



Wyre Forest District

Site Allocations and Policies Plan and Kidderminster Central Area Action Plan

Examination

District Council's Response to Inspector's Initial Questions

04th December 2012

Inspector's Initial Comments / Questions to the Council

Representations

Has the Council received any late representations and have any not been accepted?

The Council have not received any late representations to either of the Development Plan Documents. All representations received at Publication stage were duly made. However, the Council would like to draw the inspector's attention to a 'holding objection' from Stourport Town Council that was made at Preferred Options stage of the Site Allocations and Policies and subsequent comments made in relation to the Gypsy, Traveller and Travelling Showpeople consultation. These representations are attached at Appendix 1 to this document.

Council responses to representations

Does the Council intend to produce a response to the points raised in the representations made at publication stage and does it intend to circulate this to representors, and if so, what is the likely timetable?

The Council has responded to the representations received at publication stage. The Council's responses can be viewed in the following examination documents:

- SD037: Site Allocations and Policies Development Plan Document – Statement of Publication Consultation (Regulation 22 (c) (v) Statement)
- SD055: Kidderminster Central Area Action Plan Development Plan Document - Statement of Publication Consultation (Regulation 22 (c) (v) Statement)

These documents are available to view on the Council's website and representors were made aware of this in correspondence sent on the 25th October 2012, which advised them of the submission documents.

Meetings with other representors / Statements of Common Ground

Could the Council please confirm when these Statements are likely to be completed?

The Council are currently in the process of discussing the Statements of Common Ground with Stakeholders. It is anticipated that the Statements will be completed by Friday 11th January 2013.

Core Evidence base

Is any other substantial work / reports likely to be undertaken for the examination, and if so, what is the timetable for such work? A link to all the Submission and Evidence-based Documents should also be provided on the Council's web-site.

It is not anticipated that any other substantial work will be undertaken for the examination. However, it is likely that the Council will update existing information in relation to infrastructure, retail and viability considerations in time for the examination. All of the Submission and Evidence-based documents are available on the Council's web-site, in the following location:

<http://www.wyreforestdc.gov.uk/cms/non-lgnl-pages/planning-and-regulatory-servic/planning-policy/kcaap-dpd/library-document-list.aspx>

Any subsequent updates in relation to the evidence base will also appear here and will be provided directly to the Programme Officer to include within the Examination Library.

The Inspector notes that the Council are currently finalising a Draft District wide Infrastructure Delivery Plan which has been used to inform the preparation of the Plan. When will this document be complete? What stage had this document reached at the time that the Site Allocations and Policies DPD and Kidderminster AAP were published? Have there been any material changes to the document since which may have implications for the soundness of the plan?

The District wide Infrastructure Plan was submitted alongside the Development Plan. The document is referenced as EB062. The document was in draft form at the time the Site Allocations and Policies DPD and Kidderminster AAP were published. There have not been any material changes to the document since publication. However, it is considered that an update to the Plan may be provided to the examination following further discussions. It should be noted that this is a 'living document', and will be updated regularly during the plan period.


Similarly, when will the Sequential Testing (Flooding) reports be finalised? What stage had this document reached when at the time that the Site Allocations and Policies DPD and Kidderminster AAP were published? Have there been any material changes to the document since which may have implications for the soundness of the plan?

The Sequential Test (Flooding) was submitted alongside the Development Plan. The document is referenced as EB044. The document was in draft form at the time the Site Allocations and Policies DPD and Kidderminster AAP were published. There have not been any material changes to the document since publication. However, it is considered that an update to

the Plan may be provided to the examination following further discussions with the Environment Agency.

APPENDIX ONE: Stourport-on-Severn Town Council – Representations received on the Site Allocations and Policies Plan

F R A S D
07 JUL 2011

 <p>Wyre Forest District Council</p>	<p>Wyre Forest District Local Development Framework</p> <p>May 2011</p>	<p>FOR OFFICIAL USE ONLY</p> <p>Response Number: <div style="border: 1px solid black; padding: 2px; width: 100%;">SALPO 169</div> </p> <p>Date Received: <div style="border: 1px solid black; height: 15px; width: 100%;"></div> </p> <p>Date Acknowledged: <div style="border: 1px solid black; height: 15px; width: 100%;"></div> </p>
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GENERAL COMMENTS FORM

This response form accompanies the following Wyre Forest District Local Development Framework documents:

- o Site Allocations and Policies Preferred Options Development Plan Document
- o Kidderminster Central Area Action Plan Preferred Options Development Plan Document
- o Site Allocations and Policies and Kidderminster Central Area Action Plan Draft Sustainability Appraisal (SA)
- o Churchfields Masterplan Draft Supplementary Planning Document

We welcome your comments on these papers. **Please note that any comments you make cannot be treated as confidential and may be made publicly available.** All comments received will be acknowledged.

Please complete and return your comments by 5.30pm on Friday 8th July 2011 to the address below. Alternatively, you can view the documents and make responses electronically at <http://wyreforestdc-consult.Limehouse.co.uk>

Principal Forward Planning Officer, Planning and Regulatory Services Directorate, Duke House, Clensmore Street, Kidderminster, DY10 2JX or email planning.policy@wyreforestdc.gov.uk

1. Personal Details	2. Agent Details (if applicable)
<p>Title</p> <p>First Name</p> <p>Last Name</p> <p>Job Title <small>(where relevant)</small></p> <p>Organisation <small>(where relevant)</small></p> <p>Address Line 1</p> <p>Line 2</p> <p>Line 3</p> <p>Line 4</p> <p>Post Code</p> <p>Telephone Number</p> <p>E-mail address</p>	<p>Title</p> <p>First Name</p> <p>Last Name</p> <p>Job Title <small>(where relevant)</small></p> <p>Organisation <small>(where relevant)</small></p> <p>Address Line 1</p> <p>Line 2</p> <p>Line 3</p> <p>Line 4</p> <p>Post Code</p> <p>Telephone Number</p> <p>E-mail address</p>
<p>STOURPORT-ON-</p> <p>SEVERN TOWN</p> <p>COUNCIL</p> <p></p> <p></p> <p>CIVIL CENTRE</p> <p>NEW STREET</p> <p>STOURPORT-ON-</p> <p>SEVERN</p> <p>DY13 84J</p> <p>01294 877214</p> <p>townclerk@stourport- gov.uk</p>	<p></p> <p></p> <p></p> <p></p> <p></p> <p></p> <p></p> <p></p> <p></p> <p></p> <p></p> <p></p> <p></p> <p></p>

Please tick if you are happy to receive future correspondence by email.

You will need to complete one of these pages for every comment you make. You only need to fill in your contact details (overleaf) once. Please indicate the number of comments made:

ONE

1) Which consultation document does your comment relate to?

Site Allocations and Policies Preferred Options Development Plan Document

Kidderminster Central Area Action Plan Preferred Options Development Plan Document

Site Allocations and Policies and Kidderminster Central Area Action Plan Draft SA

Churchfields Masterplan Draft Supplementary Planning Document

2) Please indicate which part of the document you would like to comment on (e.g. paragraph, policy, map, table or figure reference)

4.42 - 4.46

3) Do you want to support/object/comment on this part of the document?

Support

Object

Comment

4) Please indicate your response in the box below, continuing on a separate sheet of paper if necessary:

It is hoped that this objection will amount to no more than a holding objection, pending consultation with the Town Council by the District Council's Consultants in accordance with paragraph 4.46 of the above Development Plan Document.

STOURPORT-ON-SEVERN TOWN COUNCIL

DENNIS ROOK
TOWN CLERK

TELEPHONE
01299 877214
email: townclerk@stourport-tc.gov.uk



Civic Centre,
Stourport-on-Severn,
Worcs.
DY13 8UJ

YOUR REF.

OUR REF.

9th November 2011 JE/HET/FP-EB/GT

DR/SJL/TC88

Mr J Elmer
Senior Forward Planning Officer
Planning and Regulatory Services Directorate
Duke House
Clensmore Street
Kidderminster
DY10 2JX

Dear Mr Elmer,

Consultation on Potential Sites for Gypsies, Travellers and Travelling Showpeople

Thank you for your letter of the 5th October 2011, with enclosures, which received consideration at a Meeting of the Town Council held on the 1st November 2011.

The Town Council's response to the above consultation was approved in statement form at the above Meeting, and a copy of the statement by way of response is enclosed herewith. I would be glad if you could acknowledge its safe receipt, please.

A response form was submitted to you on the lodging of the Council's holding objection on the 6th July 2011 but, if you have need for a further response form to be completed, perhaps you could please inform me accordingly. Thank you.

Yours sincerely,

Town Clerk



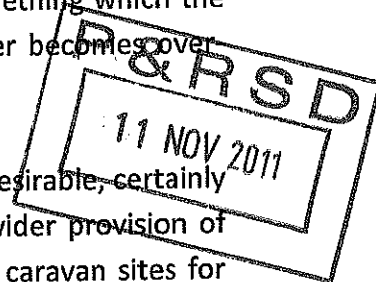
STOURPORT-ON-SEVERN TOWN COUNCIL

Wyre Forest District Local Development Framework

Assessment of Potential Sites for Gypsies, Travellers and Travelling Showpeople

Holding Objection by Stourport-on-Severn Town Council (District Council Reference SALP0169)

1. On the 6th July, 2011 Stourport-on-Severn Town Council lodged a Holding Objection to the above Local Development Framework, pending further consultation by the District Council on the Assessment of Potential Sites for Gypsies, Travellers and Travelling Showpeople when Consultants acting for the District Council (Baker Associates) had conducted an Assessment of Potential Sites.
2. According to the Assessment by the District Council's Consultants it appears that the only locality in the District where there are authorised Caravan Sites for Gypsies and Travellers is in Stourport-on-Severn.
3. In all there are currently 43 pitches for caravans, plus those at four other sites which either have temporary planning permission, are tolerated or are not tolerated.
4. Baker Associates' interviews with Romany Gypsies indicate a preference for future provision well related to the existing concentration of families within the Sandy Lane area of Stourport-on-Severn.
5. The preference at 4. above is understood but it could be said to be a "snapshot" of the preference today. It is not a preference that can be projected with certainty as far ahead as 2026 and ought not therefore to be used to bind or direct Gypsies and Travellers or their future generations to a confined area within the District (like Stourport-on-Severn) without any other measure of choice being available to them.
6. It is known that by intensifying the nature of a use in any area can lead to a change not so much in the identity but in the character of that area; something which the Planning system is capable of preventing, if a change of character becomes over dominant and therefore undesirable.
7. In examining the issue of a change in the character of an area it is desirable, certainly in the case of Stourport-on-Severn, to consider the overall and wider provision of other caravan sites. The Town is quite generously provided with caravan sites for holiday and leisure uses and probably has greater provision than any other parts of the District. To increase the number of caravan sites, for whatever purpose, can contribute to a change in the character of the area; a change which ought to be



compared and contrasted with the historic significance of the Town and its unique creation as a direct result of the Canal era. There has been a great deal of recent investment in preserving the Georgian character of the Town and it is known that work continues (not least of all through planning policy) to further develop and preserve the Town's Georgian heritage. Further development of sites for caravans would contribute in measure to bringing about a change in the character of the Town and be in conflict with the character of the Town's heritage.

8. The Town Council doesn't believe that it is the aim of the planning system to direct that provision for Gypsies and Travellers and Travelling Showpeople has to be concentrated in one particular area of a District, and nowhere else. Apart from characteristic changes which can result (7. above), any element of choice for them is denied and they become "directed" or confined to a specific locality.
9. An imbalance has already occurred in the local planning system, simply by virtue of Stourport-on-Severn being the only provider of authorised sites for Gypsies and Travellers in the whole of Wyre Forest District.
10. Finally, the Town Council wishes to comment on a site-specific basis in relation to Manor Farm. In the Assessment report by the District Council's Consultants, the Manor Farm Site is referred to as "Redundant farm and land". The report goes on to analyse various aspects of the site before proceeding to a conclusion as to its suitability for Romany Gypsies and/or Travelling Showpeople; and the report deals at some length with potential landscape impacts, having particular regard to the inclusion of the site in the Green Belt, between Stourport-on-Severn and Kidderminster.
11. Manor Farm is owned by Wyre Forest District Council. To the Town Council it appears reckless and flawed to state that the Farm and land are redundant. It is understood by the Town Council that the Farm and land remain in agricultural use, a use which is wholly appropriate within an area of Green Belt. The Farm and land are in this case in a sensitive and vulnerable part of the Green Belt, however, and ought to be protected from any other form of development; preferably by deletion from the Assessment and by receiving no further attention in the consideration of the Assessment.
12. For the foregoing reasons the Town Council maintains its objection lodged with the District Council on the 6th July, 2011.