

Wyre Forest District Council
Kidderminster Central Area Plan
Schedule of Main Modifications (February 2013)

1. These proposed modifications to the plan have arisen from representations made at the pre-submission publication stage and from further discussions between the Council and stakeholders under the Statements of Common Ground. Some modifications have also been included following discussion held at the hearing session which took place on 1st February.
2. The table below sets out the main modifications which the District Council wishes the Inspector to consider for recommendation for inclusion within the Plan. These include amendments to the content of the policies which are considered necessary to make the Plan sound. The proposed modifications have been subject to review in terms of the implications for the Sustainability Appraisal and Assessment under the Habitats Regulations, which is available to view in the accompanying Sustainability Appraisal update report.
3. It should be noted that due to the implementation of the changes to the Development Plan Regulations which have arisen from the implementation on the Localism Act, a generic minor modification is proposed to rename the Plan from “Kidderminster Central Area Action Plan Development Plan Document (KCAAP)” to the **Kidderminster Central Area Plan (KCAP)** and all references to the “Local Development Framework” to read **Local Plan**. All references to the “Proposals Map” will be amended to the **Policies Map**. For information purposes, the Local Plan encompasses the Adopted Core Strategy, the Site Allocations and Policies Local Plan, the Kidderminster Central Area Plan and the Policies Map.

4. These main modifications are now subject to a period of consultation, running from **Thursday 14th February to Thursday 28th March**. This consultation **only** concerns the proposed modifications to the Plan and there is no need to resubmit representations made on the Submission document, as these have already been considered as part of the Examination. The Inspector will consider all responses prior to issuing her report to the Council.

5. For clarity on the impact of the minor and main modifications on the document should be read in conjunction with the Submission version of the Plan, which is available to view through the following link.

[Submission Document](#)

6. Should you wish to make a representation on the Proposed Modifications, this can be done via email to programme.officer@wyreforestdc.gov.uk, or please send in writing to:

Programme Officer – Bradley Gammond, Town Hall, Vicar Street, Kidderminster, Worcs, DY10 1DB

If you have any questions on the consultation then please contact Bradley Gammond via the above e-mail address or on 01562 732196

Kidderminster Central Area Plan Main Modifications

Modification Number	Page	Policy / Section	Proposed Change	Reason for Change	Relevant Representation/State ment of Common Ground (If Applicable)	SA Required?
KCAPMA01	Page 10	Strategic Objectives	Replace Objective 9 with the following: <u>9. Improve the resilience of Kidderminster by reducing and managing flood risk and taking account of the impacts of climate change by ensuring good water management.</u>	Given the extent of flood risk to the KCAP area it may not be achievable to safeguard the town against all flood risk. Therefore the objective is proposed to be reworded to ensure that it can be met and is deliverable.	Environment Agency KCAAPP110 SOCG3	Yes. Objective is broader than the original.
KCAPMA02	Page 13	Policy KCA.PFSD1: Presumption in Favour of Sustainable Development	Include the additional wording in Policy KCA.PFSD1, as follows: Planning applications that accord with the policies <u>and objectives</u> in the ...'	To ensure that decisions accord with polices and objectives included in the Plan.	West Mercia Police SALPP251 SOCG6	No – this is a reference to objectives which have already been tested against the SA framework.
KCAPMA03	Page 18	KCA.GPB1 Retail Development	Amend policy to read: “Limited retail growth, consisting of individual units of no larger than <u>280sq.m net</u> , will also be allowed...”	To clarify that the floorspace relates to the net retail floorspace and to reflect the wider threshold change from 250sqm to 280sqm	England and Lyle KCAAP72 Brook Green Estates SALPP121	Yes. Changes threshold for small-scale retail for local and neighbourhood centres.
KCAPMA04	Page 22	KCA.GPB4 Edge-of-	Amend policy to read:	To clarify that the floorspace relates to the	England and Lyle KCAAP72	Yes. Changes threshold for

Modification Number	Page	Policy / Section	Proposed Change	Reason for Change	Relevant Representation/Statement of Common Ground (If Applicable)	SA Required?
		Centre and Out-of-Centre Retailing	"Proposals for further retail expansion, in excess of <u>280sq.m net</u> , in edge-of-centre..."	net retail floorspace and to reflect the wider threshold change from 250sqm to 280sqm	Brook Green Estates SALPP121	small-scale retail for edge- and out-of-centre locations.
KCAPMA05	Page 24	KCA.GPB5 Employment Development	Under the Health and Education section of the policy, wording should now read: "Subject to site specific policies, the following areas will be the focus for health and education development falling under the <u>C2 and D1</u> uses."	Existing wording had mixed up use class codes to read C1 and D2 instead of C2 and D1.	WFDC (Officer)	No. The use class was changed because of a typographical error. Therefore the original SA reflects the new use classes.
KCAPMA06	Page 30 / 31	KCA.GPB7 Leisure Development	Amend and restructure policy to read: Leisure Development Major new D2 leisure and multiple-unit A3 and A4 food and drink developments will be concentrated towards the waterside environments of the Western Gateway Area. Smaller scale <u>Other leisure developments will be supported throughout the Primary Shopping Area subject to these being in line with the site specific policies in Part B and the relevant</u>	To be consistent with the National Planning Policy Framework which allows for main town centre uses to located in town centres, which are considered to be the Primary Shopping Area of the town.	Arrowcroft Service Ltd KCAAP19	Yes. Changes the scale of leisure development which may be supported within the Primary Shopping Area.

Modification Number	Page	Policy / Section	Proposed Change	Reason for Change	Relevant Representation/Statement of Common Ground (If Applicable)	SA Required?
			<p><u>policies in the Site Allocations and Policies Local Plan.</u></p> <p>Elsewhere in the <u>KCAP</u> area, smaller scale proposals will be considered favourably subject to them meeting the broad objectives of the <u>KCAP</u>.</p> <p>Smaller single unit developments will be supported throughout the Primary Shopping Area subject to the policies in the Site Allocations and Policies DPD.</p> <p>There may be more limited one-off opportunities in the KCAAP area to meet local needs arising from neighbourhood regeneration e.g. Churchfields and Comberton Hill</p> <p>Evening Economy</p> <p>The District Council will encourage developments that enhance the evening and night time leisure offer of the town centre. <u>A balanced mix of uses will be specifically encouraged, including late-night shopping, cafes, restaurants, bars, take-aways, clubs and cultural activities.</u></p>	<p>To improve the soundness of the plan in respect to development of the evening economy. The proposed changes have been agreed with West Mercia Police as an appropriate approach</p>	<p>West Mercia Police KCAAPP135 SOCG6</p>	<p>Yes. This modification includes policy wording that requires more from new development.</p>

Modification Number	Page	Policy / Section	Proposed Change	Reason for Change	Relevant Representation/Statement of Common Ground (If Applicable)	SA Required?
			<p><u>No development should on its own, or cumulatively with other uses, create an unacceptable impact on neighbouring uses or the surrounding area by reasons of noise pollution, light pollution, anti-social behaviour, crime, disturbance or traffic.</u></p> <p><u>Developments should seek to ensure activity during the daytime to avoid the clustering of 'dead' frontages.</u></p> <p><u>Developments linked to the evening economy will be required to contribute towards public realm and infrastructure improvements in order to improve the sense of well being, safety and security within the town. Contributions to improving the public transport for the benefit of the evening economy will be particularly encouraged.</u></p> <p><u>Working in partnership with the Council and other stakeholders, owners and operators of evening economy related development will be expected to take part in active management measures to help the public and support the emergency services.</u></p> <p><u>Developments linked to the evening economy should also have specific regard to Policy KCA.UP1 and ensure that development incorporates 'Secured by Design Principles'</u></p>	<p>to considering development that may impact on the evening economy and the services that are required to support this type of development. The inclusion of additional policy and reasoned justification is considered to be consistent with paragraphs 58 nd69 of the NPPF.</p>		

Modification Number	Page	Policy / Section	Proposed Change	Reason for Change	Relevant Representation/Statement of Common Ground (If Applicable)	SA Required?
			<p>Include additional wording to the Reasoned Justification for the policy as follows:</p> <p><u>Although the District Council wishes to enhance the evening economy of the town centre, it is important to ensure that new developments do not cause an unacceptable nuisance to neighbouring uses and the surrounding environment. Increased activity in the evening provides important additional natural surveillance and vitality to streets and spaces in the town. However, consideration must also be given for the potential of these uses to generate issues of anti-social behaviour, particularly, but not exclusively, in respect of pubs and bars. The District Council will look to work with West Mercia Police and the Wyre Forest Community Safety Partnership (WFCSP), as well as other town centre stakeholders, to tackle any issues of crime and anti-social behaviour that may arise from an increase in evening activity through public realm improvements, active management measures or new security infrastructure.</u></p> <p><u>The Kidderminster Town Team, established as a result of a recommendation from the Government commissioned Mary Portas' High Street Review, is a partnership of public and</u></p>			

Modification Number	Page	Policy / Section	Proposed Change	Reason for Change	Relevant Representation/Statement of Common Ground (If Applicable)	SA Required?
			<p><u>private stakeholders who work together and aim to produce innovative ideas about how to improve the town. Working with the Police and the Community Safety Partnership, the Town Team will have a role in bringing forward anti-social behavior initiatives such as 'Pubwatch' and 'Best Bar None' schemes to help tackle anti-social behavior.</u></p> <p><u>The District Council will encourage the existing and new operators of evening orientated uses such as cafes, restaurants, bars, take-aways, clubs and other cultural activities to work with the Town Team, WFCSP and the Police in managing the evening economy.</u></p>			
KCAPMA07	Page 33	Paragraph 6.4 and 6.5	<p>Replace paragraph 6.4 and 6.5 with the following:</p> <p>Flood Risk is an important issue that affects the central area of Kidderminster. The Level 2 Strategic Flood Risk Assessment, undertaken by Royal Haskoning, identified that although the flood risk within the central area of Kidderminster has been reduced by the Kidderminster Flood Alleviation Scheme (FAS), should the FAS be breached or its design capacity exceeded then the flood hazard to the town is likely to be significant, due to the low lying nature of the town. In order to</p>	In order to provide a specific policy to deal with flood risk within the central area of Kidderminster which has its own unique characteristics and challenges in terms of flooding. The policy also recognises the existence of the Flood Alleviation Scheme and ensures that any development proposed in flood risk	Environment Agency SOCG3	Yes. This modification includes the creation of a new policy.

Modification Number	Page	Policy / Section	Proposed Change	Reason for Change	Relevant Representation/Statement of Common Ground (If Applicable)	SA Required?
			<p>understand this risk further the Level 2 SFRA undertook an assessment of potential breaches and overtopping of the FAS and concluded that this needs to be factored into decision making when considering the future development of the central area of Kidderminster. It is therefore considered important that a targeted flood risk policy is included within the Area Action Plan to help guide future development decisions.</p> <p><i>New Policy – Water Management</i></p> <p><i>All development that is considered to be at risk of flooding should demonstrate that it is safe by ensuring that:</i></p> <ul style="list-style-type: none"> - <i>Floor levels are situated above the 1% predicted plus climate change design flood level, incorporating an allowance for freeboard. Development should also consider in the design the risk from more extreme events. In certain instances where it is not feasible or practicable to set the floor levels then other forms of flood resilience and resistance techniques may be considered as a suitable alternative;</i> - <i>All development that includes overnight accommodation or an educational institution demonstrates a</i> 	<p>areas recognises the residual risk posed by any failure of this structure. This approach is considered to be consistent with the NPPF and will ensure that developments take appropriate mitigation measures to deal with any threat of flooding in this central area.</p>		

Modification Number	Page	Policy / Section	Proposed Change	Reason for Change	Relevant Representation/Statement of Common Ground (If Applicable)	SA Required?
			<p><i>safe pedestrian access route is available during a 1% plus climate change design flood event, with regard to hazard risk assessment. In considering this, regard should be given to the evidence in the Level 2 SFRA, including breach scenarios. All other development should clarify available access and appropriate mitigation as part of a flood management plan;</i></p> <ul style="list-style-type: none"> - <i>Developments assess the availability of ;safe vehicular access ; during a flood event, its necessity for the development type and appropriate mitigation as part of a flood management plan;</i> - <i>Developments implement a flood management plan to manage the risk to the development itself and future users/occupiers during all flood events along with any remaining residual risks.</i> - <i>Developments are avoided within areas subject to Rapid Inundation from a dam breach as identified by the Level 2 SFRA</i> - <i>SUDS are included in all developments and are appropriate to the sensitive hydrological setting of Kidderminster;</i> 			

Modification Number	Page	Policy / Section	Proposed Change	Reason for Change	Relevant Representation/Statement of Common Ground (If Applicable)	SA Required?
			<p>- <i>Developments have regard to, and are in conformity with, the emerging Local Flood Risk Management Plan being prepared by Worcestershire County Council</i></p> <p>Reasoned Justification This policy should be read in conjunction with Core Strategy Policy CP02, Site Allocations and Policies Policy Sal.CC7 and Kidderminster Central Area Plan Policy KCA.UP6. Kidderminster town centre is affected by flood risk. The town is protected by a flood alleviation scheme (FAS) located upstream of the town centre, which consists of an earth dam and a concrete culvert which help form a flood storage area. However, the residual risk associated with any failure of this scheme needs to be understood and factored in to new development decisions. This policy, therefore, provides criteria for developers to consider when proposing development within areas identified as being at risk of flooding within the <u>KCAP</u> area.</p> <p>The policy identifies the need for development proposed within flood risk areas to take account of a number of measures to ensure that the development is safe, and remains safe, in times of flood. This includes building protection, such as setting appropriate floor</p>			

Modification Number	Page	Policy / Section	Proposed Change	Reason for Change	Relevant Representation/Statement of Common Ground (If Applicable)	SA Required?
			<p>levels, providing flood resilience and resistance techniques, as well as ensuring that there is access and a flood management plan for people using these sites.</p> <p>The policy requires developers to provide a flood management plan so that information is available for the users / occupiers of a proposed development to ensure that they are aware of appropriate procedure in times of flood.</p> <p>When producing a Flood Management Plan for any development, the following information should be included:</p> <ul style="list-style-type: none"> • An identification of likely flood risk areas and sources • Details of evacuation routes • Important contacts, including floodline, emergency services, local authority information • Basic strategies for protecting property and assisting recovery • Details of key service cut off points (Electricity / Gas / Water) <p>Further information on producing a flood management plan can be found on the</p>			

Modification Number	Page	Policy / Section	Proposed Change	Reason for Change	Relevant Representation/Statement of Common Ground (If Applicable)	SA Required?
			<p>Environment Agency's website (http://www.environment-agency.gov.uk/homeandleisure/floods/default.aspx). Furthermore, in order to assist Developers in considering flood risk within Kidderminster the Environment agency and Wyre Forest District Council are proposing to produce a developer guidance note. This will include information on flood risk within the area and a pro-forma to assist Developers in producing a Flood Risk Assessment that meets the policy requirements. The guidance note will be based primarily on the information within the Level 2 Strategic Flood Risk Assessment, which should be considered in the first instance when looking at developing within the central area.</p> <p>Many of the potential redevelopment sites identified in Part B of this document are adjacent to or within flood zones 2 and 3 as identified by the Level 2 Strategic Flood Risk Assessment. Therefore, the issue of flood risk is particularly pertinent in the KCAP area and new development must consider the location of more vulnerable uses (e.g. housing) within the lowest risk areas.</p> <p>In addition to flood risk, the former industrial nature of parts of the town centre means that there is high potential for contamination issues</p>			

Modification Number	Page	Policy / Section	Proposed Change	Reason for Change	Relevant Representation/Statement of Common Ground (If Applicable)	SA Required?
			to arise. Where appropriate, ground and water contamination must be addressed as part of any redevelopment and suitable remediation measures taken. Part B of this document identifies sites where the risk is known to be particularly apparent and new development should be in line with the Environment Agency's Groundwater Protection Principles and Practice Guidance. The nature of the ground conditions and hydrogeological setting does not remove the requirement for SUDS. However developers will need to give careful consideration to the type of SUDS techniques used and their design in protecting the water environment.			
KCAPMA08	Page 33	Paragraph 6.6	<p>Include additional wording in paragraph 6.6 as follows:</p> <p>The former industrial nature of parts of the town centre means that there is high potential for contamination issues to arise. <u>Disturbance of any such contamination during re-development can mobilise pollutants and adversely impact on the groundwater and the wider water environment including the rivers, canals and wetlands. The KCAP area overlies a principal aquifer which is of strategic importance for water supply and the area falls within the Source Protection Zone of a public water supply borehole. The water table is</u></p>	To ensure that the water environment within the KCAP area is protected and to improve the soundness of the plan.	Environment Agency KCAAPP99 SOCG3	No. Changes made are to the reasoned justification, not policy.

Modification Number	Page	Policy / Section	Proposed Change	Reason for Change	Relevant Representation/Statement of Common Ground (If Applicable)	SA Required?
			relatively shallow, particularly within the Stour valley. It is therefore essential that Where appropriate ground and water contamination must be addressed as part of any redevelopment and suitable remediation measures taken. Part B of this document identifies sites where this risk is known to be particularly apparent; <u>however a desk study will be required for most sites to assess this potential</u> . New development should be in line with the Environment Agency's Groundwater Protection <u>Principles</u> and Practice Guidance (GP3).			
KCAPMA09	Page 50	Policy KCA.UP5: Staffordshire and Worcestershire Canal	Amend Policy KCA.UP5 as follows: Replace criteria i of Policy KCA.UP5, with the following: <u>(i) Create a safe, secure and crime free environment through providing active frontages, natural surveillance, incorporation of Secured by Design principles and supporting security infrastructure where necessary.</u> viii. Where appropriate, enhance the canal's <u>water environment and role</u> as part of the green infrastructure and biodiversity network."	To improve the clarity of the document and to ensure that development not only improves natural surveillance and active frontages along the canal but will also help deter crime and antisocial behaviour. To improve the effectiveness of the policy and to help meet the objectives of the	West Mercia Police KCAAPP137 SOCG6 Environment Agency KCAAPP108 SOCG3	Yes. Modifications expand what is required from development.

Modification Number	Page	Policy / Section	Proposed Change	Reason for Change	Relevant Representation/Statement of Common Ground (If Applicable)	SA Required?
				Water Framework Directive.		
KCAPMA10	Page 52	Policy KCA.UP6: River Stour	<p>Include additional wording in Policy UP6 as follows:</p> <p>New developments adjacent to the River Stour <u>should contribute to the improvement of the water environment by :</u></p> <p>i. <u>Providing</u> a positive relationship to the water's edge.</p> <p>ii. <u>Making</u> on-site improvements to the green infrastructure links.</p> <p>iii. <u>Enhancing</u> the biodiversity value of the river and riverside areas as part of a wildlife corridor.</p> <p>iv. <u>Improving the morphology of modified sections of the river, where appropriate, to recreate more natural conditions and better habitat (i.e. de-culverting, re-profiling and buffer strips).</u></p> <p>v. <u>Putting in place measures to protect and improve water quality (including groundwater).</u></p>	Due to the current condition of the River Stour and the UK's requirement to meet the objectives of the Water Framework Directive (WFD). Planning authorities have a duty under the WFD to take account of the River Basin Management Plans and can help deliver WFD objectives. This additional wording will strengthen that commitment to meeting the WFD objectives.	Environment Agency KCAAPP109 SOCG3	Yes. Modifications expand what is required from development.

Modification Number	Page	Policy / Section	Proposed Change	Reason for Change	Relevant Representation/Statement of Common Ground (If Applicable)	SA Required?
			<p>vi. Providing flood risk betterment where practical.</p> <p>vii. Providing opportunities for promenading and interaction with the environment of the River Stour.</p> <p>Added Reasoned Justification:</p> <p><u>The River Stour is currently classified as poor ecological status and failing good chemical status, as reported in the Severn River Basin Management Plan. Two of the objectives of the Water Framework Directive (WFD) are: to prevent deterioration in the status of aquatic ecosystems, protect them and improve the ecological condition of waters; and to achieve at least good status for all waters by 2015. Where this is not possible, and subject to the criteria set out in the Directive, aim to achieve good status by 2021 or 2027. New development should contribute towards improving the River Stour to assist the UK in meeting its objectives of the WFD.</u></p>			
KCAPMA11	Page 54	Green Infrastructure Opportunities	<p>Insert additional green infrastructure objectives as follows:</p> <ul style="list-style-type: none"> <u>Use green infrastructure to deliver attractive walking and cycling routes.</u> 	To explain that the role of green infrastructure is wider than biodiversity alone.	Worcestershire County Council KCAAPP127 SOCG5	No. Changes made are to objectives, not policy.

Modification Number	Page	Policy / Section	Proposed Change	Reason for Change	Relevant Representation/Statement of Common Ground (If Applicable)	SA Required?
			<ul style="list-style-type: none"> Enhance the role of green infrastructure in adapting to and mitigating against the effects of climate change, particularly flood risk. 			
KCAPMA12	Page 61	Reasoned Justification	Amend Reasoned Justification to read: It is envisaged that the Masterplan area could contain a mix of uses, accommodating in excess of 600 new homes in addition to new offices, community facilities, small scale retail (of no larger than <u>280sqm</u> per unit)	To clarify that the floorspace relates to the net retail floorspace and to reflect the wider threshold change from 250sqm to 280sqm	England and Lyle KCAAP72 Brook Green Estates SALPP121	No. Amendment already tested through modification to Policy KCA.GPB1
KCAPMA13	Page 63	Policy KCA.Ch2: Phase 1 – Grasmere Close	<p>Include additional wording in Policy KCA.CH2, as follows:</p> <p>Policy KCA.CH2</p> <p>Phase 1 – Grasmere Close</p> <p>The redevelopment of this area will be expected to include:</p> <ul style="list-style-type: none"> C3 Dwelling House <u>Community Uses (D1, including Police Post)</u> <p>Any new development on this site should:</p> <p>1. Provide a strong frontage along</p>	To help to meet concerns raised through representations and to ensure that the community element of this site (police post) is fully recognised.	West Mercia Police KCAAPP132 SOCG6	Yes. Modification to policy includes a new use class.

Modification Number	Page	Policy / Section	Proposed Change	Reason for Change	Relevant Representation/Statement of Common Ground (If Applicable)	SA Required?
			<p>Stourbridge Road and Hurcott Road.</p> <p>2. Provide active frontages and sense of enclosure to all roads within the site.</p> <p>3. <u>Have regard to Policy SAL.DPL11 when considering any redevelopment involving the existing Police Post.</u></p> <p>Include additional Reasoned Justification as follows:</p> <p>9.21 The Community Housing Group owns the site , <u>which currently consists of maisonette blocks, tower blocks and a Police Post. It is proposed to redevelop the site</u> with a scheme for more traditional houses. The redevelopment of <u>the Maisonettes</u> will provide up to 100 dwellings and will provide a more attractive environment.</p>			
KCAPMA14	Page 69	Reasoned Justification	In regard to retail development, it should be small scale (no larger than <u>280sqm</u> floor space).	To clarify that the floorspace relates to the net retail floorspace and to reflect the wider threshold change from 250sqm to 280sqm	England and Lyle KCAAP72 Brook Green Estates SALPP121	No. Amendment already tested through modification to Policy KCA.GPB1
KCAPMA15	Page 72	Policy KCA.Ch7: Phase 4 – Crossely Park	Include the additional wording in Policy KCA.Ch7, as follows: <u>'New development should demonstrate</u>	In order to ensure that any contaminated land and environmental constraints associated with this site are fully	Environment Agency KCAAPP100 SOCG3	Yes. Modifications expand what is required from development.

Modification Number	Page	Policy / Section	Proposed Change	Reason for Change	Relevant Representation/Statement of Common Ground (If Applicable)	SA Required?
			<u>appropriate remediation, building and drainage design in order to deal with any contaminated land and to protect the water environment.'</u>	considered. This amendment will help to improve the effectiveness of the plan		
KCAPMA16	Page 74	KCA.Ch8 Horsefair	Amend Policy KCA.Ch8, as follows: "The development does not exceed <u>280sq.m net</u> " iv. An improved public realm will be sought along Blackwell Street, including a new public space <u>and car parking."</u>	To clarify that the floorspace relates to the net retail floorspace and to reflect the wider threshold change from 250sqm to 280sqm To highlight the need to provide parking as part of any public realm improvements to Blackwell Street	England and Lyle KCAAP72 Brook Green Estates SALPP121 Horsefair Traders Partnership KCAAPP31 & KCAPP64 Mr Amerjit Sidhu KCAAPP76	No. Amendment already tested through modification to Policy KCA.GPB1
KCAPMA17	Page 77	KCA.EG1 Comberton Hill Area	Amend policy point i. to read: "Small scale retail (up to <u>280sq.m net</u>)"	To clarify that the floorspace relates to the net retail floorspace and to reflect the wider threshold change from 250sqm to 280sqm	England and Lyle KCAAP72 Brook Green Estates SALPP121	No. Amendment already tested through modification to Policy KCA.GPB1
KCAPMA18	Page 81	KCA.EG3 Comberton Place	Amend bullet point one as follows: A1-A5 small scale retail that would enhance the neighbourhood centre (up to <u>280sqm.</u>)	To clarify that the floorspace relates to the net retail floorspace and to reflect the wider threshold change from 250sqm to 280sqm	England and Lyle KCAAP72 Brook Green Estates SALPP121	No. Amendment already tested through modification to Policy

Modification Number	Page	Policy / Section	Proposed Change	Reason for Change	Relevant Representation/Statement of Common Ground (If Applicable)	SA Required?
						KCA.GPB1
KCAPMA19	Page 85	New Page before page 85	<p>Include a new page to introduce policies KCA.EG5 / KCA.EG6 / KCA.EG7 as follows:</p> <p>Bromsgrove Street / Worcester Street / Lion Street</p> <p>The following policies in the Plan (EG5, EG6 and EG7) all form part of a wider regeneration area located within the Eastern Gateway. The map below identifies this regeneration area and depicts the three phases included within the boundary.</p> <p>Include new map outlining the wider boundary of the three sites, as attached as appendix 1 to this paper.</p>	It is considered that a plan showing the Bromsgrove Street area would help in clearly setting out the Phasing Policies KCA.EG5, KCA.EG6 & KCA.EG7. This will set out the site boundary for the whole area whilst clearly depicting the Phase 1-3 areas as supported by the policy wording.	Arrowcroft Service Ltd KCAAP19	No. Changes made are to the reasoned justification, not policy.
KCAPMA20	Page 85	KCA.EG5 Phase 1: Bromsgrove Street Area	<p>Revise the policy wording as follows:</p> <p><u>“The District Council will seek aim to secure the comprehensive redevelopment of the Bromsgrove Street area as defined within this policy and the Plan on page 88. Development proposals in any part of the area must demonstrate how the scheme complies with a wider masterplanning approach.</u></p> <p>Amend criteria ii as follows:</p> <p>ii) Provide direct and/or enhanced links to</p>	In light of the Local Housing Delivery Group’s Viability Testing of Local Plans and the National Planning Policy Framework; the proposed rewording is intended to provided additional clarification and flexibility in light of overall viability concerns emanating from the above documents. The	WFDC (Officer)	Yes. Modification changes requirement of development.

Modification Number	Page	Policy / Section	Proposed Change	Reason for Change	Relevant Representation/Statement of Common Ground (If Applicable)	SA Required?
			Worcester street via <u>Prospect Hill</u> to the former Magistrates' Court Building, Step Entry or retail developments to the north.	Council is not intending to provide a wider masterplan for the Eastern Gateway and therefore this requirement is considered overly onerous and lacks sufficient clarity/certainty.		
KCAPMA21	Page 89	Paragraph 10.34	<p>Remove the following wording:</p> <p>“This site will require a comprehensive redevelopment to provide modern units that retail operators will be attracted to. However, major obstacles to delivery include a complicated land ownership and tenancy structures and significant changes in levels. This is likely to delay delivery”</p> <p>And replace with</p> <p><u>“The defined site will be considered comprehensively to incorporate the premises fronting Worcester Street and land to the rear and applicants will be expected to demonstrate that they have fully explored this potential to the satisfaction of the LPA. At the very least proposals will be expected to maintain and</u></p>	In light of the Local Housing Delivery Group's Viability Testing of Local Plans and the National Planning Policy Framework; it is considered that the viability of the sites development should not be compromised by requiring a comprehensive approach.	WFDC (Officer)	No. Changes made are to the reasoned justification, not policy.

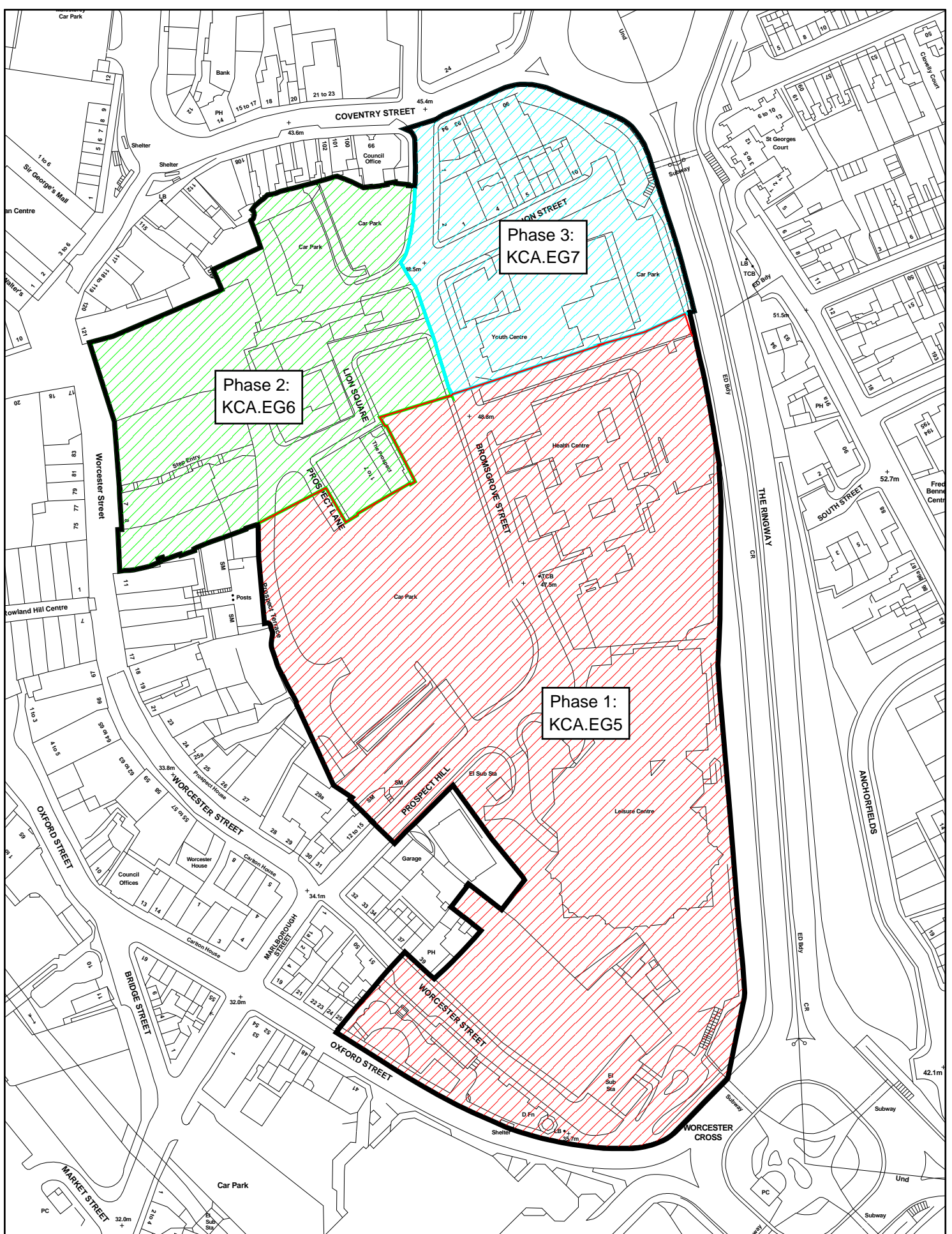
Modification Number	Page	Policy / Section	Proposed Change	Reason for Change	Relevant Representation/Statement of Common Ground (If Applicable)	SA Required?
			<u>enhance the existing links between Worcester Street and Bromsgrove Street. However, major challenges to delivery potentially earlier in the plan period include complicated land ownership and tenancy structures. These factors are likely to mean that delivery will come forward later in the plan period</u>			
KCAPMA22	Page 89	KCA.EG6 Phase 2 – Worcester Street Retail Development	Amend the title to read Worcester Street Retail Development Add the following wording to policy: “ii. <u>Seek</u> to provide a comprehensive approach to the redevelopment of the area.”	The current wording ref to retail is inconsistent with the mix of uses promoted for the site which is in itself recognition of the changing nature of Worcester Street in terms of shopping frontage. In light of the Local Housing Delivery Group’s Viability Testing of Local Plans and the National Planning Policy Framework; it is considered that the viability of the site’s development should be enhanced through providing additional flexibility with	Arrowcroft Service Ltd KCAAP19 WFDC (Officer)	Yes. Modification changes requirement of development.

Modification Number	Page	Policy / Section	Proposed Change	Reason for Change	Relevant Representation/Statement of Common Ground (If Applicable)	SA Required?
				appropriate safeguards.		
KCAPMA23	Page 90	Paragraph 10.37	Remove the following wording: <p>“...and an ambition for this site is to provide a new ‘street’ that would provide clear access.”</p> <p>And replace with:</p> <p><u>At the very least proposals will be expected to maintain and enhance the existing links between Worcester Street and Bromsgrove Street.”</u></p>	Wording is too prescriptive in terms of a solution to improving connectivity and is questionable in terms of its viability. Instead suggest revised wording to RJ to refer to maintenance and enhancement of existing links (see Para 10.34 changes).	WFDC (Officer)	No. Changes made are to the reasoned justification, not policy.
KCAPMA24	Page 91	KCA.EG7 Phase 3 – Lion Street	Revise opening sentence of policy: <p><u>“Development proposals in any part of the area will be expected to consider how the scheme relates positively to the wider setting of the ‘Eastern Gateway’.”</u></p>	In light of the Local Housing Delivery Group’s Viability Testing of Local Plans and the National Planning Policy Framework; The Council is not intending to provide a wider masterplan for the Eastern Gateway and therefore this requirement is considered overly onerous and lacks sufficient clarity/certainty.	WFDC (Officer)	Yes. Modification changes requirement of development.
KCAPMA25	Page	KCA.EG8	Amend policy to read:	To clarify that the	England and Lyle	No.

Modification Number	Page	Policy / Section	Proposed Change	Reason for Change	Relevant Representation/Statement of Common Ground (If Applicable)	SA Required?
	93	Waterloo Street Area	"A1-A5 Retail (not exceeding <u>280sq.m net</u>)"	floorspace relates to the net retail floorspace and to reflect the wider threshold change from 250sqm to 280sqm	KCAAP72 Brook Green Estates SALPP121	Amendment already tested through modification to Policy KCA.GPB1
KCAPMA26	Page 107	Policy KCA.CW1: Castle Wharf	<p>Include an additional criteria in the policy, as follows:</p> <p>x. <u>Take full account of the Groundwater Source Protection Zone that exists within this area, in safeguarding groundwater supply.</u></p> <p>Added Reasoned Justification:</p> <p><u>The site sits on a Groundwater Source Protection Area (SPZ1 and 2). SPZ1 is the inner zone and is highly sensitive to land use / contamination. Therefore the type of development and activities that can take place within this zone need to have full regard to the Environment Agency's Groundwater Protection: Principles and Practice (GP3) document. In addition to control of land use, drainage and building design (i.e. foundations), tight control of the investigation and remediation of any land contamination issues would also be required within this location.</u></p>	As identified in the representation there is currently limited reference to the areas sensitive hydrogeological setting. There are likely to be restrictions for new development on the drainage, building designs (foundations) and land uses. Therefore, it is considered that the additional wording is appropriate for the policy and would improve the soundness of the Plan.	Environment Agency KCAAPP101 KCAAPP105 SOCG3	Yes. Modification adds more detail to requirement on new development.
KCAPMA27	Page 112	KCA.MS1 Mill Street	Amend policy point 1. To read:	To clarify that the floorspace relates to the	England and Lyle KCAAP72	No. Amendment

Modification Number	Page	Policy / Section	Proposed Change	Reason for Change	Relevant Representation/Statement of Common Ground (If Applicable)	SA Required?
		Mixed Use Area	"The development does not exceed <u>280sq.m net</u> "	net retail floorspace and to reflect the wider threshold change from 250sqm to 280sqm	Brook Green Estates SALPP121	already tested through modification to Policy KCA.GPB1
KCAPMA28	Page 119	Policy KCA.HP1 Heritage Processions Area	<p>Include additional wording in Policy HP1 as follows:</p> <p><u>New development should incorporate appropriate remediation, building and drainage design in order to deal with any contaminated land and to protect the water environment.</u></p>	<p>Within this area there is high potential for ground/water contamination issues. Therefore, it is considered that the additional wording is appropriate for the policy and would improve the soundness of the Plan.</p>	Environment Agency KCAAPP102 SOCG3	Yes. Modification adds more detail to requirement on new development.
KCAPMA29	Page 124	Policy KCA.HP3: Green Street Depot	<p>Include additional wording in Policy HP3 as follows:</p> <p><u>vi. Take full account of the Groundwater Source Protection Zone that exists within this area, in safeguarding groundwater supply.</u></p> <p>Include additional wording at Paragraph 15.18:</p> <p><u>In addition to control of land use, drainage and building design (i.e. foundations), tight control of the investigation and remediation of any land contamination issues would also be required within this location.</u></p>	To improve the clarity and consistency within the document.	Environment Agency KCAAPP104 SOCG3	Yes. Modification adds more detail to requirement on new development.
KCAPMA30	Page	Policy	Include an additional paragraph in the policy,	To improve the clarity	Environment Agency	Yes.

Modification Number	Page	Policy / Section	Proposed Change	Reason for Change	Relevant Representation/Statement of Common Ground (If Applicable)	SA Required?
	126	KCA.HP4: Bus Depot	<p>as follows:</p> <p><u>x. Take full account of the Groundwater Source Protection Zone that exists within this area, in safeguarding groundwater supply.</u></p> <p>Added Reasoned Justification:</p> <p><u>The site sits on a Groundwater Source Protection Area (SPZ1 and 2). SPZ1 is the inner zone and is highly sensitive to land use / contamination. Therefore the type of development and activities that can take place within this zone need to have full regard to the Environment Agency's Groundwater Protection: Principles and Practice (GP3) document. In addition to control of land use, drainage and building design (i.e. foundations), tight control of the investigation and remediation of any land contamination issues would also be required within this location.</u></p>	and consistency within the document.	KCAAPP105 SOCG3	Modification adds more detail to requirement on new development.



Eastern Gateway - Combined Sites



Scale: 1:1750