



Wyre Forest District

Site Allocations and Policies Plan and Kidderminster Central Area Action Plan

Examination

Statement of Common Ground 5 (SOCG5)

Worcestershire County Council

14th January

**WYRE FOREST DISTRICT SITE ALLOCATIONS AND POLICIES AND
KIDDERMINSTER CENTRAL AREA ACTION PLAN EXAMINATION IN
PUBLIC
STATEMENT OF COMMON GROUND – WORCESTERSHIRE COUNTY COUNCIL**

This “Statement of Common of Ground” has been developed in response to representations received from Worcestershire County Council on the Pre-Submission Publication version of the Site Allocations and Policies and Kidderminster Central Area Action Plan DPD.

Officers from Wyre Forest District Council and representatives from Worcestershire County Council held a meeting on 04/12/2012 at which the representations listed below were discussed.

Site Allocations and Policies

- SALPP035
- SALPP181
- SALPP183
- SALPP224
- SALPP226
- SALPP227
- SALPP228
- SALPP229
- SALPP230
- SALPP231
- SALPP232
- SALPP233
- SALPP234
- SALPP235
- SALPP236
- SALPP237
- SALPP238
- SALPP239
- SALPP240
- SALPP241
- SALPP242
- SALPP243
- SALPP244.

The table attached at Appendix 1 outlines those areas where agreement has been reached on common ground for the Site Allocations and Policies. It also outlines areas where it is considered that further discussion and clarification is required during the relevant hearing sessions.

Appendix 1 sets out some proposed minor amendments to the Site Allocations and Policies in order to address the representations and establish Common Ground.

Appendix 1 – Site Allocations and Policies - Actions arising from discussion with Worcestershire County Council relating to the establishment of common ground.

**WYRE FOREST DISTRICT SITE ALLOCATIONS AND POLICIES AND
KIDDERMINSTER CENTRAL AREA ACTION PLAN EXAMINATION IN
PUBLIC
STATEMENT OF COMMON GROUND – WORCESTERSHIRE COUNTY COUNCIL**

Kidderminster Central Area Action Plan

- KCAAPP120
- KCAAPP121
- KCAAPP122
- KCAAPP123
- KCAAPP124
- KCAAPP125
- KCAAPP126
- KCAAPP127
- KCAAPP128
- KCAAPP129
- KCAAPP130

The table attached at Appendix 2 outlines those areas where agreement has been reached on common ground for the Kidderminster Central Area Action Plan. It also outlines areas where it is considered that further discussion and clarification is required during the relevant hearing sessions.

Appendix 2 also sets out some proposed minor amendments to the Kidderminster Central Area Action Plan in order to address the representations and establish Common Ground.

Appendix 2 – Kidderminster Central Area Action Plan - Actions arising from discussion with Worcestershire County Council relating to the establishment of common ground.

APPENDIX 1 – WYRE FOREST DISTRICT SITE ALLOCATIONS AND POLICIES EXAMINATION IN PUBLIC
STATEMENT OF COMMON GROUND – WORCESTERSHIRE COUNTY COUNCIL

Worcestershire County Council's Representation	Paragraph / Policy	Director of Economic Prosperity and Place Response	Resulting Minor Amendment to the Site Allocations and Policies?	Response from Worcestershire County Council	Common Ground Established
<p><u>SALPP035</u></p> <p>WCC is working with partners to develop the frameworks that will assist the fundamental role that the economy has in Worcestershire, including the Worcestershire Infrastructure Strategy, Green Infrastructure Strategy, Renewable Energy Strategy and Worcestershire Local Flood Risk Management Strategy.</p> <p>Wider regeneration of Kidderminster through Re-Wyre initiative provides a long term vision within which many of the sites identified in the DPDs sit. Early delivery of these sites will provide confidence but will require confidence through public and private sector organisations to maximise sustainable economic impact.</p> <p>WCC has significant concerns with regard to the exclusion of waste management which could usefully and appropriately be located on employment land. Gives significant concerns regarding conformity with the Waste Core Strategy. Would welcome further discussion of this particular matter to reconcile current concerns.</p> <p>Pre-submission documents not currently accompanied by an up to date Infrastructure Delivery Plan, however WCC is happy to support the proposed documents on basis of continued</p>	<p>All</p>	<p>These general comments are noted. Each of the more detailed comments are picked up in turn below.</p>	<p>See below</p>	<p>N/a</p>	<p>N/a</p>

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<p>collaboration in the development of both the Wyre Forest Infrastructure Delivery Plan and the Worcestershire Infrastructure Strategy.</p> <p>Would welcome greater recognition of the statutory role of WFDC as a Risk Management Authority and particularly the requirement to have regard to the Local Flood Risk Management Strategy. Welcome the inclusion of a policy that is consistent with this statutory requirement and identified the need for development proposals to have regard to the emerging LFRMS.</p> <p>WCC Archive and Archaeology Service has worked closely with WFDC in drafting of the historic environment content and is supportive of the proposed policies subject to detailed comments being addressed.</p>					
<p><u>SALPP224</u></p> <p>The County Council is pleased to support the proposed documents on the basis of continued collaboration with Wyre Forest District Council in the development of both the Wyre Forest Infrastructure Delivery Plan and the Worcestershire Infrastructure Strategy. This continued partnership working will assist in demonstrating the Duty-to-Cooperate.</p> <p>Welcome more detail with regard to delivery</p>	<p>All</p>	<p>Comments are noted. A District wide Infrastructure Delivery Plan has been circulated to WCC for information.</p> <p>WCC will play a key role in this particularly with their role as Local Transport Authority.</p>	<p>N/a</p>	<p>Agreed. We will continue to work closely with Wyre Forest to realise their ambitions for Kidderminster. This work will be achieved through our ongoing LTP3 Kidderminster</p>	

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<p>methods, role, responsibilities etc, especially around transport interchange, railway station etc, and the role planning and the public sector may play in this. For example the KCAAP recognises that development will need to contribute to island improvements at Eastern Gateway, but there may be other schemes that require funding.</p>		<p>WCC Officers will note that they were responsible for working up a fully costed scheme for a new station interchange at Kidderminster in 2010. Other schemes that may require funding are also currently being considered further.</p>		<p>Town Centre Strategy Package works which are currently underway. We will also continue to work with the district to review the Ring Road and establish to what extent it is possible to improve pedestrian and cycle connectivity across and through the ring road but still providing appropriate vehicle 'space' to ensure the economic vitality of the Town centre.</p>	
<p><u>SALPP226</u></p> <p>Advise that the test of soundness would be improved and would align more closely with the Worcestershire Waste Core Strategy (now found sound, adopted November 2012) if WFDC was to propose an additional change so that it referred to the need for all new development to comply with</p>	<p>All</p>	<p>These comments are noted and Officers will consider further minor amendments to the Delivering Sustainable Development Standards section following discussion with WCC</p>	<p><u>SALMOD25</u></p> <p>Following discussions with Worcestershire County Council, the following minor amendment is suggested for inclusion:</p> <p>Insert additional supporting</p>	<p>Agreed.</p>	<p>Yes.</p>

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the Waste Core Policy "Making Provision for waste in all new development"		under the Duty to Co-operate	text after paragraph 6.30: <i>“Worcestershire County Council have recently adopted the Waste Core Strategy for Worcestershire. This document forms part of the Development Plan for the District and therefore all proposals will need to have regard to its contents, and particularly Policy WCS17: Making provision for waste in all new development.”</i>		
<p><u>SALPP231</u></p> <p>Considers submission would be improved if reasoned justification in Part 8 included the terms used in the Proposed Phase 2 Revision WMRSS - that proposals for the Employment Land Provision need to achieve a 5 year reservoir of readily available employment land. These concepts used were accepted by the Panel in their Examination of the proposed Phase 2 Revision. Proposed inclusion of the supporting text along these lines and agree to a Statement of Common Ground to this effect.</p>	Intro and Context	Noted. However, the District's Adopted Core Strategy sets out a very clear strategic policy with regard to the retention and provision of employment sites within the District to 2026, which at the time was guided by the WMRSS Phase 2 Revision. It is not therefore considered necessary to introduce	N/a	Agreed.	Yes.

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		this text into the site specific allocations.			
<u>SALPP235</u> Policies SAL.PFSD1 & KCA.PFSD1 are consistent with the NPPF's requirement for the Presumption in Favour of Sustainable Development.	Policy SAL.PFSD1	Comments are noted.	N/a	N/a	N/a
<u>SALPP232</u> Section 5.6 refers to the importance of planning documents reflecting the aims and ambitions of the LEPs, but this must be a two-way exchange. It is equally important for the LEPs to take account of the aims and ambitions of the Core Strategy, and to help inform and influence planning documents such as the Site Allocations DPD	Para 5.6	Agreed. These comments are welcomed although no representations from either the Worcestershire of Greater Birmingham & Solihull LEPs have been received at the pre-submission publication stage.	N/a	N/a	N/a
<u>SALPP233</u> In part 2 of Policy SAL.GPB1 'Employment Land Allocation', it should read "no adverse <i>effect</i> " (rather than <i>affect</i>).	Policy SAL.GPB1	Noted. Agreed that this typographical error. Change included within the schedule of minor amendments.	SALMA5 Change 'affect' to 'effect' within SAL.GPB1	Agreed.	Yes.
<u>SALPP234</u>					

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<p>Raises a number of issues with regard to consistency with the provisions of the NPPF with regard to policy SAL.GPB1. Mainly that the strength of the economic argument in individual cases will be important here, The District Council should also be mindful of government intentions to re-introduce proposals to enable the change of use from commercial to residential.</p>	<p>Policy SAL.GPB1</p>	<p>These comments are noted. It is agreed that clarification should be provided within Policy SAL.GPB1 rather than within the reasoned justification.</p>	<p>SALMOD14 Amend last paragraph under Section 1. Employment Land/Economic Development to read as follows: “The replacement of a rural building for economic development purposes may be allowed where this would result in a more acceptable, sustainable and better designed development than would be achieved through conversion. <u>Under these circumstances the opportunity to convert the replacement building for other uses such as residential will be prohibited.</u>”</p>	<p>Agreed.</p>	<p>Yes.</p>
<p><u>SALPP235</u> The value of section 5.14 is questioned, as it essentially just repeats part 2 of the policy itself.</p>	<p>Para 5.14</p>	<p>It is agreed that this paragraph of the reasoned justification could be deleted.</p>	<p>SALMOD16 Delete Paragraph 5.14</p>	<p>Agreed</p>	<p>Yes.</p>
<p><u>SALPP181</u></p>					

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<p>Paragraph 6.32 - states that no sites for renewable energy are allocated at the current time however the NPPF states that LPA's should:</p> <p><i>"Consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure the development of such sources".</i></p>	Para 6.32	Noted. However the evidence base that has been used to inform both the Core Strategy and Site Allocations policies, (which includes WCC's Commissioned study into the identification of such sites for renewable energy schemes across Worcestershire) did not identify any specific deliverable sites and therefore it is not possible to allocate any within the DPDs. No further change required.	No change proposed.	Agreed	Yes
<p><u>SALPP239</u></p> <p>Emphasis of Policy SAL.CC7 very much supported. However, Planning authorities should take necessary regard of not just the statutory planning framework and the National FCERM Strategy, but also the Local Flood Risk Management Strategy. In so doing, future developments proposals will need to give proper regard to the local flood risk management strategy including the risk of flooding from surface water, groundwater and ordinary watercourses.</p>	Policy SAL.CC7	These comments are noted and it is considered this requires further discussion under the terms of a Statement of Common Ground.	<p>SALMOD27</p> <p>Proposed additional policy wording and Reasoned Justification to reflect the Local Flood Risk Management Strategy (LFRMS)</p> <p>To be added into Policy SAL.CC7, under a new sub-heading</p>	Agreed. The inclusion and reference to the emerging LFRMS and role of WCC is welcomed.	Yes

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<p>We would welcome the inclusion of a policy that is consistent with the above statutory requirement and identifies the need for development proposals to have regard to the emerging strategy. This would also assist in demonstrating the Duty to Co-operate.</p>			<p>Local Flood Risk Management Strategy</p> <p><u>When considering development within the District, developers should also have regard to, and be in conformity with, the emerging Worcestershire Local Flood Risk Management Strategy</u></p> <p>Insert additional paragraph after 6.51 as follows:</p> <p><u>The Flood and Water Management Act 2010 also requires lead local flood authorities (Worcestershire County Council) to develop, maintain, apply and monitor a local flood risk management strategy. The strategy should consider all sources of local flood risk, i.e. surface water, groundwater, and ordinary watercourses in order to determine distinct objectives to manage local flood risk to</u></p>		

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			<p><u>local communities. Given the potential impact development could have on flood risk it is important that all new development takes into account the emerging Worcestershire Local Flood Risk Management Strategy.</u></p>		
<p><u>SALPP241</u></p> <p>WCC is generally supportive of the approach to Green Infrastructure in Policy SAL.UP3. Infrastructure delivery should include green infrastructure delivery and implementation. WCC has concerns with the potentially narrow approach to the interpretation of Green Infrastructure limiting it to canals and river corridors.</p>	<p>Policy SAL.UP3</p>	<p>The comments in relation to Green Infrastructure are noted. However, the policy does not limit Green Infrastructure purely to canals and river corridors. WCC's attention is drawn to the first part of the policy - Providing a Green Infrastructure Network which seeks to enhance and retain open space and green infrastructure as set out within the Green Infrastructure Strategy.</p>	<p>Following further discussions with WCC the reason for this approach has been set out.</p> <p>We are not considering any further change in relation to this.</p>	<p>Agreed</p>	<p>Yes</p>
<p><u>SALPP243</u></p>					

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<p>Policy SAL.UP3 - Any compensatory provision needs to provide equivalent multi-functionality and needs to take into account the functions served by the areas of GI to be lost and the potential impact on communities.</p> <p>Existing Network - opportunities for new GI provision especially within new developments should be promoted.</p> <p>The role of the Wyre Forest as a sub-regional asset is not explored in any detail and could benefit from greater consideration.</p>	Policy SAL.UP3	<p>These comments are noted and are further addressed in detail through the Green Infrastructure Strategy which will provide a detailed action plan and strategy for the District to support the planning policies. It should also be noted that a specific policy on the development potential of the Wyre Forest is included in the Plan (SAL.GPB5). Furthermore, the Core Strategy (Policy CP13) also provides protection for the existing network.</p>	<p>SALMOD31 Further to discussion with WCC the following additional minor amendment is proposed:</p> <p>Amend second sentence to read: "Proposals should create new or enhance and retain existing open space and green/blue infrastructure."</p>	Agreed	Yes
<p><u>SALPP238</u></p> <p>The council strongly supports the way sites of geological interest are addressed in paragraphs 7.31, policy SAL.UP5, paragraph 7.35 and the associated table and the inclusion, by name, of all the sites of geological interest in the district. We believe that this in accordance with the NPPF and reflects the attention and protection they deserve.</p>	Policy SAL.UP5	Comments are noted and support is welcomed.	N/a	N/a	Yes

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<p><u>SALPP244</u></p> <p>Under Policy SAL.UP5 the up to date biodiversity action plan should be clarified to be the "Worcestershire Biodiversity Action Plan" Special Wildlife Sites - correctly known as "Local Wildlife Sites"</p> <p>Ecological Survey - should refer to the need to survey for protected and priority species.</p>	<p>Policy SAL.UP5</p>	<p>Comments are noted. It is considered that they could be incorporated as minor amendments to the policy to provide further clarity.</p>	<p>SALMA10 Amend the "up-to-date Biodiversity Action Plan" to read "Worcestershire Biodiversity Action Plan." Amend the 2nd paragraph under section 2. Designated Sites to read: "Locally important sites including Local Nature Reserves (LNRs), Local Wildlife Sites (LWSs) ..."</p>	<p>Agreed.</p>	<p>Yes</p>
<p><u>SALPP183</u></p> <p>Paragraph 7.43: the opening statement – <i>Wyre Forest District contains a variety of heritage assets, including buildings, areas, monuments, landscapes and archaeology</i> - we feel might benefit from clarification. We assume by <i>areas</i> the statement is referring to conservation areas we would welcome clarification on this matter. However, if it is a reference to more generic areas of historic significance then we would welcome the inclusion of a statement that clarifies this for example: areas of special historic character. We understand the ambition to minimise policy wording but would welcome clarification on this matter.</p>	<p>Paragraph 7.43</p>	<p>These comments are considered helpful for clarification purposes. See proposed Minor Amendment.</p>	<p>Amend the first sentence of Paragraph 7.43 to read as follows: "Wyre Forest District contains a variety of heritage assets, including buildings, <u>conservation</u> areas, monuments, <u>historic</u> landscapes and archaeology."</p>	<p>We welcome the minor amendments proposed in response to our comments and would agree that Common Ground has been established.</p>	<p>Yes</p>

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<p><u>SALPP237</u></p> <p>Paragraph 7.48: We consider that the paragraph of statistics should include that the District also contains <i>in excess of 3000 currently known heritage assets recorded on the Worcestershire Historic Environment Record.</i></p>	<p>Paragraph 7.48</p>	<p>Noted, however this paragraph relates specifically to listed buildings and the Local Heritage List, whereas heritage assets encompasses a wider meaning.</p>	<p>No change proposed.</p>	<p>We are happy that the minor amendments in SALPP183 now clarify the extent of heritage assets within the authority, and consequently we would agree that Common Ground has been established.</p>	<p>Yes</p>
<p><u>SALPP227 / SALP228 / SALPP229 / SALPP230</u></p> <p>Concerned over the very precise definitions of the uses proposed for the South Kidderminster Enterprise Park as B1, B2 and B8 development. Waste management development does not necessarily or easily fit into these definitions. As currently written the submission document is not in accordance with the Waste Core Strategy, in that it could exclude waste management which could usefully and appropriately be located on employment land.</p> <p>Annex A of the Waste Core Strategy states "58 areas of search have been identified as being potentially</p>	<p>Policy SAL.SK1 / SAL.SK2 / SAL.SK4 / SAL.PDS1</p>	<p>These comments are noted and will be subject to further discussion under a Statement of Common Ground. With specific regard to the British Sugar Site it should be noted that a planning application has been approved for a mix of uses on the site including an element of residential.</p>	<p>SALMOD15 Waste Developments on Employment Land</p> <p>Proposed amendment to strategic policy SAL.GPB1, to be inserted after the 4th paragraph, as follows:</p> <p><u>Development for waste facilities will also be considered favourably within the designated employment</u></p>	<p>Agreed.</p>	<p>Yes.</p>

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<p>suitable for most waste management facilities" these include the former British Sugar Site. The permitted uses proposed for this site use class B1, B2 and B8 could deter waste development from this site.</p>			<p><u>locations, subject to proposals being in conformity with the other policies in the plan and the Waste Core Strategy for Worcestershire.</u></p> <p>Include further Reasoned Justification after para 5.15, as follows:</p> <p><u>The Waste Core Strategy for Worcestershire was adopted in November 2012 and forms part of the statutory Development Plan for the District. The Waste Core Strategy sets out a long term vision for waste management within Worcestershire and outlines areas of land that may be suitable for development of new facilities. Waste management facilities are often akin to business or industrial activities and when directed to the right locations they can provide economic opportunities without having adverse impacts on their surroundings. Therefore, it is</u></p>	<p>Agreed.</p>	

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			<p><u>considered appropriate to allow for the principle of development of waste management facilities on allocated employment sites, subject to the proposals being in line with the other policies included in the Local Development Plan and the Waste Core Strategy for Worcestershire.</u></p> <p>With regard to comments made in relation to other site specific policies:</p> <p>Policy SAL.SK1: South Kidderminster Enterprise Park. It is not considered that waste development would be excluded from this area. The policy promotes development that positively contributes to the economic wellbeing of the District, which waste development could fall within. Therefore, it is not considered that any changes to this policy are required.</p>	<p>Agreed.</p>	

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			<p>Policy SAL.SK2: Former British Sugar Site. This site has outline planning approval for the uses included in the policy. Therefore, it is not considered that a waste facility will be brought forward in this location. However, the proposed changes identified above would allow for an application to be considered for a waste facility at this site.</p> <p>Policy SAL.SK3: Oasis Arts and Crafts and Reilloc Chain. It is anticipated that this site is likely to be developed for residential uses and the reference to the B use classes is in order to maintain other parts of the site in their current form. It is not considered that the site, given the potential for new residential development, is likely to come forward for waste related development.</p>	<p>Agreed.</p> <p>Agreed.</p> <p>Agreed.</p>	

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			Policy SAL.PDS1: Rushock Trading Estate: Suggest removal of the brackets within the policy to meet concerns		
<u>SALPP240</u> Specifies that clarification is required in Green Belt Policy SAL.DPS1 and that policy wording is tightened.	Policy SAL.PDS1	These comments are noted and it is agreed that the policy wording could usefully be tightened.	SALMOD63 Delete criteria a, in order to improve the clarity of the policy.	Agreed	Yes
<u>SALPP242</u> No identification of delivery agencies in the Monitoring & Implementation section, however they are identified within the Core Strategy. Suggests incorporating table 16.6 from the KCAAP into the Monitoring & Implementation section.	Monitoring and Implementation Framework	Noted, however it is considered that paragraph 19.5 of the reasoned justification provides the explanation here and includes cross reference to the Core Strategy. No further changes required.	No change proposed.	Agreed	Yes

APPENDIX 2 – WYRE FOREST DISTRICT KIDDERMINSTER CENTRAL AREA ACTION PLAN EXAMINATION IN PUBLIC STATEMENT OF COMMON GROUND – WORCESTERSHIRE COUNTY COUNCIL

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<p><u>KCAAPP120</u></p> <p>WCC is working with partners to develop the frameworks that will assist the fundamental role that the economy has in Worcestershire, including the Worcestershire Infrastructure Strategy, Green Infrastructure Strategy, Renewable Energy Strategy and Worcestershire Local Flood Risk Management Strategy.</p> <p>Wider regeneration of Kidderminster through Re-Wyre initiative provides a long term vision within which many of the sites identified in the DPDs sit. Early delivery of these sites will provide confidence but will require confidence through public and private sector organisations to maximise sustainable economic impact.</p> <p>WCC has significant concerns with regard to the exclusion of waste management which could usefully and appropriately be located on employment land. Gives significant concerns regarding conformity with the Waste Core Strategy. Would welcome further discussion of this particular matter to reconcile current concerns.</p> <p>Pre-submission documents not currently accompanied by an up to date Infrastructure Delivery Plan, however WCC is happy to support the proposed documents on basis of continued</p>	<p>All</p>	<p>These general comments are noted. Each of the more detailed comments are picked up in turn below.</p>	<p>See below</p>	<p>N/a</p>	<p>N/a</p>

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<p>collaboration in the development of both the Wyre Forest Infrastructure Delivery Plan and the Worcestershire Infrastructure Strategy.</p> <p>Would welcome greater recognition of the statutory role of WFDC as a Risk Management Authority and particularly the requirement to have regard to the Local Flood Risk Management Strategy. Welcome the inclusion of a policy that is consistent with this statutory requirement and identified the need for development proposals to have regard to the emerging LFRMS.</p> <p>WCC Archive and Archaeology Service have worked closely with WFDC in drafting of the historic environment content and is supportive of the proposed policies subject to detailed comments being addressed.</p>					
<p><u>KCAAPP121</u></p> <p>The County Council is pleased to support the proposed documents on the basis of continued collaboration with Wyre Forest District Council in the development of both the Wyre Forest Infrastructure Delivery Plan and the Worcestershire Infrastructure Strategy. This continued partnership working will assist in demonstrating the Duty-to-Cooperate.</p> <p>Welcome more detail with regard to delivery</p>	<p>All</p>	<p>Comments are noted. A District wide Infrastructure Delivery Plan has been circulated to WCC for information.</p> <p>WCC will play a key role in this particularly with their role as Local Transport Authority.</p>	<p>N/a</p>	<p>Agreed. We will continue to work closely with Wyre Forest to realise their ambitions for Kidderminster. This work will be achieved through our ongoing LTP3 Kidderminster</p>	<p>Yes.</p>

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<p>methods, role, responsibilities etc, especially around transport interchange, railway station etc, and the role planning and the public sector may play in this. For example the KCAAP recognises that development will need to contribute to island improvements at Eastern Gateway, but there may be other schemes that require funding.</p>		<p>WCC Officers will note that they were responsible for working up a fully costed scheme for a new station interchange at Kidderminster in 2010. Other schemes that may require funding are also currently being considered further.</p>		<p>Town Centre Strategy Package works which are currently underway. We will also continue to work with the district to review the Ring Road and establish to what extent it is possible to improve pedestrian and cycle connectivity across and through the ring road but still providing appropriate vehicle 'space' to ensure the economic vitality of the Town centre.</p>	
<p><u>KCAAPP123</u> Advise that the test of soundness would be improved and would align more closely with the Worcestershire Waste Core Strategy (now found sound, adopted November 2012) if WFDC was to propose an additional change so that it referred to the need for all new development to comply with</p>	<p>All</p>	<p>These comments are noted and Officers will consider further minor amendments to the Delivering Sustainable Development Standards</p>	<p>KCAPMOD15 Following discussions with Worcestershire County Council, the following minor amendment is suggested for inclusion:</p>	<p>Agreed</p>	<p>Yes</p>

APPENDIX 2 – WYRE FOREST DISTRICT KIDDERMINSTER CENTRAL AREA ACTION PLAN EXAMINATION IN PUBLIC
STATEMENT OF COMMON GROUND – WORCESTERSHIRE COUNTY COUNCIL

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the Waste Core Policy "Making Provision for waste in all new development"		section following discussion with WCC under the Duty to Co-operate	Insert additional supporting text after paragraph 6.3: <i>"Worcestershire County Council have recently adopted the Waste Core Strategy for Worcestershire. This document forms part of the Development Plan for the District and therefore all proposals will need to have regard to its contents, and particularly Policy WCS17: Making provision for waste in all new development."</i>		
<u>KCAAPP124</u> Policies SAL.PFSD1 & KCA.PFSD1 are consistent with the NPPF's requirement for the Presumption in Favour of Sustainable Development.	Policy SAL.PFSD1	Comments are noted.	N/a	N/a	N/a
<u>KCAAPP125</u> Emphasis of Policy SAL.CC7 very much supported. However, Planning authorities should take necessary regard of not just the statutory planning framework and the National FCERM Strategy, but also the Local Flood Risk Management Strategy. In	Policy SAL.CC7	These comments are noted and it is considered this requires further discussion under the terms of a Statement	KCAPMOD16 Further reference to the Local Flood Risk Management Strategy will be picked up through the new policy being	Agreed. We would welcome similar provision as that within the SAP.	Yes

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<p>so doing, future developments proposals will need to give proper regard to the local flood risk management strategy including the risk of flooding from surface water, groundwater and ordinary watercourses.</p> <p>We would welcome the inclusion of a policy that is consistent with the above statutory requirement and identifies the need for development proposals to have regard to the emerging strategy. This would also assist in demonstrating the Duty to Co-operate.</p>		of Common Ground.	proposed for the KCAAP, which has been suggested by the Environment Agency. This will reference the LFRMS as identified by the amendments to the Site Allocations and Policies Plan.		
<p><u>KCAAPP122</u></p> <p>Welcome inclusion of supporting mixed use developments and the policies to improve pedestrian connectivity through the area. Support the objectives contained within Section 6, Sustainable Transport. This work will be achieved through our ongoing LTP3 Kidderminster Town Centre Strategy Package works which are currently underway.</p>	Sustainable Transport	Comments are noted and support is welcomed.	N/a	N/a	Yes
<p><u>KCAAPP127</u></p> <p>The listed objectives for Green Infrastructure are limited. Climate change adaptation and flood attenuation is not referred to. Even within the town centre there are opportunities to deliver a range of</p>	Policy KCA.UP7	Comments are noted. Please see Minor Amendment for suggested change.	KCAPMOD26 Insert additional green infrastructure objectives as follows:	Agreed.	Yes.

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STATEMENT OF COMMON GROUND – WORCESTERSHIRE COUNTY COUNCIL

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GI objectives. Considers policy should be expanded.			<ul style="list-style-type: none"> • Use green infrastructure to deliver attractive walking and cycling routes. • Enhance the role of green infrastructure in adapting to and mitigating against the effects of climate change, particularly flood risk. 		
<p><u>KCAAPP128</u></p> <p>References are made to a green links between a number of sites. These need some greater explanation; as to its purpose and function; i.e. recreational links, biodiversity, landscape etc. Without this, there is a danger of a link being created which is inappropriate to the sites, which does not enhance any GI functions.</p>	Paragraph 7.68	Comments are noted however it is felt that the biodiversity and recreational opportunities presented by the Stour Valley corridor are set out within paragraphs 7.67-7.69. Further information is also included in the Council's Green Infrastructure Strategy. However, it is considered appropriate to include further commentary as proposed opposite.	<p>KCAPMOD27</p> <p>Expand last sentence of paragraph 7.68 to read <u>"The links also offer promenading opportunities to link the British Sugar and Churchfields sites as well as offering opportunities to address the impacts of climate change including flood risk and the urban heat island effect, as well as promoting opportunities for sustainable transport. Developments</u></p>	Agreed	Yes

APPENDIX 2 – WYRE FOREST DISTRICT KIDDERMINSTER CENTRAL AREA ACTION PLAN EXAMINATION IN PUBLIC STATEMENT OF COMMON GROUND – WORCESTERSHIRE COUNTY COUNCIL

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			<u>along the Stour Valley will also provide opportunities to enhance the landscape and townscape along this corridor."</u>		
<p><u>KCAAPP129</u></p> <p>Support the potential use of street trees, green roofs and SUDs, but their functionality needs to be further explained given this document's current focus on GI to deliver biodiversity.</p>	Paragraph 7.70	Comments are noted. Please see Minor Amendment for suggested change.	<p>KCAPMOD28</p> <p>Amend last sentence to read: Implementing measures such as street trees, green roofs and SUDs can all provide an enhancement <u>provide visual enhancement as well as benefits such as flood mitigation and amenity greenspace."</u></p>	Agreed .	Yes.
<p><u>KCAAPP130</u></p> <p>Functions of the parks and open spaces are greater than biodiversity enhancement which is just one function. Within the urban setting there may be the opportunity to link these spaces together through "greened" routes, explore walking, cycling routes, create good quality public realm etc.</p>	Paragraph 7.71	Comments are noted. Please see Minor Amendment for suggested change.	<p>KCAPMOD29</p> <p>Amend paragraph 7.71 to read:</p> <p>"The area's existing parks and green spaces are also an important part of the wider green infrastructure <u>network</u>. <u>They provide vital urban biodiversity habitats as</u></p>	Agreed.	Yes.

APPENDIX 2 – WYRE FOREST DISTRICT KIDDERMINSTER CENTRAL AREA ACTION PLAN EXAMINATION IN PUBLIC
STATEMENT OF COMMON GROUND – WORCESTERSHIRE COUNTY COUNCIL

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			<p><u>well as recreational space, whilst helping to reduce the urban heat island effect. These spaces, together with the linear parts of the green infrastructure network provide important walking and cycling routes. These spaces should be maintained and connected where appropriate to enhance the green infrastructure network within the town."</u></p>		
<p><u>KCAAPP126</u></p> <p>No identification of delivery agencies in the Monitoring & Implementation section, however they are identified within the Core Strategy. Suggests incorporating table 16.6 from the KCAAP into the Monitoring and Implementation section. Not clear why all KCAAP policies have not been included under the table entitled relevant core strategy policies as they are relevant.</p>	<p>Monitoring and Implementation Framework</p>	<p>These comments are noted. Details of delivery agencies are set out within the Adopted Core Strategy and are not repeated within either the KCAAP or Site Allocations and Policies DPDs.</p> <p>Table 16.6 already falls within the Monitoring and Implementation section.</p>	<p>KCAPMOD48</p> <p>Expand 'Relevant Core Strategy Policies' table and 'Relevant policies from Site Allocations and Policies DPD' table to incorporate all KCAAP policies.</p>	<p>Agreed. The revised table is comprehensive.</p>	<p>Yes.</p>

APPENDIX 2 – WYRE FOREST DISTRICT KIDDERMINSTER CENTRAL AREA ACTION PLAN EXAMINATION IN PUBLIC
STATEMENT OF COMMON GROUND – WORCESTERSHIRE COUNTY COUNCIL

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		Expand 'Relevant Core Strategy Policies' table and 'Relevant policies from Site Allocations and Policies DPD' table to incorporate all KCAAP policies. See Minor Amendment.			