of all the factors so there is a strong case to revisit this and model the likely benefits of such a strategic approach for the town.

The benefits of taking a strategic approach to improving access to Bewdley are wide reaching and highly attractive:

- Delivers Economic Activity and Growth – This option dramatically improves visitor accessibility, by capturing the main visitor 'flow' from the east and encouraging them to park their cars and enter the historic town on foot. This generated footfall will then support sustained growth of Bewdley's visitor economy, by enabling the town to accommodate more visitors and encouraging repeat visits, with the result that Bewdley will compete more effectively as a regionally important tourist attraction;
- Tackles environmental issues – Reducing traffic in the town centre will directly support improvement of the Welch Gate Air Quality Management Area and reduce acid and wear damage of listed historic structures, including St Anne's Church and Bewdley Bridge;
- Releases land for development in sustainable locations – The existing car parks in Dog Lane and Gardner's Meadow are ideally located for residential redevelopment, which would add to the attraction of the townscape and provide valuable land for growth in the Local Plan.



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## Stourport

Stourport's unique heritage as an inland port offers significant attraction to visitors. During the summer months, the town centre and its attractive riverside is utilised by many visitors, many of whom come from the West Midlands conurbation. The town currently has, three surface public car parks:

- Raven Street (28 Short Stay Spaces – shoppers car park)
- Vale Road (75 Long, Medium and Short Stay Spaces)

- Co-located Severn Meadows Car Parks 1, 2 and 3 and Riverside Meadows (114+111+114+600 = 939 Short, Medium and Long Stay spaces)

The Severn and Riverside Meadows Car Parks' collective 939 spaces provides plenty of car parking capacity for visitors, however, the majority of these spaces are only accessible by driving through Stourport's historic town centre depending on your route into Stourport. This can create acute congestion at peak visitor times. Also, like Bewdley, the narrow streets form a dense network of street canyons which are prone to deteriorating air quality. Recent indications suggest that an Air Quality Management Area will be declared in Stourport Town Centre in the near future.

The revised Wyre Forest Local Plan proposes development growth for Stourport; however, the location of this proposed growth shows that it fails to address the significant transport issues which face the town. As it stands, proposed growth in Stourport will lead to further congestion and could cause further tourism based economic decline without intervention.

The location of Stourport's public visitor-focussed car parks directly contributes towards congestion experiences in the town, which reduces available capacity to support growth.

1. Damage to the visitor attraction of the town – current congestion at peak visitor times is symptomatic of poor accessibility. This puts off repeat visits and damages the reputation of the town as a visitor attraction.
2. Environmental degradation – Stourport's narrow streets can be considered 'street canyons' which prevent dispersal of emissions. As historic streets become clogged with queueing vehicles, they are no longer as attractive places for pedestrians, and so footfall declines and business reduces. The possible Air Quality Management Area in Stourport Town Centre is worsened by visitor vehicle flows which prevent free traffic movement.

There is an opportunity in the Local Plan to address this issue, by releasing existing visitor (medium/long stay) car park capacity for redevelopment (Parts of Severn Meadows/Riverside Meadows not within the flood plain and potentially Vale Road) and pursuing the development of a new, larger visitor car park to the east of the town. There are a number of suitable locations where this could be considered, in the vicinity of Cheapside and land south of Discovery Road/off Power Station Road.



This proposed visitor car parking can be allocated within the flood plain, as careful design can help to mitigate this and could have positive green infrastructure benefits. The provision of car parking in the east of the town, with appropriate wayfinding will support increased footfall through Stourport's historic canal basins and town centre en-route to the Riverside area, generating increased economic activity and releasing precious town centre capacity to support redevelopment and growth.



Date: 17<sup>th</sup> December, 2018

Helen Smith  
Planning Policy Manager  
Wyre Forest District Council  
Wyre Forest House  
Kidderminster

Dear Helen,

WCC welcome the opportunity to review the pre-submission draft of the WFDC local plan.

Our comments on the plan are outlined below, which we believe can be worked through as part of the Duty to Co-operate between our respective organisations and in preparation for the WFDC Statement of Common Ground, prior to the submission of the plan to the Inspectorate, and for any subsequent changes to be part of draft modification plan prepared for the Examination in Public.

#### **Duty to Co-operate**

The WFDC pre-submission plan is not currently supported by Duty to Co-operate agreements or a Statement of Common Ground. However, we understand that WFDC propose to produce these to support the submission of the plan. We will work jointly with WFDC on the Duty to Co-operate statement with WCC, and to address the issues outlined below prior to submission of the plan.

#### **Infrastructure Delivery Plan**

WCC is one of the main infrastructure providers for the county, in its role as a Local Highway Authority, transport authority and education authority.

The two authorities have worked jointly on the development of the Infrastructure Delivery Plan which sets out the infrastructure required to support the development aspirations of the plan. Works completed so far have included an initial assessment of the sites proposed at Preferred Options and detailed assessment of the sites for the current Pre-submission Plan, to outline the transport impacts and potential mitigation schemes, with some initial costings. For the Pre-submission Plan this included the transport modelling of the impacts of the proposals. A similar process was undertaken for education, to set out the impacts of any increase in school age population in the district and the mitigations which will be required. Unfortunately, the site list which was provided to support this work for the Infrastructure Delivery Plan is not the same site list as was included in the Pre-submission Plan itself. WCC will, therefore, need to undertake the detailed transport modelling and assessment again, with further considerations of the required transport mitigation. We propose to

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Planning Services  
Manager

County Hall  
Spetchley Road  
Worcester  
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undertake this detailed work with WFDC during quarter 1 and 2 of 2019. This process will take approximately 4-6 months to complete.

Concurrently, WCC will also remodel the education requirements of the plan to inform a revised version of the Infrastructure Delivery Plan.

The outcome of this work will be required to support the Duty to Cooperate agreement between WCC and WFDC and form part of the Statement of Common Ground.

### **Viability**

WCC note that, in line with the recommendations of the viability assessment which supports the WFDC pre-submission plan, the affordable housing requirement of the plan has been reduced to 25%. However, not all of the included highways schemes have been costed, or can be costed accurately at this stage as there are a number of dependencies including timescale, and interactions with other schemes and local plan aspirations.

These matters notwithstanding, 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 fund through their own resources. WCC do not have the resources to 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.

Additionally, the viability assessment, where based on specific sites, appears to be at odds with the site numbers and allocations in the Pre-submission Plan itself. This may or may not have a material impact, but for the avoidance of any confusion and doubt, the site data should be consistent. Further work is required to address this issue.

### **Minerals and Waste**

#### **Policy 16B**

Part 3 of policy 16B should not be included. Mineral development, and the development of policy relating to mineral development, is a County Matter and, as such, is beyond the remit of the Wyre Forest Local Plan. Policies on protecting and enhancing the environment and amenity will be included in the emerging Worcestershire Minerals Local Plan, and this section of the policy should be deleted.

#### **Policy 16C**

We welcome the recognition of waste matters and the reference to the Waste Core Strategy in paragraphs 16.22-16.29. However, we do not consider that the policy is sound as currently drafted. The points included in the reasoned justification (such as

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expecting future developments to implement the waste hierarchy and address the waste implications of the development, and safeguarding existing and permitted waste management facilities, as well as the issue of incorporating facilities for storage and separation of waste in new development which is included in policy 16C) are already addressed within the adopted Development Plan in policies WCS16 and WCS17 of the Waste Core Strategy.

We suggest that the section could be retained to direct developers to the requirements of the Waste Core Strategy, but that it is unnecessary to include Policy 16C itself. If, however, Policy 16C is retained, the wording of the policy is not sound. It currently states that "Waste management facilities should be well-designed", and if this is taken as it reads - in that it applies to applications for waste management development - we consider that this is beyond the remit of the Wyre Forest Local Plan and should be deleted. However, it may be that the intention is for the point to relate to the earlier sentence of the policy requiring all new development to incorporate facilities for the storage and separation of waste for recycling and recovery and that these should be well-designed. If so, we would suggest replacing "Waste management facilities" with "Such facilities".

### **Site Allocations**

Not all allocated sites should be fully exempt from mineral safeguarding requirements and, as such, the footnote in Policy 16B should either be removed or amended. The allocations and their individual policies as drafted do not optimise require partial extraction or incidental recovery of mineral resources either in advance of development taking place or in phases alongside it. This is contrary to paragraph 206 of the NPPF, which states that "Local planning authorities should not normally permit other development proposals in Mineral Safeguarding Areas if it might constrain potential future use for mineral working". The emerging Minerals Local Plan (Fourth Stage Consultation) will state that "Site allocations which do not make reference to safeguarding, or where requirements for safeguarding mineral resources and/or supporting infrastructure are outlined, will not be exempt." As the Mineral Planning Authority, we seek to work with Local Planning Authorities to review potential site allocations and ensure that the requirements for mineral safeguarding are included, to ensure that requirements for partial extraction or incidental recovery will be delivered for sites within Mineral Safeguarding Areas. The list of allocations which need to take account of safeguarding issues is too long for this comment box, so is attached as an Appendix.

### **Sustainable Transport**

Throughout the development of the plan, WCC has worked with Wyre Forest to develop the sustainable transport policy for the plan and the growth it proposes. There have been multiple elements of this work, including draft policies, transport modelling and site allocations.

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WCC is content with the transport policies in the plan, which prioritise sustainable transport and include some critical schemes for the district.

However, the sustainable approach to rail is undermined by failure to allocate land for the further phase 2 expansion of Blakedown station and associated car parking provision. Although this may appear to be a minor matter, the consequence of this is to undermine the sustainable transport strategy which WCC have sought to achieve through the Local Transport Plan 4 and the Rail Investment Strategy, and its impact may be wider than WFDC itself.

Rail travel offers an alternative to road-based travel, particularly for local commuting into and out of the West Midlands conurbation, not only for existing and new residents, but more widely, and is an opportunity to deliver modal shift from car to rail transport which is more sustainable and will assist in reducing congestion. Delivering the phase 1 and 2 expansion of Blakedown station is critical, because to secure future funding from Government - directly or indirectly - for road improvement schemes, WCC must be able to demonstrate that all reasonable alternatives have been explored and the opportunities for sustainable travel prioritised and delivered. Failure to allocate land for the phase 2 of Blakedown station totally undermines this case.

A suitable area of land was submitted to the plan through the call for sites, but unfortunately has not been included in the draft plan, despite it being (with regard to transport) a sustainable location. This requirement was outlined in WCC's adopted Local Transport Plan 4, and has been discussed with Wyre Forest DC officers at a number of meetings concerning the Local Plan.

Through the Duty to Co-operate we would like work together to address this omission, and to develop a solution which enables us to deliver the required expansions and sustainable transport aspirations of the Wyre Forest Local Plan and the Local Transport Plan.

I look forward to working with you throughout the coming months to address the concerns which WCC have raised concerning the WFDC plan.

Yours sincerely



Emily Barker  
Planning Services Manager

**Appendix 1: Additional information on changes required to WFDC Local Plan, to support WCC's representation on site allocations**

### Policy 30 – Kidderminster Town Allocations

Site ref	Site description	Proposed Mineral Consultation Area (MCA) in Fourth Stage Consultation on Minerals Local Plan? (mineral resource)	Within 250m of Mineral Site or Supporting Infrastructure proposed to be safeguarded in Fourth Stage Consultation on Minerals Local Plan?	Within 250m of a waste site as shown on the webmap accompanying the Waste Core Strategy?	Plan policy changes needed
AS/1	Comberton Place	No	No	No	N/A
AS/3	Chester Road South Service Station	No	No	No	N/A
AS/5	Victoria Carpets Sports Ground	No	No	No	N/A
AS/6	Lea Street School	No	No	No	N/A
AS/20	North of Bernie Crossland Walk	No	No	No	N/A
BHS/2	Bromgrove Street	No	No	No	N/A
BHS/16	Timber Yard, Park Lane	No	No	Yes	Policy 30.6 should require the developer to demonstrate that as the 'agent of change' (NPPF paragraph 182) the proposed development will not prevent, hinder or unreasonably restrict the operation of the existing waste management site and will include any necessary mitigation to ensure that the operation of the existing business will not have a significant adverse effect on the new

Site ref	Site description	Proposed Mineral Consultation Area (MCA) in Fourth Stage Consultation on Minerals Local Plan? (mineral resource)	Within 250m of Mineral Site or Supporting Infrastructure proposed to be safeguarded in Fourth Stage Consultation on Minerals Local Plan?	Within 250m of a waste site as shown on the webmap accompanying the Waste Core Strategy?	Plan policy changes needed
					development.
BHS/18	Blakebrook School	No	No	No	N/A
BHS/38	Kidderminster Fire Station	No	No	Yes	Policy 30.7 should require the developer to demonstrate that as the 'agent of change' (NPPF paragraph 182) the proposed development will not prevent, hinder or unreasonably restrict the operation of the existing waste management site and will include any necessary mitigation to ensure that the operation of the existing business will not have a significant adverse effect on the new development.
BHS/39	Boucher Building	No	No	No	N/A
BW/1	Churchfields	No	No	No	N/A
BW/2	Limekiln Bridge	No	No	No	N/A
BW/3	Sladen School	No	No	No	N/A
BW/4	Stourbridge Road ADR	Yes	No	No	Paragraph 30.29 states

Site ref	Site description	Proposed Mineral Consultation Area (MCA) in Fourth Stage Consultation on Minerals Local Plan? (mineral resource)	Within 250m of Mineral Site or Supporting Infrastructure proposed to be safeguarded in Fourth Stage Consultation on Minerals Local Plan?	Within 250m of a waste site as shown on the webmap accompanying the Waste Core Strategy?	Plan policy changes needed
(Housing)					that this site already has planning permission for 91 dwellings. Therefore no changes required.
FHN/11	BT building Mill Street	No	No	No	N/A
FPH/5	Ambulance Station	No	Yes – Concrete Batching Plant	No	This site is within 250m of an existing concrete batching plant. Policy 30.14 should include a requirement to ensure that as the 'agent of change' (NPPF paragraph 182) the development will include suitable mitigation to ensure that the operation of the existing business will not have a significant adverse effect on the new development).
FPH/10 (housing)	Silverwoods phase 2	No	No	Yes	Policy 30.15 should require the developer to demonstrate that as the 'agent of change' (NPPF paragraph 182) the proposed

Site ref	Site description	Proposed Mineral Consultation Area (MCA) in Fourth Stage Consultation on Minerals Local Plan? (mineral resource)	Within 250m of Mineral Site or Supporting Infrastructure proposed to be safeguarded in Fourth Stage Consultation on Minerals Local Plan?	Within 250m of a waste site as shown on the webmap accompanying the Waste Core Strategy?	Plan policy changes needed
					development will not prevent, hinder or unreasonably restrict the operation of the existing waste management site and will include any necessary mitigation to ensure that the operation of the existing business will not have a significant adverse effect on the new development.
FPH/15	Severn Grove Shops Rifle Range Estate	No	No	No	N/A
FPH/18	Naylor's Field	No	No	No	N/A
FPH/19	164/5 Sutton Park Road	No	No	No	N/A
FPH/23 (housing)	Silverwoods phase 1	No	Yes – Concrete Batching Plant	No	This site is within 250m of an existing concrete batching plant. Policy 30.15 should include a requirement to ensure that as the 'agent of change' (NPPF paragraph

Site ref	Site description	Proposed Mineral Consultation Area (MCA) in Fourth Stage Consultation on Minerals Local Plan? (mineral resource)	Within 250m of Mineral Site or Supporting Infrastructure proposed to be safeguarded in Fourth Stage Consultation on Minerals Local Plan?	Within 250m of a waste site as shown on the webmap accompanying the Waste Core Strategy?	Plan policy changes needed
					182) the development will include suitable mitigation to ensure that the operation of the existing business will not have a significant adverse effect on the new development).
OC/11	Stourminster School site	Yes	No	No	Policy 30.19 should require the developer to undertake a minerals resource assessment to inform design and to optimise opportunities for the partial extraction or incidental recovery of the underlying mineral resource either in advance of development taking place or in phases alongside it.
WFR/WC/18	Sion Hill School site	Yes	No	No	Policy 30.20 should require the developer to undertake a minerals resource assessment to inform design and to

Site ref	Site description	Proposed Mineral Consultation Area (MCA) in Fourth Stage Consultation on Minerals Local Plan? (mineral resource)	Within 250m of Mineral Site or Supporting Infrastructure proposed to be safeguarded in Fourth Stage Consultation on Minerals Local Plan?	Within 250m of a waste site as shown on the webmap accompanying the Waste Core Strategy?	Plan policy changes needed
					optimise opportunities for the partial extraction or incidental recovery of the underlying mineral resource either in advance of development taking place or in phases alongside it.
WA/KF/3	Land at Low Habberley	Yes	No	No	Policy 30.21 should require the developer to undertake a minerals resource assessment to inform design and to optimise opportunities for the partial extraction or incidental recovery of the underlying mineral resource either in advance of development taking place or in phases alongside it.
LI/10	Land r/o Zortech Avenue	Yes	No	No	Policy 30.22 should require the developer to undertake a minerals resource assessment to

Site ref	Site description	Proposed Mineral Consultation Area (MCA) in Fourth Stage Consultation on Minerals Local Plan? (mineral resource)	Within 250m of Mineral Site or Supporting Infrastructure proposed to be safeguarded in Fourth Stage Consultation on Minerals Local Plan?	Within 250m of a waste site as shown on the webmap accompanying the Waste Core Strategy?	Plan policy changes needed
					inform design and to optimise opportunities for the partial extraction or incidental recovery of the underlying mineral resource either in advance of development taking place or in phases alongside it.
BHS/10	Frank Stone Green Street	No	No	No	N/A
BHS/11	Green Street Depot	No	No	Yes	Policy 30.24 should require the developer to demonstrate that as the 'agent of change' (NPPF paragraph 182) the proposed development will not prevent, hinder or unreasonably restrict the operation of the existing waste management site and will include any

Site ref	Site description	Proposed Mineral Consultation Area (MCA) in Fourth Stage Consultation on Minerals Local Plan? (mineral resource)	Within 250m of Mineral Site or Supporting Infrastructure proposed to be safeguarded in Fourth Stage Consultation on Minerals Local Plan?	Within 250m of a waste site as shown on the webmap accompanying the Waste Core Strategy?	Plan policy changes needed
					necessary mitigation to ensure that the operation of the existing business will not have a significant adverse effect on the new development.
BHS/17	Rock Works, Park Lane	No	No	Yes	Policy 30.24 should require the developer to demonstrate that as the 'agent of change' (NPPF paragraph 182) the proposed development will not prevent, hinder or unreasonably restrict the operation of the existing waste management site and will include any necessary mitigation to ensure that the operation of the existing business will not have a significant adverse effect on the new development.
FPH/8	SDF and adjacent land	No	Yes – Concrete Batching	Yes	This site is within 250m of

Site ref	Site description	Proposed Mineral Consultation Area (MCA) in Fourth Stage Consultation on Minerals Local Plan? (mineral resource)	Within 250m of Mineral Site or Supporting Infrastructure proposed to be safeguarded in Fourth Stage Consultation on Minerals Local Plan?	Within 250m of a waste site as shown on the webmap accompanying the Waste Core Strategy?	Plan policy changes needed
			Plant		<p>an existing concrete batching plant. Policy 30.25 should include a requirement to ensure that as the 'agent of change' (NPPF paragraph 182) the development will include suitable mitigation to ensure that the operation of the existing business will not have a significant adverse effect on the new development).</p> <p>This site is also within 250m of a waste site. Policy 30.25 should require the developer to demonstrate that as the 'agent of change' (NPPF paragraph 182) the proposed development will not prevent, hinder or unreasonably restrict the operation of the existing</p>

Site ref	Site description	Proposed Mineral Consultation Area (MCA) in Fourth Stage Consultation on Minerals Local Plan? (mineral resource)	Within 250m of Mineral Site or Supporting Infrastructure proposed to be safeguarded in Fourth Stage Consultation on Minerals Local Plan?	Within 250m of a waste site as shown on the webmap accompanying the Waste Core Strategy?	Plan policy changes needed
					waste management site and will include any necessary mitigation to ensure that the operation of the existing business will not have a significant adverse effect on the new development.
FPH/10 (Employment)	Silverwoods phase 2	No	Yes – Concrete Batching Plant	Yes	<p>This site is within 250m of an existing concrete batching plant. Policy 30.15 should include a requirement to ensure that as the 'agent of change' (NPPF paragraph 182) the development will include suitable mitigation to ensure that the operation of the existing business will not have a significant adverse effect on the new development).</p> <p>This site is also within 250m of a waste site.</p>

Site ref	Site description	Proposed Mineral Consultation Area (MCA) in Fourth Stage Consultation on Minerals Local Plan? (mineral resource)	Within 250m of Mineral Site or Supporting Infrastructure proposed to be safeguarded in Fourth Stage Consultation on Minerals Local Plan?	Within 250m of a waste site as shown on the webmap accompanying the Waste Core Strategy?	Plan policy changes needed
					<p>Policy 30.15 should require the developer to demonstrate that as the 'agent of change' (NPPF paragraph 182) the proposed development will not prevent, hinder or unreasonably restrict the operation of the existing waste management site and will include any necessary mitigation to ensure that the operation of the existing business will not have a significant adverse effect on the new development.</p>
FPH/23 (Employment)	Silverwoods phase 1	No	Yes – Concrete Batching Plant	No	<p>This site is within 250m of an existing concrete batching plant. Policy 30.15 should include a requirement to ensure that as the 'agent of change' (NPPF paragraph 182) the development will</p>

Site ref	Site description	Proposed Mineral Consultation Area (MCA) in Fourth Stage Consultation on Minerals Local Plan? (mineral resource)	Within 250m of Mineral Site or Supporting Infrastructure proposed to be safeguarded in Fourth Stage Consultation on Minerals Local Plan?	Within 250m of a waste site as shown on the webmap accompanying the Waste Core Strategy?	Plan policy changes needed
					include suitable mitigation to ensure that the operation of the existing business will not have a significant adverse effect on the new development).
FPH/24	Romwire	No	No	Yes	Paragraph 30.2 states that planning permission are already in place for this allocation, therefore no amendments required.
FPH/27	Adj. Easter Park, Worcester Road	Yes	No	No	Policy 30.26 should require the developer to undertake a minerals resource assessment to inform design and to optimise opportunities for the partial extraction or incidental recovery of the underlying mineral resource either in advance of development taking place or in phases alongside it.
FPH/28	Land at Hoobrook	No	No	Yes	Policy 30.27 should

Site ref	Site description	Proposed Mineral Consultation Area (MCA) in Fourth Stage Consultation on Minerals Local Plan? (mineral resource)	Within 250m of Mineral Site or Supporting Infrastructure proposed to be safeguarded in Fourth Stage Consultation on Minerals Local Plan?	Within 250m of a waste site as shown on the webmap accompanying the Waste Core Strategy?	Plan policy changes needed
					require the developer to demonstrate that as the 'agent of change' (NPPF paragraph 182) the proposed development will not prevent, hinder or unreasonably restrict the operation of the existing waste management site and will include any necessary mitigation to ensure that the operation of the existing business will not have a significant adverse effect on the new development.
FPH/29	VOSA site	No	No	No	N/A
LI/12	Former Burlish Golf Course Clubhouse	Yes	No	No	Policy 30.29 should require the developer to undertake a minerals resource assessment to inform design and to optimise opportunities for the partial extraction or

Site ref	Site description	Proposed Mineral Consultation Area (MCA) in Fourth Stage Consultation on Minerals Local Plan? (mineral resource)	Within 250m of Mineral Site or Supporting Infrastructure proposed to be safeguarded in Fourth Stage Consultation on Minerals Local Plan?	Within 250m of a waste site as shown on the webmap accompanying the Waste Core Strategy?	Plan policy changes needed
					incidental recovery of the underlying mineral resource either in advance of development taking place or in phases alongside it.
MI/26	Ratio Park, Finepoint	No	No	Yes	Paragraph 30.2 states that planning permission are already in place for this allocation, therefore no amendments required.
MI/34	Oakleaf, Finepoint	No	No	No	N/A
BW/4 (Green Gap)	Stourbridge Road ADR	Yes	No	No	We note that policy 30.12 is intended to prevent built development in this "green gap" and therefore no change to this policy is required.

**Policy 31 – Lea Castle Village**

Site ref	Site description	Proposed Mineral Consultation Area (MCA) in Fourth Stage Consultation on Minerals Local Plan? (mineral resource)	Within 250m of Mineral Site or Supporting Infrastructure proposed to be safeguarded in Fourth Stage Consultation on Minerals Local Plan?	Within 250m of a waste site as shown on the webmap accompanying the Waste Core Strategy?	Plan policy changes needed
WFR/WC/15	Lea Castle Hospital	No	No	No	Part of this site was previously allocated and therefore has been removed from the Mineral Consultation Areas proposed in the Fourth Stage Consultation on the Minerals Local Plan as a Mineral Safeguarding Area, but a larger area is now proposed for allocation and therefore Policy 31.2 should require the developer to undertake a minerals resource assessment to inform design and to optimise opportunities for the partial extraction or incidental recovery of the underlying mineral resource either in advance of development taking place or in phases
WFR/WC/32	Lea Castle East	Yes	No	No	
WFR/WC/33	Lea Castle West	Yes	No	No	
WFR/WC/34	Lea Castle North	Yes	No	No	

Site ref	Site description	Proposed Mineral Consultation Area (MCA) in Fourth Stage Consultation on Minerals Local Plan? (mineral resource)	Within 250m of Mineral Site or Supporting Infrastructure proposed to be safeguarded in Fourth Stage Consultation on Minerals Local Plan?	Within 250m of a waste site as shown on the webmap accompanying the Waste Core Strategy?	Plan policy changes needed
					alongside it.

### Policy 32 – Kidderminster Eastern Extension

Site ref	Site description	Proposed Mineral Consultation Area (MCA) in Fourth Stage Consultation on Minerals Local Plan? (mineral resource)	Within 250m of Mineral Site or Supporting Infrastructure proposed to be safeguarded in Fourth Stage Consultation on Minerals Local Plan?	Within 250m of a waste site as shown on the webmap accompanying the Waste Core Strategy?	Plan policy changes needed
OC/5	Land at Husum Way	Yes	No	No	Policies 32.1, 32.2 and 32.4 should require the developer to undertake a minerals resource assessment to inform design and to optimise opportunities for the partial extraction or incidental recovery of the underlying mineral resource either in advance of development taking place or in phases
OC/6	Land east of Offmore	Yes	No	No	
OC/12	Comberton Lodge Nursery	Yes	No	No	
OC/13N	Stone Hill North	Yes	No	No	

Site ref	Site description	Proposed Mineral Consultation Area (MCA) in Fourth Stage Consultation on Minerals Local Plan? (mineral resource)	Within 250m of Mineral Site or Supporting Infrastructure proposed to be safeguarded in Fourth Stage Consultation on Minerals Local Plan?	Within 250m of a waste site as shown on the webmap accompanying the Waste Core Strategy?	Plan policy changes needed
					alongside it.

### Policy 33 – Stourport-on-Severn Site Allocations

Site ref	Site description	Proposed Mineral Consultation Area (MCA) in Fourth Stage Consultation on Minerals Local Plan? (mineral resource)	Within 250m of Mineral Site or Supporting Infrastructure proposed to be safeguarded in Fourth Stage Consultation on Minerals Local Plan?		Plan policy changes needed
AKR/2	Cheapside	No	No	No	N/A
AKR/7	Swan Hotel / Working Men's Club	No	No	No	N/A
AKR/10	Queens Road Shops, Areley Kings	No	No	No	N/A
AKR/14	Pearl Lane, Areley Kings	Yes	No	No	Policy 33.5 should require the developer to undertake a minerals resource assessment to inform design and to optimise opportunities for the partial extraction or incidental recovery of the underlying mineral resource either in

Site ref	Site description	Proposed Mineral Consultation Area (MCA) in Fourth Stage Consultation on Minerals Local Plan? (mineral resource)	Within 250m of Mineral Site or Supporting Infrastructure proposed to be safeguarded in Fourth Stage Consultation on Minerals Local Plan?		Plan policy changes needed
					advance of development taking place or in phases alongside it.
AKR/18	Yew Tree Walk	Yes	No	No	Policy 33.6 should require the developer to undertake a minerals resource assessment to inform design and to optimise opportunities for the partial extraction or incidental recovery of the underlying mineral resource either in advance of development taking place or in phases alongside it.
AKR/20	Carpets of Worth	No	No	No	N/A
LI/11	Land west of former school site Coniston Crescent	Yes	No	No	Policy 33.8 should require the developer to undertake a minerals resource assessment to inform design and to optimise opportunities for the partial extraction or incidental recovery of the

Site ref	Site description	Proposed Mineral Consultation Area (MCA) in Fourth Stage Consultation on Minerals Local Plan? (mineral resource)	Within 250m of Mineral Site or Supporting Infrastructure proposed to be safeguarded in Fourth Stage Consultation on Minerals Local Plan?		Plan policy changes needed
					underlying mineral resource either in advance of development taking place or in phases alongside it.
MI/1	County Buildings	No	No	No	N/A
MI/5	Baldwin Road	No	No	No	N/A
MI/6	Steatite Way	No	No	No	N/A
MI/7	Worcester Road car sales (southern part)	No	No	No	N/A
MI/10	Four Acres Caravan Park	Yes	No	No	Policy 33.13 should require the developer to undertake a minerals resource assessment to inform design and to optimise opportunities for the partial extraction or incidental recovery of the underlying mineral resource either in advance of development taking place or in phases alongside it.
MI/11	3 Sandy Lane Titton	No	No	No	N/A

Site ref	Site description	Proposed Mineral Consultation Area (MCA) in Fourth Stage Consultation on Minerals Local Plan? (mineral resource)	Within 250m of Mineral Site or Supporting Infrastructure proposed to be safeguarded in Fourth Stage Consultation on Minerals Local Plan?		Plan policy changes needed
MI/24	Adj. Rock Tavern Wilden Lane	Yes	No	No	Policy 33.15 should require the developer to undertake a minerals resource assessment to inform design and to optimise opportunities for the partial extraction or incidental recovery of the underlying mineral resource either in advance of development taking place or in phases alongside it.
MI/38	School site Coniston Crescent	Yes	No	No	Policy 33.16 should require the developer to undertake a minerals resource assessment to inform design and to optimise opportunities for the partial extraction or incidental recovery of the underlying mineral resource either in advance of development taking place or in phases

Site ref	Site description	Proposed Mineral Consultation Area (MCA) in Fourth Stage Consultation on Minerals Local Plan? (mineral resource)	Within 250m of Mineral Site or Supporting Infrastructure proposed to be safeguarded in Fourth Stage Consultation on Minerals Local Plan?		Plan policy changes needed
					alongside it.
MI/36	Firs Yard Wilden Lane	Yes	No	Yes	<p>Policy 33.17 should require the developer to undertake a minerals resource assessment to inform design and to optimise opportunities for the partial extraction or incidental recovery of the underlying mineral resource either in advance of development taking place or in phases alongside it.</p> <p>Policy 33.17 should require the developer to demonstrate that as the 'agent of change' (NPPF paragraph 182) the proposed development will not prevent, hinder or unreasonably restrict the operation of the existing</p>

Site ref	Site description	Proposed Mineral Consultation Area (MCA) in Fourth Stage Consultation on Minerals Local Plan? (mineral resource)	Within 250m of Mineral Site or Supporting Infrastructure proposed to be safeguarded in Fourth Stage Consultation on Minerals Local Plan?		Plan policy changes needed
					waste management site and will include any necessary mitigation to ensure that the operation of the existing business will not have a significant adverse effect on the new development.
MI/3	Parsons Chain Site Hartlebury Road	No	No	No	N/A
MI/18	Land north of Wilden Industrial Estate	Yes	No	No	Policy 33.19 should require the developer to undertake a minerals resource assessment to inform design and to optimise opportunities for the partial extraction or incidental recovery of the underlying mineral resource either in advance of development taking place or in phases alongside it.
MI/33	Wilden Industrial Estate	No	No	No	N/A

### Policy 34 – Bewdley Site Allocations

Site ref	Site description	Proposed Mineral Consultation Area (MCA) in Fourth Stage Consultation on Minerals Local Plan? (mineral resource)	Within 250m of Mineral Site or Supporting Infrastructure proposed to be safeguarded in Fourth Stage Consultation on Minerals Local Plan?	Within 250m of a waste site as shown on the webmap accompanying the Waste Core Strategy?	Plan policy changes needed
BR/BE/1	Bewdley Fire Station	No	No	No	N/A
WA/BE/1	Stourport Road Triangle	Yes	No	No	Policies 34.2, 34.3 and 34.4 should require the developer to undertake a minerals resource assessment to inform design and to optimise opportunities for the partial extraction or incidental recovery of the underlying mineral resource either in advance of development taking place or in phases alongside it.
WA/BE/3	Catchem's End	Yes	No	No	
WA/BE/5	Land south of Habberley Road	Yes	No	No	

### Policy 36 Villages and Rural Areas Site Allocations

Site ref	Site description	Proposed Mineral Consultation Area (MCA) in Fourth Stage Consultation on Minerals Local Plan? (mineral resource)	Within 250m of Mineral Site or Supporting Infrastructure proposed to be safeguarded in Fourth Stage Consultation on Minerals Local Plan?	Within 250m of a waste site as shown on the webmap accompanying the Waste Core Strategy?	Plan policy changes needed
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Site ref	Site description	Proposed Mineral Consultation Area (MCA) in Fourth Stage Consultation on Minerals Local Plan? (mineral resource)	Within 250m of Mineral Site or Supporting Infrastructure proposed to be safeguarded in Fourth Stage Consultation on Minerals Local Plan?	Within 250m of a waste site as shown on the webmap accompanying the Waste Core Strategy?	Plan policy changes needed
BR/RO/2	Lem Hill Nurseries Far Forest	No	No	No	
BR/RO/21	Alton Nurseries, Long Bank	No	No	No	
WA/UA/1	Bellman's Cross Shatterford	No	No	No	
WA/UA/4	Allotments, Upper Arley	No	No	No	
WA/UA/6	Red Lion Car Park Bridgnorth Road	No	No	No	
WFR/CB/2	Station Yard, Blakedown	No	No	No	
WFR/CC/8	Fold Farm Chaddesley Corbett	No	No	No	
WFR/WC/22	Land off Lowe Lane Fairfield	No	No	No	
WFR/WC/36	Rock Tavern Car Park Caunsall	Yes	No	No	Policies 36.9 and 36.10 should require the developer to undertake a minerals resource assessment to inform design and to optimise opportunities for the partial extraction or incidental recovery of the underlying mineral resource either in advance of development taking place or in phases alongside it.
WFR/WC/37	Land at Caunsall Road, Caunsall	Yes	No	No	



14<sup>th</sup> October 2019

Helen Smith  
Planning Policy Manager  
Wyre Forest District Council  
Wyre Forest House  
Kidderminster

Dear Helen,

**Amendments to the Wyre Forest Local Plan Pre-Submission Publication document**

Worcestershire County Council (WCC) welcomes the opportunity to comment on the above consultation from Wyre Forest District Council (WFDC).

Introduction

We are pleased to note that some of the comments we made in response to the previous Pre-Submission consultation in 2018 have been taken into account. In particular, we welcome the allocation of land for the further expansion of Blakedown station and associated car parking, in line with our recommendations. This reflects the opportunity that rail offers to mitigate existing and future generated demand on strategic highway corridors (especially the A456), enabling genuinely sustainable growth opportunities in the Wyre Forest.

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 17<sup>th</sup> December 2018 remain extant and should be taken into account.

Minerals and waste

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

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Planning Services  
Manager  
  
County Hall  
Spetchley Road  
Worcester  
WR5 2NP

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 at the end of this response.

We are pleased to note that the site-specific policy AM30.30 for the new allocation “Land off Zortech Avenue LI/13”, proposed as part of the current consultation, includes a requirement for a minerals resource assessment.

### Ecology

We support the proposed wording of Policies 11D and 14 and find this broadly consistent with guidance on Biodiversity Net Gain as published by CIEEM, CIRIA and IEMA.

We note that proposed site FPH/1 has been deleted, however we also note that some areas of the FPH/1 site, specifically those comprising Wilden Marsh and Meadows SSSI, fall within the South Kidderminster Enterprise Park (SKEP). To ensure clarity and provide certainty for developers, we recommend that the footprint of the SSSI is excluded from the policies map and additional wording is inserted into paragraph 30.74 to ensure appropriate environmental consideration and to secure environmental betterment through development of the abutting PDL. We suggest the following wording:

**Although the area of the SKEP covers some natural features and Green Belt land, development will only be permitted on previously developed sites. The site designation lies adjacent to Wilden Marsh and Meadows SSSI and the associated, former settling ponds west of Wilden Lane. Impacts on this land are to be considered as part of any application for development and positive benefits consistent with policy 11(d) secured to enhance this area.**

### Health and wellbeing

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.

### Viability

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.

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.

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.

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.

### Statement of Common Ground/Duty to Co-operate

The WFDC pre-submission plan is not currently supported by Duty to Co-operate agreements or a Statement of Common Ground. However, we understand that WFDC propose to produce these to support the submission of the plan. We will work jointly with WFDC on the Duty to Co-operate statement with WCC, and will work with WFDC to address the issues outlined in this response prior to submission of the plan.

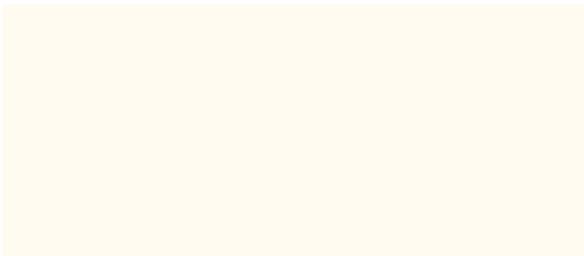
### Conclusion

Although the current Pre-Submission version of the WFDC Local Plan does not fully accord with our recommendations made in 2018, WCC officers continue to work with officers from WFDC on proposed main and minor modifications to address the outstanding matters. We are confident that, if the Local Plan Inspector agrees to these modifications, they would address any soundness concerns we may have. WCC and WFDC are working towards a Duty to Co-operate Statement and Statement of Common Ground.

On a more minor point, we note that paragraph AM1.2 of the consultation document implies that the Local Transport Plan is part of the development plan, which is not the case.

Yours sincerely,

Emily Barker  
Planning Services Manager



### Minerals and waste requirements for proposed site allocations

<p>No minerals or waste matters of concern</p>	<p>No action required</p>	<p>AS/1 Comberton Place  AS/3 Chester Road South Service Station  AS/5 Victoria Carpets Sports Ground  AS/6 Lea Street School  AS/20 North of Bernie Crossland Walk  BHS/2 Bromgrove Street  BHS/18 Blakebrook School  BHS/39 Boucher Building  BW/1 Churchfields  BW/2 Limekiln Bridge  BW/3 Sladen School  FHN/11 BT building Mill Street  FPH/15 Severn Grove Shops Rifle Range Estate  FPH/18 Naylor's Field  FPH/19 164/5 Sutton Park Road  BHS/10 Frank Stone Green Street  FPH/24 Romwire  FPH/29 VOSA site  MI/34 Oakleaf, Finepoint  BW/4 (Green Gap) Stourbridge Road ADR  AKR/2 Cheapside  AKR/7 Swan Hotel / Working Men's Club  AKR/10 Queens Road Shops, Areley Kings  AKR/20 Carpets of Worth  MI/1 County Buildings  MI/5 Baldwin Road  MI/6 Steatite Way  MI/7 Worcester Road car sales (southern part)  MI/11 3 Sandy Lane Titton  MI/3 Parsons Chain Site Hartlebury Road  MI/33 Wilden Industrial Estate</p>
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		BR/BE/1 Bewdley Fire Station BR/RO/2 Lem Hill Nurseries Far Forest BR/RO/21 Alton Nurseries, Long Bank WA/UA/1 Bellman's Cross Shatterford WA/UA/4 Allotments, Upper Arley WA/UA/6 Red Lion Car Park Bridgnorth Road WFR/CB/2 Station Yard, Blakedown WFR/CC/8 Fold Farm Chaddesley Corbett WFR/WC/22 Land off Lowe Lane Fairfield
Waste management site safeguarding implications which need to be addressed	Change needed to site allocation policies to refer to policy WCS 16 (New development proposed on or near to existing waste management facilities) and require the developer to demonstrate that as the 'agent of change' (NPPF paragraph 182) the proposed development will not prevent, hinder or unreasonably restrict the operation of the existing waste management site and will include any necessary mitigation to ensure that the operation of the existing business will not have a significant adverse effect on the new development.	BHS/16 Timber Yard, Park Lane BHS/38 Kidderminster Fire Station FPH/10 (housing) Silverwoods phase 2 FPH/10 (Employment) Silverwoods phase 2 BHS/11 Green Street Depot BHS/17 Rock Works, Park Lane FPH/8 SDF and adjacent land FPH/28 Land at Hoobrook MI/36 Firs Yard Wilden Lane

<p>Mineral <u>infrastructure</u> safeguarding implications which need to be addressed</p>	<p>Change needed to policies to refer to the safeguarding policies of the emerging Minerals Local Plan (or NPPF paragraph 204e) and require the developer to demonstrate that as the 'agent of change' (NPPF paragraph 182) the proposed development will include any necessary mitigation to ensure that the operation of the existing business will not have a significant adverse effect on the new development.</p>	<p>FPH/5 Ambulance Station  FPH/23 (housing) Silverwoods phase 1  FPH/23 (Employment) Silverwoods phase 1  FPH/10 (Employment) Silverwoods phase 2  FPH/8 SDF and adjacent land</p>
<p>Mineral <u>resource</u> safeguarding requirements have been <u>ruled out</u> but explicit reference is required</p>	<p>Following Duty to Cooperate discussions, officers agreed that the majority of the mineral resource underlying these sites is already sterilised (in most cases because the sites are regeneration of brownfield land).</p> <p>Policies or the supporting reasoned justification should clearly state that the need for safeguarding mineral resources at this site has been ruled out through the Duty to Cooperate so that it is clear that the exemptions in the</p>	<p>BW/4 (Housing) Stourbridge Road ADR  OC/11 Stourminster School site  WFR/WC/18 Sion Hill School site  AKR/18 Yew Tree Walk  MI/10 Four Acres Caravan Park  MI/24 Adj. Rock Tavern Wilden Lane  MI/38 School site Coniston Crescent  MI/36 Firs Yard Wilden Lane  WFR/WC/36 Rock Tavern Car Park Caunsall  LI/10 Land r/o Zortech Avenue  LI/11 Land west of former school site Coniston Crescent  LI/12 Former Burlish Golf Course Clubhouse</p>

	emerging Minerals Local Plan would apply.	
Mineral <u>resource</u> safeguarding implications which need to be addressed	<p>Change needed to policies to refer to the safeguarding policies of the emerging Minerals Local Plan (or NPPF paragraph 204 parts c and d) and require the developer to undertake a minerals resource assessment to inform design and to optimise opportunities for the partial extraction or incidental recovery of the underlying mineral resource either in advance of development taking place or in phases alongside it.</p> <p>By highlighting to the developer that this is one of the requirements which needs to be addressed, we consider that if the developer addresses this alongside other requirements, it should</p>	<p>WA/KF/3 Land at Low Habberley  FPH/27 Adj. Easter Park, Worcester Road  WFR/WC/15 Lea Castle Hospital  WFR/WC/32 Lea Castle East  WFR/WC/33 Lea Castle West  WFR/WC/34 Lea Castle North  OC/5 Land at Husum Way  OC/6 Land east of Offmore  OC/12 Comberton Lodge Nursery  OC/13N Stone Hill North  AKR/14 Pearl Lane, Areley Kings  MI/18 Land north of Wilden Industrial Estate  WA/BE/1 Stourport Road Triangle  WA/BE/3 Catchem's End  WA/BE/5 Land south of Habberley Road  WFR/WC/37 Land at Caunsall Road, Caunsall</p>

	not have a significant impact on the delivery timescales for the site.	
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## Appendix 6

### Implications for Worcestershire Waste Core Strategy and Worcestershire Minerals Local Plan

**37.5** As mentioned in Chapter 16, a number of the site allocations have repercussions for existing waste management facilities, mineral infrastructure or mineral resources. The sites affected are listed in the tables below.

**37.6** Policy WCS 16: New Development proposed on or near to existing waste management facilities, requires a developer to demonstrate that as the ‘agent of change’ (NPPF paragraph 182) the proposed development will not prevent, hinder or unreasonably restrict the operation of an existing waste management site within 250m and will include any necessary mitigation to ensure that the operation of the existing business will not have an adverse effect on the new development. (Worcestershire Waste Core Strategy 2012-2027)

<u>Sites potentially affecting existing waste management facility</u>	<u>BHS/16 – Timber Yard, Park Lane</u> <u>BHS/38 – Kidderminster Fire Station</u> <u>FPH/10 – Silverwoods</u> <u>BHS/11 – Green Street Depot</u> <u>BHS/17 – Rock Works, Park Lane</u> <u>FPH/8 – SDF site, Stourport Road</u> <u>FPH/28 – Land at Hoobrook</u> <u>MI/36 – Firs Yard, Wilden Lane</u>
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**37.7** NPPF paragraph 204e requires infrastructure which supports mineral development to be safeguarded. Developers of the following sites will need to address the mineral sites and infrastructure safeguarding policy requirements of the emerging Minerals Local Plan to demonstrate that as the ‘agent of change’ (NPPF paragraph 182) the proposed development will include any necessary mitigation to ensure that the operation of the existing business will not have an adverse effect on the new development.

<u>Site potentially affecting existing minerals infrastructure (concrete batching plant)</u>	<u>FPH/5 – Ambulance Station, Stourport Road</u> <u>FPH/23 – Silverwoods phase 1</u> <u>FPH/10 – Silverwoods phase 2</u> <u>FPH/8 – SDF site, Stourport Road</u>
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**37.8** NPPF paragraph 204 (c & d) requires locally and nationally important mineral resources to be safeguarded from sterilisation by non-mineral development where this should be avoided. Developers of the following sites will need to address the mineral resource safeguarding policy requirements of the emerging Worcestershire Minerals Local Plan, undertaking a minerals resource assessment to inform design and to optimise opportunities for the partial extraction or incidental recovery of the underlying mineral resource either in advance of development taking place or in phases alongside it. The following sites are affected.

<u>Sites where mineral resource safeguarding has been highlighted through the Duty to Cooperate</u>	<u>WA/KF/3 – Land at Low Habberley</u> <u>FPH/27 – adj. Easter Park, Worcester Road</u> <u>LI/13 – Land off Zortech Avenue</u>
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	<u>WFR/WC/15 – Lea Castle Hospital</u> <u>WFR/WC/32 – Lea Castle East</u> <u>WFR/WC/33 – Lea Castle West</u> <u>WFR/WC/34 – Lea Castle North</u> <u>OC/5 – Land at Husum Way</u> <u>OC/6 – Land east of Offmore</u> <u>OC/13N – Stone Hill North</u> <u>AKR/14 – Pearl Lane</u> <u>MI/18 – Land North of Wilden Industrial Estate</u> <u>WA/BE/1 – Stourport Road Triangle</u> <u>WA/BE/3 – Catchem’s End</u> <u>WA/BE/5 – Land south of Habberley Road</u> <u>WFR/WC/37 – Land at Caunsall Road</u>
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**37.9 The need for safeguarding of minerals resources at the following sites has been ruled out through the Duty to Cooperate process and exemptions will be applied.**

<b><u>Site where mineral safeguarding requirements have been ruled out</u></b>	<u>BW/4 (N) – Stourbridge Road</u> <u>BW/4 (S) – Stourbridge Road</u> <u>OC/11 – Stourminster School site</u> <u>WFR/WC/18 – Sion Hill School site</u> <u>MI/10 – Four Acres Caravan Park</u> <u>MI/24 – adjacent Rock Tavern, Wilden Lane</u> <u>MI/38 – School site Coniston Crescent</u> <u>MI/36 – Firs Yard, Wilden Lane</u> <u>WFR/WC/36 – Rock Tavern car park, Caunsall</u> <u>LI/10 – Land r/o Zortech Avenue</u> <u>LI/11 – Land west of former school site Coniston Crescent</u> <u>LI/12 – Former Burlish Golf Course Clubhouse</u>
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**9.1** Improving the health and wellbeing of Wyre Forest District's residents is a key objective of the Council. It is working closely with partner organisations to tackle health inequalities<sup>1</sup> and ensure the best health outcomes for local people.

### **Policy 9 Health and Wellbeing**

**A.** Development should help minimise negative health impacts and maximise opportunities to ensure that people in Wyre Forest District lead healthy, active lifestyles and experience a high quality of life by:

1. Providing easy to maintain, safe and attractive public realm and green infrastructure including green spaces, footpaths, bridleways and cycle routes that encourage active travel opportunities. These spaces should enable formal and informal physical activity, recreation and play, and should support healthy living and social cohesion. The design of these spaces should be flexible<sup>2</sup> and should consider older people and those living with dementia or disabilities.
2. Minimising and mitigating the impacts of negative air quality and reducing people's exposure to poor air quality
3. Providing a mix of high quality, energy efficient, affordable and adaptable housing that meets the needs of different groups in the community, including older people and those with disability.
4. Delivering new and expanded health service provision and facilities in locations where they can be easily accessed using public transport, walking and cycling.
5. Encouraging opportunities for access to fresh food, for example through the retention and provision of allotments, community orchards, fruit trees, local markets, and usable private amenity spaces.

**B.** Health Impact Assessments (HIA) Screening will be required for proposals for, or changes of use to:

- Restaurants and cafés (A3 Use Class)
- Drinking establishments (A4 Use Class)
- Hot food takeaways (A5 Use Class) (see policy 22G)
- Residential Institutions (C2 Use Class)
- Non-residential institutions (D1 Use Class)
- Leisure facilities (D2 Use Class)

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<sup>1</sup> Health inequalities are differences in health status or in the distribution of health resources between different population groups, arising from the social conditions in which people are born, grow, live, work and age

<sup>2</sup> Successful places can adapt to changing circumstances and demands. They are flexible and are able to respond to a range of future needs (PPG, Paragraph: 019 Reference ID: 26-019-20140306, Revision date: 06 03 2014)

- Betting shops and pay-day loan shops (Sui Generis)

The screening process will identify whether the proposal requires a HIA.

HIA will be required for proposals for:

- Residential and mixed-use major development sites
- Employment sites of 5 ha or more
- Retail developments of 500 square metres or more

The HIA should be commensurate with the size of the development.

Where an unacceptable adverse impact on health and wellbeing is identified through the Health Impact Assessment process, development will not be supported unless material planning considerations indicate otherwise.

### **Reasoned Justification**

**9.2** Wyre Forest District Council recognises that spatial planning has an important role to play in the creation of healthy, safe and inclusive communities.

**9.3** The Joint Strategic Needs Assessment and Public Health England data have been used to inform this policy. Health challenges for the district include obesity in children and in adults, mental health, limiting long term illness or disability and increased numbers of people living with dementia. Wyre Forest District currently has a large population of residents over the age of 65 which will increase significantly over the next 20 years. Wyre Forest District experiences significant health inequalities. There is a link between the health and wellbeing of people living in more affluent areas compared to those living in less affluent areas. Current data shows that life expectancy is 8.4 years lower for men and 11.7 years lower for women in the most deprived areas of Wyre Forest than in the least deprived areas<sup>3</sup>.

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<sup>3</sup> Public Health England, Wyre Forest Health Profile 2019

**Table 1. Key Findings from Health Profile for Wyre Forest District<sup>4</sup>**

Indicator	Year	Wyre Forest	Worcestershire	England	England Worst	England Best
GCSEs achieved (5 A*-C inc Maths & English)	2013/16	52.5%	59%	56.6%	35.4%	78.6%
Life expectancy at birth (males)	2015-17	79.4yrs	79.9yrs	79.6yrs	74.2yrs	83.3yrs
Life expectancy at birth (females)	2015-17	83.1yrs	83.9yrs	83.1yrs	79.5yrs	86.5yrs
Dementia diagnosis (aged 65+)	2019	59.8%	59.7%	68.7%	36%	90.2%
Excess weight in adults (aged 18+)	2017/18	62.7%	65%	62%	77.6%	43.4%
Obese children in Year 6 (aged 10-11)	2017/18	35.2%	32.8%	34.3%	44.5%	20.5%

***NB Worst and Best for England refer to district and not county***

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<sup>4</sup> Public Health England, Wyre Forest Health Profile 2019

**9.4** Planning has a very important role to play in addressing these issues. The NPPF contains measures aimed at reducing health inequalities, improving access to healthy food and reducing obesity, encouraging physical activity, improving mental health and wellbeing, securing proposals that meet the needs of all sections of the community and improving air quality to reduce the incidence of respiratory diseases.

**9.5** The design of the built environment can have a significant impact on both physical and mental wellbeing. Well-designed built environment can help to reduce health inequalities in Wyre Forest; while poor environmental quality, housing conditions or pollution can exacerbate them.

**9.6** Obesity is a major risk factor for several diseases such as Type 2 diabetes, cancer and heart disease. It can also affect people's mental health. The design of the built environment should encourage physical activity and healthier lifestyles which can help reduce obesity in both adults and children.

**9.7.** New homes should be adaptable to the changing needs of its occupants and be designed with all community groups in mind, including, disabled and older people. The 'Lifetime Homes' standard sets out design criteria that can help to demonstrate this type of flexible design. Homes should be affordable and energy efficient to ensure comfortable and long-term accommodation for all.

**9.8** Proposals will provide for multifunctional green infrastructure. This will encourage active travel and social interaction and minimise the potential for crime and anti-social behaviour. Proposals will provide connectivity to local centres, health and community facilities, thereby reducing car dependency. This can be achieved in part through public realm design which prioritises people over motor traffic. This should allow for convenient, safe and attractive routes, in particular for walking and cycling. Sport England's Active Design principles<sup>5</sup> will be supported to encourage physical activity through the development layout.

**9.9** The provision of green spaces can provide multiple benefits such as the facilitation of physical activity, social cohesion, healthy food growing and improvement to air quality. They should be accessible and well-maintained in order to preserve their functionality and serve members of the communities. Proposals that include access to fresh food, for example through the retention, enhancement or provision of allotments, community orchards, fruit trees or local markets, and usable private amenity spaces, will be encouraged. Shared use of community spaces will also be encouraged to improve social cohesion through schemes such as community allotments or orchards.

**9.10** Proposals will seek to reduce their negative impacts on air quality and reduce people's exposure to poor quality air through sustainable building design, encouragement of active travel, discouragement of car dependency and provision of electric charging points. Appropriate planting will be provided to absorb pollutants and the design and layout of development will increase separation distances between people and sources of air pollution.

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<sup>5</sup> Sport England (2015) Active Design Planning for health and wellbeing through sport and physical activity

**9.11** The design of public realm of should be of flexible design which means that it can adapt to changing uses and demands. Developments should consider design elements that can affect the quality of life of elderly and people living with dementia. This includes the provision of safe, well-lit and walkable routes connecting local green spaces and essential amenities. Seating areas provided in strategic places, simple street furniture and plain, non-reflective and contrasting surfaces could improve the likelihood of those with dementia continuing their everyday lives as part of the community.

**9.12** New residential developments should be supported by sufficient and accessible healthcare provision. Where there is a shortfall in sufficient healthcare facilities, measures should be taken to rectify the shortfall as a result of development.

**9.13** Health Impact Assessment (HIA) is a tool to ensure that impacts on health and wellbeing of the population are considered at the planning and design stage. HIA Screening is a simplified process to determine whether an HIA is needed for a particular scheme.

**9.14** Part B of the policy requires certain developments to demonstrate how they have specifically addressed the health and wellbeing principles specified in part A through an HIA. Other development types, as also specified in Part B will be expected to undertake an HIA screening assessment to identify whether a proposal requires a full HIA. Undertaking an HIA will ensure that the effects of a development on both health and health inequalities are considered and addressed during the planning process. Early dialogue with the local planning authority (such as through pre-application advice) is encouraged to help establish the extent and content of HIA. HIAs will be assessed by Wyre Forest District Council in consultation with Worcestershire County Council's Public Health Directorate and will be a material consideration in the planning application process.

**9.15** Further guidance on health and wellbeing principles and the HIA and HIA Screening process will be included in the Health and Wellbeing Supplementary Planning Document. This SPD will include HIA and HIA Screening templates to guide the applicants through this process.

**9.16** Other policies in the Development Plan (such as the Community Facilities Policies 20A-C) address issues which could have implications for health and wellbeing and should be considered in conjunction with this policy. Also see adopted Wyre Forest Playing Pitch Strategy and Action Plan and the Indoor and Built Facilities Strategy.

**9.17** The Food and Drink Retailing Policy (Policy 22G) further expands on the issues around the prevalence of hot-food takeaways and how they can negatively impact on health.

**9.18** The Sustainability Appraisal has assessed the Local Plan as having an overall positive impact on health and wellbeing. The Local Plan is seen as supporting healthy lifestyles by aiming to maximise the delivery of Green Infrastructure and

provide housing and employment sites in locations that are close to existing services, thereby encouraging walking and cycling and reducing reliance on car travel with the associated air pollution problems.

## **Chapter 24**

### **Telecommunications and Renewable Energy**

For the Plan to facilitate the viability and success of the Wyre Forest economy it must be sensitive to the opportunities posed by new technology whilst at the same time offering some protection from unnecessary intrusion. Two forms of new technology of particular relevance and importance to the planning system due to their infrastructure implications are Telecommunications/Broadband and Renewable Energy. The interpretation of these policies and any future review will need to acknowledge the fast-moving nature of these technologies.

Broadband development across the whole of Worcestershire is driven by the Worcestershire Local Broadband Plan (WLBP), as agreed in May 2012. The Plan aims to drive economic growth across the County improving speeds for all residents and local businesses. This will maximise opportunities for private sector investment, thus reducing the need for public sector funding. These priorities are echoed in the County Council's Corporate Plan for which "Open for Business" is a priority and broadband is a key enabler. This is fully supported by the business community and the Worcestershire Local Enterprise Partnership (LEP).

### **Policy 24A - Telecommunications and Broadband**

#### **Broadband and Mobile Infrastructure**

- a. All new development will be expected to include the provision of Full Fibre Gigabit capable Network infrastructure Fibre to the Premises (FTTP) to enable broadband services for all occupiers;
- b. All new development will be expected to consult with telecommunication providers to explore the need for other telecommunications technology incorporating mobile (including 5G and future iterations), and other wireless technologies, e.g. fixed wireless<sup>[1]</sup> and Wi-Fi. If additional technology is required space should be made available for the required infrastructure within the development;

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<sup>[1]</sup> Fixed wireless is the operation of wireless communication devices or systems used to connect two fixed locations (e.g., building to building or tower to building) with a radio or other wireless link, such as laser bridge. Usually, fixed wireless is part of a wireless LAN infrastructure. The purpose of a fixed wireless link is to enable data communications between the two sites or buildings. Fixed wireless data (FWD) links are often a cost-effective alternative to leasing fibre or installing cables between the buildings

- c. Capacity should be available within the fibre infrastructure to allow for midhaul/backhaul of equipment for applications such as smart cities and connected transport solutions

### **Reasoned Justification**

The NPPF 2019 (para 112) recognises the role of advanced, high quality communications infrastructure in creating sustainable economic growth as part of strategic policies. The development of high speed broadband technology and other communications networks will also play a vital role in enhancing the provision of local community facilities and services.

Some infrastructure providers have agreed to provide FTTP infrastructure to new developments of 30 dwellings or more at no cost to the developer and for a contribution if below a certain size e.g. Openreach; whilst others will provide and deliver materials at zero cost to the developer e.g. Virgin Media.

In some exceptional locations outside urban areas, an equivalent alternate solution may be acceptable if developers are unable to facilitate an FTTP solution, although FTTP is the preferred option and the burden of proof lies with the developer as to why an alternate solution is required. In any case developers must, as a minimum, make sure that broadband services reach ultrafast speeds and are made available to all premises, at market prices and with a choice of UK service providers.

Communication infrastructure includes telephone systems (both wired and mobile) and broadband. The benefits of having a modern and accessible system of telecommunications, wireless and electronic methods of communication to Wyre Forest District will be significant. Increasingly the demand is for FTTP broadband using fibre optic technology as defined within the NPPF (para 112).

High quality telecommunications and broadband is also recognised in Policy 12 – Infrastructure and the Wyre Forest Infrastructure Delivery Plan.

Broadband development across the whole of Worcestershire is guided by the Worcestershire Local Broadband Plan (WLBP), as agreed in May 2012. The Plan aims to drive economic growth across the County improving speeds for all residents and local businesses. This will maximise opportunities for private sector investment, thus reducing the need for public sector funding. These priorities are echoed in the County Council's Corporate Plan for which "Open for Business" is a priority and broadband is a key enabler. This is fully supported by the business community and the Worcestershire Local Enterprise Partnership (LEP).

When considering the development of telecommunications technology the following factors should be taken into consideration:

- Operational requirements of the telecommunication networks and the limitations of the technology, including technical constraints on the location of telecommunications apparatus.
- The need for ICNIRP Guidelines<sup>1</sup> and/or any other relevant guidance in place at the time of the application) for safe emissions to be met.
- The need to avoid interference with existing electrical equipment and air traffic services.
- Development should also consider the provision of in-building solutions for broadband and telecommunications technology.
- The impact of the development on its surroundings.

Reference should also be made to government guidelines on the rollout of fixed and mobile networks at the local level<sup>2</sup>

The siting and appearance of the proposed apparatus and associated structures should seek to minimise the impact on the visual amenity, character, landscape or appearance of the surrounding area, particularly if it is proposed in a Conservation Area. All geospatial considerations can be considered through Government guidance<sup>3</sup>

If positioned on a building, apparatus and associated structures should be sited and designed in order to seek to minimise the impact to the external appearance. When choosing a suitable location for the apparatus ongoing access at appropriate and suitable times should be considered.

A digitally accessible Wyre Forest District will allow people an enhanced freedom of choice about where and how they work, how they interact with services and facilities and how they promote and operate their businesses. A connected community is a more sustainable one, as it represents the opportunity for a reduction in car-based commuting and a commensurate reduction in carbon outputs and traffic congestion. It also promotes the idea of Wyre Forest as a suitable place for high technology activities and employment to take place.

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<sup>1</sup> <https://www.icnirp.org/cms/upload/publications/ICNIRPemfgdl.pdf>

<sup>2</sup> <https://www.gov.uk/guidance/considerations-for-the-local-planning-authority>

<sup>3</sup>

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/684420/OS\\_Final\\_report\\_5g-planning-geospatial-considerations.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/684420/OS_Final_report_5g-planning-geospatial-considerations.pdf)

# Wyre Forest Local Plan

## Public Health Response

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## Key points

1. A healthy community is a good place to grow up and grow old in. It is one which supports healthy behaviours and supports reductions in health inequalities. It should enhance the physical and mental health of the community.
2. In Worcestershire, in common with many areas in England, there is a general upward trend in the prevalence of overweight and obesity in adults and children. Overweight and obesity contributes to a growing prevalence of long-term conditions such as diabetes and cardiovascular disease, reduced quality of life and increased mortality.
3. In reception year 24.2% of the children living in Wyre Forest were overweight (including obese) and by year 6 this increases to 36.2% (2018/19).
4. Features of the environment within which individuals live have been identified as potential risk factors for obesity as they may affect both eating behaviour (energy intake) and physical activity level (energy expenditure). There is evidence that there are elevated levels of obesity in communities with high concentrations of fast food outlets and further evidence that such concentrations are highest in areas of greatest deprivation.
5. Local evidence in Worcestershire highlights that exposure to at least one fast food outlet within 1 mile of home and within 1 mile of school were both associated with a higher proportion of children becoming obese. This was most pronounced in the proportion who were overweight in reception and became obese by year 6.

## 1. Purpose

This report summarises the policy context and evidence which has informed the council's decision to regulate takeaways through the planning system.

## 2. Introduction

Obesity is a significant public health concern. It is one of our most significant and complex challenges which can result in long-term ill-health and lead to poor quality of life and reduced life expectancy.

Once established, obesity is hard to tackle. Obese children and adolescents are around five times more likely to be obese in adulthood - around 55% of obese children will go on to be obese in adolescence, around 80% of obese adolescents will still be obese in adulthood and around 70% will be obese over 30.<sup>a</sup>

Obesity is detrimental to individual and family health and wellbeing, impacting on business and education, and contributing to significant costs across health, social care and a wide range of services.

Failing to address the challenge posed by the obesity epidemic will place an even greater burden on NHS resources. It is estimated that the NHS in England spent £6.1 billion on overweight and obesity related ill-health in 2014 to 2015.<sup>b</sup>

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<sup>a</sup> Simmons M, Llewellyn A, Owen C G, Woolacott N (2015), 'Predicting adult obesity from childhood obesity: a systematic review and meta-analysis', *Obesity Reviews*, 17(2) pp. 95-107

<sup>b</sup> Public Health Matters; March 17; [https://www.gov.uk/government/publications/healthmatters-obesity-and-the-food-environment/health-matters-obesity-and-the-food-environment-](https://www.gov.uk/government/publications/healthmatters-obesity-and-the-food-environment/health-matters-obesity-and-the-food-environment-2)

Annual spend on the treatment of obesity and diabetes is greater than the amount spent on the police, the fire service and the judicial system combined. The UK-wide NHS costs attributable to overweight and obesity are projected to reach £9.7 billion by 2050, with wider costs to society estimated to reach £49.9 billion per year.<sup>c</sup>

There is a strong relationship between deprivation and childhood obesity. Analysis of data from the National Child Measurement Programme (NCMP) shows that obesity prevalence among children in both Reception and Year 6 increases with increased socioeconomic deprivation (measured, for example, by the 2010 Index of Multiple Deprivation (IMD) score). Obesity prevalence in the most deprived 10% of children is approximately twice that of the least deprived 10%.

At a basic level obesity is caused by a mismatch between the energy we consume and the energy we expend but the true picture is a lot more complicated.<sup>1</sup> Obesity is not just a product of genes, lifestyle choices or physical activity but is impacted by a range of factors such as access to green space, socioeconomic status, the national and international food markets and exposure to advertising.

The increasing consumption of out-of-home meals – that are often cheap and readily available at all times of the day - has been identified as an important factor contributing to rising levels of obesity. Public Health England estimated in 2014 that there were over 50,000 fast food and takeaway outlets, fast food delivery services, and fish and chip shops in England. More than one quarter (27.1%) of adults and one fifth of children eat food from out of-home food outlets at least once a week. These meals tend to be associated with higher energy intake; higher levels of fat, saturated fats, sugar, and salt, and lower levels of micronutrients<sup>d</sup>.

### 3. Planning

National and regional planning policy recognise the role of special planning in promoting health and reducing the risk of poor health, including how the environment can impact on overweight and obesity.

*“A healthy place is one which supports and promotes healthy behaviours and environments and a reduction in health inequalities for people of all ages. It will provide the community with opportunities to improve their physical and mental health, and support community engagement and wellbeing”.*

**National Planning Policy Guidance** Paragraph: 003 Reference ID:53-003-20191101

In Worcestershire, in common with many areas in England, there is a general upward trend in the prevalence of overweight and obesity in adults and children. Overweight and obesity contributes to a growing prevalence of long-term conditions such as diabetes and cardiovascular disease, reduced quality of life and increased mortality.

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<sup>c</sup> The British Medical Journal (2014), *Associations between exposure to takeaway food outlets, takeaway food consumption, and body weight in Cambridgeshire, UK: population based, cross section*

<sup>d</sup> PHE (2017) <https://www.gov.uk/government/publications/health-matters-obesity-and-the-food-environment/health-matters-obesity-and-the-food-environment--2>

The Foresight Tackling Obesity Future Choices – Obesity Systems Map<sup>e</sup> demonstrates that obesity is the result of a very large number of determinants with many of the drivers beyond the scope of individuals. The map is made up of a series of interconnected ‘sub-systems’: societal and cultural influences, food production, food consumption, biological factors, individual psychology, individual activity and environmental factors. There is broad consensus that preventing and tackling obesity effectively requires the development of a sustained ‘whole systems approach’, with co-ordinated policies and actions across individual, environmental and societal levels involving multiple sectors (including planning, housing, transport, children’s and adult’s services, business and health).

It has been recognised that local authorities, through a wide range of their functions, are well placed to take action to combat obesity. A number of important publications have already drawn attention to the potential for local government to use its powers in a variety of ways to combat obesity and try to dilute some of the effects of the obesogenic environment. The planning system is one area in which local government can act.

One of the ways in which planning can have the greatest impact on health, and in particular obesity levels, is to restrict hot food takeaways. A diet which is high in saturated fat and salt and/or which includes trans-fat contributes to the risk of developing cardiovascular disease (CVD), cancers and obesity which in turn increases the risk for type 2 diabetes.

The National Planning Policy Framework makes it clear that the planning system can play an important role in creating healthy, inclusive communities. There is evidence that there are elevated levels of obesity in communities with high concentrations of fast food outlets and further evidence that such concentrations are highest in areas of greatest deprivation. There is also evidence that the type of food on sale nearest to schools may influence the diet of school children.

Local authorities in England are beginning to use the planning system to restrict hot food takeaways with the aim of restricting access to unhealthy food to address concerns about population health in relation to cardiovascular disease (CVD) and obesity. Wyre Forest’s Local Plan has identified health and improving health outcomes and reducing health inequalities as a key objective to be addressed in the town. Increasing density of A5 outlets in an area can have an adverse impact on the amenity of surrounding properties and neighbouring uses. The levels of disturbance from noise, odour and possible anti-social behaviour may be increased when A5 uses are cluster together.

#### 4. National guidance

National Institute for Health and Care Excellence (NICE) (2010) Guidance on prevention of cardiovascular disease outlines that reducing salt and saturated fat intakes for the population will reduce morbidity and mortality rates from cardiovascular disease. Furthermore it states that trans fats (industrial-produced trans fatty acids (IPTFAs)) are a significant health hazard and that sections of the population who regularly eat fried fast-food may be consuming substantially higher amounts of trans fats.

NICE (2010) Guidance on prevention of cardiovascular disease outlines that food from takeaways and the ‘informal eating out sector’ comprises a significant part of many people’s diet and indicates that local planning authorities have powers to control fast-food outlets. It recommends that local planning authorities should be encouraged to restrict planning permission for takeaways and other food retail outlets in specific areas (for example, within walking distance of schools) as well as consider the concentration of fast-food outlets in specific areas to address disease prevention. It

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<sup>e</sup> The Foresight Tackling Obesity Future Choices – Obesity Systems Map  
<https://www.gov.uk/government/publications/reducing-obesity-obesity-system-map>

further recommends that existing planning policy guidance should be implemented in line with public health objectives.

'Healthy Lives, Healthy People' [1] was the government's response to the Marmot review. It recognises that access to good quality food is one of many factors that influence the health and wellbeing of the local population and highlights that income, social deprivation and ethnicity have an important impact on the likelihood of becoming obese. The strategy recognises that "health considerations are an important part of planning policy".

In 2014 Public Health England (PHE), the Local Government Association (LGA) and the Chartered Institute of Environmental Health highlighted that:

*"One of the dietary trends in recent years has been an increase in the proportion of food eaten outside the home, which is more likely to be high in calories. Of particular concern are hot food takeaways, which tend to sell food that is high in fat and salt, and low in fibre, fruit and vegetables."*

## 5. Planning policy context

### 5.1 National Planning Policy Framework (NPPF)

The NPPF was originally published on 27 March 2012 (and updated July 2018 and February 2019) and provides the framework within which local planning authorities must prepare their Local Plan. With regard to health, the framework states that planning should:

- take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community;

At the heart of the NPPF is a presumption in favour of sustainable development, with three dimensions to the concept: economic; social; and environmental.

**Social objective** – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being;

NPPF paragraph 85 highlights the importance the role that town centres play at the heart of local communities—and paragraph 91 sets out that "Planning policies and decisions should aim to achieve healthy, inclusive and safe places" and "enable and support healthy lifestyles, especially where this would address identified local health and well-being needs"

### 5.2 Planning Practice Guidance (PPG) – (Healthy and Safe Communities)

The PPG is statutory guidance published by the Government, which builds upon the NPPF. In relation to health and wellbeing it states that;

The design and use of the built and natural environments, including green infrastructure are major determinants of health and wellbeing. Planning and health need to be considered together in two ways: in terms of creating environments that support and encourage healthy lifestyles, and in terms of identifying and securing the facilities needed for primary, secondary and tertiary care, and the wider health and care system. (PPG Paragraph: 001 Reference ID:53-001-20190722)

Engagement between plan-making bodies and relevant organisations will help ensure that local strategies to improve health and wellbeing and the provision of the required health infrastructure are supported and considered in plans. (PPG Paragraph: 002 Reference ID:53-002-20190722)

A healthy place is one which supports and promotes healthy behaviours and environments and a reduction in health inequalities for people of all ages. It will provide the community with opportunities to improve their physical and mental health, and support community engagement and wellbeing. (PPG Paragraph: 003 Reference ID:53-003-20191101)

Specifically, national guidance states that planning policy and supplementary planning documents can be used to limit the proliferation of establishment uses in certain areas, with particular considerations to ‘proximity to locations where children and young people congregate such as schools, community centres and playgrounds’ (PPG, Paragraph: 004 Reference ID:53-004-20190722).

## 6. Wyre Forest context

The fundamental cause of excess weight and obesity is an imbalance between energy consumed, in the form of calories, and energy used. One of the factors implicated in the rise in childhood obesity is the consumption of fast food which is typically energy rich with high saturated fat content and low micronutrient content [6].

Features of the environment within which individuals live have been identified as potential risk factors for obesity as they may affect both eating behaviour (energy intake) and physical activity level (energy expenditure).

Fast food consumption has been found to have strong positive associations with weight gain and risk of obesity in both children and adults [9]. A systematic review undertaken by NICE provides good evidence of a positive association between food consumed outside of the home (mainly fast food) and obesity in children and adults.

The density of fast food outlets in Wyre Forest is 89/100,000 population (Fast food survey, PHE, Dec 2017). This is similar to the England average of 96.1/100,000 people. The total number of fast food outlets in Wyre Forest is 89. The number of fast food outlets at ward level is presented below.

LA code	2016 Ward code	2016 Ward name	Total fast food outlets
E07000239	E05010502	Aggborough & Spennells	13
E07000239	E05010503	Areley Kings & Riverside	17
E07000239	E05010504	Bewdley & Rock	4
E07000239	E05010505	Blakebrook & Habberley South	25
E07000239	E05010506	Broadwaters	9
E07000239	E05010507	Foley Park & Hoobrook	10
E07000239	E05010508	Franche & Habberley North	2
E07000239	E05010509	Lickhill	0
E07000239	E05010510	Mitton	2
E07000239	E05010511	Offmore & Comberton	3
E07000239	E05010512	Wribbenhall & Arley	1
E07000239	E05010513	Wyre Forest Rural	3

The large number of fast food outlets in Wyre Forest is in Blakebrook and Habberley South ward, which also has the two main shopping centres in Wyre Forest. Over one third, 36 of 89, of fast food outlets, are in the wards of Broadwaters, Foley Park and Hoobrook and some parts of Areley Kings, which are the most deprived wards in Wyre Forest. More fast food outlets in these areas of deprivation may increase the availability of energy-dense food outlets which may exacerbate poorer health outcomes.

A census of English local government areas (n = 325) to locate planning policies regulating takeaway food outlets found that 164 (50.5%) local government areas had a policy specifically targeting takeaway food outlets, 56 (34.1%) focused on health (Keeble et al., 2019).

Those local authorities with a planning policy restriction tend to have a 400m exclusion zone. However, in Brighton and Hove this was found to be inadequate to cover the areas actually used by pupils: an 800m radius is used as it covers significantly more lunchtime journeys.

### 6.1 Hot Food Takeaways and Deprivation

Public Health England state that there is strong evidence linking the density of fast food outlets to the level of deprivation in an area, and data shows higher concentrations of fast food outlets in England’s most deprived communities. Amongst 16 CIPFA statistical neighbours, Wyre Forest is 5<sup>th</sup> most deprived, and has a higher deprivation score than the England average. Wyre Forest currently has a hot food outlet density of 89 per 100,000 people, which is approximately average density across England. Proliferation of fast food outlets in Wyre Forest, particularly around schools, would likely to be to the further detriment of health and wellbeing and contributing to the concept of ‘food deserts’.

## 7. Local evidence on childhood overweight and obesity

Overweight and obesity are defined by the World Health Organisation (WHO) as ‘abnormal or excessive fat accumulation that may impair health’ [1]. According to UK thresholds, a child is defined as overweight if their BMI (Body Mass Index)<sup>f</sup> is equal to, or greater than the 85th centile of the British 1990 growth reference (UK90)<sup>g</sup> [2]. A child is defined as obese if their BMI is equal to, or greater than the 95th centile of the UK90 [2].

In Worcestershire 19.7% of children aged 4-5 years (Reception) and 32.9% aged 10-11 years (Year 6) are overweight, including obese (2018/19) [2]. These figures are generally similar to, or better than, those for England as a whole. However, in Wyre Forest the rates at reception and year 6 are greater than Worcestershire and the England average. In reception year 24.2% of the children living in Wyre Forest were overweight (including obese) and by year 6 this increases to 36.2% (2018/19).

(Table 1).

**Table 1:** Prevalence of Underweight, Healthy Weight, Overweight and Obese Children in the England and Worcestershire in 2018/19 by Age Group.

Weight Status	England		Worcestershire		Wyre Forest	
	4-5 years	10-11 years	4-5 years	10-11 years	4-5 years	10-11 years
Underweight (%)	1.0	1.4	1.1	1.5	No data	No data

<sup>f</sup> Body Mass Index (BMI) is calculated by dividing a person’s weight in kilograms by the square of their height in meters. For children up to age 18, BMI is age- and sex-specific.

<sup>g</sup> The UK90 BMI reference provides centile curves of BMI for British children. They are based on a sample of 32,222 measurements from 12 surveys between 1978 and 1994.

<i>Healthy Weight (%)</i>	76.5	64.3	79.3	65.6	No data	No data
<i>Overweight including obese (%)</i>	22.6	34.3	19.7	32.9	24.2	36.2
<i>Obese (%)</i>	9.7	20.2	8.2	18.6	9.8	20.4

Source:  
Fingertips

NCMP data [3]

It is well known that along with age; gender, ethnicity and deprivation influence the prevalence of obesity.

**Gender:**

In Worcestershire, during 2017/18 the percentage of Reception children who were overweight or obese was 23.3% of boys and 21.3% of girls. By year 6 this had increased in both genders with the prevalence of excess weight amongst boys being over 5% greater than that in girls (35.5% of boys and 29.9% of girls) [4].

**Ethnicity:**

Results by ethnicity in Worcestershire are similar to national figures with the greatest prevalence of obesity in children from Black ethnic groups (exact figures not available). However, these figures should be treated with caution due to the relatively small numbers of minority ethnic groups in Worcestershire. [4].

**Deprivation:**

The Index of Multiple Deprivation 2015 (IMD) is a measure of relative deprivation at small area level namely LSOA (lower super output area – average population of 1,500). The IMD is made up of 37 indicators covering seven domains and the result is a single score for each LSOA. For each child measured we can derive the LSOA in which they live through their postcode. In the following analysis children were allocated into one of five groups (or quintiles) according to the ranking of their LSOA deprivation score nationally.

In 2017/18, there were 25.7% reception children classed as having excess weight living in the most deprived quintile of Worcestershire. This compares with just 18.3% in the least deprived quintile. This is over 7 percentage points difference between children living in the most and least deprived areas of Worcestershire. This inequalities gap has not really changed over the last 7 years. In addition, in 2017/18, there were 39.5% year 6 children classed as having excess weight living in the most deprived quintile of Worcestershire. This compares with just 27.7% in the least deprived quintile. This is 11.8 percentage points difference between children living in the most and least deprived areas of Worcestershire.

As previously stated, Wyre Forest has above average deprivation levels and ranks 5<sup>th</sup> for deprivation out of the 16 CIPFA nearest neighbours. The number of children (under 16 years) living in poverty in Wyre Forest is also worse than the English average (18.1% compared to 17% in England).

Furthermore, Worcestershire Directorate of Public Health evaluated the impact of the following factors on weight gain in Worcestershire children of primary school age: sex, ethnicity, deprivation, home district, exposure to at least one fast food outlet (FFO) within the 1 mile of home and exposure to at least one FFO within the 1 mile of school.

This study found that not only are the children in the most deprived decile more likely to be obese at age 4-5 years but they are disproportionately more likely to become obese by age 10-11 year. At a district level, the proportion of children who went from being a healthy weight to overweight (not including obese), was greatest in Wyre Forest compared to the other district areas in Worcestershire. Furthermore, the exposure to at least one fast food outlet within 1 mile of home and within 1 mile of school were both associated with a higher proportion of children becoming obese. This was most pronounced in the proportion who were overweight in reception and became obese by year 6.

Local research in Worcestershire using 2016/17 NCMP data showed that at baseline the prevalence of obesity in children who were exposed to fast food outlets from the home was less than 2% higher than those not exposed. By year 6 this gap had increased to over 5%. Similarly, the prevalence of obesity for those who were exposed from school was less than 2% in reception and increased to 8% by year 6.

## 8. Conclusion

Obesity is a significant public health concern. It is one of our most significant and complex challenges which can result in long-term ill-health and lead to poor quality of life and reduced life expectancy. Failing to address the challenge posed by the obesity epidemic will place an even greater burden on NHS resources.

In Worcestershire there is a general upward trend in the prevalence of overweight and obesity in adults and children. There is evidence that there are elevated levels of obesity in communities with high concentrations of fast food outlets and further evidence that such concentrations are highest in areas of greatest deprivation. There is also evidence that the type of food on sale nearest to schools may influence the diet of school children.

The National Planning Policy Framework makes it clear that the planning system can play an important role in creating healthy, inclusive communities. Such planning policy can be utilised to promote health and reduce the risk of poor health. One way in which this can be used is to restrict hot food takeaways. Local authorities are well placed to take on action to combat obesity.

Consequently, Wyre Forest's Local Plan has identified health and improving health outcomes and reducing health inequalities as a key objective to be addressed within the District.

In order to address these issues the Wyre Forest District Local Plan Submission Publication Document Policy 22G relates to hot food takeaways. This states that they will not be permitted where the proposal is within 400m as the crow flies of any boundary of a school. It is envisaged that this will positively contribute to the improvements in the food environment and is a key action in helping to combat overweight and obesity within the district.

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