



Wyre Forest District Council

Kidderminster Central Area Action Plan Development Plan Document

Statement of Publication Consultation (Regulation 22 (c) (v) Statement)

October 2012



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1 Purpose of this Report:

- 1.1 This document has been prepared to meet the requirements of Regulation 22(c) (v) of The Town and Country Planning (Local Planning) (England) Regulations 2012. The document will be submitted alongside the Kidderminster Central Area Action Plan Development Plan Document (DPD). It sets out details of the number of representations made in response to the publication period and a summary of the main issues raised by those representations.
- 1.2 Regulation 22 (c) also requires a statement detailing representations made at Regulation 18 stage. This requirement was fulfilled by the Regulation 22(c) Statement (July 2012) which was published alongside the Pre-Submission Publication Kidderminster Central Area Action Plan DPD.

2 Publication of the Kidderminster Central Area Action Plan DPD:

- 2.1 The Kidderminster Central Area Action Plan DPD was approved by Council for publication and submission on 20th June 2012. This represents the final draft of the Kidderminster Central Area Action Plan DPD and is considered by the District Council to be both 'sound' and 'legally compliant'.
- 2.2 The Kidderminster Central Area Action Plan DPD was published for a period of eight weeks between 23rd July and 14th September 2012. During this time representations were invited in the following ways:
 - Notifications were sent by post and e-mail to all of those bodies and individuals set out at Appendix A. Specific consultees received copies of the documents.
 - A statutory notice was placed in the Kidderminster Shuttle on 19th July 2012 setting out the Statement of Representations Procedure and the Statement of Arrangements for Inspection of the Kidderminster Central Area Action Plan DPD and other Proposed Submission Documents.
 - Copies of the Publication Kidderminster Central Area Action Plan DPD, Sustainability Appraisal Report, Statement of Consultation, Statement of Representations Procedure and the Statement of Arrangements for Inspection of the Kidderminster Central Area Action Plan DPD and other Proposed Submission Documents were placed in each of the three libraries and Worcestershire Hubs within the District. Representations forms and guidance notes for their completion were also made available in these locations.
 - All of the relevant documents were published on the District Council's web-site and facilities were put in place for representations to be made online.

3 Overview of Representations:

- 3.1 A total of 142 representations were received from 21 respondents. Of these representations, 52 were from specific consultees and 90 were from general consultees. All responses received were duly made.

4 Summary of Main Issues Raised by Representations:

- 4.1 This section sets out a summary of the main issues raised by those representations which were duly made. The summary is organised by the headings used within the Kidderminster Central Area Action Plan DPD. The summary looks to set out themes which can be identified from the comments received rather than setting out a summary of each individual comment and therefore, where an issue has been raised by a number of respondents, it will only be set out once within the summary. However, due to the small number of representations received, individual comments may form part of the summary.
- 4.2 Throughout the Kidderminster Central Area Action Plan DPD, a number of factual inaccuracies and typographical errors have been identified and these will be addressed through the schedule of minor amendments. These have been excluded from the summary set out below.

General:

- Western Power Distribution provide advice on consulting them on development proposals and set out their requirements in terms of relocating electricity infrastructure.
- Kidderminster Civic Society support the DPD and the approach it sets out to provide economic growth whilst protecting the historic environment.
- Worcestershire County Council set out details of the work which they are currently undertaking and the relationship with the DPD.
- Worcestershire County Council provide information relating to conformity with the Minerals and Waste planning policies and set out some suggestions for aligning the document more closely with the Waste Core Strategy.
- Worcestershire Wildlife Trust consider that the plan gives appropriate weight to biodiversity and green infrastructure and is sound in that regard.
- Natural England are satisfied with the HRA and Sustainability Appraisal reports and support the DPD.
- Wolverley and Cookley Parish Council support the DPD.
- The Environment Agency raise concern that the Infrastructure Delivery Plan and Flooding Sequential Testing have not yet been published.

A Sustainable Future: Development Strategy:

- The fire and police services request a change to the vision to refer to a safe and crime free environment.

- The Environment Agency consider that the vision should refer to flood risk.
- Environment Agency suggest alternative wording for objective 9.
- Police and Fire service suggest that objective 12 should include reference to being crime free.

A Proactive Approach to Sustainable Development:

- Worcestershire County Council consider that policy KCA.PFSD1 is in conformity with the NPPF.

A Desirable Place to Live:

- Support for increasing residential development in Kidderminster.
- Support for reference to safe environments throughout the policies.
- Suggestion that infrastructure beyond the sites itself needs full consideration.
- Support for Churchfields urban village.
- Support for mixed use developments.
- Support for the town centre first approach to retailing.
- Suggestion that policy KCA.DPL2 should make reference to the emergency services as a town centre use.

A Good Place to do Business:

- Suggestion that more D1 Uses should be encouraged within the town centre where retail units have been vacant for a time.
- Support for focus on the vitality and viability of the town centre.
- Suggestion that sites allocated for retail development should be preferred sites for retail development along with locations within the Primary Shopping Area of Kidderminster.
- Support for focussing retail growth at Weavers Wharf and Bromsgrove Street whilst limiting local centres to small-scale convenience retail.
- English Heritage supports the retail dumbbell approach and feels it will help wider town centre regeneration.
- Suggestion that the Bromsgrove Street retail site should be accessed via the former Woolworths building.
- Support for concentrating retail development in the town centre.
- Suggestion that the dumbbell would create two separate destinations and would not help regenerate the town centre.
- Suggestion that policy KCA.GPB4 should set out whether 250 sq m is net or gross floorspace.
- Concern that the sequential approach is not clearly stated.
- KCA.GPB5 - Environment Agency suggest more detailed text in relation to ground water protection.
- KCA.GPB6 – Tourism Development – Police and Fire Service suggest additional wording which reflects the fact that such development places additional pressure on the emergency services.
- KCA.GPB7 – Leisure Development – suggestion that policy is too restrictive.
- KCA.GPB7 – Leisure Development - Suggestion that the enhancement of the town hall should be included within the policy itself.

- KCA.GPB7 – Leisure Development – suggestion that the policy conflicts with KCA.GPB7 and is therefore unsound.
- Suggestion that an additional policy should be inserted relating to the evening economy.

Adapting to and Mitigating Against Climate Change:

- Concern that the DPD does not take account of the fact that rural areas are reliant on the private car.
- Worcestershire County Council and the Environment Agency suggest including an additional policy on flood risk.
- The Environment Agency suggest additional wording at paragraph 6.6 to refer to safeguarding water quality.
- Support for approach to sustainable transport.
- Suggestion that paragraph 6.16 should exclude the Aggborough section of the ring road which is not suitable for pedestrians and cyclists.
- Support for increased pedestrian and cycle use of the canal corridor.

A Unique Place:

- Suggest that urban design and place making objectives should refer to minimising opportunities for crime and anti-social behaviour.
- English Heritage suggest changes to the objectives to strengthen conformity with the BPPF.
- Suggestion that paragraph 7.12 should be upgraded to a policy.
- The Environment Agency support the wording in KCA.UP1 (l) but suggest alternative wording to strengthen it.
- Fire and Police Service suggest additional wording to strengthen policy KCA.UP1.
- English Heritage support the prominence given to improving the public realm.
- The Environment Agency support policy KCA.UP2 (g).
- Support for improvements to the walking route from the town centre to the rail station.
- English Heritage welcome the specific consideration given to St. Mary's Church.
- Suggestion that the Staffordshire and Worcestershire Canal deserves a higher profile.
- Support for paragraph 7.50.
- The Environment Agency support policy KCA.UP5 and propose amendments to it.
- Fire and Police Services suggest additional wording for policy KCA.UP5 relating to safety.
- The Environment Agency suggest additional wording for policy KCA.UP6.
- Worcestershire County Council suggest additional green infrastructure objectives.
- Worcestershire County Council suggest additional information is needed in relation to the role of green infrastructure and its multi-functionality.

Churchfields:

- Support for urban village.
- Suggests parking should be improved within the Horsefair local centre.
- Suggestion that Blackwell Street should be one-way with on-street parking.
- Fire and Police Services welcome the acknowledgement that Churchfields regeneration will require additional investment in police infrastructure including a compensatory police post at Grasmere Close.
- Sport England supports the need for compensatory playing field provision as part of policy KCA.Ch4 – Former Sladen School.
- Suggestion that a retail impact assessment should be undertaken for all new retail development within Churchfields.
- Policy KCA.Ch7 – Crossley Park - Suggestion that walking routes through the Crossley Park site should be retained.
- Policy KCA.Ch7 – Crossley Park - suggestion that site boundary should be adjusted to run alongside the river bank.
- The Environment Agency has suggested additional wording relating to water protection for policy KCA.Ch7.
- Support for policy KCA.Ch8 – Horsefair.

Eastern Gateway:

- Support for policy KCA.EG1 – Comberton Hill Area.
- Suggestion that the Eastern Gateway section is unsound because it is inappropriate to deal with areas separated by the ring road in the same part of the document.
- Suggestion that the policy KCA.EG1 is unsound because small scale medical uses should be allowed within the retail frontage and the boundary of the area should be amended to include the Harriers Trading Estate.
- Suggestion that policy KCA.EG2 should cover both the rail station and the Severn Valley Railway station, including extending the boundary and amending the heading to rail stations.
- Support for replacing Comberton Hill subway with surface level crossing facilities.
- Suggests that Kidderminster does not need any more traffic lights and suggests a solution which allows pedestrians to be above the traffic would be more appropriate.
- Suggestion that the retail dumb bell will split the town in two.
- Suggestion that policies KCA.EG5 and KCA.EG6 should be amalgamated and consideration should be given to including KCA.EG7 also.
- Suggestion that paragraphs 10.29 and 10.30 are unsound because Kidderminster does not need another edge of centre supermarket and the boundary with Worcester Street and Prospect Hill is inappropriate.
- Support for the retention of the former Law Courts.
- Sport England stress the importance of making sure that new leisure provision is at least as good as the existing provision.
- Suggestion that the masterplan accompanying policy KCA.EG5 is inappropriate because it uses decked parking.

- Suggestion that more decked parking could offer the opportunity to develop comparison retailing alongside a supermarket at Bromsgrove Street.

Western Gateway:

- Suggestion that the topography makes links to Park Street unachievable.

Castle Wharf:

- Suggestion that policy KCA.CW1 is confusing because it includes limited retailing which could lead to the area becoming an edge of town shopping area.
- The Environment Agency suggest alternative wording for policy KCA.CW1 in relation to groundwater protection.

Crossley Park and Mill Street:

- Concern that the vision is not deliverable because of the dominance of other retail centres such as Merry Hill and Worcester.

Traditional Town Centre:

- Support for encouraging investment in the old town.

Heritage Processions Area:

- Support for new development in these areas being high quality to complement the existing conservation area.
- The Environment Agency suggest additional wording relating to water quality.
- Alternative wording is suggested which removes specific use and instead refers to uses appropriate to the edge-of-centre location.
- The Environment Agency express concern over the extension to the Frank Stone building which is built over the River Stour and in their view should be removed.
- Suggestion that the Frank Stone building should be allocated for a mixture of residential and commercial uses rather than specific uses.
- The Environment Agency suggest additional wording to policies KCA.HP3 and KCA.HP4 in relation to safeguarding water quality.

Monitoring and Implementation Framework:

- Worcestershire County Council suggest that delivery agencies should be included within the framework and that all of the Area Action Policies should be cross-referenced to relevant Core Strategy policies.

Policies to be Replaced:

- Suggests that Site Allocations and Policies DPD should set out the policies which remain rather than the DPDs setting out the policies which are to be replaced.

Appendix C – Maps:

- Suggestion that the primary shopping area is amended to include the Morrisons store at Green Street.

5. How the Representations Have Been Addressed:

5.1 The table at Appendix B sets out how each of the representations have been addressed. A number of minor amendments have been suggested in order to address the issues raised in some of the representations. Officers will continue to discuss some of the outstanding issues further with respondents and prepare Statements of Common Ground following the submission of the DPD.

Appendix A – List of People Notified at Publication Stage

Specific Consultees

Wyre Forest District Parish/Town Councils

Bewdley Town Council
Broome Parish Council
Chaddesley Corbett Parish Council
Churchill and Blakedown Parish Council
Kidderminster Charter Trustees
Kidderminster Foreign Parish Council
Rock Parish Council
Rushock Parish Council
Stone Parish Council
Stourport-on-Severn Town Council
Upper Arley Parish Council
Wolverley & Cookley Parish Council

Adjacent Parish Councils

Abberley Parish Council
Astley & Dunley Parish Council
Bayton Parish Council
Belbroughton Parish Council
Clent Parish Council
Cleobury Mortimer Parish Council
Dodford with Grafton Parish Council
Elmbridge Parish Council
Elmley Lovett Parish Council
Hagley Parish Council
Hartlebury Parish Council
Highley Parish Council
Kinlet Parish Council
Kinver Parish Council
Milson & Neen Sollars Parish Council
Pensax Parish Council
Upton Warren Parish Council

Other Specific Consultees

British Telecom
Bromsgrove District Council
Central Networks
Dudley Metropolitan Borough Council
English Heritage
Environment Agency
Greater Birmingham and Solihull Local Enterprise Partnership
Hereford & Worcester Ambulance Service
Hereford & Worcester Fire & Rescue Service
Highways Agency
Highways Agency Network Strategy West Midlands Group
Homes & Communities Agency

Malvern Hills District Council
Mobile Operators Association
National Grid
Natural England
Network Rail
Office of Rail Regulation
Oil and Pipelines Agency (The)
PINS - GOWM
Severn Trent Water Ltd
Shropshire Council
South Staffordshire District Council
South Staffordshire Water Plc
South Worcestershire Development Plan
Staffordshire County Council
Staffordshire Police Authority
The Coal Authority
The Planning Inspectorate
Transco West Midlands Local Distribution Zone
West Mercia Constabulary
West Midlands Strategic Health Authority
Worcestershire County Council
Worcestershire Local Enterprise Partnership
Worcestershire Primary Care Trust
Wychavon District Council

General Consultees

Act on Energy
Age Concern Wyre Forest
Aggborough & Spennells Community Action Group
All Rivers Hydro Limited
Arley Area Environmental Group
Arts Council West Midlands
ASHA Wyre Forest
Association of Retired and Persons over 50
Bewdley Chamber of Trade
Bewdley Civic Society
Bewdley Development Trust
Bewdley Town Centre Management Forum
Bill Wiggin MP
Bishops Wood Centre
Bodenham Arboretum & Earth Centre
British Geological Survey
British Horse Society
Buddhist Community
Business Connections 4 North Worcestershire
Campaign for Real Ale Ltd (CAMRA)
Campaign to Protect Rural England
Canal & Rivers Trust

Centro- WMPTA
 Chaplaincy for Agricultural & Rural Life
 Chiltern Railways
 Church Commissioners
 Civil Aviation Authority
 Community - The Union for Life
 Community Action Wyre Forest (CAWF)
 Community First
 Council for British Archaeology West Midlands
 Council for the Protection of Rural England (Wyre Forest District Group)
 Country Land & Business Association
 Crown Estate Commissioners
 D & G Coach & Bus Limited
 Derbyshire Gypsy Liaison Group
 Design Council
 DIAL North Worcestershire
 Disability Action Wyre Forest
 English Heritage
 Federation of Small Businesses, Herefordshire & Worcestershire
 Fields in Trust
 First Group Plc
 Forestry Commission
 Freight by Water Freight Transport Association
 Freight Transport Association
 Friends Families and Travellers
 Friends of Broadwaters
 Friends of the Village Association
 Fusion Online Ltd
 Garden History Society
 GPU Power UK
 H.M. Prison Service
 Health and Safety Executive, Chemical and Hazardous Installations Division
 Help the Aged
 Hereford and Worcester Gardens Trust
 Herefordshire & Worcestershire Chamber of Commerce
 Herefordshire & Worcestershire Earth Heritage Trust
 Home Builders Federation (Midlands and South West)
 Home-Start Wyre Forest
 Horsefair, Broadwaters & Greenhill Partnership
 Hurcott Village (Management) Ltd
 Independent Advisory Group for Black & Ethnic Minority Issues
 Islamic Mosque
 Jephson Housing Association
 Kidderminster & District Scout Group
 Kidderminster and District Archaeology & Historical Society
 Kidderminster Civic Society
 Kidderminster Connexions
 Kidderminster Cycle Club (Cyclists Touring Club)
 Kidderminster Horticultural Society
 Kidderminster Swan Centre Manager

Kidderminster Town Centre Partnership
 Little Lakes Leisure Ltd
 Local Resident and Tenant Associations
 Local schools and colleges
 London Midland
 MADE
 Marches Energy Agency
 Marches Housing Association Ltd
 Mark Garnier MP
 Meeting Deaf Community
 Museums, Libraries and Archives, West Midlands
 National Farmers Union
 National Farmers Union West Midlands Region
 National Society of Allotment and Leisure Gardeners
 National Travellers Action Group
 National Trust
 NERL Safeguarding
 Nexus Housing Association
 NHS Estates
 Odell Trust
 Offmore Comberton Action Group
 Oldington & Foley Park Community Network
 Other interested parties including:

- agents
- developers
- land owners
- local interest groups
- local residents
- members of the public

PHAB Ltd
 Pipeline Management Land & Wayleaves Ltd
 Planning Aid England
 Ramblers Association
 Renewable UK
 Rooftop Housing Group
 Royal British Legion
 Royal Mail Property Holdings
 Royal Town Planning Institute
 RSPB Midlands Regional Office
 Rushock Traders Association
 Severn Navigation Restoration Trust
 Severn Valley Railway
 Sir Thomas White's Charity
 SPA Housing Association
 Sport England
 Staffordshire & Worcestershire Canal Society
 Stourport Business Association
 Stourport Cricket Club
 Stourport Forward Ltd
 Stourport-on-Severn Civic Society

Stourport-on-Severn Horticultural Society
 Stourport Rugby Football Club
 Stourport-on-Severn Town Centre Forum
 Strategic Health Authority (Estates - Midlands Division)
 Sure-Start Wyre Forest
 Sustainability West Midlands
 Sustrans
 The Community Housing Group
 The Diocese Board of Finance Worcester
 The Equality and Human Rights Commission
 The Georgian Group
 The Gypsy and Traveller Law Reform Coalition
 The Inland Waterways Association (Birmingham, Black Country & Worcestershire Branch)
 The Lawn Tennis Association
 The Showman's Guild of Great Britain Midland Section
 The Society for the Protection of Ancient Buildings
 The Theatres Trust
 The Victorian Society
 The Wyre Forest Agenda
 Tourism West Midlands
 Transition Bewdley
 Twentieth Century Society
 Ukranian Club
 Warwickshire Primary Care Trust
 West Mercia Probation Service
 West Midlands Consortium Education Service for Travelling Children
 West Midlands Planning Aid Service
 West Midlands Region RSL Planning Consortium
 Whittles Coaches
 Wolverley Allotment Society
 Worcestershire Acute Hospitals NHS Trust
 Worcestershire Biodiversity Partnership
 Worcestershire County Association of Local Councils
 Worcestershire Girl Guides
 Worcestershire Greenpeace
 Worcestershire Mental Health Partnership NHS Trust
 Worcestershire Racial Equality Council
 Worcestershire Wildlife Trust
 Wyre Forest Action Group for Older People
 Wyre Forest Advocacy
 Wyre Forest Bangladeshi Forum
 Wyre Forest Citizens Advice Bureau
 Wyre Forest Cycle Forum
 Wyre Forest Dial A Ride
 Wyre Forest Friends of the Earth
 Wyre Forest Lifelong Learning Partnership
 Wyre Forest Matters LSP Chair
 Wyre Forest Schools Partnership
 Wyre Forest Society

Wyre Forest Tourism and Leisure Network
Wyre Forest Women's Aid
Wyre Forest Youth Strategy Group

Appendix B – Summary of Representations Received

| Respondent/ Response Number | Paragraph/ Policy | Summary of Representation | Officer Response |
|---------------------------------------------------------------|----------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------|
| <p>Western Power Distribution KCAAPP1</p> | <p>Document</p> | <p>Western Power Distribution [may have] [has] a number of strategic electricity distribution circuits (which can operate at 132,000 Volts, 66,000 Volts and 33,000 Volts) in some of the area's being considered for development. These circuits may run both underground and as overhead lines (on either towers/pylons or wood poles). WPD may also have electricity substations in these areas.</p> <p>Generally, Western Power Distribution would expect developers of a site to pay to divert less strategic electricity circuits operating at 11,000 Volts (11kV) or below. This may include undergrounding some 11kV and low voltage overhead lines as necessary.</p> <p>Western Power Distribution would normally seek to retain the position of electricity circuits operating at 132,000 Volts (132kV) and 66,000 Volts (66kV) and in some cases 33,000 Volts (33kV), particularly if the diversion of such circuits placed a financial obligation on Western Power Distribution to either divert or underground them as WPD would not be party to any planning application and any such obligation would also go against the statutory and regulatory requirement on Western Power Distribution to operate an economic and efficient</p> | <p>Comments are noted.</p> |

| Respondent/ Response Number | Paragraph/ Policy | Summary of Representation | Officer Response |
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| | | <p>electricity distribution system. Assuming the required minimum statutory clearances can be maintained and WPD can access its pylons/poles, WPD does not generally have any restriction on the type of development possible in proximity to its strategic overhead lines but it would be sensible for planning guidance and layout of developments to take WPD's position into account and consider uses compatible with the retention of strategic overhead lines, for example such as parking, estate roads, commercial uses or open space, within their immediate proximity. It is worth noting that any existing circuits crossing the proposed development areas in the document may run both overhead and underground. In any case WPD should be consulted on detail at an early stage and WPD are always keen to discuss larger sites with the local authorities at an early stage, so that constraints can be taken into account and sites planned in the most effective way.</p> <p>Where WPD have substations on land being considered for development, WPD should be consulted on the detail of proposals in good time to ensure that the required access can be maintained and catered for and that other requirements for development in the vicinity of substations are taken into account.</p> | |
| Kidderminster Civic | Document | The DPDs together provide an excellent proposed | Support is welcomed. |

| Respondent/ Response Number | Paragraph/ Policy | Summary of Representation | Officer Response |
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| Society KCAAPP10 | | plan for the redevelopment of Kidderminster whilst protecting its heritage and retaining economic progress. | |
| Worcestershire Wildlife Trust KCAAPP35 | Document | General comment - The Kidderminster Central Area Action Plan appears to give appropriate weight to biodiversity and Green Infrastructure interests in line with the adopted Core Strategy and national guidance. Accordingly we consider it be sound in this regard. | Support is noted. |
| Campaign to Protect Rural England KCAAPP68 | Document | Paragraph 6.16 is logically part of the justification to UP4, perhaps becoming a general introductory paragraph to 7.39-47. As indicated in relation to paragraph 6.16, the Aggbrough section of the Ringroad would be best kept as a pedestrian and cycle-free road, with a pedestrian and cycle route being signed through the "Heritage Processions" Area. We have no objection to the remainder of the policy. | Comments are noted. However, it is considered that the policy as written is sufficiently clear and the vision for the ring road is a long term ambition that should not preclude consideration of improvements to walking and cycling links, across its entire length. |
| Wolverley & Cookley Parish Council KCAAPP69 | Document | Wolverley and Cookley Parish Council would like to thank you for the very comprehensive documents. The Council have discussed and reviewed these and are happy with the contents contained. | Comments are noted and support is welcomed. |
| Natural England KCAAPP115 | Document | Considers that both DPDs, the SA reports and the Habitats Regulations Assessment accord with the legal requirements and guidance and that they are | Support is noted. |

| Respondent/ Response Number | Paragraph/ Policy | Summary of Representation | Officer Response |
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| | | <p>consistent with the NPPF and relevant local policies.</p> <p>Satisfied that site allocations are evidence based and that the environmental considerations and constraints for each site are understood and addressed adequately.</p> <p>Supports the proposed development management policies.</p> | |
| <p>Natural England KCAAPP116</p> | <p>Document</p> | <p>Satisfied that the Sustainability Appraisal has provided a systematic assessment of the Pre-Submission sites in terms of consistency with the principles of sustainable development and likely social, economic and environmental effects. Considers that sustainability objectives are clear and relevant and that they have helped to refine emerging policies.</p> | <p>Support is noted.</p> |
| <p>Natural England KCAAPP117</p> | <p>Document</p> | <p>Satisfied that the HRA provides a systematic and appropriately detailed assessment of both DPDs. Consider that the conclusion that the DPDs will not have a significant effect on European protected sites is reasonable.</p> | <p>Support is noted.</p> |
| <p>Natural England KCAAPP118</p> | <p>Document</p> | <p>Correction The Jargon Guide refers to Sites of Special Scientific Interest (SSSI) and suggests these are officially notified by English Nature. Please note this responsibility has passed to Natural England.</p> | <p>Comments are noted. The term SSSI is not currently included within the KCAAP jargon guide.</p> <p>Please refer to Minor Amendment KCA -</p> |

| Respondent/ Response Number | Paragraph/ Policy | Summary of Representation | Officer Response |
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| | | | MA44 |
| Worcestershire County Council KCAAPP120 | Document | <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</p> | These general comments are noted. |

| Respondent/ Response Number | Paragraph/ Policy | Summary of Representation | Officer Response |
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| | | <p>proposed documents on basis of continued 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>Worcestershire County Council - Environmental Policy & Strategic Planning KCAAPP121</p> | <p>Document</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>Comments are noted. Officers are currently finalising a Draft District wide Infrastructure Delivery Plan which will prioritise infrastructure. WCC will play a key role in this particularly with their role as Local Transport Authority. WCC Officers will note that they were responsible for working up a fully costed scheme for a new station interchange at Kidderminster in 2010.</p> |

| Respondent/ Response Number | Paragraph/ Policy | Summary of Representation | Officer Response |
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| Worcestershire County Council - Environmental Policy & Strategic Planning KCAAPP123 | Document | 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 the Waste Core Policy "Making Provision for waste in all new development" | These comments are noted and Officers will consider further minor amendments to the Delivering Sustainable Development Standards section following discussion with WCC under the Duty to Co-operate. |
| Environment Agency KCAAPP98 | Paragraph 1.17 | <p>Two of the documents listed are not available for review and we understand that they are still being undertaken by the Council to inform the evidence base.</p> <p>There appears to be no clear cross reference with the evidence base as the Sequential Testing (Flooding) document and Infrastructure Delivery Plan are still being completed. It is difficult to comment on the soundness of the plan as we have not seen the contents of these two key evidence base documents.</p> <p>As the Sequential Testing (Flooding) and Infrastructure Delivery Plan are still being completed it is unclear whether the plan is the most appropriate strategy, when considered against reasonable alternatives, and whether the plan is deliverable over its period i.e. flood risk, environmental infrastructure requirements etc.</p> | <p>Comments are noted. Officers are currently finalising a Draft District wide Infrastructure Delivery Plan which will prioritise infrastructure. This has been used to inform the preparation of the Plan. Furthermore, work has been undertaken in conjunction with the County Council in terms of infrastructure planning and these documents are available to view on the County Council's website.</p> <p>The draft sequential test has also been used to develop the plan, this document has helped to justify the site selection process.</p> <p>These documents will be circulated to the Environment Agency for their comment.</p> |
| West Mercia Police | Paragraph 1.17 | Paragraph 1.17 states that an Infrastructure Delivery | Comments are noted. The SIA will be used to |

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| KCAAPP138 | | <p>Plan (IDP) supported the site selection process leading to the present KCAAP publication document.</p> <p>WMP and HWFRS are aware that work by Wyre Forest District Council on the IDP is taking place in partnership with Worcestershire County Council's work on an infrastructure plan for Worcestershire as a whole.</p> <p>To assist the two councils with respect to emergency service infrastructure planning matters, WMP commissioned consultants WYG to undertake a Strategic Infrastructure Assessment (SIA) to identify the police infrastructure required to serve growth and identify where and when that infrastructure will be required, based on the proposals in the adopted Wyre Forest Core Strategy, Pre-submission Site Allocations and Policies DPD and the Pre-submission Kidderminster Central Area Action Plan DPD.</p> | help inform the development of both the County and the District Infrastructure Delivery Plans. |
| Shuttes J KCAAPP37 | Paragraph 2.5 | Considers that the vision and objectives have failed because the construction of the Civic Centre at Finepoint removes an opportunity to draw people into Kidderminster. The site is also remote from services and unless a further change of "use" allocation is approved it fragments the principles of District development. | Comments are noted. |
| Environment | Paragraph 2.5 | We support reference to the River Stour as an | Comments are noted and support is |

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| Agency KCAAPP111 | | <p>important natural movement corridor and the green infrastructure network.</p> <p>However, it is disappointing that flood risk has not been referred to in the vision, given that a significant part of the KCAAP area is within the floodplain and in considering the benefits that works to alleviate flood risk can have, in enhancing the water (blue infrastructure) environment and creating regeneration opportunities within the town.</p> | <p>welcomed.</p> <p>Please refer to Minor Amendment KCA - MA1</p> |
| West Mercia Police KCAAPP142 | Paragraph 2.5 | <p>WMP and HWFRS welcome and support the inclusion of a Vision statement within the KCAAP. This constitutes a significant improvement on the Preferred Options paper and an acceptance of our previous representations regarding this particular issue.</p> <p>Whilst we support the vision of a safe environment, with streets, spaces and buildings designed to promote activity and natural surveillance, we would like to see the wording of the third paragraph expanded as follows:</p> <p><i>‘...The town centre will be a vibrant, attractive , safe and crime free environment in which people wish to spend their time at all times of the day and night...’</i></p> | <p>Comments are noted and support is welcomed.</p> <p>Please refer to Minor Amendment KCA - MA2</p> |

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| Environment Agency KCAAPP110 | Paragraph 2.6 | <p>We support the inclusion of Objective number 6, 7, 8 and 9, in protecting and enhancing the water environment. However we would recommend amended wording for objective number 9 on flood risk and water management.</p> <p>Recommended wording: "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".</p> | <p>Comments are noted and support is welcomed.</p> <p>Please refer to Minor Amendment KCA - MA3</p> |
| West Mercia Police KCAAPP140 | Paragraph 2.6 | <p>Whilst we are supportive of Strategic Objective 12 in so far as it is currently written, we are very concerned that there is no reference to ensuring that Kidderminster is crime free.</p> <p>This is inconsistent with paragraphs 58 and 69 of the National Planning Policy Framework, which clearly state that planning policies and decisions should create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion.</p> <p>In view of our comments above, we suggest that part 12 of the Strategic Objectives is amended as follows: - <i>12. Ensure the town is safe , crime free and enjoyable for all users.</i></p> | <p>Comments are noted.</p> <p>Please refer to Minor Amendment KCA - MA4</p> |

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| Worcestershire County Council KCAAPP124 | Policy KCA.PFSD1 Presumption in Favour of Sustainable Development | Policies SAL.PFSD1 & KCA.PFSD1 are consistent with the NPPF's requirement for their Presumption in Favour of Sustainable Development. | Comments are noted. |
| Horsefair Traders Partnership KCAAPP14 | Paragraph 4.2 | The Kidderminster Central Area Action Plan is correct to focus on unlocking residential development potential at the heart of Kidderminster. | Noted and support welcomed. |
| Shuttes J KCAAPP38 | Paragraph 4.2 | The over use of "mixed use" schemes just out of centre could dilute the central core policy in what is a relatively small area in overall terms. Judicious use of "mixed use" in locations remote from the centre could be beneficial in ecological and general transport terms. | Comments are noted. The mix of use varies between town centre sites and those sites further away from the town centre so as not to undermine the town centre first approach towards general town centre uses whilst still allowing communities to have access to convenience retail and local services. |
| West Mercia Police KCAAPP131 | Housing | We welcome and support the requirement in the housing and mixed use development objectives for new developments to create a safe environment which reduces the opportunities for crime. We are grateful to the Council for taking into account our representations to the Preferred Options (May 2011) document in this respect. | Comments are noted and support is welcomed. |
| Shuttes J KCAAPP39 | Paragraph 4.8 | As with the SAL DPD an emphasis on dwellings, which are a general district requirement, needs to | Comments are noted. Strategic transport infrastructure requirements are set out within |

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| | | ensure a wider consideration of infrastructure than just the subject area. All types of access and parking needs to be considered carefully in relation to proposed and retained uses. | policy CP03 of the Adopted Core Strategy and policy SAL.CC3 of the Site Allocations and Policies DPD. |
| Horsefair Traders Partnership KCAAPP15 | Paragraph 4.9 | The concept of an urban village development on Churchfields would fulfil the objective of blending business and community interests in the local area. Indeed, a concentration of residential units on the edge of town would also boost the confidence of businesses within the town centre which will help to reinvigorate the town centre economy. | Noted. |
| Kidderminster Civic Society KCAAPP2 | Policy KCA.DPL2 Mixed Use Development | Supports mixed use developments because they will increase natural surveillance and attract visitors throughout the day. | Support is welcomed. |
| England & Lyle KCAAPP71 | Policy KCA.DPL2 Mixed Use Development | Support for Policy KCA.DPL2. The 'town-centre first' emphasis in the AAP is consistent with the priorities in the NPPF for town centre uses and sustainable development. The town centre has the capacity to accommodate the growth in comparison and convenience retail floorspace over the plan period. | Noted and support welcomed. |
| West Mercia Police KCAAPP133 | Policy KCA.DPL2 Mixed Use Development | The policy, as written, makes no reference to the emergency services as one of the uses that can contribute to supporting the vitality and viability of the town centre. The lack of reference to the emergency services as | Comments are noted. Please refer to Minor Amendment KCA - MA6 |

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| | | <p>part of mixed use developments, which in turn contribute to the vitality and viability of the town centre, could potentially inhibit partnership working in relation to such schemes. By creating uncertainty as to whether the emergency services are a legitimate use within mixed use schemes, this in turn casts doubt on whether other parties should involve them in negotiations. This could in turn affect the delivery of community safety, particularly given that some of the proposed mixed use developments involve creating an evening and night-time economy in Kidderminster.</p> <p>To resolve all of the concerns expressed above, we request that the following amendment is made to Policy KCA.DPL2:-</p> <ul style="list-style-type: none"> • <i>Community uses (including medical and the emergency services)</i> | |
| Horsefair Traders Partnership KCAAPP16 | Paragraph 4.17 | The general theme of mixed use development is absolutely the right approach. A variety of uses for any given site will have significantly more potential than to allow an overwhelming single use development to dominate the area. | Noted. |
| Shuttes J KCAAPP44 | Paragraph 4.17 | Feels that more D1 uses should be encouraged within the retail areas where retail premises are | Comments are noted. Outside of the primary shopping area there is greater flexibility over |

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| | | vacant for long periods. | uses. |
| Horsefair Traders Partnership KCAAPP17 | Paragraph 5.6 | The focus on the vitality and viability of the town centre is a crucial factor in preserving the role of the town centre as a primary shopping destination. A clearly defined strategy highlighting the importance of the role of the town centre will play an important part in attracting investment to the town centre in the future. | Noted. |
| Arrowcroft Services Ltd KCAAPP12 | Policy KCA.GPB1 Retail Development | To accord with paragraph 24 of the NPPF (and so to ensure that this paragraph is sound), it should also be noted that sites which are allocated for retail development should be preferred locations for retail development along with locations within the Primary Shopping Area of Kidderminster. | Comments are noted. However, it is considered that Policy KCA.GPB5 is consistent with the sequential approach to site selection detailed in the NPPF, particularly when read with KCA.GPB4 and Site Allocations & Policies DPD Policy SAL.GPB2, which is intended to provide the detailed guidance on the sequential approach. The policy guidance looks for retail development to be located in the Primary Shopping Area in the first instance before looking to edge-of-centre and out-of-centre sites, as per the NPPF. |
| Horsefair Traders Partnership KCAAPP18 | Policy KCA.GPB1 Retail Development | The balance of targeted retail growth within the town centre focused on Weavers Wharf and Bromsgrove Street is consistent with a sensible approach to enhance the vitality and viability of the town centre. Limiting retail growth in the local centres at Horsefair, Comberton Hill and the Mill Street mixed use area to small scale units of no more than | Noted. |

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| | | 250sqm will allow those areas to maintain their role as effective and sustainable neighbourhood centres. This will also promote a vital sense of community within the local area. | |
| English Heritage KCAAPP21 | Policy KCA.GPB1 Retail Development | English Heritage welcomes vision for retail development 'dumbbell' focussed on Weavers Wharf and Bromsgrove Street which should help wider regeneration of town centre. | Support is welcomed. |
| England & Lyle KCAAPP70 | Policy KCA.GPB1 Retail Development | We accept that sites in the Western and Eastern Gateways would be the sequentially preferable locations for new retail development in Kidderminster. Support that view that Bromsgrove Street is appropriate for a major supermarket development, but note that it may also be suitable to meet comparison goods retail development. We support the policy acceptance of limited retail growth in the Horsefair neighbourhood centre. | Noted and support welcomed. Paragraphs 5.9 to 5.13 set out that new retail development in the Worcester Street/Bromsgrove Street area will be encouraged and is not restricted to either comparison or convenience. |
| Arrowcroft Services Ltd KCAAPP13 | Paragraph 5.10 | The text should be re-drafted to express a preference for access to the Bromsgrove Street site via the former Woolworths unit. | Comments are noted. The policies and guidance contained within the A Unique Place chapter look to create a network of well connect streets and spaces and improve access and permeability throughout the town. This is further highlighted by Policy KCA.CC2 which looks to developments to provide links through sites themselves and create direct routes to aid the ease of movement. |

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| | | | <p>Paragraph 5.10 in the A Good Place to do Business chapter supports this approach and states that footfall could be encouraged to the Bromsgrove Street site " <i>via the former Magistrate's Court site, Step Entry and/or premises fronting Worcester Street</i> ." The text does not restrict improved access being provided through only one of these options but looks for a number of possible solutions that could work in tandem.</p> <p>In addition to this, the site specific policy KCA.EG6 Worcester Street Retail Development (which covers the former Woolworths unit) states that any new development should "create improved pedestrian links between Worcester Street and Bromsgrove Street." The reasoned justification goes on to highlight the importance of this site in improving visual and physical links between these two streets and states the ambition for the site to provide new 'street' to improve access.</p> |
| Shuttes J KCAAPP45 | Paragraph 5.10 | Feels that Kidderminster requires a compact town centre and that further development will take people away from small traders. | Comments are noted, the retail centre has shifted towards Weavers Wharf and the proposals for Bromsgrove Street aim to encourage shoppers back into the traditional town centre. |

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| Kidderminster Civic Society KCAAPP3 | Paragraph 5.13 | Improving and utilising the Vicar Street, High Street, Worcester Street areas in conjunction with Weavers Wharf would benefit the town in the long-term. Concentrating retail development in the town is welcomed as out of centre retail developments damage the traditional town centre. | Support is welcomed. |
| Shuttes J KCAAPP46 | Paragraph 5.13 | Feels that the dumbbell effect would create separate destinations and leave the town centre streets unoccupied. The topography of the town means that a supermarket off the ring road is unlikely to generate footfall through the town centre. | Comments are noted. |
| Campaign to Protect Rural England KCAAPP92 | Policy KCA.GPB2 Primary and Secondary Shopping Frontages | <p>The policy is not legally compliant or effective, the following changes are required:</p> <ol style="list-style-type: none"> 1. Paragraph 5.20 constitutes a policy and should appear as such, not as mere justification 2. The policy should be split into two - one relating to the Primary Shopping Area and the other to the Secondary Shopping Area. 3. The possibility of the use of basements for non-A1 uses (as well as upper floors) should be allowed where A2-A5 are allowed. 4. Small medical facilities such as dentists and physiotherapists should be allowed where A2-A5 is | <p>Comments are noted. Taking each of them in turn:</p> <ol style="list-style-type: none"> 1. It is considered that the wording in paragraph 5.20 should remain as Reasoned Justification. It helps to explain the policy position and clarify what is considered to be over-concentration. This approach has been successfully applied in the current Adopted Local Plan of 2004. 2. It is considered that the policy is already split into the two component parts mention in the representation. It is important to note that this policy refers to frontage and not the Primary |

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| | | permissible | Shopping Area. 3. This is not considered to be precluded by the policy as currently worded 4. It is considered that this is permissible - within the Secondary Shopping Frontage. It is considered important to ensure that the Primary Frontage is retained for A use classes. The policy for the Secondary frontage is more flexible to allow these other uses to be implemented. |
| Shuttes J KCAAPP47 | Paragraph 5.24 | The East end of New Road and Oxford Street are traditional shopping streets and closer infill areas between the existing shopping zones/supermarkets and the museum attraction. | Comments are noted. |
| Shuttes J KCAAPP48 | Paragraph 5.30 | As stated above good pedestrian links and free parking make Crossley Park feel less edge of town. However the same can not be said of B&Q which is in a location that is not a natural walking destination from the centre and by the nature of its business is an "in and out" destination more out of town than edge of town. | Comments are noted. B&Q is restricted to bulky goods retail for this reason. |
| England & Lyle KCAAPP72 | Policy KCA.GPB4 Edge-of-Centre and Out-of-Centre Retailing | The policy does not specify whether 250 sq.m. is gross or net floorspace. The AAP should clarify that 250 sq.m. is a net figure. It would also be helpful to clarify that the use of this floorspace figure is | Noted and support welcomed. In regard to retail floor space, as per Policy SAL.GPB2 of the Site Allocations & Policies |

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| | | <p>effectively a floorspace threshold for retail impact assessments.</p> <p>The general health of the centre has, in our view, not improved in recent years and, despite the attraction of the large edge-of-centre stores, the retail core area remains at risk from further pressure for retail development outside the centre. This pressure should be resisted in order to sustain the vitality and viability of the town centre.</p> <p>We welcome the support in the AAP for the town centre to be strengthened through further retail development and overall improvements in the shopping environment. Policy KCA.GPB4 should safeguard the vitality and viability of the town centre from pressures for edge-of-centre and out-of-centre development.</p> | <p>DPD, this is intended to be 250 sq.m. net sales area. It is agreed that this could be specified within the policy.</p> <p>In terms of 250 sq.m. being a locally set threshold for retail impact assessments, as allowed through the NPPF; it is considered that this is achieved through Policy KCA.GPB4 which requires any retail development outside of the Primary Shopping Area (PSA), over 250 sq.m. to undertake a sequential test and demonstrate that there will be no significant adverse impact on vitality and viability of the PSA.</p> <p>Please refer to Minor Amendments KCA - MA7, KCA - MA8, KCA - MA30, KCA - MA31, KCA - MA37 and KCA - MA40</p> |
| <p>Campaign to Protect Rural England KCAAPP93</p> | <p>Policy KCA.GPB4 Edge-of-Centre and Out-of-Centre Retailing</p> | <p>1. The sequential approach is not adequately expressed. It would be better to incorporate expressly or by cross-reference SAL.GBP2. Our comments on SALP have suggested that the area covered by KCAAP should be excluded from the operation of SAL.GBP2, so that KCAAP stands alone.</p> <p>2. There should be a clearer statement of preference of sites within the ring road or adjoining</p> | <p>Comments are noted. Taking each of these in turn:</p> <p>1. It is considered that this is explained in paragraph 5.8, which identifies the importance of considering the sequential policy, as set out in the Site Allocations DPD.</p> <p>2. It is considered that the policy, as currently worded, is suitable and does not require</p> |

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| | | Comberton Hill, with a preference for that and the northern part of the "Heritage Processions" area being regarded as edge-of-centre. Other areas beyond the Ring Road should be regarded as out-of-centre, irrespective of the distance from its edge. | amendments. This is because it follows the NPPF's definition of edge-of-centre and to follow a different approach would mean that the document was not consistent with National Policy. |
| Shuttes J KCAAPP49 | Paragraph 5.43 | It is important that small manufacturing can get a foothold and grow and policy must support small industry as part of housing development proposal. The availability of specialist and manual labour is more obvious in the area and encouragement of service based uses will import travelling labour from outside the area and further adding to the infrastructure requirements. | Comments are noted, as well as retaining employment space within the town centre, the Site Allocations and Policies DPD sets out a supply of employment land to meet the District's requirements. |
| Environment Agency KCAAPP96 | Paragraph 5.44 | We support the inclusion of paragraph 5.44 in considering the environment setting of the industrial sites identified within policy KCA.GPB5. However we would recommend some additional wording in considering the justification for this statement as follows: <i>"Any new industrial development will need to consider the potential impact on ground water protection in the area. Types of activities, drainage and building design should be in line with the Environment Agency's Groundwater Protection Policy and Practice Guidance. Tighter controls are likely to be required in line with this guidance, as the sites overlie a principal aquifer</i> | Comments are noted and support is welcomed. Please refer to Minor Amendment KCA - MA10 |

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| | | <p>with a relatively shallow water table. The aquifer is of regional strategic importance in terms of water supply and the sites fall within close proximity (Inner, Outer and Total Source Protection Zone) of a public water supply source."</p> | |
| <p>Kidderminster Civic Society KCAAPP4</p> | <p>Tourism</p> | <p>Agree that heritage sites should be promoted with Kidderminster being the tourist Hub for the District. Recognises importance of tourism in the local economy. Supports aim to "strengthen the tourism offer of the town" because of its economic benefits.</p> | <p>Comments are noted and support is welcomed.</p> |
| <p>West Mercia Police KCAAPP134</p> | <p>Policy KCA.GPB6 Tourism Development</p> | <p>The Strategic Infrastructure Assessment (SIA) prepared by consultants WYG, submitted in support of these representations, confirms that tourism related development places significant additional demands on the police and emergency services.</p> <p>This is implicitly acknowledged by paragraph 5.57 of the KCAAP, which notes that Kidderminster unfortunately suffers from a negative reputation amongst the canal boating community, due to anti-social behaviour and vandalism.</p> <p>The absence of an explicit reference to the need to create a safe and crime free environment, as part of this overarching policy on tourism related development, is inconsistent with Policy KCA.GPB7</p> | <p>Comments are noted.</p> <p>Please refer to Minor Amendment KCA-MA11</p> |

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| | | <p>which does implicitly acknowledge these issues.</p> <p>In view of all of the above, the absence of a reference in policy to the need to ensure that tourist related development is safe, enjoyable and crime free is unjustified. It is also likely to mean that the KCAAP will be ineffective in delivering genuinely sustainable tourist related development from a social perspective, as required by paragraph 7 of the National Planning Policy Framework.</p> <p>To resolve all our concerns and make the KCAAP sound, we suggest the inclusion of the following addition text in Policy KCA.GPB6: -</p> <p><i>'...Within these areas, development which is demonstrated to create a safe, enjoyable and crime free environment for the following uses will be specifically encouraged:...'</i></p> | |
| <p>Arrowcroft Services Ltd KCAAPP19</p> | <p>Policy KCA.GPB7 Leisure Development</p> | <p>Given that D2 leisure and A3 and A4 food and drink uses are 'town centre uses', the AAP should recognise that such uses may also be acceptable on other sites but without a proviso that these should be "smaller scale". We recognise, however, that such recognition should be subject to there being an appropriate mix of uses on those other sites so that the aims of site-specific policies are not prejudiced.</p> | <p>Comment noted.</p> <p>Please refer to Minor Amendment KCA - MA12</p> |

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| The Theatres Trust KCAAPP36 | Policy KCA.GPB7 Leisure Development | <p>Pleased to see that live performance venues are encouraged but assumes this does not refer to theatres. Supports the enhancement of the Town Hall but suggests that the policy should specifically refer to this.</p> <p>Disappointed that the Rose Theatre is not included and unsure whether it falls outside the boundary. Feels it should be considered at 5.61 regardless as it makes a contribution to the cultural and visitor economy.</p> | <p>Comments are noted.</p> <p>The Rose Theatre is not referenced as it lies outside of the KCAAP boundary.</p> <p>Please refer to Minor Amendment KCA - MA13</p> |
| Campaign to Protect Rural England KCAAPP94 | Policy KCA.GPB7 Leisure Development | <p>Policy- Unsound: not effective:</p> <ol style="list-style-type: none"> 1. The policy appears to conflict with GBP2. The first paragraph of GBP7 should be expressed to be subject to the policy of GPB2. 2. References to the Carpet museum as "forthcoming" in 5.47 and 5.61 will need to be updated before adoption. It is suggested that suitable phrases should be placed in square brackets with a footnote that they are to be deleted as from the museum's opening. | <p>Comments are noted. Taking these points in turn:</p> <ol style="list-style-type: none"> 1. It is considered that the approach is acceptable in targeting uses to certain central areas of the town, furthermore the policy states elsewhere in the KCAAP proposals will be considered favourable subject to them meeting the objectives of the KCAAP. 2. Comments are noted. Updates will be made to the plan as and when appropriate, prior to adoption. |
| West Mercia Police KCAAPP135 | Policy KCA.GPB7 Leisure Development | There is a need for robust guidance to address the KCAAP specific problems, but also to address the lack of policy in the NPPF covering the evening and | Comments are noted. It is, however, considered that the KCAAP provides a clear stance on the evening economy through the |

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| | | <p>night-time economy.</p> <p>The DPD does not go far enough in terms of:</p> <ol style="list-style-type: none"> 1. Setting out in a clear and concise way where and when evening and night-time economy related development will be located and delivered within Kidderminster. 2. Providing sufficient policy and supporting guidance in terms of explaining how the well documented negative side effects of evening and night-time economy related development will be actively managed. 3. Establishing the basis by which public sector agencies, private companies and other stakeholders will work together to coordinate the active management of the evening and night-time economy in Kidderminster town centre. 4. Providing sufficient encouragement for development proposals relating to the evening and night-time economy to: - <ul style="list-style-type: none"> • Locate in preferred locations for this type of development • Positively integrate with surrounding uses • Provide a high quality, safe and secure public realm | <p>inclusion of Policy KCA.GPB7 and its associated Reasoned Justification. The policy prioritises the location of potential new night time activity into certain central locations. It also makes clear that any proposals for this type of development should have regard to neighbouring uses and should not cause unacceptable disturbance. This is further supplemented by other policies in the plan, specifically in relation to design. Policy UP1 which requires, in Criteria J, for developments to <i>"create a safe and secure environment that minimises the opportunity for crime and anti-social behaviour incorporating Secured by Design Principles."</i> ensures that crime and anti-social behaviour considerations are key aspects of all new development - including proposals that will enhance the night time economy.</p> <p>Officers have reviewed the Policy wording contained within the Telford Central Area Action Plan and it is considered that Policy KCA.GPB7, whilst not as detailed, provides a similar policy approach to considering the night time economy. This, coupled with the Reasoned Justification in paragraphs 5.66 - 5.70, is considered to set out a robust policy framework to enable the consideration of</p> |

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| | | <p>It would be preferable if the KCAAP included specific policy and detailed supporting guidance in relation to the evening and night-time economy.</p> <p>As stated in our representations to the Preferred Options (May 2011), we would ideally like to see the KCAAP include planning policies and supporting guidance on the evening and night-time economy to the same level of detail as that included on pages 80 – 83 of the Central Telford Area Action Plan (adopted March 2011), prepared by Telford & Wrekin Council.</p> <p>We would be very willing to actively collaborate with the Council in the preparation of such guidance in the lead up to the KCAAP public examination and/or during.</p> | <p>proposals for the night time economy.</p> <p>Notwithstanding the above, the Council consider it to be useful to discuss the policy wording further with West Mercia with the aim of coming to a mutually agreeable position prior to examination.</p> |
| Shuttes J KCAAPP50 | Adapting to and Mitigating Against Climate Change | <p>Concern that sustainable transport takes no account of reliance on the private car to get around the District. Suggests that alternative out of centre shopping points are also required to allow people to walk to shops.</p> <p>Tourism will by its nature rely on private transport and therefore the objectives need revisiting.</p> | |
| Worcestershire County Council - | Adapting to and Mitigating Against | Emphasis of Policy SAL.CC7 very much supported. However, Planning authorities should take | These comments are noted and it is considered that they should be subject to |

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| Environmental Policy & Strategic Planning KCAAPP125 | Climate Change | <p>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> <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> | discussion under a Statement of Common Ground. |
| Environment Agency KCAAPP97 | Paragraph 6.4 | <p>We acknowledge the aspirations of the Council to regeneration the KCAAP area with mixed use development. However, a flood risk policy is considered necessary for the following reasons:</p> <ul style="list-style-type: none"> -The majority of the KCAAP area lies within an area at risk of flooding from the River Stour. - Although flood risk within the area has been reduced by the Kidderminster Flood Alleviation Scheme (FAS), should the FAS be breached or its design capacity exceeded then the flood hazard is likely to be significant, due to the low lying nature of the town and the proximity of parts of the KCAAP area (proposed allocations) to the FAS reservoir | Comments are noted. A meeting will be held with the Environment Agency to discuss the inclusion of a flood risk policy within the KCAAP area through a Statement of Common Ground. This will build on the information provided in this representation. |

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| | | <p>area. The Level 2 Strategic Flood Risk Assessment (SFRA) by Royal Haskoning (dated February 2010) undertook breach and overtopping scenarios to confirm the above. The report (section 7, page 53) concluded 'it is essential that this residual risk is appreciated and sufficiently mitigated against...'</p> <p>- The Water Management Policy (CP02) in the Council's adopted Core Strategy includes a general flood risk policy for the District area. It does not address the specific flood risk (identified above) for the KCAAP area.</p> <p>The policy should be relevant to the KCAAP area and address:</p> <p>- safe development (design and layout) requirements to mitigate for actual and residual risk from the towns flood defences and reservoir overtopping or failing;</p> <p>-the importance of adequate emergency planning to cater for new development, particularly higher flood risk uses;</p> <p>-opportunities offered through new development to manage and reduce flood risk i.e. through provision or maintenance/improvement of flood risk</p> | |

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| | | <p>management structures (some of these measures would need to be delivered strategically, working with other partners and development sites);</p> <p>-the amount of surface water run-off from the town centre/opportunities for retro fitting SuDS (we understand that a Surface Water Management Plan is in progress for the Wyre Forest District, being undertaken by the Lead Local Flood Authority, that could link into this policy).</p> <p>We would be happy to meet with your Council to assist with the specific wording of a flood risk policy.</p> | |
| <p>Environment Agency KCAAPP99</p> | <p>Paragraph 6.6</p> | <p>We support the inclusion of a paragraph on contaminated land. However, we would recommend it is reworded as follows, in fully explaining its context and importance in relation to the District:</p> <p>Paragraph 6.6:- The former industrial nature of parts of the town centre means that there is high potential for contamination issues to arise. 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 KCAAP area overlies a principal aquifer which is of strategic importance for water supply and the area falls within the Source</p> | <p>Comments are noted and support is welcomed.</p> <p>Please refer to Minor Amendment KCA - MA14</p> |

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| | | <p>Protection Zone of a public water supply borehole. The water table is relatively shallow, particularly within the Stour valley. It is therefore essential that 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; however a desk study will be required for most sites to assess this potential . New development should be in line with the Environment Agency's Groundwater Protection Policy and Practice Guidance (GP3).</p> | |
| <p>Worcestershire County Council KCAAPP122</p> | <p>Sustainable Transport</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> | <p>Support is welcomed.</p> |
| <p>Campaign to Protect Rural England KCAAPP87</p> | <p>Policy KCA.CC1 Sustainable Transport</p> | <p>We would question the wisdom of any policy of changing the status of the Aggborough section of the Ringroad, which is completely unsuitable for pedestrians and cyclists. Green Street and New Road are far more suitable as routes for them. It might even be possible to provide a northbound cycle lane in Green Street. This is a shorter route</p> | <p>Comments are noted. However, it is not considered that this policy cause confusion in respect of UP4. Paragraph 6.16 talks about the ring road generally and paragraph 6.17 signposts readers to the relevant policy in Section 7 (UP4). it is not considered, therefore, that a change is necessary in this regard.</p> |

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| | | <p>than the Ringroad.</p> <p>Proposals for that section are dealt with at length in policy UP4 and their reappearance here is unnecessary and liable to cause confusion. The policy is appropriate (and sound) in respect of the rest of the Ring Road.</p> <p>6.16 should be expressed to exclude the Aggborough section of the Ring Road.</p> | |
| Canal & River Trust KCAAPP54 | Paragraph 6.20 | Canal & River Trust welcome the references to opportunities for linkages to the canal corridors for pedestrians and cyclists. | Noted and support welcomed. |
| Shuttes J KCAAPP51 | Paragraph 6.22 | Suggests walking should be replaced by browsing as tourists will not walk a long way but will stroll between shopping points and attractions. Park and ride should be considered from more than one location. | Comments are noted however, it is felt that walkable town is the most appropriate term. |
| West Mercia Police KCAAPP141 | Paragraph 7.4 | <p>The current Urban Design and Place Making Objectives currently make no reference to minimising the opportunities for crime and antisocial behaviour.</p> <p>If left unaddressed, this issue will affect the resulting effectiveness of the KCAAP once it has been adopted by the Council.</p> | <p>Comments are noted.</p> <p>Please refer to Minor Amendment KCA - MA16</p> |

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| | | <p>To fully resolve the consistency and effectiveness issue, we suggest the following additional bullet point is inserted into the Urban Design and Place Making Objectives: -</p> <ul style="list-style-type: none"> • <i>Create a safe and secure environment which reduces opportunities for crime and anti-social behaviour.</i> | |
| <p>English Heritage KCAAPP22</p> | <p>Policy KCA.UP1 Urban Design Key Principles</p> | <p>Generally support for urban design key principles and commitment to prepare Town Centre Design Framework. Suggest amendments to points (i) and (l) to strengthen consistency with NPPF para.58.</p> | <p>Comments are noted. Please refer to Minor Amendment KCA - MA17</p> |
| <p>Campaign to Protect Rural England KCAAPP84</p> | <p>Policy KCA.UP1 Urban Design Key Principles</p> | <p>Paragraph 7.12 is acceptable in principle, but needs to be upgraded to a policy.</p> <ul style="list-style-type: none"> • A large number of visitors are likely to come to the town by car. The retention of sufficient car parking is thus vital to the town's viability as a retail centre. • Provision is also needed to ensure that commuters and other all-day visitors can park in more peripheral locations. Failure to provide such is liable to lead to commuters and other all-day visitors parking in residential side streets to the annoyance of residents. This requires a policy, not merely | <p>Comments are noted. However, it is considered that this issue is dealt with sufficiently under Policy UP1 and criteria k.</p> |

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| | | <p>explanation.</p> <ul style="list-style-type: none"> We consider the rest of policy UP1 to be sound. | |
| <p>Environment Agency KCAAPP106</p> | <p>Policy KCA.UP1 Urban Design Key Principles</p> | <p>We support the inclusion of core design principle (I.) relating to blue and green infrastructure of the town centre, in particular the River Stour. We would suggest a minor change to the wording:</p> <p>The word enhance could be added i.e. ‘respect and enhance the blue and green infrastructure of the town centre...’</p> | <p>Comments are noted and support is welcome.</p> <p>Please refer to Minor Amendment KCA - MA15</p> |
| <p>West Mercia Police KCAAPP136</p> | <p>Policy KCA.UP1 Urban Design Key Principles</p> | <p>We commend the Council on the inclusion of part (j) in Policy KCA.UP1, which requires development proposals to create a safe and secure environment that minimises opportunities for crime and antisocial behaviour, through the incorporation of Secured by Design principles. We also commend the Council for the inclusion of parts (b) and (e) in Policy KCA.UP1, which promote the creation of safe environments subject to natural surveillance.</p> <p>We are grateful to the Council for taking into account our previous representations to the Preferred Options (May 2011) document on this matter. The inclusion of part (j) particularly in Policy KCA.UP1 will ensure that new developments comply with a</p> | <p>Comments are noted and support is welcomed. However, it is considered that the proposed changes to the policy are not required. These issues are considered to be picked up by Part B of the Building Regulations. Reference is also made to the changes introduced in Wales, but these were contentious and enforced nationally and not on a local scale.</p> |

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| | | <p>nationally recognised consistent standard, which in turn will mean they contribute to the achievement of Government's objectives set out in paragraphs 58 and 69 of the National Planning Policy Framework.</p> <p>We are, however, of the view that Policy KCA.UP1 should also require new development schemes to incorporate the following: -</p> <ul style="list-style-type: none"> • Automatic water suppression systems • Adequate water supplies for fire fighting • Effective and efficient access for emergency vehicles <p>The Chief Fire Officers' Association (CFOA), HWFRS and WMP strongly advocate the installation of automatic water suppression systems in all new housing and other developments.</p> <p>We will expect developers to install hydrants attached to the mains suitable for the purposes of fire fighting at their own expense, and to provide funds for their on going maintenance. Locations of hydrants should be approved in consultation with HWFRS. Where hydrants are not feasible suitable alternative water sources, such as gravity tanks, should be installed.</p> | |

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| | | <p>Finally, the design of new housing and other developments must ensure that the emergency services can access all areas and buildings. It is important to remember in this respect that each specific development will have implications for WMP and HWFRS e.g. the need to ensure that WMP personnel can attend quickly in the event of a domestic incident, or ensuring that HWFRS personnel can attend rapidly in the event of a fire.</p> <p>To resolve all our concerns expressed in these representations, we suggest the inclusion of the following additional design principle in Policy KCA.UP1: -</p> <p><i>(?) Include automatic water suppression systems, provide adequate water supplies for fire fighting and ensure effective and efficient access for emergency service vehicles.</i></p> | |
| English Heritage KCAAPP23 | Policy KCA.UP2 Public Realm | Supports prominence given to improving public realm. Will contribute to delivery of tourism, sustainable transport and economic vitality. | Support is welcomed. |
| Environment Agency KCAAPP107 | Policy KCA.UP2 Public Realm | We support the inclusion of part g. of this policy for new and/or improved public streets and spaces to incorporate SuDS to improve surface water drainage. Carefully designed SuDS can improve water quality and biodiversity in addition to | Comments are noted and support is welcomed. |

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| | | managing and improving surface water run-off, in line with the objectives of the Water Framework Directive. | |
| Kidderminster Civic Society KCAAPP6 | Paragraph 7.24 | Agree that pedestrian route from rail station to town centre needs to be improved and that signage is poor and subways are not visitor friendly. | Comments are noted. |
| English Heritage KCAAPP24 | Policy KCA.UP3 Ring Road Framework | In principle support given for ambitions for ring road. Strategy is positive and proactive. | Support is welcomed. |
| English Heritage KCAAPP25 | Policy KCA.UP4 Ring Road Character Areas | Welcomes specific consideration given to St. Mary's Church. | Support is welcomed. |
| Kidderminster Civic Society KCAAPP5 | Paragraph 7.50 | Argues Staffordshire and Worcestershire Canal deserves a higher profile and that development along the canal should be of high quality. | Comments are noted. However, the KCAAP seeks to improve the design of development throughout the entire central area. Therefore, it is considered that further wording is not required specifically for the design of development adjacent to the Canal. |
| Canal & River Trust KCAAPP55 | Paragraph 7.50 | Canal & River Trust welcome the additional wording at paragraph 7.50 highlighting the multifunctional nature of the waterways. | Noted and support welcomed. |
| English Heritage KCAAPP26 | Policy KCA.UP5 Staffordshire and Worcestershire Canal | Support positive policy framework for the canal which will encourage and promote its sustainable use and full integration into the town centre. | Support is welcomed. |

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| Environment Agency KCAAPP108 | Policy KCA.UP5 Staffordshire and Worcestershire Canal | <p>We support the reference to enhancing the canal's role as part of the green infrastructure and biodiversity network in point viii. However, we would recommend that this point also includes a reference to the canal's water environment, in ensuring that new development contributes to the objectives of the Water Framework Directive.</p> <p>Recommended wording: "viii. Where appropriate, enhance the canal's water environment and role as part of the green infrastructure and biodiversity network."</p> | <p>Comments are noted and support is welcomed.</p> <p>Please refer to Minor Amendment KCA - MA19</p> |
| West Mercia Police KCAAPP137 | Policy KCA.UP5 Staffordshire and Worcestershire Canal | <p>As the KCAAP acknowledges in paragraphs 5.57 and 7.51, there are unfortunately continuing problems of crime and antisocial behaviour along the Staffordshire and Worcestershire Canal.</p> <p>Whilst we support the assertion that increasing natural surveillance and active frontages along the canal will help deter crime and antisocial behaviour, the current wording implies that this is all that is required. If the policy is implemented as currently written, it will not achieve its objective of significantly reducing crime and antisocial behaviour along the Staffordshire and Worcestershire Canal.</p> <p>To resolve the issues highlighted above, we suggest the insertion of the following bullet point in place of</p> | <p>Comments are noted.</p> <p>Please refer to Minor Amendment KCA - MA20</p> |

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| | | <p>the existing part (i) of Policy KCA.UP5:-</p> <p><i>(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.</i></p> | |
| <p>Canal & River Trust KCAAPP57</p> | <p>Paragraph 7.53</p> | <p>Canal & River Trust welcome the additional bullet points within the policy and additional wording at paragraph 7.53. Individual waterways and water spaces need to be viewed as an integral part of a wider network, and not in isolation. Waterways themselves should be the starting point for consideration of the development and use of the water and waterside land – look from the water outwards, as well as from the land to the water. It is important that building design optimise views of the water, generate natural surveillance of water space, and encourage and improve access to, along and from the water.</p> | <p>Noted and support welcomed.</p> |
| <p>Canal & River Trust KCAAPP56</p> | <p>Paragraph 7.57</p> | <p>In regards to the additional paragraph 7.57 Canal & River Trust consider Green infrastructure is the network of multi-functional open spaces and natural assets. However, the canals within Worcestershire are multifunctional, therefore operating as green/blue infrastructure in only one of their functions.</p> | <p>Noted.</p> |

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| Canal & River Trust KCAAPP58 | Paragraph 7.58 | In regard to paragraph 7.58 Canal & River Trust consider the waterways should not be viewed purely as environmental assets. It is crucial that the nature of inland waterways as multifunctional spaces and arteries is fully recognised and supported within planning policy. | Noted and agreed. The River and Canal section within Chapter 7 Unique Place supports the greater utilisation of the canal and its potential to contribute to the regeneration of the town. The section recognises the development potential of sites adjacent to the canal and the opportunity for these to improve and promote greater activity alongside the waterway. |
| Environment Agency KCAAPP109 | Policy KCA.UP6 River Stour | <p>We support the inclusion of a policy on the River Stour. However, we would suggest the following changes to the wording in strengthening the policy:</p> <p>New developments adjacent to the River Stour should contribute to the improvement of the water environment by :</p> <ul style="list-style-type: none"> i. Providing a positive relationship to the water's edge. ii. Making on-site improvements to the green infrastructure links. iii. Enhancing the biodiversity value of the river and riverside areas as part of a wildlife corridor. iv. Improving the morphology of modified sections of the river, where appropriate, to | <p>Comments are noted and support is welcomed.</p> <p>Please refer to Minor Amendment KCA - MA21</p> |

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| | | <p>recreate more natural conditions and better habitat (i.e. de-culverting, re-profiling and buffer strips).</p> <p>v. Putting in place measures to protect and improve water quality (including groundwater).</p> <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> | |
| Worcestershire County Council KCAAPP127 | Policy KCA.UP7 Green Infrastructure | 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 GI objectives. Considers policy should be expanded. | Comments are noted. Please refer to Minor Amendment KCA - MA22 |
| Worcestershire County Council KCAAPP128 | Paragraph 7.68 | 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. | 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. |
| Worcestershire County Council KCAAPP129 | Paragraph 7.70 | 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 | Comments are noted. Please refer to Minor Amendment KCA - |

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| | | to deliver biodiversity. | MA23 |
| Worcestershire County Council - Environmental Policy & Strategic Planning KCAAPP130 | Paragraph 7.71 | 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. | Comments are noted. Please refer to Minor Amendment KCA - MA24 |
| English Heritage KCAAPP27 | Paragraph 7.73 | We support in principle the ambitions for the area's historic environment and heritage assets as set out in the text. Consider that plan provides positive and proactive strategy for Kidderminster's historic environment and heritage assets. Consider it useful to strengthen links between this section and urban design, place-making and public realm. Also helpful to establish clear link with proposed Town Centre Design Framework and how this will take account of and promote surviving historic character of the townscape. | Comments are noted. Please refer to Minor Amendment KCA - MA18 |
| Canal & River Trust KCAAPP59 | Paragraph 7.79 | Canal & River Trust welcome the additional wording in paragraph 7.79. The built environment of the waterways represents a unique working heritage. However, the protection and enhancement of the heritage and character of the canals should not include measures which would prevent the waterways potential for being fully unlocked or discourage the use of the waterway network. | Support is noted. |

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| Campaign to Protect Rural England KCAAPP95 | Paragraph 8.1 | <p>This is essentially a drafting point. There are references throughout KCAAP to particular areas. Nothing on the map is objectionable in principle, but the map should refer to the whole document not merely Part B.</p> <p>Place this map as a foldout map in section C, amalgamating it with the map currently there.</p> | <p>Comments are noted.</p> <p>Please refer to Minor Amendment KCA - MA25</p> |
| Horsefair Traders Partnership KCAAPP28 | Paragraph 9.2 | The Council is right to be focusing on an urban village concept for regeneration of this area. We strongly concur with the policy of limiting the size of any new retail business to a maximum of 250sqm. | Noted. |
| Horsefair Traders Partnership KCAAPP29 | Paragraph 9.5 | We support this approach in its ability to deliver a clearly defined 'road map' for regeneration of the area. | Noted. |
| Hussain S KCAAPP40 | Paragraph 9.7 | I fully support the approach that was taken. | Noted. |
| Horsefair Traders Partnership KCAAPP30 | Paragraph 9.11 | <p>We support the policy of a mixed use development for the Churchfields area. A variety of different uses anchored by housing will create a strong sense of community aligning the interests of local residents and businesses.</p> <p>The policy will also hugely benefit the town centre area by creating a complimentary dimension within the central district of Kidderminster.</p> | Noted. |

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| Sidhu A KCAAPP61 | Paragraph 9.11 | I support the mixed use redevelopment of Churchfields with a big focus housing. This will be very good for Kidderminster town centre. | Noted. |
| Sidhu A KCAAPP75 | Paragraph 9.11 | I would like to register my support and agreement with the emerging vision for the Churchfields site. A parallel focus on offices, community facilities and food and drink premises would significantly enhance local employment prospects. | Noted. |
| Horsefair Traders Partnership KCAAPP31 | Paragraph 9.12 | We consider it to be imperative to protect and enhance car parking provision in the Horsefair local centre. The policy should highlight the need maintain the existing car parking provision of 5 short term car parking spaces (adjacent to the public art horse statue) in the Horsefair local centre. In addition, it should be made clear that a designation of Blackwell Street as one way must include enhanced on street short term car parking. | The importance of car parking provision in the Horsefair is noted. Policy KCA.Ch1 Churchfields Masterplan sets out that new development in the Churchfields area will be expected to conform to the overall aims of the Churchfields Masterplan Supplementary Planning Document (SPD). Within the SPD the Churchfields Historic Quadrant section sets out that a new one way link along Blackwell Street is to include pavement widening and on-street parking. Also stated is the intention for a new public car park to be provided in the centre of the area. Please refer to Minor Amendment KCA - MA29 |
| Hussain S KCAAPP41 | Paragraph 9.12 | A sustainable local centre will only be possible if the car parking provision able to meet the needs of local businesses. | The importance of car parking provision in the Horsefair is noted. Policy KCA.Ch1 Churchfields Masterplan sets out that new |

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| | | | development in the Churchfields area will be expected to conform to the overall aims of the Churchfields Masterplan Supplementary Planning Document (SPD). Within the SPD the Churchfields Historic Quadrant section sets out that a new one way link along Blackwell Street is to include pavement widening and on-street parking. Also stated is the intention for a new public car park to be provided in the centre of the area. |
| Sidhu A KCAAPP76 | Paragraph 9.12 | <p>Blackwell Street should be safeguarded against truncation.</p> <p>The designation of Blackwell Street as one way should be combined with an effective scheme of local car parking provision to serve the Horsefair local centre.</p> | <p>Noted, the importance of the traffic flow along Blackwell Street to traders is recognised. Despite this, it would be beyond the scope of the DPD to safeguard Blackwell Street from any future truncation.</p> <p>However, Policy KCA.Ch1 Churchfields Masterplan states that any new development will be expected to conform to the overall aims of the Churchfields Masterplan Supplementary Planning Document. In the supporting text in point 9.12 and 9.13 it states that the proposed highway changes contained in the masterplan have been worked up using specialist transport advice and are considered to be the preferred option. This layout is the starting point and any proposals that deviate from this would need to be fully justified to the satisfaction of the District</p> |

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| | | | <p>Council. This would be the case if any proposal to truncate Blackwell Street were put forward.</p> <p>Similarly, within the SPD the Churchfields Historic Quadrant section sets out that a new one way link along Blackwell Street is to include pavement widening and on-street parking. Also stated is the intention for a new public car park to be provided in the centre of the area.</p> <p>Please refer to Minor Amendment KCA - MA29</p> |
| <p>Horsefair Traders Partnership KCAAPP32</p> | <p>Paragraph 9.13</p> | <p>The truncation of Blackwell Street should be formally discounted due its potential for adversely affecting the vitality and viability of the Horsefair local centre.</p> <p>The policy wording should be amended to include provision to safeguard Blackwell Street from truncation as part of any future proposed highway changes.</p> | <p>Noted, the importance of the traffic flow along Blackwell Street to traders is recognised. Despite this, it would be beyond the scope of the DPD to safeguard Blackwell Street from any future truncation.</p> <p>However, Policy KCA.Ch1 Churchfields Masterplan states that any new development will be expected to conform to the overall aims of the Churchfields Masterplan Supplementary Planning Document. In the supporting text in point 9.12 and 9.13 it states that the proposed highway changes contained in the masterplan have been worked up using specialist transport advice and are considered to be the preferred</p> |

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| | | | option. This layout is the starting point and any proposals that deviate from this would need to be fully justified to the satisfaction of the District Council. This would be the case if any proposal to truncate Blackwell Street were put forward. |
| West Mercia Police KCAAPP139 | Paragraph 9.16 | <p>We welcome and support the confirmation in paragraph 9.16 of the KCAAP that the regeneration of the Churchfields area will require further investment in emergency service facilities. We are grateful to the Council for taking into account our previous representations to the Preferred Options (May 2011) document in this respect.</p> <p>Under the terms of Policy KCA.Ch2, the three high rise tower blocks will be demolished to make way for 100 dwellings. Whilst WMP and HWFRS do not oppose the redevelopment, it will result in the loss of a Police Post that delivers policing services to the entire Churchfields area. We therefore respectfully request that compensatory provision of a new Police Post is provided either within Grasmere Close or in another, mutually acceptable, part of the regeneration scheme</p> <p>The Council should also be aware that a successful regeneration scheme will require the incorporation of measures to prevent and contain fires alongside</p> | <p>Comments are noted and support is welcomed. Officers have considered the responses and have suggested a minor amendment to the plan to refer to community facilities as a whole, as this will protect all uses of this type and not specifically refer to a particular type, as proposed through this representation.</p> <p>Please refer to Minor Amendment KCA - MA26</p> |

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| | | <p>emergency services infrastructure.</p> <p>Unless there is acknowledgment in the KCAAP that the above measures may be required, they will most likely not be incorporated at all to the detriment of the safety of those living and working there. This will in turn harm the effectiveness of the KCAAP in facilitating a successful regeneration scheme.</p> <p>To resolve the issues highlighted in Part 6 of these representations, we request that the following additional text is inserted into paragraph 9.16 of the KCAAP: -</p> <p><i>'The Churchfields Masterplan sets out the priority areas for development contributions which includes off-site highways works, public transport and affordable housing. However, contributions will also be sought for other important infrastructure including education, drainage, infrastructure , emergency services (compensatory provision of a Police Post) and water suppression systems.'</i></p> | |
| West Mercia Police KCAAPP132 | Policy KCA.Ch2 Phase 1 - Grasmere Close | Whilst WMP and HWFRS do not oppose the redevelopment, it will result in the loss of a Police Post that delivers policing services to the entire Churchfields area. We therefore respectfully request that compensatory provision of a new Police Post is provided either within Grasmere Close or in another, | Comments are noted. A Minor Amendment has been suggested to the plan but with slightly different wording to that proposed through this representation. Please refer to Minor Amendment KCA - |

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| | | <p>mutually acceptable, part of the Churchfields regeneration scheme.</p> <p>We therefore suggest the following amendments to Policy KCA.Ch2: -</p> <p><i>Policy KCA.CH2</i> <i>Phase 1 – Grasmere Close</i></p> <p><i>The redevelopment of this area will be expected to include:</i></p> <ul style="list-style-type: none"> • <i>C3 Dwelling House</i> • Community Uses (D1, including Police Post) <p><i>Any new development on this site should:</i></p> <ol style="list-style-type: none"> 1. <i>Provide a strong frontage along Stourbridge Road and Hurcott Road.</i> 2. <i>Provide active frontages and sense of enclosure to all roads within the site.</i> 3. Ensure that compensatory provision is provided for the existing Police Post, if this is not to be retained on site, before considering any future redevelopment. | <p>MA27</p> |

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| | | <p><i>Reasoned Justification</i></p> <p>9.21 The Community Housing Group owns the site, which currently consists of maisonette blocks and a Police Post. It is proposed to redevelop the site with a scheme for more traditional houses. The redevelopment of this site will provide up to 100 dwellings and will provide a more attractive environment.</p> | |
| <p>Sport England KCAAPP33</p> | <p>Policy KCA.Ch4 Phase 2b - Former Sladen School</p> | <p>Re-iterates that Sport England is a statutory consultee for applications affecting areas of playing fields. Draws attention to Sport England's Playing Fields Policy which provides guidance on how Sport England assesses applications and whether compensatory provision is acceptable. Identifies that the Wyre Forest Playing Pitch Strategy identifies the need for replacement playing fields where there is any loss which is consistent with the approach in this policy.</p> | <p>Comments are noted.</p> |
| <p>Horsefair Traders Partnership KCAAPP62</p> | <p>Policy KCA.Ch5 Phase 3a - Churchfields Business Park</p> | <p>A clear statement to safeguard the town centre and Horsefair local centre from an adverse impact by any new retail development.</p> <p>New retail development, particularly in the A1 classification should be made conditional upon a satisfactory retail impact assessment report.</p> | <p>The Reasoned Justification for Policy KCA.Ch8 states the ambition to maintain and enhance the Horsefair's role as a local service centre, and to also not allow development that would have a negative affect on the viability of the town centre.</p> <p>The National Planning Policy</p> |

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| | | | <p>Framework states that when assessing applications for retail development that local planning authorities should require an impact assessment if development is over a proportionate, locally set threshold. If there is no threshold the default is 2,500 sq. m. The District Council considers that a threshold of 250 sq. m. is proportionate for the Horsefair to support and enhance its role as a Neighbourhood Centre. It is not considered that a requirement for any new retail development to produce an impact assessment would be deemed to be proportionate and could restrict the ambitions to enhance the retail area.</p> |
| <p>Sidhu A KCAAPP77</p> | <p>Policy KCA.Ch5 Phase 3a - Churchfields Business Park</p> | <p>Any new retail development of Churchfields should be subject to a retail impact assessment to ensure that it does not adversely affect the vitality or viability of the town centre or Horsefair local centre.</p> | <p>The National Planning Policy Framework states that when assessing applications for retail development that local planning authorities should require an impact assessment if development is over a proportionate, locally set threshold. If there is no threshold the default is 2,500 sq. m. The District Council considers that a threshold of 250 sq. m. is proportionate for the Horsefair to support and enhance its role as a Neighbourhood Centre. It is not considered that a requirement for any new retail development to produce an impact assessment would be deemed to be proportionate and could restrict the ambitions</p> |

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| | | | to enhance the retail area. |
| Sidhu A KCAAPP78 | Paragraph 9.31 | I support the policy to limit any new retail development to units of no larger than 250sqm. This will go some way to preventing any adverse impact on the town centre and Horsefair local centre. | Noted. |
| Horsefair Traders Partnership KCAAPP81 | Policy KCA.Ch6 Phase 3b - Limekiln Bridge | I fully support this policy and recognise the huge potential to capitalise on the appeal of canalside living. There is great potential for a housing development on this site to create a sense of escape from the conventional, urban style of living. | Noted. |
| Horsefair Traders Partnership KCAAPP82 | Paragraph 9.35 | I would support these proposals for Crossley Park. | Noted. |
| Campaign to Protect Rural England KCAAPP86 | Policy KCA.Ch7 Phase 4 - Crossley Park | The policy should additionally require the retention of these links, preferably with an active frontage to them. This should not prevent minor footpath diversions. The site boundary should be the river bank, to ensure that a small area of land is not left isolated between the site boundary and the river. Add a further paragraph iv: iv. Enjoy a positive relationship, preferably with an active frontage, to the paths at the northern end of the site. | Comments are noted. However, as pointed out in the representations, the paths in question are not registered public footpaths and therefore their retention through policy is not considered to be appropriate. The boundary is considered to be appropriate and would constitute the area where potential development could be located, which would not be immediately adjacent to the river bank. |
| Environment | Policy KCA.Ch7 | The Sequential Testing (Flooding) report should be | The draft sequential test has also been used to |

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| Agency KCAAPP100 | Phase 4 - Crossley Park | <p>finalised and published so that it can be viewed and commented on. It should be clear how the report has been used to inform and support the policy, site allocations (Sequential Approach) and deliverability of the plan, providing transparency and a clear link to the evidence base. The flood risk sequential approach must be fully utilised in selecting sites for development and the appropriate type of development in considering flood risk vulnerability. Upon receipt of this document we would be able to comment further and update our position.</p> <p>Subject to the above, the inclusion of policy wording on flood risk should be detailed within policy KCA.Ch7, and/or the site boundary altered, so that it is clear that only a small area of the site is likely to be developable.</p> <p>In relation to contaminated land and the environmental constraints associated with this site, as a minimum the following policy wording is recommended for KCA.Ch7:</p> <p>‘New development should demonstrate appropriate remediation, building and drainage design in order to deal with any contaminated land and to protect the water environment.’</p> | <p>develop the plan; this document has helped to justify the site selection process.</p> <p>These documents will be circulated to the Environment Agency for their comment.</p> <p>Please refer to Minor Amendment KCA - MA28</p> |
| Horsefair Traders | Paragraph 9.44 | We support this approach to highlight the | Noted. |

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| Partnership KCAAPP63 | | significance of the Horsefair as an historic gateway to Kidderminster. | |
| Hussain S KCAAPP42 | Paragraph 9.45 | I fully support the renovation/refurbishment of properties in the Horsefair to improve the overall appearance of this vital local centre. | Noted. |
| Hussain S KCAAPP43 | Policy KCA.Ch8 Horsefair | I support every aspect of this policy. | Noted. |
| Sidhu A KCAAPP60 | Policy KCA.Ch8 Horsefair | I fully support all aspects of this policy directive. | Noted. |
| Horsefair Traders Partnership KCAAPP64 | Policy KCA.Ch8 Horsefair | Blackwell Street should be protected from any form of truncation. If Blackwell Street is designated as one-way then short stay, on street car park provision must be made along Blackwell Street and Horsefair. The existing car parking provision of 5 short stay parking spaces on the Horsefair triangle (adjacent to public art horse statue) should be retained | Noted, the importance of the traffic flow along Blackwell Street to traders is recognised. Despite this, it would be beyond the scope of the DPD to safeguard Blackwell Street from any future truncation. However, Policy KCA.Ch1 Churchfields Masterplan states that any new development will be expected to conform to the overall aims of the Churchfields Masterplan Supplementary Planning Document. In the supporting text in point 9.12 and 9.13 it states that the proposed highway changes contained in the masterplan have been worked up using specialist transport advice and are considered to be the preferred option. This layout is the starting point and any proposals that deviate from this would need to |

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| | | | <p>be fully justified to the satisfaction of the District Council. This would be the case if any proposal to truncate Blackwell Street were put forward.</p> <p>Similarly, within the SPD the Churchfields Historic Quadrant section sets out that a new one way link along Blackwell Street is to include pavement widening and on-street parking. Also stated is the intention for a new public car park to be provided in the centre of the area.</p> <p>Please refer to Minor Amendment KCA - MA29</p> |
| <p>England & Lyle KCAAPP73</p> | <p>Policy KCA.Ch8 Horsefair</p> | <p>We support this policy and in particular the proposal to limit new retail development to a maximum of 250 sq.m. (net) per unit.</p> <p>We support the views of the Horsefair Traders Partnership that it is important to retain the existing provision of 5 short term car parking spaces on the Horsefair triangle area. Also, if Blackwell Street is to be designated as one-way then some form of short term on-street car parking provision along Blackwell Street and Horsefair must be incorporated within any such scheme.</p> | <p>Noted and support welcomed.</p> |
| <p>Sidhu A</p> | <p>Policy KCA.Ch8</p> | <p>I would like to support the policy approach to toward</p> | <p>Noted.</p> |

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| KCAAPP79 | Horsefair | the Horsefair local centre. The Horsefair has great potential to become a shopping destination not only for local residents but also for people who live outside the local area. | |
| Campaign to Protect Rural England KCAAPP85 | Policy KCA.EG1 Comberton Hill Area | <p>Policy EG section is unsound in its overall structure. Since they are separated by the Ring Road, it is unsatisfactory to deal with Comberton Hill and the rest of the Eastern Gateway as a single area; they are essentially disparate, and so should not be covered together. Comberton Hill is a secondary Retail Area with other adjacent uses. The intra Ring Road area is a town centre fringe area.</p> <p>Split out Policies EG1-4 into a Comberton Hill Section, so that only the EG5-8 form the Eastern Gateway section.</p> | Comments are noted. However, it is considered that this section looks at the Eastern Gateway in a holistic sense and the connections between Comberton Hill and Bromsgrove Street and considered to be important for the future development of the town; especially as the two could link passengers from the Railway Station into the town. The sites are subsequently split into individual policies and it is considered that this approach is appropriate. |
| Campaign to Protect Rural England KCAAPP89 | Policy KCA.EG1 Comberton Hill Area | <p>Policy: unsound: not effective or not positive enough</p> <ol style="list-style-type: none"> 1. Small scale medical uses (such as doctors, dentists, and physiotherapists) should be permissible both within and beyond the retail frontage. 2. The boundary of the area should be altered to bring the Harriers Industrial Estate within it. Its exclusion from area EG1 and KCAAP generally | <p>Comments are noted. Taking each of these in turn:</p> <ol style="list-style-type: none"> 1. It is considered tha the policy allows for these uses to be brought forward, as identified by criteria v. 2. The Harriers Industrial Estate is zoned for residential use and has received planning permission for this use, it is anticipated that this site will come forward for development and is |

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| | | seems illogical. | not considered necessary to be included within the KCAAP. |
| Sidhu A KCAAPP80 | Policy KCA.EG1 Comberton Hill Area | I support this policy and I believe it is the best way forward to improve the Comberton Hill area in the future. | Noted. |
| Campaign to Protect Rural England KCAAPP90 | Policy KCA.EG2 Kidderminster Railway Station | <p>Since the policy is encouraging links between the Network Rail and SVR systems, it would be better to have one policy covering both stations.</p> <ol style="list-style-type: none"> 1. Mainly a boundary change, so that the boundary covers both stations, their associated car parks and what appear to be the Severn Valley Railway engine sheds. Furthermore, it is probably desirable to include the adjacent railway tracks, so that the present edge of the platform is not an artificial barrier. 2. The heading should have "stations" (plural), since there are two of them. | Comments are noted. However, this policy is specifically to cover the mainline station. This is because it is anticipated that redevelopment of the station will occur over the lifetime of the plan. The reference to linking to the SVR is a valid consideration for any redevelopment of the mainline station, and this is why it is included in the policy. As indicated at 10.12, other policies cover the protection and development of the SVR and therefore it is considered appropriate to retain the boundary as currently drawn. |
| Kidderminster Civic Society KCAAPP7 | Policy KCA.EG4 | Supports the replacement of subways with surface level crossings because it would greatly improve the Eastern Gateway and provide a user friendly entrance to the town. | Support is welcomed. |
| Wilcox N | | Supports improving pedestrian access to the town | Comments are noted. Any detailed design of a |

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| KCAAPP11 | Policy KCA.EG4 | centre and reducing subways however feels that Kidderminster does not need any more traffic lights. Suggests a solution which allows pedestrians to be above the traffic and cites Paradise Circus, Birmingham as an example of this. | scheme to replace the subways with another alternative will need to take into account cost as well as traffic flow. Examples from other areas are always worth considering. More detailed consideration of this aspect of the plan will be assessed through work on the Kidderminster Town Centre Design Framework |
| Shuttes J KCAAPP52 | Paragraph 10.20 | The proposals in this element of the Policy has the probability of splitting the town in two. The topography does not encourage walking between the West side and this location across the traditional shopping street. These traditional locations will suffer as the new larger retail locations will overpower the smaller traders leaving a no mans land. This also conflicts with the master plan for a supermarket in clause 10.30 that has been pushed hard by the Politicians. | Comments are noted. Paragraphs 10.20 and 10.30 refer to the same site where it is possible to accommodate a large supermarket. As part of these proposals the links between this site and the traditional town centre would need to be significantly improved to attract people to make the journey into the town centre. |
| Arrowcroft Services Ltd KCAAPP20 | Policy KCA.EG5 Phase 1: Bromsgrove Street Area | Proposals KCA.EG5 and KCA.EG6 should be amalgamated, and consideration should also be given to including proposals KCA.EG7. | The wider Eastern Gateway area contains a number of distinct development opportunities covered by policies EG.1 to EG.8. Whilst there will inevitably be an interplay between the various elements, it is considered that the distinct areas can be delivered separately. This can be achieved in a way that ensures each development is complementary without requiring wholesale comprehensive redevelopment. That [comprehensive |

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| | | | redevelopment] would itself be likely to undermine the certainty and deliverability of the plan within reasonable timescales. The LPA considers it would likely do this by increasing the complexity and potentially harming the viability of development proposals in the short/ medium term. As worded the Plan seeks to encourage a phased programme approach which ensures a delivery focus |
| Campaign to Protect Rural England KCAAPP91 | Policy KCA.EG5 Phase 1: Bromsgrove Street Area | <p>Paragraphs 10.29-30 Unsound: not effective</p> <ol style="list-style-type: none"> 1. Kidderminster already has at least three edge-of-centre supermarkets. We cannot believe another is needed, unless one relatively remote from the town centre is to be relocated to this site. 2. The boundary adjoining Worcester Street and Prospect Hill is unduly sinuous. Wording should be added to allow adjustments to the precise site boundaries. 3. We have no objection to the rest of the policy. | Comments are noted. With regard to the 'need' for another supermarket within Kidderminster, this test no longer applies in planning policy. An operator is not required to demonstrate need, but instead must pass sequential and impact tests. In terms of the boundary, it is considered appropriate to remain as currently drafted, as the sites identified are where new development is likely to occur. Links from the site to other areas will be an important consideration and these design principles are picked up in the Part A policies of the KCAAP. |
| Kidderminster Civic Society KCAAPP119 | Policy KCA.EG5 Phase 1: Bromsgrove Street Area | Would like to see the retention of the former Law Courts, Worcester Street and provides some history relating to the building. Accepts that the retention of the frontage as per the policy is an acceptable | Comments are noted. |

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| | | solution. | |
| Sport England KCAAPP34 | Paragraph 10.28 | The above paragraph refers to the intended closure of the Glades Leisure Centre. Sport England wishes to stress the importance of ensuring that any replacement leisure centre is as good as or better than the existing centre and must be provided before the existing centre is closed. This requirement is reinforced by the policy set out in paragraph 74 of the National Planning Policy Framework. | Comments are noted. The District Council is in the process of securing improved provision to replace current facilities at Wyre Forest Glades. |
| Shuttes J KCAAPP53 | Paragraph 10.30 | Fells that the masterplan is inappropriate because decked parking does not work in terms of making the store look busy without making it look difficult to find a parking space. Concern that if the store has a non-food area and a filling station it will become a destination in itself detracting from the town centre. | Comments are noted however, there is a need for parking at the site to be decked in order to maximise the available space and other examples of town centre supermarkets use this model. |
| England & Lyle KCAAPP74 | Paragraph 10.30 | Although the AAP suggests how a major supermarket development could be accommodated on the Bromsgrove Street site, with adjacent surface car parking, a more intensive layout with multi-level parking could provide the opportunity for redevelopment for comparison retail floorspace in addition to a major supermarket. | Noted. The Supermarket Feasibility Study was undertaken as an exercise into whether a supermarket development could feasibly be delivered on the site. It was not intended to provide the definitive layout of any future development. Further negotiations with any prospective developers will help to determine the future arrangement. |
| Shuttes J | Western Gateway | The proposed link to Park Street is creditable. The | Comments are noted. The 3D illustration is |

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| KCAAPP65 | | potential as a "specialist area" with the possible links seems to work. Unfortunately the 3D illustrative scheme does the proposal no service as it shows features that the topography will make difficult particularly on the West side of Park Street. The land behind Rock Works is significantly above Park Street. | indicative only. |
| Campaign to Protect Rural England KCAAPP88 | Policy KCA.WG3 Weavers Wharf | <p>In general we support the policy. Our only concern is with the relationship between Weavers Wharf and the canal, which the Council should take any opportunity to enhance, not merely that of "new development".</p> <p>The solution is for the Council to negotiate the opening of gateways from adjoining land on to the towing path to make it a natural route between retail sites near the canal.</p> <p>Additional wording is required, encouraging the opening accesses between the canal and the retail area. This ought to be able to provide an alternative pedestrian and cycle route to these recent retail developments and the town centre generally.</p> | Comments are noted. However, it is considered that the wording included at criteria i, vi, ix and x all seek to achieve this aim. Further detail on potential development would need to be considered at a planning application stage. |
| Shuttes J KCAAPP66 | Castle Wharf | This section seems to confuse particularly when read with parts of section 15 as it talks of regeneration introducing limited shopping. This could, due to its location in the road system, become | Comments are noted. Retail would be limited to small scale specialist retailing fitting the nature of the manufacturing and sales currently in the area. |

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| | | <p>an edge of town shopping destination on its own particularly when read as part of the potential complex outlined in clauses 15.7 to 10.</p> | |
| <p>Environment Agency KCAAPP101</p> | <p>Policy KCA.CW1 Castle Wharf</p> | <p>The location and industrial history of the area means that there is a high potential for ground/water contamination issues that will need to be considered and addressed. We welcome the reference to this in paragraph 12.4. There is a typo in the last sentence of paragraph 12.4 which refers to our G3 guidance - this should be GP3. We welcome the reference to this document.</p> <p>Notwithstanding the above, 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. The level of desk study, and if necessary, site investigation and remediation will be high.</p> <p>We would recommend that wording is added to policy KCA.CW1 as follows:</p> <p>x. Take full account of the Groundwater Source Protection Zone that exists within this area, in safeguarding groundwater supply.</p> <p>Reasoned Justification:</p> | <p>Comments are noted.</p> <p>Please refer to Minor Amendment KCA - MA38</p> |

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| | | <p>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: Policy 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.</p> | |
| <p>Shuttes J KCAAPP67</p> | <p>Crossley Park and Mill Street</p> | <p>Concern that the vision will not be achievable because of the dominance of other retail centres such as Merry Hill and Worcester. The centre needs to be more vibrant and more easily accessible. Ludlow and Malvern are currently taking shoppers from Kidderminster because of their environments.</p> <p>In conclusion this document needs I feel a thorough review as time has overtaken the authors ideas and the piecemeal updating is showing in some level of contradiction.</p> | <p>Comments are noted however it is considered that the vision and development sites set out are deliverable.</p> |
| <p>Kidderminster Civic Society KCAAPP8</p> | <p>Traditional Town Centre</p> | <p>Supports section 14, the old town needs investment to make it more attractive to residents and visitors and improve its viability. New development should be high quality to enhance the conservation areas</p> | <p>Support is noted.</p> |

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| | | and listed buildings. | |
| Kidderminster Civic Society KCAAPP9 | Policy KCA.HP1 Heritage Processions Area | Supports the protection of Green Street, New Road and Dixon Street and the requirement for new development in these areas to be high quality to complement the existing conservation area. | Support is welcomed. |
| Environment Agency KCAAPP102 | Policy KCA.HP1 Heritage Processions Area | <p>We support the inclusion of paragraph 15.4, acknowledging the area's industrial history and the high potential for ground/water contamination issues. In light of this, we would recommend the inclusion of a reference within the policy wording as follows:</p> <p>'New development should incorporate appropriate remediation, building and drainage design in order to deal with any contaminated land and to protect the water environment.'</p> <p>There is a typo in the last sentence of paragraph 15.4 which refers to our G3 guidance - this should be GP3. We welcome the reference to this document.</p> | <p>Comments are noted and support is welcomed.</p> <p>Please refer to Minor Amendment KCA - MA41</p> |
| WM Morrison Supermarkets Plc KCAAPP113 | Policy KCA.HP1 Heritage Processions Area | <p>We therefore suggest that the following text is deleted:</p> <p><i>"A mix of uses in this area will be promoted, including:</i></p> | <p>This list of uses is not exhaustive but suggests a number of suitable uses based of policies contained within Part A of the document such as KCA.DPL1 Sites for Housing and KCA.GPB5 Employment Development. Additional uses may be acceptable providing</p> |

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| | | <ul style="list-style-type: none"> • <i>C1 Hotel</i> • <i>C2 Residential Institutions</i> • <i>C3 Residential</i> • <i>B1 (a) Office</i> • <i>B1(c) Light industrial</i> • <i>D1 Non-residential Institutions"</i> <p>And replaced with the following: "A mix of uses will be promoted in this area appropriate to the edge-of-centre location".</p> | they meet all other relevant Local Development Framework policies. |
| Environment Agency KCAAPP103 | Policy KCA.HP2 Frank Stone | <p>We support the inclusion of point ii of policy KCA.HP2 and paragraph 15.13 for new development to contribute to the improvement of the riverside environment and enhancement of the green infrastructure.</p> <p>We acknowledge that the policy looks to retain the existing building frontage. There is an extension structure, which does not appear to be in keeping with the adjacent façade, built over the bank of the River Stour on the site. We would wish to see this structure removed and any new development to be set further back from the bank of the River Stour, in line with policy KCA.UP6 (River Stour). We would welcome the inclusion of a specific reference to the above in paragraph 15.13.</p> | Comments are noted. It is the ambition of the policy only to retain the facade of the building and it is agreed that the extensions to the rear should be removed as part of any redevelopment. |

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| WM Morrison Supermarkets Plc KCAAPP114 | Policy KCA.HP2 Frank Stone | <p>We therefore suggest that the following is deleted :</p> <p><i>"On the Frank Stone site the following uses will be acceptable:</i></p> <ul style="list-style-type: none"> • <i>C3 Residential</i> • <i>B1a Office</i> • <i>B1c Light Industrial</i> • <i>D1 Non-residential Institutions"</i> <p>And replaced with the following: "The Frank Stone site will be suitable for a range of commercial or residential uses".</p> | <p>This list of uses is not exhaustive, however, any proposal will be expected to meet all other relevant Local Development Framework policies.</p> |
| Environment Agency KCAAPP104 | Policy KCA.HP3 Green Street Depot | <p>We fully support the inclusion of point vi. in this policy, for any redevelopment of the site to take full account of the groundwater Source Protection Zone, and welcome the explanation provided in paragraph 15.18 of the reasoned justification, in safeguarding the water environment. We would suggest minor additions to the wording as follows (shown in bold), in providing further clarification:</p> <p>Policy: vi. Take full account of the Groundwater Source Protection Zone that exists within this area, in safeguarding groundwater supply.</p> <p>Paragraph 15.18:</p> | <p>Comments are noted and support is welcome.</p> <p>Please refer to Minor Amendment KCA - MA42</p> |

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| | | In addition to control of land use, drainage and building design (i.e. foundations) , tight control of the investigation... | |
| Environment Agency KCAAPP105 | Policy KCA.HP4 Bus Depot | <p>The Bus Depot site is located within a similar environmental setting to the Green Street Depot site (policy KCA.HP3). These sites are located in very close proximity to a public water supply pumping station, within the inner Source Protection Zone and are therefore located in an extremely sensitive location.</p> <p>The above matter is covered within the policy for Green Street Depot but not for the Bus Depot site. Therefore we would recommend that similar wording is added to policy KCA.HP4 as follows:</p> <p>Policy: iv . <i>Take full account of the Groundwater Source Protection Zone that exists within this area, in safeguarding groundwater supply.</i></p> <p>Reasoned Justification: <i>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: Policy and Practice (GP3) document. In</i></p> | <p>Comments are noted.</p> <p>Please refer to Minor Amendment KCA - MA38</p> |

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| | | <i>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.</i> | |
| Worcestershire County Council KCAAPP126 | Monitoring and Implementation Framework | <p>No identification of delivery agencies in the Monitoring & Implementation section, however they are identified within the Core Strategy.</p> <p>Suggests incorporating table 16.6 from the KCAAP into the Monitoring and Implementation section.</p> <p>Not clear why all KCAAP policies have not been included under the table entitled relevant core strategy policies as they are relevant.</p> | <p>These comments are noted.</p> <p>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>Expand 'Relevant Core Strategy Policies' table and 'Relevant policies from Site Allocations and Policies DPD' table to incorporate all KCAAP policies.</p> <p>Please refer to Minor Amendment KCA - MA43</p> |
| Campaign to Protect Rural England KCAAPP83 | Policies to be Replaced | The same objection relates to both Appendix B of SALP and Appendix B of KCAAP Will the adoption of WFCS and both documents result in all policies in the 2004 Local Plan and WCSP being replaced with the possible exception of the Mineral and Waste | Comments are noted. Although the intention of the representation is agreed with, it is considered that the schedule remains as drafted. This is because the Adopted Local Plan has been replaced by a suite of |

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| | | provisions (where the County is the Planning Authority)? If so, they should say so. If not, SALP should contain a schedule of policies which will survive. | documents and not a singular plan. Therefore, the schedule identifies what elements have been replaced, in the same way the Adopted Core Strategy has. |
| WM Morrison Supermarkets Plc KCAAPP112 | Maps | We suggest that the boundary of the Primary Shopping Area is amended to include the Morrisons store at Green Street. | The Primary Shopping Area has been defined in order to concentrate retail activity and footfall and contribute to creating a more viable town centre. It is not intended to stretch the PSA too wide and thus risk diluting retail activity in the town and undermining the centre. The District Council considers that the site of the Morrisons store be appropriate as an edge-of-centre location. |