



Wyre Forest District Council

Representations made to the

**Pre-Submission Publication Version of the
Kidderminster Central Area Action Plan DPD**

**In accordance with Regulation 20 (2) of The Town and Country
Planning (Local Planning)(England) Regulations 2012**

October 2012



Kidderminster Central Area Action Plan DPD Pre Submission Publication Version - Index of Responses (October 2012)

Respondent	Response No	Part of Document	Page
Arrowcroft Services Ltd	KCAAPP12	Policy KCA.GPB1.Retail Development	1
	KCAAPP13	5.1.Paragraph	
	KCAAPP19	Policy KCA.GPB7.Leisure Development	
	KCAAPP20	Policy KCA.EG5.Phase 1: Bromsgrove Street Area	
Campaign to Protect Rural England	KCAAPP68	.Kidderminster Central Area Action Plan Publication (July 2012)	18
	KCAAPP92	Policy KCA.GPB2.Primary and Secondary Shopping Frontages	
	KCAAPP93	Policy KCA.GPB4.Edge-of-Centre and Out-of-Centre Retailing	
	KCAAPP94	Policy KCA.GPB7.Leisure Development	
	KCAAPP87	Policy KCA.CC1.Sustainable Transport	
	KCAAPP84	Policy KCA.UP1.Urban Design Key Principles	
	KCAAPP95	8.1.Paragraph	
	KCAAPP86	Policy KCA.Ch7.Phase 4 - Crossley Park	
	KCAAPP85	Policy KCA.EG1.Comberton Hill Area	
	KCAAPP89	Policy KCA.EG1.Comberton Hill Area	
	KCAAPP90	Policy KCA.EG2.Kidderminster Railway Station	
	KCAAPP91	Policy KCA.EG5.Phase 1: Bromsgrove Street Area	
	KCAAPP88	Policy KCA.WG3.Weavers Wharf	
	KCAAPP83	B.Policies to be Replaced	
Canal & River Trust	KCAAPP54	6.2.Paragraph	60
	KCAAPP55	7.5.Paragraph	
	KCAAPP57	7.53.Paragraph	
	KCAAPP56	7.57.Paragraph	
	KCAAPP58	7.58.Paragraph	
	KCAAPP59	7.79.Paragraph	
England & Lyle	KCAAPP71	Policy KCA.DPL2.Mixed Use Development	72
	KCAAPP70	Policy KCA.GPB1.Retail Development	
	KCAAPP72	Policy KCA.GPB4.Edge-of-Centre and Out-of-Centre Retailing	
	KCAAPP73	Policy KCA.Ch8.Horsefair	
	KCAAPP74	10.3.Paragraph	
English Heritage	KCAAPP21	Policy KCA.GPB1.Retail Development	82
	KCAAPP22	Policy KCA.UP1.Urban Design Key Principles	
	KCAAPP23	Policy KCA.UP2.Public Realm	

Kidderminster Central Area Action Plan DPD Pre Submission Publication Version - Index of Responses (October 2012)

Respondent	Response No	Part of Document	Page
English Heritage	KCAAPP24	Policy KCA.UP3.Ring Road Framework	82
	KCAAPP25	Policy KCA.UP4.Ring Road Character Areas	
	KCAAPP26	Policy KCA.UP5.Staffordshire and Worcestershire Canal	
	KCAAPP27	7.73.Paragraph	
Environment Agency	KCAAPP98	1.17.Paragraph	85
	KCAAPP111	2.5.Paragraph	
	KCAAPP110	2.6.Paragraph	
	KCAAPP96	5.44.Paragraph	
	KCAAPP97	6.4.Paragraph	
	KCAAPP99	6.6.Paragraph	
	KCAAPP106	Policy KCA.UP1.Urban Design Key Principles	
	KCAAPP107	Policy KCA.UP2.Public Realm	
	KCAAPP108	Policy KCA.UP5.Staffordshire and Worcestershire Canal	
	KCAAPP109	Policy KCA.UP6.River Stour	
	KCAAPP100	Policy KCA.Ch7.Phase 4 - Crossley Park	
	KCAAPP101	Policy KCA.CW1.Castle Wharf	
	KCAAPP102	Policy KCA.HP1.Heritage Processions Area	
	KCAAPP103	Policy KCA.HP2.Frank Stone	
	KCAAPP104	Policy KCA.HP3.Green Street Depot	
KCAAPP105	Policy KCA.HP4.Bus Depot		
Horsefair Traders Partnership	KCAAPP14	4.2.Paragraph	142
	KCAAPP15	4.9.Paragraph	
	KCAAPP16	4.17.Paragraph	
	KCAAPP17	5.6.Paragraph	
	KCAAPP18	Policy KCA.GPB1.Retail Development	
	KCAAPP28	9.2.Paragraph	
	KCAAPP29	9.5.Paragraph	
	KCAAPP30	9.11.Paragraph	
	KCAAPP31	9.12.Paragraph	
	KCAAPP32	9.13.Paragraph	
	KCAAPP62	Policy KCA.Ch5.Phase 3a - Churchfields Business Park	
	KCAAPP81	Policy KCA.Ch6.Phase 3b - Limekiln Bridge	

Kidderminster Central Area Action Plan DPD Pre Submission Publication Version - Index of Responses (October 2012)

Respondent	Response No	Part of Document	Page
Horsefair Traders Partnership	KCAAPP82	9.35.Paragraph	142
	KCAAPP63	9.44.Paragraph	
	KCAAPP64	Policy KCA.Ch8.Horsefair	
Hussain S	KCAAPP40	9.7.Paragraph	172
	KCAAPP41	9.12.Paragraph	
	KCAAPP42	9.45.Paragraph	
	KCAAPP43	Policy KCA.Ch8.Horsefair	
Kidderminster Civic Society	KCAAPP10	.Kidderminster Central Area Action Plan Publication (July 2012)	179
	KCAAPP2	Policy KCA.DPL2.Mixed Use Development	
	KCAAPP3	5.13.Paragraph	
	KCAAPP4	.Tourism	
	KCAAPP6	7.24.Paragraph	
	KCAAPP5	7.5.Paragraph	
	KCAAPP7	Policy KCA.EG4.	
	KCAAPP119	Policy KCA.EG5.Phase 1: Bromsgrove Street Area	
	KCAAPP8	14.Traditional Town Centre	
KCAAPP9	Policy KCA.HP1.Heritage Processions Area		
Natural England	KCAAPP118	.Kidderminster Central Area Action Plan Publication (July 2012)	182
	KCAAPP116	.Kidderminster Central Area Action Plan Publication (July 2012)	
	KCAAPP117	.Kidderminster Central Area Action Plan Publication (July 2012)	
	KCAAPP115	.Kidderminster Central Area Action Plan Publication (July 2012)	
Shuttles J	KCAAPP37	2.5.Paragraph	185
	KCAAPP38	4.2.Paragraph	
	KCAAPP39	4.8.Paragraph	
	KCAAPP44	4.17.Paragraph	
	KCAAPP45	5.1.Paragraph	
	KCAAPP46	5.13.Paragraph	
	KCAAPP47	5.24.Paragraph	
	KCAAPP48	5.3.Paragraph	
	KCAAPP49	5.43.Paragraph	
	KCAAPP50	6.Adapting to and Mitigating Against Climate Change	
	KCAAPP51	6.22.Paragraph	

Kidderminster Central Area Action Plan DPD Pre Submission Publication Version - Index of Responses (October 2012)

Respondent	Response No	Part of Document	Page
Shuttes J	KCAAPP52	10.2.Paragraph	185
	KCAAPP53	10.3.Paragraph	
	KCAAPP65	11.Western Gateway	
	KCAAPP66	12.Castle Wharf	
	KCAAPP67	13.Crossley Park and Mill Street	
Sidhu A	KCAAPP75	9.11.Paragraph	190
	KCAAPP61	9.11.Paragraph	
	KCAAPP76	9.12.Paragraph	
	KCAAPP77	Policy KCA.Ch5.Phase 3a - Churchfields Business Park	
	KCAAPP78	9.31.Paragraph	
	KCAAPP60	Policy KCA.Ch8.Horsefair	
	KCAAPP79	Policy KCA.Ch8.Horsefair	
	KCAAPP80	Policy KCA.EG1.Comberton Hill Area	
Sport England	KCAAPP33	Policy KCA.Ch4.Phase 2b - Former Sladen School	206
	KCAAPP34	10.28.Paragraph	
The Theatres Trust	KCAAPP36	Policy KCA.GPB7.Leisure Development	208
Western Power Distribution	KCAAPP1	.Kidderminster Central Area Action Plan Publication (July 2012)	211
West Mercia Police	KCAAPP138	1.17.Paragraph	213
	KCAAPP142	2.5.Paragraph	
	KCAAPP140	2.6.Paragraph	
	KCAAPP131	.Housing	
	KCAAPP133	Policy KCA.DPL2.Mixed Use Development	
	KCAAPP134	Policy KCA.GPB6.Tourism Development	
	KCAAPP135	Policy KCA.GPB7.Leisure Development	
	KCAAPP141	7.4.Paragraph	
	KCAAPP136	Policy KCA.UP1.Urban Design Key Principles	
	KCAAPP137	Policy KCA.UP5.Staffordshire and Worcestershire Canal	
	KCAAPP139	9.16.Paragraph	
	KCAAPP132	Policy KCA.Ch2.Phase 1 - Grasmere Close	
	Wilcox N	KCAAPP11	
WM Morrison Supermarkets Plc	KCAAPP113	Policy KCA.HP1.Heritage Processions Area	389
	KCAAPP114	Policy KCA.HP2.Frank Stone	

Kidderminster Central Area Action Plan DPD Pre Submission Publication Version - Index of Responses (October 2012)

Respondent	Response No	Part of Document	Page
WM Morrison Supermarkets Plc	KCAAPP112	C.Maps	389
Wolverley & Cookley Parish Council	KCAAPP69	.Kidderminster Central Area Action Plan Publication (July 2012)	391
Worcestershire County Council	KCAAPP120	.Kidderminster Central Area Action Plan Publication (July 2012)	392
	KCAAPP121	.Kidderminster Central Area Action Plan Publication (July 2012)	
	KCAAPP123	.Kidderminster Central Area Action Plan Publication (July 2012)	
	KCAAPP124	Policy KCA.PFSD1.Presumption in Favour of Sustainable Development	
	KCAAPP125	6.Adapting to and Mitigating Against Climate Change	
	KCAAPP122	.Sustainable Transport	
	KCAAPP127	Policy KCA.UP7.Green Infrastructure	
	KCAAPP128	7.68.Paragraph	
	KCAAPP129	7.7.Paragraph	
	KCAAPP130	7.71.Paragraph	
	KCAAPP126	16.Monitoring and Implementation Framework	
Worcestershire Wildlife Trust	KCAAPP35	.Kidderminster Central Area Action Plan Publication (July 2012)	404

Response to Consultation on:

Kidderminster Central Area Action Plan Development Plan Document (DPD) Site Allocations and Policies Development Plan Document Kidderminster Central Area Action Plan Proposals Map (First Draft)

6 September 2012

1. Introduction

These representations have been prepared on behalf of Arrowcroft Services Ltd ('Arrowcroft') as agent on behalf of the Receiver of the former Woolworths' store at 1 Worcester Street, Kidderminster DY10 2EB. That site is located between the prime shopping pitch of Kidderminster town centre and the Bromsgrove Street car park. The Bromsgrove Street car park is a major development opportunity in the town centre.

Arrowcroft has been established as a real estate investor and developer for more than forty years and is securely and independently financed, having foreseen the downturn and sold a significant proportion of its portfolio in the period 2005-2007. It has undertaken many significant investment and development projects in the past but has no current development exposure, having withdrawn from the development market before the market deteriorated. Nevertheless, it continues to progress development opportunities in anticipation of market recovery and has a strong track record of working in partnership with local planning authorities to deliver successful developments in the public interest.

Arrowcroft thanks the Council for the invitation extended to it (by way of letter to Montagu Evans dated 20 July 2012) to become involved in the Local Development Plan formulation process.

Arrowcroft strongly supports the Council's aims expressed in the draft Kidderminster Central Area Action Plan Development Plan Document ('KCAAP') to bring forward a significant programme of sustainable regeneration on previously-developed land with the aim of creating a prosperous town. Arrowcroft welcomes the aim to develop Kidderminster as the strategic centre of the District and beyond, and in particular the aim to facilitate the creation of a new retail anchor for the Worcester Street / Bromsgrove Street area.

Arrowcroft also supports the general aims of the Site Allocations and Policies Development Plan Document ('SAPDPD').

Arrowcroft respectfully requests, however, that a number of changes be made to the draft KCAAP, the SAPDPD, and the related proposals map as follows.

2. Proposed Changes to the Draft Kidderminster Central Area Action Plan

Paragraph 5.8 and KCA.GPB1

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.

Paragraphs 5.10 and 5.15

To help address the apparent decline of the eastern side of the town centre, the District Council is seeking to encourage new retail development in the Eastern Gateway to increase pedestrian footfall to the eastern side of the town. Paragraph 5.10 says that it is envisaged that this could involve a

major new retail store in Bromsgrove Street leading to Worcester Street via the former Magistrates' Court site, step entry and / or premises fronting Worcester Street.

Paragraph 5.15 then notes that consolidating retail facilities within a tighter geographical area of the town will help to concentrate footfall and will contribute to creating a more viable centre and an improvement in the attractiveness of Kidderminster as a shopping destination.

We consider that, in isolation, a link through the Magistrates' Court site would be too distant from the existing shopping focus of the town centre and could therefore prejudice the success of development of the Eastern Gateway and the aim to concentrate footfall. Whilst it would be desirable to bring the Magistrates' Court site back into economic use, it is unlikely that this would be a desirable location for major retailers. Instead, a preference should be expressed for a primary link in the vicinity of the former Woolworths and Littlewoods units in order to maximise the potential for generating west-east footfall across the town centre. Any link should be accessible to all members of the community and therefore a step-only access would not be satisfactory.

A strong, direct pedestrian linkage between a new anchor store and the prime shopping area at the junction of Worcester Street and High Street will deliver new pedestrian flow to sustain and improve the performance of retail activities at that very point, and will also attract restaurants and a cinema operator to add vitality.

The concentration of footfall at the Worcester Street and High Street junction will also assist in encouraging future capital investment in the regeneration of the Swan Centre, a major asset which is in great need of rejuvenation.

Such a link would be consistent with proposed **Policy KCA.CC2** which aims to create a walkable town centre by providing simple and direct routes that are visually and physically well-connected.

On the other hand, we consider that if there was only a link through the Magistrates' Court site or a step-only link, then this would be contrary to that aim and would result in inconsistent and ineffective policies in the AAP, rendering this proposed policy unsound.

Policy KCA.GPB7

This draft policy favours major new D2 leisure and multiple-unit A3 and A4 food and drink developments in the waterside environments of the Western Gateway area. It also says that elsewhere in the KCAAP area, smaller-scale proposals will be considered favourably subject to them meeting the broad objectives of the KCAAP.

A mixed-use development in the Eastern Gateway area, however, also presents an opportunity to improve the breadth of uses in the town centre and thus the vibrancy of the town centre throughout the day, consistent with the aims for town centres in the NPPF.

Proposed **Policy KCA.GPB7** is therefore too restrictive. 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.

Eastern Gateway

Arrowcroft strongly supports the Council's broad aims to encourage investment in, and regeneration of, the Eastern Gateway which is a gateway to Kidderminster town centre. We consider that the regeneration of Bromsgrove Street should be highlighted as a high priority for the central area of Kidderminster to counter-balance the function of Weavers' Wharf.

Arrowcroft supports the Council's aim to connect the historic core of Kidderminster town centre with the National Rail station via the Bromsgrove Street area and the desire to improve the public realm to make that route more attractive. This initiative will enable the development of the Worcester Street /

Bromsgrove Street area to act as a new gateway for visitors to the historic core, including for those arriving by train as well as for those arriving by car via the ringway. As representative of a landowner in this policy area, Arrowcroft will work in collaboration with the Council to optimise the design of development in this regard.

We note that the Council is aiming to achieve the regeneration of the area to the east of Worcester Street / to the west of Bromsgrove Street in three phases and has identified three potential sites for allocation – EG5, EG6, EG7. The related policies envisage development coming forward in accordance with a “*masterplan approach*”.

Site EG5 envisages the redevelopment of land at Bromsgrove Street. Whilst Arrowcroft supports the principle of redevelopment of this site and the potential uses indicated in proposed **Policy KCA.EG5**, concern is expressed that development of this site on its own will not achieve the benefits for the town centre which the Council is aspiring to by virtue of the absence of clear and convenient linkages with the existing retail focus of the town centre. Development of the site as indicated would not, therefore, meet other aspirations of the AAP as discussed earlier in these representations and, so, this policy would be ineffective.

Whilst we appreciate that it is intended to be indicative; whilst we are conscious that the Council has invested in detailed background studies to explore the feasibility of a new superstore on the Eastern Gateway; and whilst we appreciate that the background studies demonstrate that a superstore can be accommodated in this sequentially-preferable location, we consider that the level of detail in the AAP – including a potential site layout plan – is inappropriate, for reasons which we will now explain.

In relation to proposed **Policy KCA.EG6** (Worcester Street Retail Development), we consider that it is essential that this area be combined with the area subject of proposed **Policy KCA.EG5**. Whilst the Council may be of the opinion that major obstacles to delivery include a complicated land ownership and tenancy structures, we note that Arrowcroft is ready and willing to engage with the Council to bring forward the development of its interest in unison with the development of proposed site **Policy KCA.EG5**. A co-ordinated approach would enable a scheme to be delivered which is far more beneficial to the town centre than that which could be achieved on a site-by-site piecemeal basis. Whilst Arrowcroft recognises that ownership considerations in relation to other parts of this area may take longer to resolve and may involve other approaches (such as compulsory purchase), ultimately the ability to assemble this site and the success of any proceedings will depend on there being a clearly-expressed desire to achieve comprehensive regeneration across both the EG5 and EG6 sites. Implementation of a development that achieves the Council’s policy objectives is clearly a matter of public interest and, accordingly, an approach must be adopted that serves the public interest.

It must also be borne in mind that if the Council is aiming to create a new “street” through the EG6 site, this will potentially result in the loss of lettable floorspace or developable area for some or all of the landowners affected by this allocation. As a standalone proposition, therefore, there will be less to commend development of this site to the interested landowners than if it were part of a wider proposition.

We consider that the EG6 site is essential to the creation of satisfactory linkages between the existing shopping focus of the town centre and the EG5 site (as aspired to elsewhere in the draft KCAAP), and therefore sites EG5 and EG6 should be amalgamated into one policy area.

We are also of the opinion that further consideration should be given to the amalgamation of the EC7 site into this area in the interests of the comprehensive planning of the area.

Such a change to the AAP would not prevent development from proceeding on a phased basis (which could proceed in accordance with an agreed masterplan) but it would ensure that the aim to regenerate this part of the Eastern Gateway is consistent with the other draft policies of the KCAAP and would maximise the prospects of comprehensive regeneration coming about.

In particular, the absence of a comprehensive approach conflicts with the desire set out in proposed **Policy KCA.UP1** (which *inter alia* says that development proposals should avoid being prejudicial to the comprehensive development of a larger area) and, as such, this conflict renders the proposed

policies for land to the east of Worcester Street and to the west of Bromsgrove Street unsound by reason of ineffectiveness.

Finally in relation to this matter, whilst the proposed policies in relation to sites EG5, EG6 and EG7 advocate a masterplan approach to development, we note that the proposed policies do not require a masterplan to be prepared. If the Council considers that a masterplan approach is necessary and desirable, this should be clearly provided for in any relevant policy or policies. Such a change should be made to ensure that the AAP is effective and therefore sound.

3. Proposed Changes to Draft Site Allocations and Policies Development Plan Document and Related Designations on the Kidderminster Central Area Action Plan Proposals Map (First Draft)

In association with our comments on the KCAAP, we consider that a number of changes should be made to the Site Allocations and Policies DPD and to the Kidderminster Central Area Action Plan Proposals Map ('KCAAPP').

Policy SAL.GPB2

To be consistent with our comments in the draft KCAAP, proposed **Policy SAL.GPB2** should be amended to say that retail development will be preferred on allocated sites as well as within the Primary Shopping Area of Kidderminster.

Policy SAL.CC2

There is no evidence provided in the supporting text to this policy to justify the requirement that there should not be a reduction in the overall number of spaces in identified car parks as a result of development.

Either evidence should be explained to justify this policy or the wording of the policy should incorporate flexibility on a site-by-site basis, requiring any change in parking space numbers to be fully justified as part of any proposal for redevelopment.

Policy SAL.CC1

The first draft of the KCAAPP indicates that part of a Bus Priority Network crosses proposed site allocation EG5. It also indicates that part of a Proposed Cycle Route Network crosses through proposed site allocation EG5 and proposed site allocation EG7.

Whilst the aims behind these designations and the direction of the related draft policy (proposed **Policy SAL CC1**) are supported, the proposed policy should be sufficiently flexible so that such designations do not prejudice the successful planning of sites which are proposed to be allocated, recognising for example that routes may need to be diverted in the interests of the proper and comprehensive planning of the area.

Montagu Evans LLP
6 September 2012



Wyre Forest District Local Development Framework – Site Allocations and Policies and Kidderminster Central Area Action Plan Development Plan Documents (DPDs) Publication Stage Representation Form

Ref:

(For official use only)

Please return to: Planning Policy Manager, Economic Prosperity and Place Directorate, Duke House, Clensmore Street, Kidderminster, Worcestershire, DY10 2JX; or by e-mailing this form to Planning.Policy@wyreforestdc.gov.uk

BY 5.30pm on Friday 14th September 2012

This form has two parts –
Part A – Personal Details
Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make and remember to specify which document it relates to. Please specify which DPD you are commenting on.

Part A

1. Personal Details*	2. Agent's Details (if applicable)
----------------------	------------------------------------

**If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

Title	Mr	Mr
First Name	Daniel	Paul
Last Name	Carter	Burley
Job Title (where relevant)	Director	Partner
Organisation (where relevant)	Arrowcroft Services Ltd	Montagu Evans LLP
Address Line 1	Contact Agent	5 Bolton Street
Line 2		London
Line 3		
Post Code		W1J 8BA
Telephone Number		020 7493 4002
E-mail Address (where relevant)		paul.burley@montagu-evans.co.uk

Part B – Please use a separate sheet for each representation

Your representation should cover all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

After this stage, further submission will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Name or Organisation : Arrowcroft Services Ltd

3. To which DPD does this representation relate? ~~Site Allocations and Policies~~ / Kidderminster Central Area Action Plan-(*delete as necessary*)

To which part of the DPD does this representation relate?

Paragraph	5.8	Policy	KCA.GPB1	Other e.g. Map, table, figure, key diagram
-----------	------------	--------	-----------------	--

4. Do you consider the DPD is :

4.(1) Compliant with the Duty to Cooperate	Yes		No	
4.(2) Legally compliant	Yes		No	
4.(3) Sound	Yes		No	✓

Please refer to guidance notes for explanation of terms

If you have entered **No** to 4(3), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is **unsound** because it is not:

- (1) Positively prepared
- (2) Justified
- (3) Effective
- (4) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

The wording of the policy is not consistent with the sequential approach to site selection in the NPPF.

(Continue on a separate sheet /expand box if necessary)

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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.

(Continue on a separate sheet /expand box if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Date:

6 Sep 2012



Wyre Forest District Local Development Framework – Site Allocations and Policies and Kidderminster Central Area Action Plan Development Plan Documents (DPDs) Publication Stage Representation Form

Ref:

(For official use only)

Please return to: Planning Policy Manager, Economic Prosperity and Place Directorate, Duke House, Clensmore Street, Kidderminster, Worcestershire, DY10 2JX; or by e-mailing this form to Planning.Policy@wyreforestdc.gov.uk

BY 5.30pm on Friday 14th September 2012

This form has two parts –
Part A – Personal Details
Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make and remember to specify which document it relates to. Please specify which DPD you are commenting on.

Part A

1. Personal Details*	2. Agent's Details (if applicable)
----------------------	------------------------------------

**If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

Title	Mr	Mr
First Name	Daniel	Paul
Last Name	Carter	Burley
Job Title (where relevant)	Director	Partner
Organisation (where relevant)	Arrowcroft Services Ltd	Montagu Evans LLP
Address Line 1	Contact Agent	5 Bolton Street
Line 2		London
Line 3		
Post Code		W1J 8BA
Telephone Number		020 7493 4002
E-mail Address (where relevant)		paul.burley@montagu-evans.co.uk

Part B – Please use a separate sheet for each representation

Your representation should cover all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

After this stage, further submission will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Name or Organisation : Arrowcroft Services Ltd

3. To which DPD does this representation relate? ~~Site Allocations and Policies~~ Kidderminster Central Area Action Plan (*delete as necessary*)

To which part of the DPD does this representation relate?

Paragraph	5.10 and 5.15	Policy		Other e.g. Map, table, figure, key diagram	
-----------	---------------------	--------	--	--	--

4. Do you consider the DPD is :

4.(1) Compliant with the Duty to Cooperate	Yes			No	
4.(2) Legally compliant	Yes			No	
4.(3) Sound	Yes			No	✓

Please refer to guidance notes for explanation of terms

If you have entered **No** to 4(3), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is **unsound** because it is not:

- (1) Positively prepared
- (2) Justified
- (3) Effective
- (4) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

To help address the apparent decline of the eastern side of the town centre, the District Council is seeking to encourage new retail development in the Eastern Gateway to increase pedestrian footfall to the eastern side of the town. Paragraph 5.10 says that it is envisaged that this could involve a major new retail store in Bromsgrove Street leading to Worcester Street via the former Magistrates' Court site, step entry and / or premises fronting Worcester Street.

Paragraph 5.15 then notes that consolidating retail facilities within a tighter geographical area of the town will help to concentrate footfall and will contribute to creating a more viable centre and an improvement in the attractiveness of Kidderminster as a shopping destination.

We consider that, in isolation, a link through the Magistrates' Court site would be too distant from the existing shopping focus of the town centre and could therefore prejudice the success of development of the Eastern Gateway and the aim to concentrate footfall. Whilst it would be desirable to bring the Magistrates' Court site back into economic use, it is unlikely that this would be a desirable location for major retailers. Instead, a preference should be expressed for a primary link in the vicinity of the former Woolworths and Littlewoods units in order to maximise the potential for generating west-east footfall

across the town centre. Any link should be accessible to all members of the community and therefore a step-only access would not be satisfactory.

A strong, direct pedestrian linkage between a new anchor store and the prime shopping area at the junction of Worcester Street and High Street will deliver new pedestrian flow to sustain and improve the performance of retail activities at that very point, and will also attract restaurants and a cinema operator to add vitality.

The concentration of footfall at the Worcester Street and High Street junction will also assist in encouraging future capital investment in the regeneration of the Swan Centre, a major asset which is in great need of rejuvenation.

Such a link would be consistent with proposed **Policy KCA.CC2** which aims to create a walkable town centre by providing simple and direct routes that are visually and physically well-connected.

On the other hand, we consider that if there was only a link through the Magistrates' Court site or a step-only link, then this would be contrary to that aim and would result in inconsistent and ineffective policies in the AAP, rendering this proposed policy unsound.

(Continue on a separate sheet /expand box if necessary)

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The text should be re-drafted to express a preference for access to the Bromsgrove Street site via the former Woolworths unit.

(Continue on a separate sheet /expand box if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

The successful development of the Bromsgrove Street site is a very important consideration for the future of Kidderminster town centre and it is essential that an effective policy is in place. If the requested changes are not made to the emerging DPD then Arrowcroft would wish to put its case to the Inspector. If the changes are made then Arrowcroft would not consider it necessary to address the Inspector in relation to this matter.

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Date:

6 Sep 2012



Wyre Forest District Local Development Framework – Site Allocations and Policies and Kidderminster Central Area Action Plan Development Plan Documents (DPDs) Publication Stage Representation Form

Ref:

(For official use only)

Please return to: Planning Policy Manager, Economic Prosperity and Place Directorate, Duke House, Clensmore Street, Kidderminster, Worcestershire, DY10 2JX; or by e-mailing this form to Planning.Policy@wyreforestdc.gov.uk

BY 5.30pm on Friday 14th September 2012

This form has two parts –
Part A – Personal Details
Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make and remember to specify which document it relates to. Please specify which DPD you are commenting on.

Part A

1. Personal Details*	2. Agent's Details (if applicable)
----------------------	------------------------------------

**If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

Title	Mr	Mr
First Name	Daniel	Paul
Last Name	Carter	Burley
Job Title (where relevant)	Director	Partner
Organisation (where relevant)	Arrowcroft Services Ltd	Montagu Evans LLP
Address Line 1	Contact Agent	5 Bolton Street
Line 2		London
Line 3		
Post Code		W1J 8BA
Telephone Number		020 7493 4002
E-mail Address (where relevant)		paul.burley@montagu-evans.co.uk

Part B – Please use a separate sheet for each representation

Your representation should cover all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

After this stage, further submission will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Name or Organisation : Arrowcroft Services Ltd

3. To which DPD does this representation relate? ~~Site Allocations and Policies~~ Kidderminster Central Area Action Plan (*delete as necessary*)

To which part of the DPD does this representation relate?

Paragraph	Policy	KCA.EG5 and KCA.EG6	Other e.g. Map, table, figure, key diagram	Related Areas Delineated on Proposals Map
-----------	--------	------------------------------------	--	--

4. Do you consider the DPD is :

4.(1) Compliant with the Duty to Cooperate	Yes			No	
4.(2) Legally compliant	Yes			No	
4.(3) Sound	Yes			No	✓

Please refer to guidance notes for explanation of terms

If you have entered **No** to 4(3), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is **unsound** because it is not:

- (1) Positively prepared
- (2) Justified
- (3) Effective
- (4) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Arrowcroft strongly supports the Council's broad aims to encourage investment in, and regeneration of, the Eastern Gateway which is a gateway to Kidderminster town centre. We consider that the regeneration of Bromsgrove Street should be highlighted as a high priority for the central area of Kidderminster to counter-balance the function of Weavers' Wharf.

Arrowcroft supports the Council's aim to connect the historic core of Kidderminster town centre with the National Rail station via the Bromsgrove Street area and the desire to improve the public realm to make that route more attractive. This initiative will enable the development of the Worcester Street / Bromsgrove Street area to act as a new gateway for visitors to the historic core, including for those arriving by train as well as for those arriving by car via the ringway. As representative of a landowner in this policy area, Arrowcroft will work in collaboration with the Council to optimise the design of development in this regard.

We note that the Council is aiming to achieve the regeneration of the area to the east of Worcester Street / to the west of Bromsgrove Street in three phases and has identified three potential sites for allocation – EG5, EG6, EG7. The related policies envisage development coming forward in

accordance with a “*masterplan approach*”.

Site EG5 envisages the redevelopment of land at Bromsgrove Street. Whilst Arrowcroft supports the principle of redevelopment of this site and the potential uses indicated in proposed **Policy KCA.EG5**, concern is expressed that development of this site on its own will not achieve the benefits for the town centre which the Council is aspiring to by virtue of the absence of clear and convenient linkages with the existing retail focus of the town centre. Development of the site as indicated would not, therefore, meet other aspirations of the AAP as discussed earlier in these representations and, so, this policy would be ineffective.

Whilst we appreciate that it is intended to be indicative; whilst we are conscious that the Council has invested in detailed background studies to explore the feasibility of a new superstore on the Eastern Gateway; and whilst we appreciate that the background studies demonstrate that a superstore can be accommodated in this sequentially-preferable location, we consider that the level of detail in the AAP – including a potential site layout plan – is inappropriate, for reasons which we will now explain.

In relation to proposed **Policy KCA.EG6** (Worcester Street Retail Development), we consider that it is essential that this area be combined with the area subject of proposed **Policy KCA.EG5**. Whilst the Council may be of the opinion that major obstacles to delivery include a complicated land ownership and tenancy structures, we note that Arrowcroft is ready and willing to engage with the Council to bring forward the development of its interest in unison with the development of proposed site **Policy KCA.EG5**. A co-ordinated approach would enable a scheme to be delivered which is far more beneficial to the town centre than that which could be achieved on a site-by-site piecemeal basis. Whilst Arrowcroft recognises that ownership considerations in relation to other parts of this area may take longer to resolve and may involve other approaches (such as compulsory purchase), ultimately the ability to assemble this site and the success of any proceedings will depend on there being a clearly-expressed desire to achieve comprehensive regeneration across both the EG5 and EG6 sites. Implementation of a development that achieves the Council’s policy objectives is clearly a matter of public interest and, accordingly, an approach must be adopted that serves the public interest.

It must also be borne in mind that if the Council is aiming to create a new “street” through the EG6 site, this will potentially result in the loss of lettable floorspace or developable area for some or all of the landowners affected by this allocation. As a standalone proposition, therefore, there will be less to commend development of this site to the interested landowners than if it were part of a wider proposition.

We consider that the EG6 site is essential to the creation of satisfactory linkages between the existing shopping focus of the town centre and the EG5 site (as aspired to elsewhere in the draft KCAAP), and therefore sites EG5 and EG6 should be amalgamated into one policy area.

We are also of the opinion that further consideration should be given to the amalgamation of the EC7 site into this area in the interests of the comprehensive planning of the area.

Such a change to the AAP would not prevent development from proceeding on a phased basis (which could proceed in accordance with an agreed masterplan) but it would ensure that the aim to regenerate this part of the Eastern Gateway is consistent with the other draft policies of the KCAAP and would maximise the prospects of comprehensive regeneration coming about.

In particular, the absence of a comprehensive approach conflicts with the desire set out in proposed **Policy KCA.UP1** (which *inter alia* says that development proposals should avoid being prejudicial to the comprehensive development of a larger area) and, as such, this conflict renders the proposed policies for land to the east of Worcester Street and to the west of Bromsgrove Street unsound by reason of ineffectiveness.

Finally in relation to this matter, whilst the proposed policies in relation to sites EG5, EG6 and EG7 advocate a masterplan approach to development, we note that the proposed policies do not require a masterplan to be prepared. If the Council considers that a masterplan approach is necessary and desirable, this should be clearly provided for in any relevant policy or policies. Such a change should be made to ensure that the AAP is effective and therefore sound.

(Continue on a separate sheet /expand box if necessary)

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Proposals KCA.EG5 and KCA.EG6 should be amalgamated, and consideration should also be given to including proposal KCA.EG7.

If the Council requires development to be brought forward in accordance with a masterplan, then it should require this in policy and explain the mechanism for the preparation of a masterplan (eg in conjunction with a planning application, or by way of an SPD formulated by a developer in conjunction with the Council and in consultation with other interests).

(Continue on a separate sheet /expand box if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

The successful development of the Bromsgrove Street site is a very important consideration for the future of Kidderminster town centre and it is essential that an effective policy is in place. If the requested changes are not made to the emerging DPD then Arrowcroft would wish to put its case to the Inspector. If the changes are made then Arrowcroft would not consider it necessary to address the Inspector in relation to this matter.

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Date:

6 Sep 2012



Wyre Forest District Local Development Framework – Site Allocations and Policies and Kidderminster Central Area Action Plan Development Plan Documents (DPDs) Publication Stage Representation Form

Ref:

(For official use only)

Please return to: Planning Policy Manager, Economic Prosperity and Place Directorate, Duke House, Clensmore Street, Kidderminster, Worcestershire, DY10 2JX; or by e-mailing this form to Planning.Policy@wyreforestdc.gov.uk

BY 5.30pm on Friday 14th September 2012

This form has two parts –
Part A – Personal Details
Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make and remember to specify which document it relates to. Please specify which DPD you are commenting on.

Part A

1. Personal Details*	2. Agent's Details (if applicable)
----------------------	------------------------------------

**If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

Title	Mr	Mr
First Name	Daniel	Paul
Last Name	Carter	Burley
Job Title (where relevant)	Director	Partner
Organisation (where relevant)	Arrowcroft Services Ltd	Montagu Evans LLP
Address Line 1	<i>Contact Agent</i>	5 Bolton Street
Line 2		London
Line 3		
Post Code		W1J 8BA
Telephone Number		020 7493 4002
E-mail Address (where relevant)		paul.burley@montagu-evans.co.uk

Part B – Please use a separate sheet for each representation

Your representation should cover all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

After this stage, further submission will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Name or Organisation : Arrowcroft Services Ltd

3. To which DPD does this representation relate? ~~Site Allocations and Policies~~ Kidderminster Central Area Action Plan (*delete as necessary*)

To which part of the DPD does this representation relate?

Paragraph		Policy	KCA.GPB7	Other e.g. Map, table, figure, key diagram	
-----------	--	--------	-----------------	--	--

4. Do you consider the DPD is :

4.(1) Compliant with the Duty to Cooperate	Yes		No	
4.(2) Legally compliant	Yes		No	
4.(3) Sound	Yes		No	✓

Please refer to guidance notes for explanation of terms

If you have entered **No** to 4(3), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is **unsound** because it is not:

- (1) Positively prepared
- (2) Justified
- (3) Effective
- (4) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

This draft policy favours major new D2 leisure and multiple-unit A3 and A4 food and drink developments in the waterside environments of the Western Gateway area. It also says that elsewhere in the KCAAP area, smaller-scale proposals will be considered favourably subject to them meeting the broad objectives of the KCAAP.

A mixed-use development in the Eastern Gateway area, however, also presents an opportunity to improve the breadth of uses in the town centre and thus the vibrancy of the town centre throughout the day, consistent with the aims for town centres in the NPPF.

Proposed **Policy KCA.GPB7** is therefore too restrictive.

(Continue on a separate sheet /expand box if necessary)

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to

put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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.

(Continue on a separate sheet /expand box if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

The successful development of the Bromsgrove Street site is a very important consideration for the future of Kidderminster town centre and it is essential that an effective policy is in place. If the requested changes are not made to the emerging DPD then Arrowcroft would wish to put its case to the Inspector. If the changes are made then Arrowcroft would not consider it necessary to address the Inspector in relation to this matter.

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Date:

6 Sep 2012



Wyre Forest District Local Development Framework – Site Allocations and Policies and Kidderminster Central Area Action Plan Development Plan Documents (DPDs) Publication Stage Representation Form

Ref:

(For official use only)

Please return to: Planning Policy Manager, Economic Prosperity and Place Directorate, Duke House, Clensmore Street, Kidderminster, Worcestershire, DY10 2JX; or by e-mailing this form to Planning.Policy@wyreforestdc.gov.uk

BY 5.30pm on Friday 14th September 2012

This form has two parts –

Part A – Personal Details

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make and remember to specify which document it relates to. Please specify which DPD you are commenting on.

Part A

1. Personal Details*

2. Agent's Details (if applicable)

**If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

Title

Dr

First Name

Peter

Last Name

King

Job Title
(where relevant)

Chairman, Bromsgrove and
Wyre Forest group

Organisation
(where relevant)

Campaign to Protect Rural
England

Address Line 1

49, Stourbridge Road

Line 2

Hagley

Line 3

Stourbridge, W. Midlands

Post Code

DY9 0QS

Telephone Number

01562-720368

E-mail Address
(where relevant)

peterkingiron@blueyonder.co.uk

Part B – Please use a separate sheet for each representation

Your representation should cover all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

After this stage, further submission will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Name or Organisation :

3. To which DPD does this representation relate? **Kidderminster Central Area Action Plan** (*delete as necessary*)

To which part of the DPD does this representation relate?

Paragraph	7.12	Policy	UP1	Other e.g. Map, table, figure, key diagram	
-----------	------	--------	-----	--	--

4. Do you consider the DPD is :

4.(1) Compliant with the Duty to Cooperate	Yes		No	
4.(2) Legally compliant	Yes		No	
4.(3) Sound	Yes		No	NO

Please refer to guidance notes for explanation of terms

If you have entered **No** to 4(3), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is **unsound** because it is not:

- (1) Positively prepared
- (2) Justified
- (3) Effective
- (4) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Paragraph 7.12 is acceptable in principle, but needs to be upgraded to a policy.

- 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 explanation.
- We consider the rest of policy UP1 to be sound.

(Continue on a separate sheet /expand box if necessary)

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Paragraph 7.12 should become a policy, not mere justification. Furthermore, it should contain provisions to ensure that there is somewhere for commuters and other all-day visitors to park at a reasonable cost.

(Continue on a separate sheet /expand box if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

The Campaign to Protect Rural England is a leading NGO dealing with planning related issues. We usefully participated in a number of the sessions of the Examination of the Core Strategy, in a way that we believe produced results that improved the Core Strategy, as adopted. We believe that our participation will have a similar effect on the further documents now being consulted on. We further consider it important that there should be someone other than Council officers to challenge the views of developers, with a view to restraining unnecessary development

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Date:

14.9.12



Wyre Forest District Local Development Framework – Site Allocations and Policies and Kidderminster Central Area Action Plan Development Plan Documents (DPDs) Publication Stage Representation Form

Ref:

(For official use only)

Please return to: Planning Policy Manager, Economic Prosperity and Place Directorate, Duke House, Clensmore Street, Kidderminster, Worcestershire, DY10 2JX; or by e-mailing this form to Planning.Policy@wyreforestdc.gov.uk

BY 5.30pm on Friday 14th September 2012

This form has two parts –

Part A – Personal Details

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make and remember to specify which document it relates to. Please specify which DPD you are commenting on.

Part A

1. Personal Details*

2. Agent's Details (if applicable)

**If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

Title

Dr

First Name

Peter

Last Name

King

Job Title
(where relevant)

Chairman, Bromsgrove and
Wyre Forest group

Organisation
(where relevant)

Campaign to Protect Rural
England

Address Line 1

49, Stourbridge Road

Line 2

Hagley

Line 3

Stourbridge, W. Midlands

Post Code

DY9 0QS

Telephone Number

01562-720368

E-mail Address
(where relevant)

peterkingiron@blueyonder.co.uk

Part B – Please use a separate sheet for each representation

Your representation should cover all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

After this stage, further submission will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Name or Organisation :

3. To which DPD does this representation relate? **Kidderminster Central Area Action Plan** (*delete as necessary*)

To which part of the DPD does this representation relate?

Paragraph	Policy	EG generally	Other e.g. Map, table, figure, key diagram

4. Do you consider the DPD is :

4.(1) Compliant with the Duty to Cooperate	Yes		No	
4.(2) Legally compliant	Yes		No	
4.(3) Sound	Yes		No	NO

Please refer to guidance notes for explanation of terms

*If you have entered **No** to 4(3), please continue to Q5. In all other circumstances, please go to Q6.*

5. Do you consider the DPD is **unsound** because it is not:

- (1) Positively prepared
- (2) Justified
- (3) Effective
- (4) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

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.

(Continue on a separate sheet /expand box if necessary)

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Split out Policies EG1-4 into a Comberton Hill Section, so that only the EG5-8 form the Eastern Gateway section.

(Continue on a separate sheet /expand box if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

The Campaign to Protect Rural England is a leading NGO dealing with planning related issues. We usefully participated in a number of the sessions of the Examination of the Core Strategy, in a way that we believe produced results that improved the Core Strategy, as adopted. We believe that our participation will have a similar effect on the further documents now being consulted on. We further consider it important that there should be someone other than Council officers to challenge the views of developers, with a view to restraining unnecessary development

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Date:

14.9.12



Wyre Forest District Local Development Framework – Site Allocations and Policies and Kidderminster Central Area Action Plan Development Plan Documents (DPDs) Publication Stage Representation Form

Ref:

(For official use only)

Please return to: Planning Policy Manager, Economic Prosperity and Place Directorate, Duke House, Clensmore Street, Kidderminster, Worcestershire, DY10 2JX; or by e-mailing this form to Planning.Policy@wyreforestdc.gov.uk

BY 5.30pm on Friday 14th September 2012

This form has two parts –

Part A – Personal Details

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make and remember to specify which document it relates to. Please specify which DPD you are commenting on.

Part A

1. Personal Details*

2. Agent's Details (if applicable)

**If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

Title

Dr

First Name

Peter

Last Name

King

Job Title
(where relevant)

Chairman, Bromsgrove and
Wyre Forest group

Organisation
(where relevant)

Campaign to Protect Rural
England

Address Line 1

49, Stourbridge Road

Line 2

Hagley

Line 3

Stourbridge, W. Midlands

Post Code

DY9 0QS

Telephone Number

01562-720368

E-mail Address
(where relevant)

peterkingiron@blueyonder.co.uk

Part B – Please use a separate sheet for each representation

Your representation should cover all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

After this stage, further submission will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Name or Organisation :

3. To which DPD does this representation relate? **Kidderminster Central Area Action Plan** (*delete as necessary*)

To which part of the DPD does this representation relate?

Paragraph		Policy	Ch7	Other e.g. Map, table, figure, key diagram	
-----------	--	--------	-----	--	--

4. Do you consider the DPD is :

4.(1) Compliant with the Duty to Cooperate	Yes			No	
4.(2) Legally compliant	Yes			No	
4.(3) Sound	Yes			No	NO

Please refer to guidance notes for explanation of terms

If you have entered **No** to 4(3), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is **unsound** because it is not:

- (1) Positively prepared
- (2) Justified
- (3) Effective
- (4) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

The Aerial Photo on p.73 appears to show a number of well-used paths passing through the northern corner of the site. The policy should additionally require the retention of these links, preferably with an active frontage to them. This should not prevent minor footpath diversions.

We note that the paths in question do not appear to be registered as public footpaths, but the amount of wear suggests they are well-used and may well have gained public footpath status by long usage.

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. There is a rebuttable legal presumption that the boundary of land adjoining a river is in the centre of the river, and that the boundary moves if the course of the river moves. It is possible that the present boundary, presumably a land ownership resulted from the former existence of a mill leat and that the present course of the river is now that of a leat. That would not cause the boundary to move, but this is irrelevant to planning policy.

(Continue on a separate sheet /expand box if necessary)

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Add a further paragraph iv:

iv. Enjoy a positive relationship with, preferably with an active frontage to the paths at the northern end of the site.

Adjust site boundary to river bank (even if not in the same ownership)

(Continue on a separate sheet /expand box if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

The Campaign to Protect Rural England is a leading NGO dealing with planning related issues. We usefully participated in a number of the sessions of the Examination of the Core Strategy, in a way that we believe produced results that improved the Core Strategy, as adopted. We believe that our participation will have a similar effect on the further documents now being consulted on. We further consider it important that there should be someone other than Council officers to challenge the views of developers, with a view to restraining unnecessary development

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

|

Date:

14.9.12



Wyre Forest District Local Development Framework – Site Allocations and Policies and Kidderminster Central Area Action Plan Development Plan Documents (DPDs) Publication Stage Representation Form

Ref:

(For official use only)

Please return to: Planning Policy Manager, Economic Prosperity and Place Directorate, Duke House, Clensmore Street, Kidderminster, Worcestershire, DY10 2JX; or by e-mailing this form to Planning.Policy@wyreforestdc.gov.uk

BY 5.30pm on Friday 14th September 2012

This form has two parts –

Part A – Personal Details

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make and remember to specify which document it relates to. Please specify which DPD you are commenting on.

Part A

1. Personal Details*

2. Agent's Details (if applicable)

**If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

Title

Dr

First Name

Peter

Last Name

King

Job Title
(where relevant)

Chairman, Bromsgrove and
Wyre Forest group

Organisation
(where relevant)

Campaign to Protect Rural
England

Address Line 1

49, Stourbridge Road

Line 2

Hagley

Line 3

Stourbridge, W. Midlands

Post Code

DY9 0QS

Telephone Number

01562-720368

E-mail Address
(where relevant)

peterkingiron@blueyonder.co.uk

Part B – Please use a separate sheet for each representation

Your representation should cover all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

After this stage, further submission will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Name or Organisation :

3. To which DPD does this representation relate? **Kidderminster Central Area Action Plan** (*delete as necessary*)

To which part of the DPD does this representation relate?

Paragraph	6.16	Policy	CC1	Other e.g. Map, table, figure, key diagram	
-----------	------	--------	-----	--	--

4. Do you consider the DPD is :

4.(1) Compliant with the Duty to Cooperate	Yes		No	
4.(2) Legally compliant	Yes		No	
4.(3) Sound	Yes		No	NO

Please refer to guidance notes for explanation of terms

If you have entered **No** to 4(3), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is **unsound** because it is not:

- (1) Positively prepared
- (2) Justified
- (3) Effective
- (4) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

We would question the wisdom of any policy of changing the status of the Aggbrough 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 than the Ringroad.

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.

(Continue on a separate sheet /expand box if necessary)

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

6.16 should be expressed to exclude the Aggborough section of the Ring Road.

(Continue on a separate sheet /expand box if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

The Campaign to Protect Rural England is a leading NGO dealing with planning related issues. We usefully participated in a number of the sessions of the Examination of the Core Strategy, in a way that we believe produced results that improved the Core Strategy, as adopted. We believe that our participation will have a similar effect on the further documents now being consulted on. We further consider it important that there should be someone other than Council officers to challenge the views of developers, with a view to restraining unnecessary development

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Date:

14.9.12



Wyre Forest District Local Development Framework – Site Allocations and Policies and Kidderminster Central Area Action Plan Development Plan Documents (DPDs) Publication Stage Representation Form

Ref:

(For official use only)

Please return to: Planning Policy Manager, Economic Prosperity and Place Directorate, Duke House, Clensmore Street, Kidderminster, Worcestershire, DY10 2JX; or by e-mailing this form to Planning.Policy@wyreforestdc.gov.uk

BY 5.30pm on Friday 14th September 2012

This form has two parts –

Part A – Personal Details

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make and remember to specify which document it relates to. Please specify which DPD you are commenting on.

Part A

1. Personal Details*

2. Agent's Details (if applicable)

**If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

Title	Dr		
First Name	Peter		
Last Name	King		
Job Title (where relevant)	Chairman, Bromsgrove and Wyre Forest group		
Organisation (where relevant)	Campaign to Protect Rural England		
Address Line 1	49, Stourbridge Road		
Line 2	Hagley		
Line 3	Stourbridge, W. Midlands		
Post Code	DY9 0QS		
Telephone Number	01562-720368		
E-mail Address (where relevant)	peterkingiron@blueyonder.co.uk		

Part B – Please use a separate sheet for each representation

Your representation should cover all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

After this stage, further submission will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Name or Organisation :

3. To which DPD does this representation relate? **Kidderminster Central Area Action Plan** (*delete as necessary*)

To which part of the DPD does this representation relate?

Paragraph	Policy	Other e.g. Map, table, figure, key diagram

4. Do you consider the DPD is :

4.(1) Compliant with the Duty to Cooperate	Yes		No	
4.(2) Legally compliant	Yes		No	Inadequately
4.(3) Sound	Yes		No	

Please refer to guidance notes for explanation of terms

*If you have entered **No** to 4(3), please continue to Q5. In all other circumstances, please go to Q6.*

5. Do you consider the DPD is **unsound** because it is not:

- (1) Positively prepared
- (2) Justified
- (3) Effective
- (4) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

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 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.

(Continue on a separate sheet /expand box if necessary)

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

See 6

(Continue on a separate sheet /expand box if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

 YES

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

The Campaign to Protect Rural England is a leading NGO dealing with planning related issues. We usefully participated in a number of the sessions of the Examination of the Core Strategy, in a way that we believe produced results that improved the Core Strategy, as adopted. We believe that our participation will have a similar effect on the further documents now being consulted on. We further consider it important that there should be someone other than Council officers to challenge the views of developers, with a view to restraining unnecessary development

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Date:

14.9.12



Wyre Forest District Local Development Framework – Site Allocations and Policies and Kidderminster Central Area Action Plan Development Plan Documents (DPDs) Publication Stage Representation Form

Ref:

(For official use only)

Please return to: Planning Policy Manager, Economic Prosperity and Place Directorate, Duke House, Clensmore Street, Kidderminster, Worcestershire, DY10 2JX; or by e-mailing this form to Planning.Policy@wyreforestdc.gov.uk

BY 5.30pm on Friday 14th September 2012

This form has two parts –
 Part A – Personal Details
 Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make and remember to specify which document it relates to. Please specify which DPD you are commenting on.

Part A

1. Personal Details*	2. Agent's Details (if applicable)
----------------------	------------------------------------

**If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

Title	Dr		
First Name	Peter		
Last Name	King		
Job Title (where relevant)	Chairman, Bromsgrove and Wyre Forest group		
Organisation (where relevant)	Campaign to Protect Rural England		
Address Line 1	49, Stourbridge Road		
Line 2	Hagley		
Line 3	Stourbridge, W. Midlands		
Post Code	DY9 0QS		
Telephone Number	01562-720368		
E-mail Address (where relevant)	peterkingiron@blueyonder.co.uk		

Part B – Please use a separate sheet for each representation

Your representation should cover all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

After this stage, further submission will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Name or Organisation :

3. To which DPD does this representation relate? **Kidderminster Central Area Action Plan** (*delete as necessary*)

To which part of the DPD does this representation relate?

Paragraph		Policy	WG3	Other e.g. Map, table, figure, key diagram	
-----------	--	--------	-----	--	--

4. Do you consider the DPD is :

4.(1) Compliant with the Duty to Cooperate	Yes			No	
4.(2) Legally compliant	Yes			No	
4.(3) Sound	Yes			No	NO

Please refer to guidance notes for explanation of terms

If you have entered **No** to 4(3), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is **unsound** because it is not:

- (1) Positively prepared **NOT**
- (2) Justified
- (3) Effective **NOT**
- (4) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

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".

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. It is appreciated that this is not straightforward since the towing path is technically the private property of the Waterways Trust, and strictly not a public path, despite perceptions.

(Continue on a separate sheet /expand box if necessary)

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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.

(Continue on a separate sheet /expand box if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

The Campaign to Protect Rural England is a leading NGO dealing with planning related issues. We usefully participated in a number of the sessions of the Examination of the Core Strategy, in a way that we believe produced results that improved the Core Strategy, as adopted. We believe that our participation will have a similar effect on the further documents now being consulted on. We further consider it important that there should be someone other than Council officers to challenge the views of developers, with a view to restraining unnecessary development

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Date:

14.9.12



Wyre Forest District Local Development Framework – Site Allocations and Policies and Kidderminster Central Area Action Plan Development Plan Documents (DPDs) Publication Stage Representation Form

Ref:

(For official use only)

Please return to: Planning Policy Manager, Economic Prosperity and Place Directorate, Duke House, Clensmore Street, Kidderminster, Worcestershire, DY10 2JX; or by e-mailing this form to Planning.Policy@wyreforestdc.gov.uk

BY 5.30pm on Friday 14th September 2012

This form has two parts –

Part A – Personal Details

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make and remember to specify which document it relates to. Please specify which DPD you are commenting on.

Part A

1. Personal Details*

2. Agent's Details (if applicable)

**If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

Title

Dr

First Name

Peter

Last Name

King

Job Title
(where relevant)

Chairman, Bromsgrove and
Wyre Forest group

Organisation
(where relevant)

Campaign to Protect Rural
England

Address Line 1

49, Stourbridge Road

Line 2

Hagley

Line 3

Stourbridge, W. Midlands

Post Code

DY9 0QS

Telephone Number

01562-720368

E-mail Address
(where relevant)

peterkingiron@blueyonder.co.uk

Part B – Please use a separate sheet for each representation

Your representation should cover all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

After this stage, further submission will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Name or Organisation :

3. To which DPD does this representation relate? **Kidderminster Central Area Action Plan** (*delete as necessary*)

To which part of the DPD does this representation relate?

Paragraph		Policy	UP4 (1)	Other e.g. Map, table, figure, key diagram	
-----------	--	--------	---------	--	--

4. Do you consider the DPD is :

4.(1) Compliant with the Duty to Cooperate	Yes			No	
4.(2) Legally compliant	Yes			No	
4.(3) Sound	Yes			No	NO

Please refer to guidance notes for explanation of terms

If you have entered **No** to 4(3), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is **unsound** because it is not:

- (1) Positively prepared
- (2) Justified
- (3) Effective
- (4) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

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.

(Continue on a separate sheet /expand box if necessary)

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The policy should be limited to the fringes of the highway, but an additional paragraph at the beginning (before the present i):

i. The road will be maintained as a pedestrian-free route (except adjoining the Comberton Hill Island) to ensure that traffic flows freely on this part of the strategic highway network.

And at the end:

v. A route for pedestrians and cyclists will be signed through the "Heritage Processions" area to provide them with an alternative through route.

(Continue on a separate sheet /expand box if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

The Campaign to Protect Rural England is a leading NGO dealing with planning related issues. We usefully participated in a number of the sessions of the Examination of the Core Strategy, in a way that we believe produced results that improved the Core Strategy, as adopted. We believe that our participation will have a similar effect on the further documents now being consulted on. We further consider it important that there should be someone other than Council officers to challenge the views of developers, with a view to restraining unnecessary development

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Date:

14.9.12



Wyre Forest District Local Development Framework – Site Allocations and Policies and Kidderminster Central Area Action Plan Development Plan Documents (DPDs) Publication Stage Representation Form

Ref:

(For official use only)

Please return to: Planning Policy Manager, Economic Prosperity and Place Directorate, Duke House, Clensmore Street, Kidderminster, Worcestershire, DY10 2JX; or by e-mailing this form to Planning.Policy@wyreforestdc.gov.uk

BY 5.30pm on Friday 14th September 2012

This form has two parts –
Part A – Personal Details
Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make and remember to specify which document it relates to. Please specify which DPD you are commenting on.

Part A

1. Personal Details*	2. Agent's Details (if applicable)
----------------------	------------------------------------

**If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

Title	Dr		
First Name	Peter		
Last Name	King		
Job Title (where relevant)	Chairman, Bromsgrove and Wyre Forest group		
Organisation (where relevant)	Campaign to Protect Rural England		
Address Line 1	49, Stourbridge Road		
Line 2	Hagley		
Line 3	Stourbridge, W. Midlands		
Post Code	DY9 0QS		
Telephone Number	01562-720368		
E-mail Address (where relevant)	peterkingiron@blueyonder.co.uk		

Part B – Please use a separate sheet for each representation

Your representation should cover all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

After this stage, further submission will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Name or Organisation :

3. To which DPD does this representation relate? **Kidderminster Central Area Action Plan** (*delete as necessary*)

To which part of the DPD does this representation relate?

Paragraph	Policy	EG1	Other e.g. Map, table, figure, key diagram

4. Do you consider the DPD is :

4.(1) Compliant with the Duty to Cooperate	Yes		No	
4.(2) Legally compliant	Yes		No	
4.(3) Sound	Yes		No	NO

Please refer to guidance notes for explanation of terms

If you have entered **No** to 4(3), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is **unsound** because it is not:

- (1) Positively prepared
- (2) Justified
- (3) Effective
- (4) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Policy: unsound: not effective or not positive enough

- Small scale medical uses (such as doctors, dentists, and physiotherapists) should be permissible both within and beyond the retail frontage.
- The boundary of the area should be altered to bring the Harriers Industrial Estate within it. Its exclusion from area EG1 and KCAAP generally seems illogical.

(Continue on a separate sheet /expand box if necessary)

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

See 6

(Continue on a separate sheet /expand box if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

 YES

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

The Campaign to Protect Rural England is a leading NGO dealing with planning related issues. We usefully participated in a number of the sessions of the Examination of the Core Strategy, in a way that we believe produced results that improved the Core Strategy, as adopted. We believe that our participation will have a similar effect on the further documents now being consulted on. We further consider it important that there should be someone other than Council officers to challenge the views of developers, with a view to restraining unnecessary development

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Date:

14.9.12



Wyre Forest District Local Development Framework – Site Allocations and Policies and Kidderminster Central Area Action Plan Development Plan Documents (DPDs) Publication Stage Representation Form

Ref:

(For official use only)

Please return to: Planning Policy Manager, Economic Prosperity and Place Directorate, Duke House, Clensmore Street, Kidderminster, Worcestershire, DY10 2JX; or by e-mailing this form to Planning.Policy@wyreforestdc.gov.uk

BY 5.30pm on Friday 14th September 2012

This form has two parts –
Part A – Personal Details
Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make and remember to specify which document it relates to. Please specify which DPD you are commenting on.

Part A

1. Personal Details*

2. Agent's Details (if applicable)

**If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

Title

Dr

First Name

Peter

Last Name

King

Job Title
(where relevant)

Chairman, Bromsgrove and
Wyre Forest group

Organisation
(where relevant)

Campaign to Protect Rural
England

Address Line 1

49, Stourbridge Road

Line 2

Hagley

Line 3

Stourbridge, W. Midlands

Post Code

DY9 0QS

Telephone Number

01562-720368

E-mail Address
(where relevant)

peterkingiron@blueyonder.co.uk

Part B – Please use a separate sheet for each representation

Your representation should cover all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

After this stage, further submission will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Name or Organisation :

3. To which DPD does this representation relate? **Kidderminster Central Area Action Plan** (*delete as necessary*)

To which part of the DPD does this representation relate?

Paragraph		Policy	EG2	Other e.g. Map, table, figure, key diagram	
-----------	--	--------	-----	--	--

4. Do you consider the DPD is :

4.(1) Compliant with the Duty to Cooperate	Yes			No	
4.(2) Legally compliant	Yes			No	
4.(3) Sound	Yes			No	NO

Please refer to guidance notes for explanation of terms

*If you have entered **No** to 4(3), please continue to Q5. In all other circumstances, please go to Q6.*

5. Do you consider the DPD is **unsound** because it is not:

- (1) Positively prepared
- (2) Justified
- (3) Effective
- (4) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Since the policy is encouraging links between the Network Rail and SVR systems, it would be better to have one policy covering both stations.

(Continue on a separate sheet /expand box if necessary)

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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

(Continue on a separate sheet /expand box if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

 YES

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

The Campaign to Protect Rural England is a leading NGO dealing with planning related issues. We usefully participated in a number of the sessions of the Examination of the Core Strategy, in a way that we believe produced results that improved the Core Strategy, as adopted. We believe that our participation will have a similar effect on the further documents now being consulted on. We further consider it important that there should be someone other than Council officers to challenge the views of developers, with a view to restraining unnecessary development

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

[

Date:

14.9.12



Wyre Forest District Local Development Framework – Site Allocations and Policies and Kidderminster Central Area Action Plan Development Plan Documents (DPDs) Publication Stage Representation Form

Ref:

(For official use only)

Please return to: Planning Policy Manager, Economic Prosperity and Place Directorate, Duke House, Clensmore Street, Kidderminster, Worcestershire, DY10 2JX; or by e-mailing this form to Planning.Policy@wyreforestdc.gov.uk

BY 5.30pm on Friday 14th September 2012

This form has two parts –

Part A – Personal Details

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make and remember to specify which document it relates to. Please specify which DPD you are commenting on.

Part A

1. Personal Details*

2. Agent's Details (if applicable)

**If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

Title

Dr

First Name

Peter

Last Name

King

Job Title
(where relevant)

Chairman, Bromsgrove and
Wyre Forest group

Organisation
(where relevant)

Campaign to Protect Rural
England

Address Line 1

49, Stourbridge Road

Line 2

Hagley

Line 3

Stourbridge, W. Midlands

Post Code

DY9 0QS

Telephone Number

01562-720368

E-mail Address
(where relevant)

peterkingiron@blueyonder.co.uk

Part B – Please use a separate sheet for each representation

Your representation should cover all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

After this stage, further submission will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Name or Organisation :

3. To which DPD does this representation relate? **Kidderminster Central Area Action Plan** (*delete as necessary*)

To which part of the DPD does this representation relate?

Paragraph	10.29-30	Policy	EG5	Other e.g. Map, table, figure, key diagram
-----------	----------	--------	-----	--

4. Do you consider the DPD is :

4.(1) Compliant with the Duty to Cooperate	Yes		No	
4.(2) Legally compliant	Yes		No	
4.(3) Sound	Yes		No	NO

Please refer to guidance notes for explanation of terms

If you have entered **No** to 4(3), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is **unsound** because it is not:

- (1) Positively prepared
- (2) Justified
- (3) Effective
- (4) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Paragraphs 10.29-30 Unsound: not effective

- 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.
- The boundary adjoining Worcester Street and Prospect Hill is unduly sinuous. Wording should be added to allow adjustments to the precise site boundaries.
- We have no objection to the rest of the policy.

(Continue on a separate sheet /expand box if necessary)

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Wording should be added to the effect that boundary variations near Worcester Street and Prospect Hill will be permissible.

(Continue on a separate sheet /expand box if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

The Campaign to Protect Rural England is a leading NGO dealing with planning related issues. We usefully participated in a number of the sessions of the Examination of the Core Strategy, in a way that we believe produced results that improved the Core Strategy, as adopted. We believe that our participation will have a similar effect on the further documents now being consulted on. We further consider it important that there should be someone other than Council officers to challenge the views of developers, with a view to restraining unnecessary development

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Date:

14.9.12



Wyre Forest District Local Development Framework – Site Allocations and Policies and Kidderminster Central Area Action Plan Development Plan Documents (DPDs) Publication Stage Representation Form

Ref:

(For official use only)

Please return to: Planning Policy Manager, Economic Prosperity and Place Directorate, Duke House, Clensmore Street, Kidderminster, Worcestershire, DY10 2JX; or by e-mailing this form to Planning.Policy@wyreforestdc.gov.uk

BY 5.30pm on Friday 14th September 2012

This form has two parts –

Part A – Personal Details

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make and remember to specify which document it relates to. Please specify which DPD you are commenting on.

Part A

1. Personal Details*

2. Agent's Details (if applicable)

**If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

Title

Dr

First Name

Peter

Last Name

King

Job Title
(where relevant)

Chairman, Bromsgrove and
Wyre Forest group

Organisation
(where relevant)

Campaign to Protect Rural
England

Address Line 1

49, Stourbridge Road

Line 2

Hagley

Line 3

Stourbridge, W. Midlands

Post Code

DY9 0QS

Telephone Number

01562-720368

E-mail Address
(where relevant)

peterkingiron@blueyonder.co.uk

Part B – Please use a separate sheet for each representation

Your representation should cover all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

After this stage, further submission will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Name or Organisation :

3. To which DPD does this representation relate? **Kidderminster Central Area Action Plan** (*delete as necessary*)

To which part of the DPD does this representation relate?

Paragraph		Policy	GPB2	Other e.g. Map, table, figure, key diagram	
-----------	--	--------	------	--	--

4. Do you consider the DPD is :

4.(1) Compliant with the Duty to Cooperate	Yes			No	
4.(2) Legally compliant	Yes			No	
4.(3) Sound	Yes			No	NO

Please refer to guidance notes for explanation of terms

If you have entered **No** to 4(3), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is **unsound** because it is not:

- (1) Positively prepared
- (2) Justified
- (3) Effective
- (4) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

- :
- Not legally compliant or not effective: Paragraph 5.20 constitutes a policy (not mere justification) and should be set out as such. Policy GPB2 deals with two separate issues – a policy GPB2a for the Primary Shopping Area and another GPB2b for secondary frontages. Paragraph 5.20 should be incorporated into the new GPB2a (as it only relates to its paragraph ii).
 - Not positive enough or not effective: Some leisure uses (such as pubs, nightclubs and restaurants) are a traditional part of the town centre mix and should be permissible in the Primary area, but above or below street level.
 - The policy as currently drafted does not cover the possibility of night clubs in basements.
 - Small scale medical facilities, such as dentists and physiotherapists fit well with A2-A5 uses and should be listed with them.

(Continue on a separate sheet /expand box if necessary)

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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 permissible

(Continue on a separate sheet /expand box if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

 YES

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

The Campaign to Protect Rural England is a leading NGO dealing with planning related issues. We usefully participated in a number of the sessions of the Examination of the Core Strategy, in a way that we believe produced results that improved the Core Strategy, as adopted. We believe that our participation will have a similar effect on the further documents now being consulted on. We further consider it important that there should be someone other than Council officers to challenge the views of developers, with a view to restraining unnecessary development

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Date:

14.9.12



Wyre Forest District Local Development Framework – Site Allocations and Policies and Kidderminster Central Area Action Plan Development Plan Documents (DPDs) Publication Stage Representation Form

Ref:

(For official use only)

Please return to: Planning Policy Manager, Economic Prosperity and Place Directorate, Duke House, Clensmore Street, Kidderminster, Worcestershire, DY10 2JX; or by e-mailing this form to Planning.Policy@wyreforestdc.gov.uk

BY 5.30pm on Friday 14th September 2012

This form has two parts –

Part A – Personal Details

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make and remember to specify which document it relates to. Please specify which DPD you are commenting on.

Part A

1. Personal Details*

2. Agent's Details (if applicable)

**If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

Title

Dr

First Name

Peter

Last Name

King

Job Title
(where relevant)

Chairman, Bromsgrove and
Wyre Forest group

Organisation
(where relevant)

Campaign to Protect Rural
England

Address Line 1

49, Stourbridge Road

Line 2

Hagley

Line 3

Stourbridge, W. Midlands

Post Code

DY9 0QS

Telephone Number

01562-720368

E-mail Address
(where relevant)

peterkingiron@blueyonder.co.uk

Part B – Please use a separate sheet for each representation

Your representation should cover all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

After this stage, further submission will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Name or Organisation :

3. To which DPD does this representation relate? **Kidderminster Central Area Action Plan** (*delete as necessary*)

To which part of the DPD does this representation relate?

Paragraph	Policy	GPB4	Other e.g. Map, table, figure, key diagram

4. Do you consider the DPD is :

4.(1) Compliant with the Duty to Cooperate	Yes		No	
4.(2) Legally compliant	Yes		No	
4.(3) Sound	Yes		No	NO

Please refer to guidance notes for explanation of terms

If you have entered **No** to 4(3), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is **unsound** because it is not:

- (1) Positively prepared **NOT**
- (2) Justified
- (3) Effective **NOT**
- (4) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

- 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. In any event, the relationship of the two plans in relation to the KCAAP area needs to be clarified, as the way in which they overlap is unclear.
- There should be a clearer statement of preference of sites within the ring road or adjoining 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.

(Continue on a separate sheet /expand box if necessary)

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

See 6

(Continue on a separate sheet /expand box if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

 YES

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

The Campaign to Protect Rural England is a leading NGO dealing with planning related issues. We usefully participated in a number of the sessions of the Examination of the Core Strategy, in a way that we believe produced results that improved the Core Strategy, as adopted. We believe that our participation will have a similar effect on the further documents now being consulted on. We further consider it important that there should be someone other than Council officers to challenge the views of developers, with a view to restraining unnecessary development

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Date:

14.9.12



Wyre Forest District Local Development Framework – Site Allocations and Policies and Kidderminster Central Area Action Plan Development Plan Documents (DPDs) Publication Stage Representation Form

Ref:

(For official use only)

Please return to: Planning Policy Manager, Economic Prosperity and Place Directorate, Duke House, Clensmore Street, Kidderminster, Worcestershire, DY10 2JX; or by e-mailing this form to Planning.Policy@wyreforestdc.gov.uk

BY 5.30pm on Friday 14th September 2012

This form has two parts –
Part A – Personal Details
Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make and remember to specify which document it relates to. Please specify which DPD you are commenting on.

Part A

1. Personal Details*	2. Agent's Details (if applicable)
----------------------	------------------------------------

**If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

Title	Dr		
First Name	Peter		
Last Name	King		
Job Title (where relevant)	Chairman, Bromsgrove and Wyre Forest group		
Organisation (where relevant)	Campaign to Protect Rural England		
Address Line 1	49, Stourbridge Road		
Line 2	Hagley		
Line 3	Stourbridge, W. Midlands		
Post Code	DY9 0QS		
Telephone Number	01562-720368		
E-mail Address (where relevant)	peterkingiron@blueyonder.co.uk		

Part B – Please use a separate sheet for each representation

Your representation should cover all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

After this stage, further submission will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Name or Organisation :

3. To which DPD does this representation relate? **Kidderminster Central Area Action Plan** (*delete as necessary*)

To which part of the DPD does this representation relate?

Paragraph	Policy	GBP7	Other e.g. Map, table, figure, key diagram

4. Do you consider the DPD is :

4.(1) Compliant with the Duty to Cooperate	Yes		No	
4.(2) Legally compliant	Yes		No	
4.(3) Sound	Yes		No	NO

Please refer to guidance notes for explanation of terms

If you have entered **No** to 4(3), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is **unsound** because it is not:

- (1) Positively prepared
- (2) Justified
- (3) Effective
- (4) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Policy– Unsound: not effective:

- The policy appears to conflict with GBP2. The first paragraph of GBP7 should be expressed to be subject to the policy of GPB2.
- 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

(Continue on a separate sheet /expand box if necessary)

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

See 6

(Continue on a separate sheet /expand box if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

 YES

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

The Campaign to Protect Rural England is a leading NGO dealing with planning related issues. We usefully participated in a number of the sessions of the Examination of the Core Strategy, in a way that we believe produced results that improved the Core Strategy, as adopted. We believe that our participation will have a similar effect on the further documents now being consulted on. We further consider it important that there should be someone other than Council officers to challenge the views of developers, with a view to restraining unnecessary development

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Date:

14.9.12



Wyre Forest District Local Development Framework – Site Allocations and Policies and Kidderminster Central Area Action Plan Development Plan Documents (DPDs) Publication Stage Representation Form

Ref:

(For official use only)

Please return to: Planning Policy Manager, Economic Prosperity and Place Directorate, Duke House, Clensmore Street, Kidderminster, Worcestershire, DY10 2JX; or by e-mailing this form to Planning.Policy@wyreforestdc.gov.uk

BY 5.30pm on Friday 14th September 2012

This form has two parts –

Part A – Personal Details

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make and remember to specify which document it relates to. Please specify which DPD you are commenting on.

Part A

1. Personal Details*

2. Agent's Details (if applicable)

**If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

Title

Dr

First Name

Peter

Last Name

King

Job Title
(where relevant)

Chairman, Bromsgrove and
Wyre Forest group

Organisation
(where relevant)

Campaign to Protect Rural
England

Address Line 1

49, Stourbridge Road

Line 2

Hagley

Line 3

Stourbridge, W. Midlands

Post Code

DY9 0QS

Telephone Number

01562-720368

E-mail Address
(where relevant)

peterkingiron@blueyonder.co.uk

Part B – Please use a separate sheet for each representation

Your representation should cover all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

After this stage, further submission will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Name or Organisation :

3. To which DPD does this representation relate? **Kidderminster Central Area Action Plan** (*delete as necessary*)

To which part of the DPD does this representation relate?

Paragraph	8.1	Policy		Other e.g. Map, table, figure, key diagram	Map at 8.1
-----------	-----	--------	--	--	------------

4. Do you consider the DPD is :

4.(1) Compliant with the Duty to Cooperate	Yes			No	
4.(2) Legally compliant	Yes			No	
4.(3) Sound	Yes			No	NO

Please refer to guidance notes for explanation of terms

If you have entered **No** to 4(3), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is **unsound** because it is not:

- (1) Positively prepared
- (2) Justified
- (3) Effective
- (4) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

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. Accordingly, this map and the foldout map in Part C should be amalgamated and placed at that location.

Certain of our other comments imply minor boundary variations between KCAAP and adjacent areas, but they are better considered individually.

(Continue on a separate sheet /expand box if necessary)

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Place this map as a foldout map in section C, amalgamating it with the map currently there.

(Continue on a separate sheet /expand box if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

 YES

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

The Campaign to Protect Rural England is a leading NGO dealing with planning related issues. We usefully participated in a number of the sessions of the Examination of the Core Strategy, in a way that we believe produced results that improved the Core Strategy, as adopted. We believe that our participation will have a similar effect on the further documents now being consulted on. We further consider it important that there should be someone other than Council officers to challenge the views of developers, with a view to restraining unnecessary development

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Date:



Comment

Consultee	Miss Katherine Burnett (543337)
Email Address	katherine.burnett@britishwaterways.co.uk
Company / Organisation	British Waterways
Address	Peels Wharf Lichfield Street Tamworth B78 3QZ
Event Name	Kidderminster Central Area Action Plan Publication
Comment by	British Waterways (Miss Katherine Burnett)
Comment ID	KCAAPP54
Response Date	12/09/12 16:52
Consultation Point	6.20 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.1

To which part of the DPD does this representation relate? (Please state paragraph number, policy number, map, table or figure number). Paragraph 6.20

Please refer to guidance notes for explanation of terms. If you enter **No** to 'Sound', please continue to Q5. In all other circumstances, please go to Q6.

Do you consider the DPD is:

Compliant with the Duty to Cooperate	Yes
Legally Compliant	Yes
Sound	Yes

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Canal & River Trust welcome the references to opportunities for linkages to the canal corridors for pedestrians and cyclists. The towing paths play an important role in widening travel choices for cycling and walking and opportunities for enhancing access will benefit the local community.

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? No



Comment

Consultee	Miss Katherine Burnett (543337)
Email Address	katherine.burnett@britishwaterways.co.uk
Company / Organisation	British Waterways
Address	Peels Wharf Lichfield Street Tamworth B78 3QZ
Event Name	Kidderminster Central Area Action Plan Publication
Comment by	British Waterways (Miss Katherine Burnett)
Comment ID	KCAAPP55
Response Date	12/09/12 16:53
Consultation Point	7.50 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.1

To which part of the DPD does this representation relate? (Please state paragraph number, policy number, map, table or figure number). Paragraph 7.50

Please refer to guidance notes for explanation of terms. If you enter **No** to 'Sound', please continue to Q5. In all other circumstances, please go to Q6.

Do you consider the DPD is:

Compliant with the Duty to Cooperate	Yes
Legally Compliant	Yes
Sound	Yes

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Canal & River Trust welcome the additional wording at paragraph 7.50. The waterways are multi-functional. The multi-functional roles of the waterways include: an agent of or catalyst for regeneration; a contributor to water supply and transfer, drainage and flood management; a tourism, cultural, sport, leisure and recreation resource; a heritage landscape, open space and ecological resource; sustainable modes of transport; and routes for telecommunications; supporting climate change, carbon reduction and sustainability. However, these multifunctional uses of the canals are

predominantly during the day. It is more difficult to utilise the canal during darkness due to the lack of lighting and safety risks. Canal & River Trust do not generally promote lighting of the canal corridors due to impact on nocturnal species

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? No



Comment

Consultee	Miss Katherine Burnett (543337)
Email Address	katherine.burnett@britishwaterways.co.uk
Company / Organisation	British Waterways
Address	Peels Wharf Lichfield Street Tamworth B78 3QZ
Event Name	Kidderminster Central Area Action Plan Publication
Comment by	British Waterways (Miss Katherine Burnett)
Comment ID	KCAAPP56
Response Date	12/09/12 16:53
Consultation Point	7.57 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.1

To which part of the DPD does this representation relate? (Please state paragraph number, policy number, map, table or figure number). Paragraph 7.57

Please refer to guidance notes for explanation of terms. If you enter **No** to 'Sound', please continue to Q5. In all other circumstances, please go to Q6.

Do you consider the DPD is:

Compliant with the Duty to Cooperate	Yes
Legally Compliant	Yes
Sound	Yes

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

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. The definition of green infrastructure encompasses ?blue infrastructure and blue spaces? such as waterways, towing paths and their environs. Inland waterways form part of strategic and local green infrastructure networks. However, the canals within Worcestershire are multifunctional, therefore operating as green/blue infrastructure in only one of their functions. The multi-functional roles of the waterways include: an agent of or catalyst

for regeneration; a contributor to water supply and transfer, drainage and flood management; a tourism, cultural, sport, leisure and recreation resource; a heritage landscape, open space and ecological resource; sustainable modes of transport; and routes for telecommunications; supporting climate change, carbon reduction and sustainability.

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? No



Comment

Consultee	Miss Katherine Burnett (543337)
Email Address	katherine.burnett@britishwaterways.co.uk
Company / Organisation	British Waterways
Address	Peels Wharf Lichfield Street Tamworth B78 3QZ
Event Name	Kidderminster Central Area Action Plan Publication
Comment by	British Waterways (Miss Katherine Burnett)
Comment ID	KCAAPP57
Response Date	12/09/12 16:53
Consultation Point	7.53 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.1

To which part of the DPD does this representation relate? (Please state paragraph number, policy number, map, table or figure number). Policy and Paragraph 7.53

Please refer to guidance notes for explanation of terms. If you enter **No** to 'Sound', please continue to Q5. In all other circumstances, please go to Q6.

Do you consider the DPD is:

Compliant with the Duty to Cooperate	Yes
Legally Compliant	Yes
Sound	Yes

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Canal & River Trust welcome the additional bullet points within the policy and additional wording at paragraph 7.53. The Trust recommends a number of guiding principles for waterside developments. Individual waterways and water spaces need to be viewed as an integral part of a wider network, and not in isolation. Water should not be treated as just a setting or backdrop for development but as a space and leisure and commercial resource in its own right. The 'added value' of the water space needs to be fully explored. 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. A waterway?s towing path and its environs should form an integral part of the public realm in terms of both design and management. It is important that the siting, configuration and orientation of buildings optimise views of the water, generate natural surveillance of water space, and encourage and improve access to, along and from the water. New waterside development needs to be considered holistically with the opportunities for water-based development, use and enhancement. Improve the appearance of the site from the towing path and from the water at boat level, and enhance the environmental quality of the waterway corridor. It should be recognised that appropriate boundary treatment and access issues are often different for the towing path side and the offside.

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? No



Comment

Consultee	Miss Katherine Burnett (543337)
Email Address	katherine.burnett@britishwaterways.co.uk
Company / Organisation	British Waterways
Address	Peels Wharf Lichfield Street Tamworth B78 3QZ
Event Name	Kidderminster Central Area Action Plan Publication
Comment by	British Waterways (Miss Katherine Burnett)
Comment ID	KCAAPP58
Response Date	12/09/12 16:54
Consultation Point	7.58 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.1

To which part of the DPD does this representation relate? (Please state paragraph number, policy number, map, table or figure number). Paragraph 7.58

Please refer to guidance notes for explanation of terms. If you enter **No** to 'Sound', please continue to Q5. In all other circumstances, please go to Q6.

Do you consider the DPD is:

Compliant with the Duty to Cooperate	Yes
Legally Compliant	Yes
Sound	Yes

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

In regard to paragraph 7.58 Canal & River Trust consider the waterways should not be viewed purely as environmental assets. In order to successfully generate the public benefits offered by the inland waterways, optimise their contribution to wider Government policy objectives, and secure the long-term sustainability of the network, it is crucial that the nature of inland waterways as multifunctional spaces and arteries is fully recognised and supported within planning policy.

The benefits of green infrastructure such as waterways should not be viewed in purely environmental terms. There is a real risk that this could lead to the development of restrictive planning policies which would affect the sustainability of the waterway network and waterways' ability to deliver economic and social benefits, as well as environmental benefits.

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? No



Comment

Consultee	Miss Katherine Burnett (543337)
Email Address	katherine.burnett@britishwaterways.co.uk
Company / Organisation	British Waterways
Address	Peels Wharf Lichfield Street Tamworth B78 3QZ
Event Name	Kidderminster Central Area Action Plan Publication
Comment by	British Waterways (Miss Katherine Burnett)
Comment ID	KCAAPP59
Response Date	12/09/12 16:54
Consultation Point	7.79 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.1

To which part of the DPD does this representation relate? (Please state paragraph number, policy number, map, table or figure number). Paragraph 7.79

Please refer to guidance notes for explanation of terms. If you enter **No** to 'Sound', please continue to Q5. In all other circumstances, please go to Q6.

Do you consider the DPD is:

Compliant with the Duty to Cooperate	Yes
Legally Compliant	Yes
Sound	Yes

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Canal & River Trust welcome the additional wording in paragraph 7.79. The Trust consider the inland waterways are successfully being used as tools in place-making and place-shaping; in re-branding; in confidence-building; in attracting and generating investment; and in improving the quality of life in areas undergoing transformational change through regeneration, renewal and growth.

The built environment of the waterways represents a unique working heritage of industrial architecture, archaeology and engineering structures, and is a valuable part of the national heritage, as well as an integral part of regional and sub-regional cultural heritage and local distinctiveness. 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.

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? No



Comment

Agent	Dr John England (676647)
Email Address	john@england-lyle.co.uk
Company / Organisation	Englnd & Lyle Limited
Address	Gateway House 55 Coniscliffe Road Darlington DL3 7EH
Consultee	Dr John England (678075)
Email Address	john@england-lyle.co.uk
Company / Organisation	England & Lyle
Address	Gateway House 55 Coniscliffe Road Darlington DL3 7EH
Event Name	Kidderminster Central Area Action Plan Publication
Comment by	England & Lyle (Dr John England)
Comment ID	KCAAPP70
Response Date	13/09/12 15:18
Consultation Point	Policy KCA.GPB1 Retail Development (View)
Status	Submitted
Submission Type	Web
Version	0.1
To which part of the DPD does this representation relate? (Please state paragraph number, policy number, map, table or figure number).	KCA.GPB1
Please refer to guidance notes for explanation of terms. If you eneter No to 'Sound', please continue to Q5. In all other circumstances, please go to Q6.	
Do you consider the DPD is:	
Compliant with the Duty to Cooperate	Yes
Legally Compliant	Yes
Sound	Yes

Do you consider the document is **unsound** because it is not:

Positively prepared	No
Justified	No
Effective	No
Consistent with national policy	No

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

We accept that sites in the Western and Eastern Gateways would be the sequentially preferable locations for new retail development in Kidderminster. We support the view that the Bromsgrove Street site is appropriate for a major supermarket development. However, it may also be the most suitable site to meet the longer term needs for further comparison goods retail development in the town centre. We support the policy acceptance of limited retail growth in the Horsefair neighbourhood centre to enhance its role as a community and specialist shopping area, and the proposal to restrict individual retail units to no larger than 250 sq. metres

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? No



Comment

Agent	Dr John England (676647)
Email Address	john@england-lyle.co.uk
Company / Organisation	Englnd & Lyle Limited
Address	Gateway House 55 Coniscliffe Road Darlington DL3 7EH
Consultee	Dr John England (678075)
Email Address	john@england-lyle.co.uk
Company / Organisation	England & Lyle
Address	Gateway House 55 Coniscliffe Road Darlington DL3 7EH
Event Name	Kidderminster Central Area Action Plan Publication
Comment by	England & Lyle (Dr John England)
Comment ID	KCAAPP71
Response Date	13/09/12 15:19
Consultation Point	Policy KCA.DPL2 Mixed Use Development (View)
Status	Submitted
Submission Type	Web
Version	0.1
To which part of the DPD does this representation relate? (Please state paragraph number, policy number, map, table or figure number).	KCA.DPL2
Please refer to guidance notes for explanation of terms. If you eneter No to 'Sound', please continue to Q5. In all other circumstances, please go to Q6.	
Do you consider the DPD is:	
Compliant with the Duty to Cooperate	Yes
Legally Compliant	Yes
Sound	Yes

Do you consider the document is **unsound** because it is not:

Positively prepared	No
Justified	No
Consistent with national policy	No

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

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. Kidderminster town centre has the capacity to accommodate the growth in comparison retail floorspace identified in the Core Strategy over the plan period. It also has the potential to meet the need for any additional convenience goods floorspace in Kidderminster. Any proposals for new supermarket development must satisfy the NPPF sequential approach and demonstrate that they would not have adverse impacts on the town centre. Retail development within the town centre area would comply with NPPF requirements.

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? No



Comment

Agent	Dr John England (676647)
Email Address	john@england-lyle.co.uk
Company / Organisation	Englnd & Lyle Limited
Address	Gateway House 55 Coniscliffe Road Darlington DL3 7EH
Consultee	Dr John England (678075)
Email Address	john@england-lyle.co.uk
Company / Organisation	England & Lyle
Address	Gateway House 55 Coniscliffe Road Darlington DL3 7EH
Event Name	Kidderminster Central Area Action Plan Publication
Comment by	England & Lyle (Dr John England)
Comment ID	KCAAPP72
Response Date	13/09/12 15:20
Consultation Point	Policy KCA.GPB4 Edge-of-Centre and Out-of-Centre Retailing (View)
Status	Submitted
Submission Type	Web
Version	0.1
To which part of the DPD does this representation relate? (Please state paragraph number, policy number, map, table or figure number).	KCA.GPB4
Please refer to guidance notes for explanation of terms. If you eneter No to 'Sound', please continue to Q5. In all other circumstances, please go to Q6.	
Do you consider the DPD is:	
Compliant with the Duty to Cooperate	Yes
Legally Compliant	Yes
Sound	Yes

Do you consider the document is **unsound** because it is not:

Positively prepared	No
Justified	No
Effective	No
Consistent with national policy	No

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

The policy does not specify whether 250 sq.m. is gross or net floorspace. However, the Site Allocations DPD publication version, Policy SAL.GPB2, indicates that this is intended to be 250 sq.m. net sales area. 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 effectively a floorspace threshold for retail impact assessments. The NPPF (paragraph 26) allows local authorities to adopt a proportionate, locally set floorspace threshold for impact assessments. In Wyre Forest this would require retail proposals of more than 250 sq.m. net outside centres to be supported by a retail assessment. England & Lyle have carried out a health check of Kidderminster town centre which concludes that Kidderminster has experienced a significant amount of new retail development in the last few years - a scale of development that has transformed shopping provision in the town. The health check shows that two indicators are rated as 'good' - the capacity for growth or change, and the accessibility of the town centre. Retailer representation is rated as 'fair' to 'good'. Several indicators are rated as 'fair' - the diversity of main town centre uses, commercial performance, pedestrian flow and linked trips, and environmental quality. However, the large amount of floorspace outside the town centre and the level of vacancies and vacant floorspace in the town centre are rated as 'poor'. 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.

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. Any further weakening of the health of the town centre could prejudice the prospects for successful redevelopment in the Bromsgrove Street area and have a negative effect on the overall vitality and viability of the town centre. Policy KCA.GPB4 should safeguard the vitality and viability of the town centre from pressures for edge-of-centre and out-of-centre development.

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? No



Comment

Agent	Dr John England (676647)
Email Address	john@england-lyle.co.uk
Company / Organisation	Englnd & Lyle Limited
Address	Gateway House 55 Coniscliffe Road Darlington DL3 7EH
Consultee	Dr John England (678075)
Email Address	john@england-lyle.co.uk
Company / Organisation	England & Lyle
Address	Gateway House 55 Coniscliffe Road Darlington DL3 7EH
Event Name	Kidderminster Central Area Action Plan Publication
Comment by	England & Lyle (Dr John England)
Comment ID	KCAAPP73
Response Date	13/09/12 15:21
Consultation Point	Policy KCA.Ch8 Horsefair (View)
Status	Submitted
Submission Type	Web
Version	0.1
To which part of the DPD does this representation relate? (Please state paragraph number, policy number, map, table or figure number).	KCA.Ch8
Please refer to guidance notes for explanation of terms. If you eneter No to 'Sound', please continue to Q5. In all other circumstances, please go to Q6.	
Do you consider the DPD is:	
Compliant with the Duty to Cooperate	Yes
Legally Compliant	Yes
Sound	Yes

Do you consider the document is **unsound** because it is not:

Positively prepared	No
Justified	No
Effective	No
Consistent with national policy	No

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

We support this policy and in particular the proposal to limit new retail development to a maximum of 250 sq.m. (net) per unit. Below this level new development would not require a retail assessment. However, schemes that comprise more than one unit of 250 sq.m. would exceed the proposed floorspace threshold and require a retail assessment. The policy should have positive implications in helping to maintain and enhance Horsefair in its important role a service centre for the local community. 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.

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? No



Comment

Agent	Dr John England (676647)
Email Address	john@england-lyle.co.uk
Company / Organisation	Englnd & Lyle Limited
Address	Gateway House 55 Coniscliffe Road Darlington DL3 7EH
Consultee	Dr John England (678075)
Email Address	john@england-lyle.co.uk
Company / Organisation	England & Lyle
Address	Gateway House 55 Coniscliffe Road Darlington DL3 7EH
Event Name	Kidderminster Central Area Action Plan Publication
Comment by	England & Lyle (Dr John England)
Comment ID	KCAAPP74
Response Date	13/09/12 15:21
Consultation Point	10.30 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.1
To which part of the DPD does this representation relate? (Please state paragraph number, policy number, map, table or figure number).	paragraph 10.30
Please refer to guidance notes for explanation of terms. If you eneter No to 'Sound', please continue to Q5. In all other circumstances, please go to Q6.	
Do you consider the DPD is:	
Compliant with the Duty to Cooperate	Yes
Legally Compliant	Yes
Sound	Yes

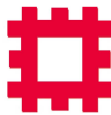
Do you consider the document is **unsound** because it is not:

Positively prepared	No
Justified	No
Effective	No
Consistent with national policy	No

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

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.

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? No



ENGLISH HERITAGE

WEST MIDLANDS

Ms R Mayman
Planning Policy Manager
Economic Prosperity and Place Directorate
Wyre Forest District Council
Duke House
Clensmore Street
Kidderminster
Worcestershire
DY10 2JX

Our ref: HD/P LDF
Your ref: RM/HET/FP-
SAL-SD
Telephone
Fax 0121 625 6851
0121 625 6821

31 August 2012

Dear Ms Mayman

**re: PRE-SUBMISSION PUBLICATION - KIDDERMINSTER CENTRAL AREA
ACTION PLAN DEVELOPMENT PLAN DOCUMENT**

Thank you for your letter of 20 July and the invitation to comment on the pre-submission Kidderminster Central Area Action Plan (AAP). In 2011 (letter dated 8 July) we submitted a response to the Preferred Options. We fully support the preparation of the AAP for Kidderminster Central, and we are pleased that our previous comments have been largely addressed in the current version.

We have the following representations on the pre-submission document as follows:

Support: Strategic Objectives

English Heritage welcomes and supports the aspirations of the strategic objectives, and in particular welcome the emphasis placed upon the conservation and enhancement of the town's heritage assets, the re-use of buildings and delivering quality design.

Support: Policy KCA.GPB1 Retail Development

English Heritage welcomes and supports the strategic vision for retail development in the area in terms of the 'retail dumbbell' focused on Weavers Wharf and Bromsgrove Street. We believe that this could serve to support the vitality and viability and regeneration of the wider town centre area within the ring road.

Support: Policy KCA.UP1 Urban Design Key Principles

English Heritage supports the emphasis this policy and the supporting reason justification give to delivering quality design in the future regeneration and

8TH FLOOR, THE AXIS, 10 HOLLIDAY STREET, BIRMINGHAM B1 1TG

Telephone 0121 625 6820 Facsimile 0121 625 6821

www.english-heritage.org.uk

Please note that English Heritage operates an access to information policy.
Correspondence or information which you send us may therefore become publicly available



development of Kidderminster. We also welcome and support the commitment to preparing a Town Centre Design Framework.

Whilst we broadly support the ambitions of the core design principles set out in the policy, we consider that the following amendments would serve to further strengthen their consistency with national guidance (e.g. National Planning Policy Framework, paragraph 58):

- Point (i) add 'character' so '... enhances local character and distinctiveness..'
- Point (L) include a reference to heritage assets, so '...green infrastructure and heritage assets of the town centre....'.

Support: Policy KCA.UP2 Public Realm

English Heritage welcomes and supports the prominence given to improving the public realm. This is a key component and influence on the quality of the townscape as well as contributing to the delivery of wider objectives associated with tourism, sustainable transport and economic vitality.

Support: Policy KCA.UP3 Ring Road Framework General Design Principles

English Heritage supports in principle the Plan's ambitions for the ring road. This is a bold and ambitious commitment, but as a key issue for the town we believe it fully warrants the positive and proactive strategy set out in the AAP.

Support: Policy KCAUP4 Ring Road Character Areas

English Heritage welcomes the specific consideration given to St. Mary's Church as part of this policy.

Support: Policy KCA.UP5 Staffordshire and Worcestershire Canal

English Heritage agrees that the canal is a major asset for the town, as well as a heritage asset in its own right as a designated conservation area. As such we support the positive policy framework established by the plan in order to encourage and promote its sustainable use and full integration as part of the town centre in terms of active use and visual amenity.

Support: Heritage paragraphs 7.73-7.80

English Heritage supports in principle the ambitions for the area's historic environment and heritage assets as set out in the text. We acknowledge that the Site Allocations and Policies Development Plan Document includes a detailed policy on the historic environment and that site specific heritage considerations are included within Part B of the Area Action Plan. In this context, and on balance, we therefore consider the plan provides a positive and proactive strategy for the Kidderminster's historic environment and heritage assets.

We consider, however, that it would be useful to strengthen and clarify the inter-relationships between this section and the policy framework on other topic areas, especially on urban and design and place-making and the public realm. The historic environment informs and can contribute to quality design, whilst the public realm can be an integral part of the setting of a heritage asset and hence make a positive or indeed negative contribution to its significance. We also consider that it would be helpful to establish a clear link to the proposed Town Centre Design Framework and how this will take account of and promote the surviving historic character of the

8TH FLOOR, THE AXIS, 10 HOLLIDAY STREET, BIRMINGHAM B1 1TG

Telephone 0121 625 6820 Facsimile 0121 625 6821

www.english-heritage.org.uk

Please note that English Heritage operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available



townscape, as for example described in the conservation area appraisals and any supporting management plans.

Yours sincerely

Amanda Smith
Planner (West Midlands)
E-mail: amanda.smith@english-heritage.org.uk

8TH FLOOR, THE AXIS, 10 HOLLIDAY STREET, BIRMINGHAM B1 1TG

Telephone 0121 625 6820 Facsimile 0121 625 6821

www.english-heritage.org.uk

*Please note that English Heritage operates an access to information policy.
Correspondence or information which you send us may therefore become publicly available*



Miss Rebecca Mayman
Wyre Forest District Council
Planning Policy
Duke House Clensmore Street
Kidderminster
Worcestershire
DY10 2JX

Our ref: SV/2010/103971/AP-
03/SB1-L01
Your ref: RM/HET/FP-SAL-SD
Date: 14 September 2012

Dear Miss Mayman

**Pre-Submission Publication of Kidderminster Central Area Action Plan (KCAAP)
Development Plan Document (DPD)**

Thank you for referring the above Local Plan document for consultation, which was received on 23 July 2012. Please find attached our formal representations having reviewed the DPD.

Several of the key evidence documents, listed in paragraph 1.17 as informing the DPD, are currently not available for viewing. These are the Sequential Testing (Flooding) document and Infrastructure Delivery Plan. The absence of these two documents has made it difficult to comment on the soundness of the plan.

We have maintained our previous representation seeking the inclusion of a flood risk policy within the DPD. We would be happy to meet with your Council to discuss our representations and the wording of a flood risk policy.

We would welcome the opportunity to review the Sequential Testing (Flooding) document and Infrastructure Delivery Plan.

Yours sincerely

**Mrs Rachel Whiteman
Senior Planning Officer**

Direct dial 01743 283 505
Direct fax 01743 283 419
Direct e-mail rachel.whiteman@environment-agency.gov.uk

Environment Agency
Hafren House Welshpool Road, Shelton, Shrewsbury, SY3 8BB.
Customer services line: 03708 506 506
www.environment-agency.gov.uk

End



Wyre Forest District Local Development Framework – Site Allocations and Policies and Kidderminster Central Area Action Plan Development Plan Documents (DPDs) Publication Stage Representation Form

Ref:

(For official use only)

Please return to: Planning Policy Manager, Economic Prosperity and Place Directorate, Duke House, Clensmore Street, Kidderminster, Worcestershire, DY10 2JX; or by e-mailing this form to Planning.Policy@wyreforestdc.gov.uk

BY 5.30pm on Friday 14th September 2012

This form has two parts –
Part A – Personal Details
Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make and remember to specify which document it relates to. Please specify which DPD you are commenting on.

Part A

1. Personal Details*	2. Agent's Details (if applicable)
----------------------	------------------------------------

**If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

Title	Mrs		
First Name	Rachel		
Last Name	Whiteman		
Job Title (where relevant)	Senior Planning Officer		
Organisation (where relevant)	Environment Agency		
Address Line 1	Hafren House		
Line 2	Welshpool Road		
Line 3	Shrewsbury		
Post Code	SY3 8BB		
Telephone Number	01743 283 505		
E-mail Address (where relevant)	rachel.whiteman@environment-agency.gov.uk		

Part B – Please use a separate sheet for each representation

Your representation should cover all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

After this stage, further submission will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Name or Organisation : Environment Agency

3. To which DPD does this representation relate? Kidderminster Central Area Action Plan
To which part of the DPD does this representation relate?

Paragraph	5.44	Policy		Other e.g. Map, table, figure, key diagram	
-----------	------	--------	--	--	--

4. Do you consider the DPD is :

4.(1) Compliant with the Duty to Cooperate	Yes	x		No	
4.(2) Legally compliant	Yes	x		No	
4.(3) Sound	Yes	x		No	

Please refer to guidance notes for explanation of terms

If you have entered **No** to 4(3), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is **unsound** because it is not:

- (1) Positively prepared
- (2) Justified
- (3) Effective
- (4) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Paragraph 5.44 'Industrial Development' (Page 25)

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:

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 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.**

(Continue on a separate sheet /expand box if necessary)

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

(Continue on a separate sheet /expand box if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note: *The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.*

Signature:

Date:



Wyre Forest District Local Development Framework – Site Allocations and Policies and Kidderminster Central Area Action Plan Development Plan Documents (DPDs) Publication Stage Representation Form

Ref:

(For official use only)

Please return to: Planning Policy Manager, Economic Prosperity and Place Directorate, Duke House, Clensmore Street, Kidderminster, Worcestershire, DY10 2JX; or by e-mailing this form to Planning.Policy@wyreforestdc.gov.uk

BY 5.30pm on Friday 14th September 2012

This form has two parts –
Part A – Personal Details
Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make and remember to specify which document it relates to. Please specify which DPD you are commenting on.

Part A

1. Personal Details*	2. Agent's Details (if applicable)
----------------------	------------------------------------

**If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

Title	Mrs		
First Name	Rachel		
Last Name	Whiteman		
Job Title (where relevant)	Senior Planning Officer		
Organisation (where relevant)	Environment Agency		
Address Line 1	Hafren House		
Line 2	Welshpool Road		
Line 3	Shrewsbury		
Post Code	SY3 8BB		
Telephone Number	01743 283 505		
E-mail Address (where relevant)	rachel.whiteman@environment-agency.gov.uk		

Part B – Please use a separate sheet for each representation

Your representation should cover all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

After this stage, further submission will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Name or Organisation : Environment Agency

3. To which DPD does this representation relate? Kidderminster Central Area Action Plan
To which part of the DPD does this representation relate?

Paragraph	6.4	Policy		Other e.g. Map, table, figure, key diagram	
-----------	-----	--------	--	--	--

4. Do you consider the DPD is :

4.(1) Compliant with the Duty to Cooperate	Yes	x		No	
4.(2) Legally compliant	Yes	x		No	
4.(3) Sound	Yes			No	x

Please refer to guidance notes for explanation of terms

If you have entered **No** to 4(3), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is **unsound** because it is not:

- (1) Positively prepared
- (2) Justified
- (3) Effective
- (4) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Paragraph 6.4 (Adapting to and Mitigating Against Climate Change)

Whilst paragraph 6.4 refers to flood risk as 'particularly pertinent in the KCAAP area' there is no inclusion of a flood risk policy within this document, as requested in our previous response to the 'preferred options' consultation.

Paragraph 6.4 considers this issue has been factored into the selection of sites. However a number of sites are located within Flood Zone 3 and 2. The Sequential Testing (Flooding) document referred to in paragraph 1.17 (Sustainability Appraisal and Evidence Base) is not available for review/comment, in justifying paragraph 6.4. In addition, paragraph 6.4 refers to flood risk being addressed through the site specific details, where appropriate, in Part B. The comments in Part B appear general and are lacking the detail required within a policy to address flood risk within the KCAAP area. There is also some inconsistency in the references to flood risk for individual sites within Part B.

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:

-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 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...'
- 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.

(Continue on a separate sheet /expand box if necessary)

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

It is considered that the inclusion of a flood risk policy in Section 6 'Adapting and Mitigating Against Climate Change' is required to make the DPD sound. This is consistent with national policy, with reference to Policy 99 and 100 of the National Planning Policy Framework. Policy 99 states that 'Local Plans should take account of climate change over the longer term, including factors such as flood risk...When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures...'. Policy 100 states that 'Local Plans should... develop policies to manage flood risk from all sources, taking account of advice from the Environment Agency...'.

The policy should be relevant to the KCAAP area and address:

- safe development (design and layout) requirements to mitigate for actual and residual risk from the towns flood defences and reservoir overtopping or failing;
- the importance of adequate emergency planning to cater for new development, particularly higher flood risk uses;
- opportunities offered through new development to manage and reduce flood risk i.e. through provision or maintenance/improvement of flood risk management structures (some of these measures would need to be delivered strategically, working with other partners and development sites);
- 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).

We would be happy to meet with your Council to assist with the specific wording of a flood risk policy.

(Continue on a separate sheet /expand box if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

- To clarify the issues.

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Rachel Whiteman

Date:

14/9/2012



Wyre Forest District Local Development Framework – Site Allocations and Policies and Kidderminster Central Area Action Plan Development Plan Documents (DPDs) Publication Stage Representation Form

Ref:

(For official use only)

Please return to: Planning Policy Manager, Economic Prosperity and Place Directorate, Duke House, Clensmore Street, Kidderminster, Worcestershire, DY10 2JX; or by e-mailing this form to Planning.Policy@wyreforestdc.gov.uk

BY 5.30pm on Friday 14th September 2012

This form has two parts –
Part A – Personal Details
Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make and remember to specify which document it relates to. Please specify which DPD you are commenting on.

Part A

1. Personal Details*	2. Agent's Details (if applicable)
----------------------	------------------------------------

**If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

Title	Mrs		
First Name	Rachel		
Last Name	Whiteman		
Job Title (where relevant)	Senior Planning Officer		
Organisation (where relevant)	Environment Agency		
Address Line 1	Hafren House		
Line 2	Welshpool Road		
Line 3	Shrewsbury		
Post Code	SY3 8BB		
Telephone Number	01743 283 505		
E-mail Address (where relevant)	rachel.whiteman@environment-agency.gov.uk		

Part B – Please use a separate sheet for each representation

Your representation should cover all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

After this stage, further submission will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Name or Organisation : Environment Agency

3. To which DPD does this representation relate? Kidderminster Central Area Action Plan
To which part of the DPD does this representation relate?

Paragraph	1.17	Policy		Other e.g. Map, table, figure, key diagram	
-----------	------	--------	--	--	--

4. Do you consider the DPD is :

4.(1) Compliant with the Duty to Cooperate	Yes	x		No	
4.(2) Legally compliant	Yes	x		No	
4.(3) Sound	Yes			No	x

Please refer to guidance notes for explanation of terms

If you have entered **No** to 4(3), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is **unsound** because it is not:

- (1) Positively prepared
- (2) Justified
- (3) Effective
- (4) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Paragraph 1.17 'Sustainability Appraisal and Evidence Base'

Paragraph 1.17 refers to background studies and technical reports that have been produced to inform the decisions made regarding sites in the Development Plan Document (DPD). All of the studies are stated as available to view on the Council's website and the main studies produced to inform the site selection process are listed.

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.

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.

Paragraph 177 of the National Planning Policy Framework states that it is 'important to ensure that there is a reasonable prospect that planned infrastructure is deliverable in a timely fashion. To facilitate

this, it is important that local planning authorities understand district-wide development costs at the time Local Plans are drawn up.'

Paragraph 5.70 of the adopted Core Strategy states that 'the availability of the necessary infrastructure and the potential need to provide additional capacity in some of the locations will be key factors in determining the timing of the release of sites...Further work on high level costings and an infrastructure implementation plan will be carried out to inform the Site Allocations and Policies and Kidderminster Central Area Action Plan DPDs. This will ensure that the information is up-to-date.' In terms of environmental infrastructure, the Environment Agency and utility company are listed as key stakeholders and delivery bodies (paragraph B.2 (B Infrastructure Schedules) of the adopted Core Strategy defines environmental infrastructure for the purpose of the plan).

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.

(Continue on a separate sheet /expand box if necessary)

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The Infrastructure Delivery Plan and Sequential Testing (Flooding) reports should be finalised and published so that they can be viewed and commented on. It should be clear how the plans have 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.

Flood Risk:

A significant part of the KCAAP area is within the floodplain of the River Stour. Whilst we acknowledge that the regeneration of this area is a key aspiration of the Council in delivering mixed use development, 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. The Sequential Testing (Flooding) report has been referred to in the plan and should therefore be completed to support the allocation of sites within the DPD. Upon receipt of this document we would be able to comment further and update our position.

Environmental Infrastructure:

The Infrastructure Delivery Plan should address and update the environmental infrastructure constraints identified in the Wyre Forest District Water Cycle Strategy (WCS) Final Report, March 2010. When comparing the DPD with the WCS, it appears that many of the development sites assessed within the KCAAP area were found to have no significant constraints. The Infrastructure Delivery Plan should further clarify this and provide an update to support the delivery of sites within the DPD. Upon receipt of this document we would be able to comment further and update our position.

(Continue on a separate sheet /expand box if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

- To clarify the issues.
- The Council are still finalising the evidence base. We would welcome the opportunity to review the Sequential Testing (Flooding) report and Infrastructure Delivery Plan and to discuss this further with the Council, with a view to informing policy and potential amendments where necessary.

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Rachel Whiteman

Date:

14/9/2012



Wyre Forest District Local Development Framework – Site Allocations and Policies and Kidderminster Central Area Action Plan Development Plan Documents (DPDs) Publication Stage Representation Form

Ref:

(For official use only)

Please return to: Planning Policy Manager, Economic Prosperity and Place Directorate, Duke House, Clensmore Street, Kidderminster, Worcestershire, DY10 2JX; or by e-mailing this form to Planning.Policy@wyreforestdc.gov.uk

BY 5.30pm on Friday 14th September 2012

This form has two parts –
Part A – Personal Details
Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make and remember to specify which document it relates to. Please specify which DPD you are commenting on.

Part A

1. Personal Details*

2. Agent's Details (if applicable)

**If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

Title

Mrs

First Name

Rachel

Last Name

Whiteman

Job Title
(where relevant)

Senior Planning Officer

Organisation
(where relevant)

Environment Agency

Address Line 1

Hafren House

Line 2

Welshpool Road

Line 3

Shrewsbury

Post Code

SY3 8BB

Telephone Number

01743 283 505

E-mail Address
(where relevant)

rachel.whiteman@environment-agency.gov.uk

Part B – Please use a separate sheet for each representation

Your representation should cover all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

After this stage, further submission will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Name or Organisation : Environment Agency

3. To which DPD does this representation relate? Kidderminster Central Area Action Plan
To which part of the DPD does this representation relate?

Paragraph	6.6	Policy		Other e.g. Map, table, figure, key diagram	
-----------	-----	--------	--	--	--

4. Do you consider the DPD is :

4.(1) Compliant with the Duty to Cooperate	Yes	x		No	
4.(2) Legally compliant	Yes	x		No	
4.(3) Sound	Yes	x		No	

Please refer to guidance notes for explanation of terms

If you have entered **No** to 4(3), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is **unsound** because it is not:

- (1) Positively prepared
- (2) Justified
- (3) Effective
- (4) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Paragraph 6.6 'Water Management' (page 33)

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:

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 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).

(Continue on a separate sheet /expand box if necessary)

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

(Continue on a separate sheet /expand box if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Rachel Whiteman

Date:

14/9/2012



Wyre Forest District Local Development Framework – Site Allocations and Policies and Kidderminster Central Area Action Plan Development Plan Documents (DPDs) Publication Stage Representation Form

Ref:

(For official use only)

Please return to: Planning Policy Manager, Economic Prosperity and Place Directorate, Duke House, Clensmore Street, Kidderminster, Worcestershire, DY10 2JX; or by e-mailing this form to Planning.Policy@wyreforestdc.gov.uk

BY 5.30pm on Friday 14th September 2012

This form has two parts –
Part A – Personal Details
Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make and remember to specify which document it relates to. Please specify which DPD you are commenting on.

Part A

1. Personal Details*	2. Agent's Details (if applicable)
----------------------	------------------------------------

**If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

Title	Mrs		
First Name	Rachel		
Last Name	Whiteman		
Job Title (where relevant)	Senior Planning Officer		
Organisation (where relevant)	Environment Agency		
Address Line 1	Hafren House		
Line 2	Welshpool Road		
Line 3	Shrewsbury		
Post Code	SY3 8BB		
Telephone Number	01743 283 505		
E-mail Address (where relevant)	rachel.whiteman@environment-agency.gov.uk		

Part B – Please use a separate sheet for each representation

Your representation should cover all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

After this stage, further submission will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Name or Organisation : Environment Agency

3. To which DPD does this representation relate? Kidderminster Central Area Action Plan
To which part of the DPD does this representation relate?

Paragraph		Policy	KCA.Ch7	Other e.g. Map, table, figure, key diagram	
4. Do you consider the DPD is :					
4.(1) Compliant with the Duty to Cooperate		Yes		x	No
4.(2) Legally compliant		Yes		x	No
4.(3) Sound		Yes			No x

Please refer to guidance notes for explanation of terms

If you have entered **No** to 4(3), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is **unsound** because it is not:

- (1) Positively prepared
- (2) Justified
- (3) Effective
- (4) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Policy KCA.Ch7 'Crossley Park'

We acknowledge the reference within paragraph 9.42 to flood risk and the positioning of development on the eastern edge of the canal.

However, we would question why flood risk is not referred to in the policy for this site given the extent of flood risk in this area. The text provided does not fully explain the significant constraints to developing this site. The majority of the site is located within the functional floodplain and there is also a significant residual risk and flood hazard from the dam overtopping or breaching, given the sites location close to the Kidderminster Flood Alleviation Scheme. As noted, the higher ground is on the eastern side of the site; however the area that can be developed is likely to be small/significantly constrained.

The Sequential Testing (Flooding) document should provide further justification for the selection of this site. This document is not currently available to view. It is difficult to comment on the soundness of the plan as we have not seen the content of this key evidence base document.

We note that paragraph 9.43 acknowledges that the site is a former landfill and that development will

need to demonstrate that contamination issues can be adequately addressed. Given the previous use of the site there could be significant environmental constraints. It is difficult to make detailed comments on the ability of this site to be developed in the absence of comprehensive site investigation works/detailed development proposals. Careful consideration would need to be given to the design of the development e.g. drainage, the use of foundations has the potential to act as rapid contaminant migration pathways to the underlying principal aquifer. This could be an issue for the proposed new 'multi-modal' bridge link referred to in the policy for this location

(Continue on a separate sheet /expand box if necessary)

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The Sequential Testing (Flooding) report should be 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.

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.

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:

'New development should demonstrate appropriate remediation, building and drainage design in order to deal with any contaminated land and to protect the water environment.'

(Continue on a separate sheet /expand box if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

- To clarify the issues.

- The Council are still finalising the evidence base. We would welcome the opportunity to review the Sequential Testing (Flooding) report and to discuss this further with the Council, with a view to informing policy and potential amendments where necessary.

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Rachel Whiteman

Date:

14/9/2012



Wyre Forest District Local Development Framework – Site Allocations and Policies and Kidderminster Central Area Action Plan Development Plan Documents (DPDs) Publication Stage Representation Form

Ref:

(For official use only)

Please return to: Planning Policy Manager, Economic Prosperity and Place Directorate, Duke House, Clensmore Street, Kidderminster, Worcestershire, DY10 2JX; or by e-mailing this form to Planning.Policy@wyreforestdc.gov.uk

BY 5.30pm on Friday 14th September 2012

This form has two parts –
 Part A – Personal Details
 Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make and remember to specify which document it relates to. Please specify which DPD you are commenting on.

Part A

1. Personal Details*	2. Agent's Details (if applicable)
----------------------	------------------------------------

**If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

Title	Mrs		
First Name	Rachel		
Last Name	Whiteman		
Job Title (where relevant)	Senior Planning Officer		
Organisation (where relevant)	Environment Agency		
Address Line 1	Hafren House		
Line 2	Welshpool Road		
Line 3	Shrewsbury		
Post Code	SY3 8BB		
Telephone Number	01743 283 505		
E-mail Address (where relevant)	rachel.whiteman@environment-agency.gov.uk		

Part B – Please use a separate sheet for each representation

Your representation should cover all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

After this stage, further submission will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Name or Organisation : Environment Agency

3. To which DPD does this representation relate? Kidderminster Central Area Action Plan
To which part of the DPD does this representation relate?

Paragraph		Policy	KCA.CW1	Other e.g. Map, table, figure, key diagram	
-----------	--	--------	---------	--	--

4. Do you consider the DPD is :

4.(1) Compliant with the Duty to Cooperate	Yes	x		No	
4.(2) Legally compliant	Yes	x		No	
4.(3) Sound	Yes	x		No	

Please refer to guidance notes for explanation of terms

If you have entered **No** to 4(3), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is **unsound** because it is not:

- (1) Positively prepared
- (2) Justified
- (3) Effective
- (4) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Policy KCA.CW1 'Castle Wharf'

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.

Notwithstanding the above, there is currently limited reference to the areas sensitive hydrogeological setting. This area is located in the inner and outer protection zone of a public water supply borehole and is therefore an extremely sensitive hydrogeological setting. The shallow groundwater setting means that any reaction/response times for pollution of the groundwater supply would be rapid. 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.

The above matter is covered within the policy for Green Street Depot and recommended for the Bus Depot site, located in a similar hydrogeological setting. We would recommend that wording is added to policy KCA.CW1 as follows:

Policy:

x. Take full account of the Groundwater Source Protection Zone that exists within this area, in safeguarding groundwater supply.

Reasoned Justification:

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.

(Continue on a separate sheet /expand box if necessary)

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

(Continue on a separate sheet /expand box if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Rachel Whiteman

Date:

14/9/2012



Wyre Forest District Local Development Framework – Site Allocations and Policies and Kidderminster Central Area Action Plan Development Plan Documents (DPDs) Publication Stage Representation Form

Ref:

(For official use only)

Please return to: Planning Policy Manager, Economic Prosperity and Place Directorate, Duke House, Clensmore Street, Kidderminster, Worcestershire, DY10 2JX; or by e-mailing this form to Planning.Policy@wyreforestdc.gov.uk

BY 5.30pm on Friday 14th September 2012

This form has two parts –
Part A – Personal Details
Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make and remember to specify which document it relates to. Please specify which DPD you are commenting on.

Part A

1. Personal Details*

2. Agent's Details (if applicable)

**If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

Title	Mrs		
First Name	Rachel		
Last Name	Whiteman		
Job Title (where relevant)	Senior Planning Officer		
Organisation (where relevant)	Environment Agency		
Address Line 1	Hafren House		
Line 2	Welshpool Road		
Line 3	Shrewsbury		
Post Code	SY3 8BB		
Telephone Number	01743 283 505		
E-mail Address (where relevant)	rachel.whiteman@environment-agency.gov.uk		

Part B – Please use a separate sheet for each representation

Your representation should cover all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

After this stage, further submission will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Name or Organisation : Environment Agency

3. To which DPD does this representation relate? Kidderminster Central Area Action Plan
To which part of the DPD does this representation relate?

Paragraph		Policy	KCA.HP1	Other e.g. Map, table, figure, key diagram	
-----------	--	--------	---------	--	--

4. Do you consider the DPD is :

4.(1) Compliant with the Duty to Cooperate	Yes	x		No	
4.(2) Legally compliant	Yes	x		No	
4.(3) Sound	Yes	x		No	

Please refer to guidance notes for explanation of terms

If you have entered **No** to 4(3), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is **unsound** because it is not:

- (1) Positively prepared
- (2) Justified
- (3) Effective
- (4) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Policy KCA.HP1 'Heritage Processions Area'

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, and the sensitive environmental setting (the location of the area within an inner and outer protection zone of a public supply borehole), we would recommend the inclusion of a reference within the policy wording as follows:

'New development should incorporate appropriate remediation, building and drainage design in order to deal with any contaminated land and to protect the water environment.'

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.

(Continue on a separate sheet /expand box if necessary)

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

(Continue on a separate sheet /expand box if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note: *The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.*

Signature:

Rachel Whiteman

Date:

14/9/2012



Wyre Forest District Local Development Framework – Site Allocations and Policies and Kidderminster Central Area Action Plan Development Plan Documents (DPDs) Publication Stage Representation Form

Ref:

(For official use only)

Please return to: Planning Policy Manager, Economic Prosperity and Place Directorate, Duke House, Clensmore Street, Kidderminster, Worcestershire, DY10 2JX; or by e-mailing this form to Planning.Policy@wyreforestdc.gov.uk

BY 5.30pm on Friday 14th September 2012

This form has two parts –

Part A – Personal Details

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make and remember to specify which document it relates to. Please specify which DPD you are commenting on.

Part A

1. Personal Details*

2. Agent's Details (if applicable)

**If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

Title

Mrs

First Name

Rachel

Last Name

Whiteman

Job Title
(where relevant)

Senior Planning Officer

Organisation
(where relevant)

Environment Agency

Address Line 1

Hafren House

Line 2

Welshpool Road

Line 3

Shrewsbury

Post Code

SY3 8BB

Telephone Number

01743 283 505

E-mail Address
(where relevant)

rachel.whiteman@environment-agency.gov.uk

Part B – Please use a separate sheet for each representation

Your representation should cover all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

After this stage, further submission will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Name or Organisation : Environment Agency

3. To which DPD does this representation relate? Kidderminster Central Area Action Plan
To which part of the DPD does this representation relate?

Paragraph		Policy	KCA.HP2	Other e.g. Map, table, figure, key diagram	
-----------	--	--------	---------	--	--

4. Do you consider the DPD is :

4.(1) Compliant with the Duty to Cooperate	Yes	x		No	
4.(2) Legally compliant	Yes	x		No	
4.(3) Sound	Yes	x		No	

Please refer to guidance notes for explanation of terms

If you have entered **No** to 4(3), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is **unsound** because it is not:

- (1) Positively prepared
- (2) Justified
- (3) Effective
- (4) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Policy KCA.HP2 'Frank Stone'

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.

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.

(Continue on a separate sheet /expand box if necessary)

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

(Continue on a separate sheet /expand box if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note: *The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.*

Signature:

Rachel Whiteman

Date:

14/9/2012



Wyre Forest District Local Development Framework – Site Allocations and Policies and Kidderminster Central Area Action Plan Development Plan Documents (DPDs) Publication Stage Representation Form

Ref:

(For official use only)

Please return to: Planning Policy Manager, Economic Prosperity and Place Directorate, Duke House, Clensmore Street, Kidderminster, Worcestershire, DY10 2JX; or by e-mailing this form to Planning.Policy@wyreforestdc.gov.uk

BY 5.30pm on Friday 14th September 2012

This form has two parts –

Part A – Personal Details

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make and remember to specify which document it relates to. Please specify which DPD you are commenting on.

Part A

1. Personal Details*

2. Agent's Details (if applicable)

**If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

Title

Mrs

First Name

Rachel

Last Name

Whiteman

Job Title
(where relevant)

Senior Planning Officer

Organisation
(where relevant)

Environment Agency

Address Line 1

Hafren House

Line 2

Welshpool Road

Line 3

Shrewsbury

Post Code

SY3 8BB

Telephone Number

01743 283 505

E-mail Address
(where relevant)

rachel.whiteman@environment-agency.gov.uk

Part B – Please use a separate sheet for each representation

Your representation should cover all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

After this stage, further submission will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Name or Organisation : Environment Agency

3. To which DPD does this representation relate? Kidderminster Central Area Action Plan
To which part of the DPD does this representation relate?

Paragraph		Policy	KCA.HP3	Other e.g. Map, table, figure, key diagram	
-----------	--	--------	---------	--	--

4. Do you consider the DPD is :

4.(1) Compliant with the Duty to Cooperate	Yes	x		No	
4.(2) Legally compliant	Yes	x		No	
4.(3) Sound	Yes	x		No	

Please refer to guidance notes for explanation of terms

If you have entered **No** to 4(3), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is **unsound** because it is not:

- (1) Positively prepared
- (2) Justified
- (3) Effective
- (4) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Policy KCA.HP3 'Green Street Depot'

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:

Policy:

vi. Take full account of the Groundwater Source Protection Zone that exists within this area, in **safeguarding groundwater supply**.

Paragraph 15.18:

The majority of this site sits on a Groundwater Source Protection Area (SPZ1). A 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.

(Continue on a separate sheet /expand box if necessary)

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

(Continue on a separate sheet /expand box if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note: *The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.*

Signature:

Rachel Whiteman

Date:

14/9/2012



Wyre Forest District Local Development Framework – Site Allocations and Policies and Kidderminster Central Area Action Plan Development Plan Documents (DPDs) Publication Stage Representation Form

Ref:

(For official use only)

Please return to: Planning Policy Manager, Economic Prosperity and Place Directorate, Duke House, Clensmore Street, Kidderminster, Worcestershire, DY10 2JX; or by e-mailing this form to Planning.Policy@wyreforestdc.gov.uk

BY 5.30pm on Friday 14th September 2012

This form has two parts –

Part A – Personal Details

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make and remember to specify which document it relates to. Please specify which DPD you are commenting on.

Part A

1. Personal Details*

2. Agent's Details (if applicable)

**If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

Title

Mrs

First Name

Rachel

Last Name

Whiteman

Job Title
(where relevant)

Senior Planning Officer

Organisation
(where relevant)

Environment Agency

Address Line 1

Hafren House

Line 2

Welshpool Road

Line 3

Shrewsbury

Post Code

SY3 8BB

Telephone Number

01743 283 505

E-mail Address
(where relevant)

rachel.whiteman@environment-agency.gov.uk

Part B – Please use a separate sheet for each representation

Your representation should cover all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

After this stage, further submission will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Name or Organisation : Environment Agency

3. To which DPD does this representation relate? Kidderminster Central Area Action Plan
To which part of the DPD does this representation relate?

Paragraph		Policy	KCA.HP4	Other e.g. Map, table, figure, key diagram	
-----------	--	--------	---------	--	--

4. Do you consider the DPD is :

4.(1) Compliant with the Duty to Cooperate	Yes	x		No	
4.(2) Legally compliant	Yes	x		No	
4.(3) Sound	Yes	x		No	

Please refer to guidance notes for explanation of terms

If you have entered **No** to 4(3), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is **unsound** because it is not:

- (1) Positively prepared
- (2) Justified
- (3) Effective
- (4) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Policy KCA.HP4 'Bus Depot'

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. There are likely to be restrictions on the drainage, building designs (foundations), and land uses. The level of desk study, and if necessary, site investigation and remediation will be high. Long term monitoring/mitigation measures may be required.

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:

Policy:

- iv. Take full account of the Groundwater Source Protection Zone that exists within this area, in safeguarding groundwater supply.

Reasoned Justification:

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.

(Continue on a separate sheet /expand box if necessary)

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

(Continue on a separate sheet /expand box if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note: *The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.*

Signature:

Rachel Whiteman

Date:

14/9/2012



Wyre Forest District Local Development Framework – Site Allocations and Policies and Kidderminster Central Area Action Plan Development Plan Documents (DPDs) Publication Stage Representation Form

Ref:

(For official use only)

Please return to: Planning Policy Manager, Economic Prosperity and Place Directorate, Duke House, Clensmore Street, Kidderminster, Worcestershire, DY10 2JX; or by e-mailing this form to Planning.Policy@wyreforestdc.gov.uk

BY 5.30pm on Friday 14th September 2012

This form has two parts –
Part A – Personal Details
Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make and remember to specify which document it relates to. Please specify which DPD you are commenting on.

Part A

1. Personal Details*	2. Agent's Details (if applicable)
----------------------	------------------------------------

**If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

Title	Mrs		
First Name	Rachel		
Last Name	Whiteman		
Job Title (where relevant)	Senior Planning Officer		
Organisation (where relevant)	Environment Agency		
Address Line 1	Hafren House		
Line 2	Welshpool Road		
Line 3	Shrewsbury		
Post Code	SY3 8BB		
Telephone Number	01743 283 505		
E-mail Address (where relevant)	rachel.whiteman@environment-agency.gov.uk		

Part B – Please use a separate sheet for each representation

Your representation should cover all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

After this stage, further submission will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Name or Organisation : Environment Agency

3. To which DPD does this representation relate? Kidderminster Central Area Action Plan
To which part of the DPD does this representation relate?

Paragraph		Policy	KCA.UP1 (I.)	Other e.g. Map, table, figure, key diagram	
-----------	--	--------	-----------------	--	--

4. Do you consider the DPD is :

4.(1) Compliant with the Duty to Cooperate	Yes	x		No	
4.(2) Legally compliant	Yes	x		No	
4.(3) Sound	Yes	x		No	

Please refer to guidance notes for explanation of terms

If you have entered **No** to 4(3), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is **unsound** because it is not:

- (1) Positively prepared
- (2) Justified
- (3) Effective
- (4) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Policy KCA.UP1 'Urban Design Principles'

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:

The word enhance could be added i.e. 'respect and **enhance** the blue and green infrastructure of the town centre...'

This would be more positive wording in identifying opportunities through new development to achieve environmental gains for watercourses and the River Stour Valley such as: flood risk betterment; biodiversity; water quality, and in working towards the objectives of the Water Framework Directive.

(Continue on a separate sheet /expand box if necessary)

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

(Continue on a separate sheet /expand box if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Rachel Whiteman

Date:

14/9/2012



Wyre Forest District Local Development Framework – Site Allocations and Policies and Kidderminster Central Area Action Plan Development Plan Documents (DPDs) Publication Stage Representation Form

Ref:

(For official use only)

Please return to: Planning Policy Manager, Economic Prosperity and Place Directorate, Duke House, Clensmore Street, Kidderminster, Worcestershire, DY10 2JX; or by e-mailing this form to Planning.Policy@wyreforestdc.gov.uk

BY 5.30pm on Friday 14th September 2012

This form has two parts –
Part A – Personal Details
Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make and remember to specify which document it relates to. Please specify which DPD you are commenting on.

Part A

1. Personal Details*

2. Agent's Details (if applicable)

**If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

Title	Mrs		
First Name	Rachel		
Last Name	Whiteman		
Job Title (where relevant)	Senior Planning Officer		
Organisation (where relevant)	Environment Agency		
Address Line 1	Hafren House		
Line 2	Welshpool Road		
Line 3	Shrewsbury		
Post Code	SY3 8BB		
Telephone Number	01743 283 505		
E-mail Address (where relevant)	rachel.whiteman@environment-agency.gov.uk		

Part B – Please use a separate sheet for each representation

Your representation should cover all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

After this stage, further submission will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Name or Organisation : Environment Agency

3. To which DPD does this representation relate? Kidderminster Central Area Action Plan
To which part of the DPD does this representation relate?

Paragraph	Policy	KCA.UP2 (g)	Other e.g. Map, table, figure, key diagram
4. Do you consider the DPD is :			
4.(1) Compliant with the Duty to Cooperate	Yes	x	No
4.(2) Legally compliant	Yes	x	No
4.(3) Sound	Yes	x	No

Please refer to guidance notes for explanation of terms

If you have entered **No** to 4(3), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is **unsound** because it is not:

- (1) Positively prepared
- (2) Justified
- (3) Effective
- (4) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Policy KCA.UP2 (g) '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 managing and improving surface water run-off, in line with the objectives of the Water Framework Directive.

(Continue on a separate sheet /expand box if necessary)

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

(Continue on a separate sheet /expand box if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Rachel Whiteman

Date:

14/9/2012



Wyre Forest District Local Development Framework – Site Allocations and Policies and Kidderminster Central Area Action Plan Development Plan Documents (DPDs) Publication Stage Representation Form

Ref:

(For official use only)

Please return to: Planning Policy Manager, Economic Prosperity and Place Directorate, Duke House, Clensmore Street, Kidderminster, Worcestershire, DY10 2JX; or by e-mailing this form to Planning.Policy@wyreforestdc.gov.uk

BY 5.30pm on Friday 14th September 2012

This form has two parts –
Part A – Personal Details
Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make and remember to specify which document it relates to. Please specify which DPD you are commenting on.

Part A

1. Personal Details*

2. Agent's Details (if applicable)

**If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

Title	Mrs		
First Name	Rachel		
Last Name	Whiteman		
Job Title (where relevant)	Senior Planning Officer		
Organisation (where relevant)	Environment Agency		
Address Line 1	Hafren House		
Line 2	Welshpool Road		
Line 3	Shrewsbury		
Post Code	SY3 8BB		
Telephone Number	01743 283 505		
E-mail Address (where relevant)	rachel.whiteman@environment-agency.gov.uk		

Part B – Please use a separate sheet for each representation

Your representation should cover all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

After this stage, further submission will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Name or Organisation : Environment Agency

3. To which DPD does this representation relate? Kidderminster Central Area Action Plan
To which part of the DPD does this representation relate?

Paragraph		Policy	KCA.UP5 (viii)	Other e.g. Map, table, figure, key diagram	
-----------	--	--------	-------------------	--	--

4. Do you consider the DPD is :

4.(1) Compliant with the Duty to Cooperate	Yes	x		No	
4.(2) Legally compliant	Yes	x		No	
4.(3) Sound	Yes	x		No	

Please refer to guidance notes for explanation of terms

If you have entered **No** to 4(3), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is **unsound** because it is not:

- (1) Positively prepared
- (2) Justified
- (3) Effective
- (4) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Policy KCA.UP5 (viii) 'Staffordshire and Worcestershire Canal'

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.

Recommended wording:

"viii. Where appropriate, enhance the canal's **water environment and** role as part of the green infrastructure and biodiversity network."

As mentioned in our response to the 'preferred options' consultation, the Staffordshire and Worcestershire Canal is currently classified as less than good ecological potential (artificial or heavily modified water bodies are expressed as potential rather than status). We would recommend that a reference to the current condition of the canal (i.e. moderate ecological potential) and the WFD objectives is included in the text/reasoned justification supporting this policy.

The WFD water body ID is GB70910505 and name is 'Staffordshire and Worcester Canal, Stourbridge Canal to River Severn', as reported in the Severn River Basin Management Plan.

(Continue on a separate sheet /expand box if necessary)

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

(Continue on a separate sheet /expand box if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Rachel Whiteman

Date:

14/9/2012



Wyre Forest District Local Development Framework – Site Allocations and Policies and Kidderminster Central Area Action Plan Development Plan Documents (DPDs) Publication Stage Representation Form

Ref:

(For official use only)

Please return to: Planning Policy Manager, Economic Prosperity and Place Directorate, Duke House, Clensmore Street, Kidderminster, Worcestershire, DY10 2JX; or by e-mailing this form to Planning.Policy@wyreforestdc.gov.uk

BY 5.30pm on Friday 14th September 2012

This form has two parts –

Part A – Personal Details

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make and remember to specify which document it relates to. Please specify which DPD you are commenting on.

Part A

1. Personal Details*

2. Agent's Details (if applicable)

**If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

Title

Mrs

First Name

Rachel

Last Name

Whiteman

Job Title
(where relevant)

Senior Planning Officer

Organisation
(where relevant)

Environment Agency

Address Line 1

Hafren House

Line 2

Welshpool Road

Line 3

Shrewsbury

Post Code

SY3 8BB

Telephone Number

01743 283 505

E-mail Address
(where relevant)

rachel.whiteman@environment-agency.gov.uk

Part B – Please use a separate sheet for each representation

Your representation should cover all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

After this stage, further submission will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Name or Organisation : Environment Agency

3. To which DPD does this representation relate? Kidderminster Central Area Action Plan
To which part of the DPD does this representation relate?

Paragraph		Policy	KCA.UP6	Other e.g. Map, table, figure, key diagram	
-----------	--	--------	---------	--	--

4. Do you consider the DPD is :

4.(1) Compliant with the Duty to Cooperate	Yes	x		No	
4.(2) Legally compliant	Yes	x		No	
4.(3) Sound	Yes	x		No	

Please refer to guidance notes for explanation of terms

If you have entered **No** to 4(3), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is **unsound** because it is not:

- (1) Positively prepared
- (2) Justified
- (3) Effective
- (4) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Policy KCA.UP6 'River Stour'

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:

New developments adjacent to the River Stour **should contribute to the improvement of the water environment by:**

- 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 recreate more natural conditions and better habitat (i.e. de-culverting, re-profiling and buffer strips).**
- v. **Putting in place measures to protect and improve water quality (including groundwater).**
- vi. **Providing flood risk betterment where practical.**

- vii. **Providing** opportunities for promenading and interaction with the environment of the River Stour.

We have recommended stronger wording of the policy, in considering the current condition of the River Stour and the UK's requirement to meet the objectives of the Water Framework Directive. Planning authorities have a duty under the WFD to take account of the River Basin Management Plans and can help deliver WFD objectives. A paragraph can be added to the reasoned justification as follows to support this:

The River Stour is currently classified as poor ecological status and failing good chemical status, as reported in the Severn River Basin Management Plan. Two of the objectives of the Water Framework Directive (WFD) are: to prevent deterioration in the status of aquatic ecosystems, protect them and improve the ecological condition of waters; and to achieve at least good status for all waters by 2015. Where this is not possible, and subject to the criteria set out in the Directive, aim to achieve good status by 2021 or 2027. New development should contribute towards improving the River Stour to assist the UK in meeting its objectives of the WFD. The WFD water body ID is GB109054044710 and name is 'River Stour (Worcs) – confluence Smestow Brook to confluence River Severn'.

(Continue on a separate sheet /expand box if necessary)

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

(Continue on a separate sheet /expand box if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Rachel Whiteman

Date:

14/9/2012



Wyre Forest District Local Development Framework – Site Allocations and Policies and Kidderminster Central Area Action Plan Development Plan Documents (DPDs) Publication Stage Representation Form

Ref:

(For official use only)

Please return to: Planning Policy Manager, Economic Prosperity and Place Directorate, Duke House, Clensmore Street, Kidderminster, Worcestershire, DY10 2JX; or by e-mailing this form to Planning.Policy@wyreforestdc.gov.uk

BY 5.30pm on Friday 14th September 2012

This form has two parts –
 Part A – Personal Details
 Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make and remember to specify which document it relates to. Please specify which DPD you are commenting on.

Part A

1. Personal Details*	2. Agent's Details (if applicable)
----------------------	------------------------------------

**If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

Title	Mrs		
First Name	Rachel		
Last Name	Whiteman		
Job Title (where relevant)	Senior Planning Officer		
Organisation (where relevant)	Environment Agency		
Address Line 1	Hafren House		
Line 2	Welshpool Road		
Line 3	Shrewsbury		
Post Code	SY3 8BB		
Telephone Number	01743 283 505		
E-mail Address (where relevant)	rachel.whiteman@environment-agency.gov.uk		

Part B – Please use a separate sheet for each representation

Your representation should cover all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

After this stage, further submission will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Name or Organisation : Environment Agency

3. To which DPD does this representation relate? Kidderminster Central Area Action Plan
To which part of the DPD does this representation relate?

Paragraph	Policy	Other e.g. Map, table, figure, key diagram	Strategic Objectives
4. Do you consider the DPD is :			
4.(1) Compliant with the Duty to Cooperate	Yes	x	No
4.(2) Legally compliant	Yes	x	No
4.(3) Sound	Yes	x	No

Please refer to guidance notes for explanation of terms

If you have entered **No** to 4(3), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is **unsound** because it is not:

- (1) Positively prepared
- (2) Justified
- (3) Effective
- (4) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Strategic Objectives (page 10)

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.

Given the extent of flood risk to the KCAAP area it may not be achievable to safeguard the town against all flood risk. We would recommend that this Objective is reworded to ensure that it can be met and is deliverable.

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”.

(Continue on a separate sheet /expand box if necessary)

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

(Continue on a separate sheet /expand box if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Rachel Whiteman

Date:

14/9/2012



Wyre Forest District Local Development Framework – Site Allocations and Policies and Kidderminster Central Area Action Plan Development Plan Documents (DPDs) Publication Stage Representation Form

Ref:

(For official use only)

Please return to: Planning Policy Manager, Economic Prosperity and Place Directorate, Duke House, Clensmore Street, Kidderminster, Worcestershire, DY10 2JX; or by e-mailing this form to Planning.Policy@wyreforestdc.gov.uk

BY 5.30pm on Friday 14th September 2012

This form has two parts –
Part A – Personal Details
Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make and remember to specify which document it relates to. Please specify which DPD you are commenting on.

Part A

1. Personal Details*

2. Agent's Details (if applicable)

**If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

Title	Mrs		
First Name	Rachel		
Last Name	Whiteman		
Job Title (where relevant)	Senior Planning Officer		
Organisation (where relevant)	Environment Agency		
Address Line 1	Hafren House		
Line 2	Welshpool Road		
Line 3	Shrewsbury		
Post Code	SY3 8BB		
Telephone Number	01743 283 505		
E-mail Address (where relevant)	rachel.whiteman@environment-agency.gov.uk		

Part B – Please use a separate sheet for each representation

Your representation should cover all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

After this stage, further submission will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Name or Organisation : Environment Agency

3. To which DPD does this representation relate? Kidderminster Central Area Action Plan
To which part of the DPD does this representation relate?

Paragraph	Policy	Other e.g. Map, table, figure, key diagram	Vision
4. Do you consider the DPD is :			
4.(1) Compliant with the Duty to Cooperate	Yes	x	No
4.(2) Legally compliant	Yes	x	No
4.(3) Sound	Yes	x	No

Please refer to guidance notes for explanation of terms

If you have entered **No** to 4(3), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is **unsound** because it is not:

- (1) Positively prepared
- (2) Justified
- (3) Effective
- (4) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Vision (page 9 - 10)

We support reference to the River Stour as an important natural movement corridor and the green infrastructure network.

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.

(Continue on a separate sheet /expand box if necessary)

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

(Continue on a separate sheet /expand box if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Rachel Whiteman

Date:

14/9/2012



Comment

Consultee	MR SUKHJIT SIDHU (675706)
Email Address	bill2000@btconnect.com
Company / Organisation	Horsefair Traders Partnership
Address	27-28 THE HORSEFAIR KIDDERMINSTER DY10 2EN
Event Name	Kidderminster Central Area Action Plan Publication
Comment by	Horsefair Traders Partnership (MR SUKHJIT SIDHU)
Comment ID	KCAAPP14
Response Date	07/09/12 19:20
Consultation Point	4.2 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.1

To which part of the DPD does this representation relate? (Please state paragraph number, policy number, map, table or figure number). Paragraph 4.2

Please refer to guidance notes for explanation of terms. If you enter **No** to 'Sound', please continue to Q5. In all other circumstances, please go to Q6.

Do you consider the DPD is:

Compliant with the Duty to Cooperate	Yes
Legally Compliant	Yes
Sound	Yes

Do you consider the document is **unsound** because it is not:

Positively prepared	No
Justified	No
Effective	No
Consistent with national policy	No

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

The Kidderminster Central Area Action Plan is correct to focus on unlocking residential development potential at the heart of Kidderminster. Residential development opportunities in and around the centre of town have the potential to strengthen the link between business and community. Strong relationships between the local community and businesses will have the effect of reducing crime by encouraging a sense of ownership and responsibility for the local area amongst residents and business owners.



Comment

Consultee	MR SUKHJIT SIDHU (675706)
Email Address	bill2000@btconnect.com
Company / Organisation	Horsefair Traders Partnership
Address	27-28 THE HORSEFAIR KIDDERMINSTER DY10 2EN
Event Name	Kidderminster Central Area Action Plan Publication
Comment by	Horsefair Traders Partnership (MR SUKHJIT SIDHU)
Comment ID	KCAAPP15
Response Date	07/09/12 20:04
Consultation Point	4.9 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.1

To which part of the DPD does this representation relate? (Please state paragraph number, policy number, map, table or figure number). paragraph 4.8

Please refer to guidance notes for explanation of terms. If you enter **No** to 'Sound', please continue to Q5. In all other circumstances, please go to Q6.

Do you consider the DPD is:

Compliant with the Duty to Cooperate	Yes
Legally Compliant	Yes
Sound	Yes

Do you consider the document is **unsound** because it is not:

Positively prepared	No
Justified	No
Effective	No
Consistent with national policy	No

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

The concept of an urban village development on Chruchfields would fulfill 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 reinvigourate the town centre economy.



Comment

Consultee	MR SUKHJIT SIDHU (675706)
Email Address	bill2000@btconnect.com
Company / Organisation	Horsefair Traders Partnership
Address	27-28 THE HORSEFAIR KIDDERMINSTER DY10 2EN
Event Name	Kidderminster Central Area Action Plan Publication
Comment by	Horsefair Traders Partnership (MR SUKHJIT SIDHU)
Comment ID	KCAAPP16
Response Date	07/09/12 20:34
Consultation Point	4.17 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.1

To which part of the DPD does this representation relate? (Please state paragraph number, policy number, map, table or figure number). paragraph 4.17

Please refer to guidance notes for explanation of terms. If you enter **No** to 'Sound', please continue to Q5. In all other circumstances, please go to Q6.

Do you consider the DPD is:

Compliant with the Duty to Cooperate	Yes
Legally Compliant	Yes
Sound	Yes

Do you consider the document is **unsound** because it is not:

Positively prepared	No
Justified	No
Effective	No
Consistent with national policy	No

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

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 a overwhelming single use development to dominate the area. Town centre living and similar urban residential concepts including canal side living, resonate closely with modern lifestyles and have been proven to regenerate previously rundown areas such as Brindley Place in Birmingham. Similiar examples can be seen in Manchester, Liverpool and Cardiff.

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? No



Comment

Consultee	MR SUKHJIT SIDHU (675706)
Email Address	bill2000@btconnect.com
Company / Organisation	Horsefair Traders Partnership
Address	27-28 THE HORSEFAIR KIDDERMINSTER DY10 2EN
Event Name	Kidderminster Central Area Action Plan Publication
Comment by	Horsefair Traders Partnership (MR SUKHJIT SIDHU)
Comment ID	KCAAPP17
Response Date	07/09/12 21:25
Consultation Point	5.6 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.1

To which part of the DPD does this representation relate? (Please state paragraph number, policy number, map, table or figure number). Paragraph 5.6

Please refer to guidance notes for explanation of terms. If you enter **No** to 'Sound', please continue to Q5. In all other circumstances, please go to Q6.

Do you consider the DPD is:

Compliant with the Duty to Cooperate	Yes
Legally Compliant	Yes
Sound	Yes

Do you consider the document is **unsound** because it is not:

Positively prepared	No
Justified	No
Effective	No

Consistent with national policy

No

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

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.

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No



Comment

Consultee	MR SUKHJIT SIDHU (675706)
Email Address	bill2000@btconnect.com
Company / Organisation	Horsefair Traders Partnership
Address	27-28 THE HORSEFAIR KIDDERMINSTER DY10 2EN
Event Name	Kidderminster Central Area Action Plan Publication
Comment by	Horsefair Traders Partnership (MR SUKHJIT SIDHU)
Comment ID	KCAAPP18
Response Date	07/09/12 21:46
Consultation Point	Policy KCA.GPB1 Retail Development (View)
Status	Submitted
Submission Type	Web
Version	0.1

To which part of the DPD does this representation relate? (Please state paragraph number, policy number, map, table or figure number). Policy KCA.GPB1

Please refer to guidance notes for explanation of terms. If you enter **No** to 'Sound', please continue to Q5. In all other circumstances, please go to Q6.

Do you consider the DPD is:

Compliant with the Duty to Cooperate	Yes
Legally Compliant	Yes
Sound	Yes

Do you consider the document is **unsound** because it is not:

Positively prepared	No
Justified	No
Effective	No
Consistent with national policy	No

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

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 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.



Comment

Consultee	MR SUKHJIT SIDHU (675706)
Email Address	bill2000@btconnect.com
Company / Organisation	Horsefair Traders Partnership
Address	27-28 THE HORSEFAIR KIDDERMINSTER DY10 2EN
Event Name	Kidderminster Central Area Action Plan Publication
Comment by	Horsefair Traders Partnership (MR SUKHJIT SIDHU)
Comment ID	KCAAPP28
Response Date	10/09/12 20:02
Consultation Point	9.2 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.1

To which part of the DPD does this representation relate? (Please state paragraph number, policy number, map, table or figure number). Churchfields 9.2

Please refer to guidance notes for explanation of terms. If you enter **No** to 'Sound', please continue to Q5. In all other circumstances, please go to Q6.

Do you consider the DPD is:

Compliant with the Duty to Cooperate	Yes
Legally Compliant	Yes
Sound	Yes

Do you consider the document is **unsound** because it is not:

Positively prepared	No
Justified	No
Effective	No
Consistent with national policy	No

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

We fully support the idea that any development proposals for the wider Churchfields area must be in the context of rejuvenation of the town centre and sustaining the Horsefair local centre. We strongly concur with the policy of limiting the size of any new retail business to a maximum of 250sqm. This will eliminate the threat of large scale out of centre retail development which will be detrimental to the vitality and viability of the town centre area. Any associated road layout scheme which will be required to serve a large scale retail development will also have an adverse effect on the Horsefair local centre, which is highly dependent on passing trade captured from the traffic flows along Blackwell Street.

The Council is right to be focusing on an urban village concept for regeneration of this area. A solid residential base will boost confidence and draw businesses to the area leading to the investment and growth for the whole area.

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? No



Comment

Consultee	MR SUKHJIT SIDHU (675706)
Email Address	bill2000@btconnect.com
Company / Organisation	Horsefair Traders Partnership
Address	27-28 THE HORSEFAIR KIDDERMINSTER DY10 2EN
Event Name	Kidderminster Central Area Action Plan Publication
Comment by	Horsefair Traders Partnership (MR SUKHJIT SIDHU)
Comment ID	KCAAPP29
Response Date	10/09/12 20:06
Consultation Point	9.5 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.1

To which part of the DPD does this representation relate? (Please state paragraph number, policy number, map, table or figure number). Churchfields 9.5

Please refer to guidance notes for explanation of terms. If you enter **No** to 'Sound', please continue to Q5. In all other circumstances, please go to Q6.

Do you consider the DPD is:

Compliant with the Duty to Cooperate	Yes
Legally Compliant	Yes
Sound	Yes

Do you consider the document is **unsound** because it is not:

Positively prepared	No
Justified	No
Effective	No
Consistent with national policy	No

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

We support this approach in its ability to deliver a clearly defined 'road map' for regeneration of the area.



Comment

Consultee	MR SUKHJIT SIDHU (675706)
Email Address	bill2000@btconnect.com
Company / Organisation	Horsefair Traders Partnership
Address	27-28 THE HORSEFAIR KIDDERMINSTER DY10 2EN
Event Name	Kidderminster Central Area Action Plan Publication
Comment by	Horsefair Traders Partnership (MR SUKHJIT SIDHU)
Comment ID	KCAAPP30
Response Date	10/09/12 20:25
Consultation Point	9.11 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.1

To which part of the DPD does this representation relate? (Please state paragraph number, policy number, map, table or figure number). Churchfields 9.11

Please refer to guidance notes for explanation of terms. If you enter **No** to 'Sound', please continue to Q5. In all other circumstances, please go to Q6.

Do you consider the DPD is:

Compliant with the Duty to Cooperate	Yes
Legally Compliant	Yes
Sound	Yes

Do you consider the document is **unsound** because it is not:

Positively prepared	No
Justified	No
Effective	No
Consistent with national policy	No

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

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. This holds the potential not only to deliver a physical regeneration of the area but also to foster a spirit of enterprise and co-operation within the local area that could help to reduce crime and encourage long term investment by business and other organisations.

The policy will also hugely benefit the town centre area by creating a complimentary dimension within the central district of Kidderminster.

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? No



Comment

Consultee	MR SUKHJIT SIDHU (675706)
Email Address	bill2000@btconnect.com
Company / Organisation	Horsefair Traders Partnership
Address	27-28 THE HORSEFAIR KIDDERMINSTER DY10 2EN
Event Name	Kidderminster Central Area Action Plan Publication
Comment by	Horsefair Traders Partnership (MR SUKHJIT SIDHU)
Comment ID	KCAAPP31
Response Date	10/09/12 21:11
Consultation Point	9.12 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.1

To which part of the DPD does this representation relate? (Please state paragraph number, policy number, map, table or figure number). Churchfields 9.12

Please refer to guidance notes for explanation of terms. If you enter **No** to 'Sound', please continue to Q5. In all other circumstances, please go to Q6.

Do you consider the DPD is:

Compliant with the Duty to Cooperate	Yes
Legally Compliant	Yes
Sound	No

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Although we generally support the policy's approach in highlighting the need for improved infrastructure and air quality in the Horsefair area, we are concerned that car parking provision has not been mentioned. In principal, the designation of Blackwell street as one way would be an acceptable option to take in that it would ease congestion and improve local air quality. However, car parking provision must also be a crucial consideration in any such scheme.

Businesses in the Horsefair local centre are highly dependent on the flow passing traffic along Blackwell Street in order to capture passing trade. If Blackwell Street is designated as one way then it would reduce by 50% the vehicle flows by eliminating the contraflow. This would impact upon the passing trade potential for the Horsefair local centre and have an adverse effect on trade in the area.

To compensate for the reduction in passing traffic, additional car parking provision along Blackwell Street would be a very effective way of making it easier for passing motorists to conveniently park on road and use the local shops. The existing Horsefair car park (adjacent to the public art horse statue), which provides 5 short term car parking spaces for customers of shops in the Horsefair is also a crucial provision of local car parking and should be maintained in any future road layout improvements.

We request that a clear statement of intent to protect the existing car parking provision and further enhance short term convenient car parking in the Horsefair local centre should be included in policy wording at this stage.

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

We consider it to be imperative to protect and enhance car parking provision in the Horsefair local centre.

The policy should highlight the need to 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 provision to compensate for the reduction in volume of passing traffic and make it easier for passing motorists to park conveniently and use shops in the Horsefair local centre.

These measures to preserve and enhance car parking provision are vital as part of any strategic policy to grow and maintain the influence of local centres in Kidderminster.

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? No



Comment

Consultee	MR SUKHJIT SIDHU (675706)
Email Address	bill2000@btconnect.com
Company / Organisation	Horsefair Traders Partnership
Address	27-28 THE HORSEFAIR KIDDERMINSTER DY10 2EN
Event Name	Kidderminster Central Area Action Plan Publication
Comment by	Horsefair Traders Partnership (MR SUKHJIT SIDHU)
Comment ID	KCAAPP32
Response Date	10/09/12 21:32
Consultation Point	9.13 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.1

To which part of the DPD does this representation relate? (Please state paragraph number, policy number, map, table or figure number). Chirchfileds 9.13

Please refer to guidance notes for explanation of terms. If you eneter **No** to 'Sound', please continue to Q5. In all other circumstances, please go to Q6.

Do you consider the DPD is:

Compliant with the Duty to Cooperate Yes

Legally Compliant Yes

Sound No

Do you consider the document is **unsound** becasue it is not:

Positively prepared No

Justified No

Effective No

Consistent with national policy No

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Any proposed highway changes should be sympathetic to the functional needs of the Horsefair local centre. The flow of passing traffic is vital to delivering trade for shops in the local centre. The designation of Blackwell Street as one way does have clear advantages for easing traffic congestion and improving air quality and if the issue of car parking provision is addressed alongside any such proposals there will also be a benefit for local businesses in the Horsefair.

However, it should also be noted that a truncation of Blackwell Street would be catastrophic for the Horsefair local centre. This is because the complete absence of any passing traffic along Blackwell Street would eliminate the potential for local businesses to capture passing trade.

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The truncation of Blackwell Street should be formally discounted due its potential for adversely affecting the vitality and viability of the Horsefair local centre.

The policy wording should be amended to include provision to safeguard Blackwell Street from truncation as part of any future proposed highway changes.

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? No



Comment

Consultee	MR SUKHJIT SIDHU (675706)
Email Address	bill2000@btconnect.com
Company / Organisation	Horsefair Traders Partnership
Address	27-28 THE HORSEFAIR KIDDERMINSTER DY10 2EN
Event Name	Kidderminster Central Area Action Plan Publication
Comment by	Horsefair Traders Partnership (MR SUKHJIT SIDHU)
Comment ID	KCAAPP62
Response Date	12/09/12 21:09
Consultation Point	Policy KCA.Ch5 Phase 3a - Churchfields Business Park (View)
Status	Submitted
Submission Type	Web
Version	0.1

To which part of the DPD does this representation relate? (Please state paragraph number, policy number, map, table or figure number). Policy KCA.Ch5

Please refer to guidance notes for explanation of terms. If you enter **No** to 'Sound', please continue to Q5. In all other circumstances, please go to Q6.

Do you consider the DPD is:

Compliant with the Duty to Cooperate Yes

Legally Compliant Yes

Sound No

Do you consider the document is **unsound** because it is not:

Positively prepared No

Justified No

Effective No

Consistent with national policy

No

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Although we would support the general theme of this policy, we are cautious that any new retail development in this area should not have an adverse impact on the town centre or Horsefair local centre.

Whilst limiting the size of any new retail unit to 250sqm is helpful, a more specific approach where any new retail proposals are made subject to a retail impact assesment report would be preferrable.

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified above where this relates to soundness. You will need to say why this change will make the DPD legally comliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

A clear statement to safeguard the town centre and Horsefair local centre from an adverse impact by any new retail develpoment.

New retail develpoment, particularly in the A1 classification should be made conditional upon a satisfactory retail impact assesment report.

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? No



Comment

Consultee	MR SUKHJIT SIDHU (675706)
Email Address	bill2000@btconnect.com
Company / Organisation	Horsefair Traders Partnership
Address	27-28 THE HORSEFAIR KIDDERMINSTER DY10 2EN
Event Name	Kidderminster Central Area Action Plan Publication
Comment by	Horsefair Traders Partnership (MR SUKHJIT SIDHU)
Comment ID	KCAAPP63
Response Date	12/09/12 21:17
Consultation Point	9.44 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.1

To which part of the DPD does this representation relate? (Please state paragraph number, policy number, map, table or figure number). Horsefair 9.44

Please refer to guidance notes for explanation of terms. If you enter **No** to 'Sound', please continue to Q5. In all other circumstances, please go to Q6.

Do you consider the DPD is:

Compliant with the Duty to Cooperate	Yes
Legally Compliant	Yes
Sound	Yes

Do you consider the document is **unsound** because it is not:

Positively prepared	No
Justified	No
Effective	No

Consistent with national policy

No

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

We support this approach to highlight the significance of the Horsefair as an historic gateway to Kidderminster.

The buildings within this area are steeped in local history and they encapsulate the character and heritage of this important local area.

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? No



Comment

Consultee	MR SUKHJIT SIDHU (675706)
Email Address	bill2000@btconnect.com
Company / Organisation	Horsefair Traders Partnership
Address	27-28 THE HORSEFAIR KIDDERMINSTER DY10 2EN
Event Name	Kidderminster Central Area Action Plan Publication
Comment by	Horsefair Traders Partnership (MR SUKHJIT SIDHU)
Comment ID	KCAAPP64
Response Date	12/09/12 21:52
Consultation Point	Policy KCA.Ch8 Horsefair (View)
Status	Submitted
Submission Type	Web
Version	0.1

To which part of the DPD does this representation relate? (Please state paragraph number, policy number, map, table or figure number). Policy KCA.Ch8

Please refer to guidance notes for explanation of terms. If you enter **No** to 'Sound', please continue to Q5. In all other circumstances, please go to Q6.

Do you consider the DPD is:

Compliant with the Duty to Cooperate Yes

Legally Compliant Yes

Sound No

Do you consider the document is **unsound** because it is not:

Positively prepared No

Justified No

Effective Yes

Consistent with national policy No

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

We generally support the policy for the Horsefair local centre. However, the issue of car parking and traffic flow along Blackwell Street must also be a vital policy consideration. Businesses in the Horsefair are highly dependent on passing trade which is captured from the flow of passing traffic. To capture passing trade, there is a need for convenient car parking provision. There are 5 existing short stay car parking spaces on the Horsefair triangle area (adjacent to the public art horse statue). These should be retained as part of any highway scheme to improve the local road network.

The truncation of Blackwell Street would be devastating for local businesses in the Horsefair. Blackwell Street should be protected from any form of truncation.

The designation of Blackwell Street as one-way should also provide for short stay on street car parking spaces along Blackwell Street and Horsefair.

The sustainability of local centres is completely dependent upon attracting customers to the local area. Ease of access for traffic flows and convenient car parking are fundamental to attracting customers and generating interest in the area.

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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 as part of any future highway scheme to improve the local road network.

The above measures will ensure that the policy objective of supporting, retaining and improving the Horsefair local centre will be deliverable by helping to unlock the latent potential of this enterprising area.

If these measures are incorporated within the local plan it will ensure that the Horsefair local centre is able to fulfill its defined role as an effective and successful service centre for the local community.

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? No



Comment

Consultee	MR SUKHJIT SIDHU (675706)
Email Address	bill2000@btconnect.com
Company / Organisation	Horsefair Traders Partnership
Address	27-28 THE HORSEFAIR KIDDERMINSTER DY10 2EN
Event Name	Kidderminster Central Area Action Plan Publication
Comment by	Horsefair Traders Partnership (MR SUKHJIT SIDHU)
Comment ID	KCAAPP81
Response Date	14/09/12 13:53
Consultation Point	Policy KCA.Ch6 Phase 3b - Limekiln Bridge (View)
Status	Submitted
Submission Type	Web
Version	0.1

To which part of the DPD does this representation relate? (Please state paragraph number, policy number, map, table or figure number). Policy KCA.Ch6

Please refer to guidance notes for explanation of terms. If you enter **No** to 'Sound', please continue to Q5. In all other circumstances, please go to Q6.

Do you consider the DPD is:

Compliant with the Duty to Cooperate Yes

Legally Compliant Yes

Sound Yes

Do you consider the document is **unsound** because it is not:

Positively prepared No

Justified No

Effective No

Consistent with national policy

No

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

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.

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? No



Comment

Consultee	MR SUKHJIT SIDHU (675706)
Email Address	bill2000@btconnect.com
Company / Organisation	Horsefair Traders Partnership
Address	27-28 THE HORSEFAIR KIDDERMINSTER DY10 2EN
Event Name	Kidderminster Central Area Action Plan Publication
Comment by	Horsefair Traders Partnership (MR SUKHJIT SIDHU)
Comment ID	KCAAPP82
Response Date	14/09/12 13:57
Consultation Point	9.35 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.1

To which part of the DPD does this representation relate? (Please state paragraph number, policy number, map, table or figure number). Crossley Park 9.35

Please refer to guidance notes for explanation of terms. If you eneter **No** to 'Sound', please continue to Q5. In all other circumstances, please go to Q6.

Do you consider the DPD is:

Compliant with the Duty to Cooperate	Yes
Legally Compliant	Yes
Sound	Yes

Do you consider the document is **unsound** becasue it is not:

Positively prepared	No
Justified	No
Effective	No

Consistent with national policy

No

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

I would support these proposals for Crossley Park.

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? No



Comment

Consultee	Syed Hussain (677527)
Email Address	syedshebu@yahoo.co.uk
Address	39 Eddy Road Kidderminster DY10 2EN
Event Name	Kidderminster Central Area Action Plan Publication
Comment by	Syed Hussain
Comment ID	KCAAPP40
Response Date	12/09/12 13:50
Consultation Point	9.7 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.1

To which part of the DPD does this representation relate? (Please state paragraph number, policy number, map, table or figure number). Churchfields 9.7

Please refer to guidance notes for explanation of terms. If you enter **No** to 'Sound', please continue to Q5. In all other circumstances, please go to Q6.

Do you consider the DPD is:

Compliant with the Duty to Cooperate	Yes
Legally Compliant	Yes
Sound	Yes

Do you consider the document is **unsound** because it is not:

Positively prepared	No
Justified	No
Effective	No
Consistent with national policy	No

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

I fully support the approach that was taken.

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? No



Comment

Consultee	Syed Hussain (677527)
Email Address	syedshebu@yahoo.co.uk
Address	39 Eddy Road Kidderminster DY10 2EN
Event Name	Kidderminster Central Area Action Plan Publication
Comment by	Syed Hussain
Comment ID	KCAAPP41
Response Date	12/09/12 14:07
Consultation Point	9.12 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.1

To which part of the DPD does this representation relate? (Please state paragraph number, policy number, map, table or figure number). Chirchfields 9.12

Please refer to guidance notes for explanation of terms. If you enter **No** to 'Sound', please continue to Q5. In all other circumstances, please go to Q6.

Do you consider the DPD is:

Compliant with the Duty to Cooperate	Yes
Legally Compliant	Yes
Sound	No

Do you consider the document is **unsound** because it is not:

Positively prepared	No
Justified	No
Effective	No
Consistent with national policy	No

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

I agree that the traffic issues in the local area will need to be addressed. However, it also important that car parking in the Horsefair local centre is treated as a priority. Businesses in the Horsefair are very dependent on local and convenient car parking.

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

A sustainable local centre will only be possible if the car parking provision able to meet the needs of local businesses.

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? No



Comment

Consultee	Syed Hussain (677527)
Email Address	syedshebu@yahoo.co.uk
Address	39 Eddy Road Kidderminster DY10 2EN
Event Name	Kidderminster Central Area Action Plan Publication
Comment by	Syed Hussain
Comment ID	KCAAPP42
Response Date	12/09/12 14:14
Consultation Point	9.45 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.1

To which part of the DPD does this representation relate? (Please state paragraph number, policy number, map, table or figure number). Chirchfields 9.45

Please refer to guidance notes for explanation of terms. If you enter **No** to 'Sound', please continue to Q5. In all other circumstances, please go to Q6.

Do you consider the DPD is:

Compliant with the Duty to Cooperate	Yes
Legally Compliant	Yes
Sound	Yes

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

I fully support the renovation/refurbishment of properties in the Horsefair to improve the overall appearance of this vital local centre. The Horsefair is an important gateway to Kidderminster town centre that gives a clear first impression to anyone approaching the town from Stourbridge road.

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? No



Comment

Consultee	Syed Hussain (677527)
Email Address	syedshebu@yahoo.co.uk
Address	39 Eddy Road Kidderminster DY10 2EN
Event Name	Kidderminster Central Area Action Plan Publication
Comment by	Syed Hussain
Comment ID	KCAAPP43
Response Date	12/09/12 14:21
Consultation Point	Policy KCA.Ch8 Horsefair (View)
Status	Submitted
Submission Type	Web
Version	0.1

To which part of the DPD does this representation relate? (Please state paragraph number, policy number, map, table or figure number). Policy KCA.Ch8

Please refer to guidance notes for explanation of terms. If you enter **No** to 'Sound', please continue to Q5. In all other circumstances, please go to Q6.

Do you consider the DPD is:

Compliant with the Duty to Cooperate	Yes
Legally Compliant	Yes
Sound	Yes

Do you consider the document is **unsound** because it is not:

Positively prepared	No
Justified	No
Effective	No
Consistent with national policy	No

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

I support every aspect of this policy.

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? No

Stephen Bragginton
14 Beauchamp Avenue
Foley Park
Kidderminster
Worcestershire
DY11 7AQ

August 21st 2012

Rebecca Mayman
Planning Policy Manager
Wyre Forest District Council.
Duke House
Kidderminster.

Dear Sirs / Madam

Wyre Forest District Council. Kidderminster Central Area Action Plan.

Thank you for your letter 20th July 2012, I would wish to make the following comments. I can only make general comments with a particular interest in History and Culture.

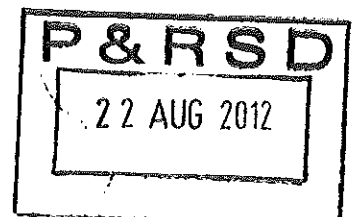
Ref Policy KDA DPL 2. Mixed use development. Mixed use developments would ensure that areas developed are used for a greater number of hours per day. And as a result greater natural surveillance and the developments are safe to use.

Ref 5.13 improving and utilizing the Vicar Street, High Street, Worcester Street Areas In conjunction with the new Weavers Wharf development would be of great benefit to the long term future of the town. The concentration of primary retail development as against out of town shopping development is welcomed. Large out of Town retail developments damage the viability of the Primary shopping areas in traditional town centres.

Tourism and Heritage sites.

We agree that the Heritage sites in Kidderminster should promoted, with Kidderminster being the hub for tourism for the Wyre Forest.
Tourism is important for the long term survival of the district, we have in our town A Terminal station of a major heritage railway, a new Museum of Carpets, the West Midlands safari park is close by. The Staffordshire and Worcestershire Canal, deserves a higher profile. Ref 7.50 any development along side the canal should be of high quality, so to compliment this asset.

The aim of the KCAAP to "strengthen the tourism offer of the Town" is excellent. The extra visitors will spend in the revitalised primary shopping areas of the town, in turn provide extra jobs.



It would in the long Term make Kidderminster a good place to Live with thriving new business that can be sustained.

The footfall from the Railway stations to the Town Centre needs to be improved re 7.24 page 44, we agree the signage from the stations to the Town centre is confusing to the visitor and, the subways under the Comberton Hill ringway are not visitor friendly.

With Ref to **Policy KCA EG4**, It would a great improvement to infill the pedestrian subway system and replace with surface level pedestrian and Cycle Access.

The Eastern Gateway to the town would be improved greatly, and provide a more User friendly entry to the revitalised town centre.

Traditional Town Centre section 14 Heritage processions Section 15.

We agree with the comments of Section 14, Traditional Town Centre. The old town area needs investment to improve its appearance, to make the area more attractive to both residents and visitors. This will in turn improve the viability of the town.

Any new developments should in the old town should be high quality to enhance the existing conservation areas, and listed buildings.

With Ref to **policy KCA.HP**, It is an excellent plan to ensure that the historic linear processional routes along Green Street, New Road, and Dixon Street are to be protected, and any new development is to be of high quality to complement the existing conservation areas.

With reference to Wyre Forest District Council "Site allocations and Policies Development Plan Document, Pre submission publication version July 2012.

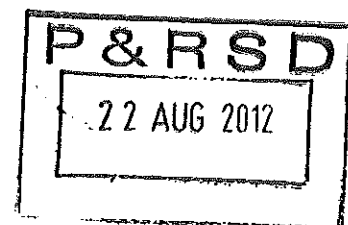
Page 84 Section 7.4 "safe guarding the historic environment"

We agree with the Government statement.

"the historic environment is an asset of enormous cultural, social, economic and environmental value: it makes a very real contribution to our quality of life and the quality of our places"

The council **policy SAL.UP6** is agreed with, so to ensure that our as built environment is protected in consideration of future development. As noted from your report an historic asset is unique. Once destroyed, cannot be replaced. This makes policy SAL.UP6 very important.

It is not beyond imagination to retain the historic aspect of Kidderminster and District, with in a new vibrant, economic and sustainable economy of the whole area.



Ref page 108 section 9 South Kidderminster Enterprise Park.

I have lived in this part of the town for 55 years. It is important that the former Sugar beet site is redeveloped as described in your report, It is better to redevelop a brown field site, that use Green belt land,

Ref page 120 Section 10 West Kidderminster.

General. It would be good to keep all the building that was last used as a law Court in Worcester Street. The Cast iron columns of the former weaving shed are inscribed F. Bradley (and were manufactured in Kidderminster prior to 1900 at Clensmore) and the interior of the building has many fine details, for example in the room used as the former main court room, the Corbels are of note, each one appears to be different design. This room (I am informed) was used originally as a carpet sales room. However I would accept the retention of the frontage of this attractive Landmark building in Kidderminster as stated in your plan for the town.

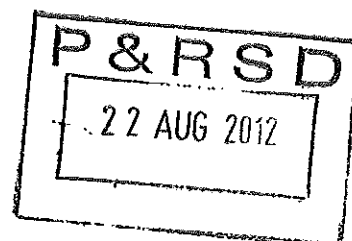
Policy SAL.WK2. Is to be applauded. The Kidderminster hospital site will be safe guarded for medical purposes. The hospital is a valued service in the three towns Kidderminster, Stourport and Bewdley.

To conclude. Both the KCAAP Development Plan Document July 2012, with site allocation and policies Development plan Document July 2012. Provide an excellent proposed plan for the redevelopment of our town, protecting our as built environment, whilst still retaining economic progress, to take Kidderminster and District into the next century.

Yours faithfully

Stephen Bragginton

Kidderminster Civic Society



Date: 14 September 2012
Our ref: 59370
Your ref: RM/HET/FP-SAL-SD



Rebecca Mayman
Planning Policy Manager
Wyre Forest District
BY EMAIL ONLY
(Rebecca.mayman@wyreforestdc.gov.uk)

Natural England
Consultation Service
Hornbeam House
Electra Way
Crewe Business Park
CREWE
CW1 6GJ

T: 0300 060 3900

Dear Ms Mayman

Pre-Submission Publication of Wyre Forest District Site Allocations and Policies and Kidderminster Central Area Action Plan Development Plan Documents (DPD)

Thank you for seeking Natural England's comments regarding the above. Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

General comments

We have considered the Site Allocations and Policies and Kidderminster Central Area Action Plan Development Plan Documents, and the supporting Sustainability Appraisal and Habitats Regulations Assessment. We are satisfied the preparation of the documents accords with the relevant legal requirements and guidance, and that they are consistent with the National Planning Policy Framework (NPPF) and with relevant local plans and policies, including the Wyre Forest Core Strategy and Sustainable Community Strategy.

We are also generally satisfied that the rationale for the proposed allocations appears reasonable and evidence based and that the environmental implications and constraints associated with each potential site have been understood and adequately addressed, including with respect to landscape, ecology and public access. Furthermore, we can confirm that Natural England broadly supports the proposed development management policies, which appear robust and able to provide appropriate guidance to developers and decision makers to ensure significant adverse effects on the natural environment can be avoided or mitigated. Indeed we would expect the effects of the proposed policies to be generally positive.

Natural England
Foundry House
3 Millsands
Riverside Exchange
Sheffield S3 8NH

Natural England particularly welcomes the policy guidance provided for Green Infrastructure, safeguarding local biodiversity and geodiversity and water quality and quantity. We are very pleased to note the reference in the plan to the use of appropriate sustainable drainage schemes (SUDs) to contribute to re-wetting drying out SSSI wetland in the District, which along with high phosphate levels and effluence in rivers and water bodies, has been identified as being a particular issue for the district.

Wilden Marsh and Meadows SSSI

As you will be aware, this SSSI contains some of the richest and most diverse wetland habitat in Worcestershire, including species-rich marshland and mires with locally scarce plants. The site is also of local ornithological and entomological interest with breeding birds including snipe, reed bunting and water rail.

The SSSI is located in very close proximity to the former British Sugar Site, which has been allocated for mixed use development during the plan period. Due to the highly sensitive nature of the SSSI habitats and features, public access is strictly prohibited and must remain so in the long term. With this in mind, **Natural England recommends that further policy guidance is provided in the Sites Allocations and Policies DPD to ensure that public access to the SSSI will continue to be prohibited.**

Notwithstanding the above, in our view proposed development within the District, perhaps most notably that proposed at the Former British Sugar site, presents an opportunity to provide long-term protection and enhancement for the Wilden Marsh and Meadows SSSI, as part of the wider green infrastructure provision. The SSSI is currently being managed by the Worcestershire Wildlife Trust under a Higher Level Stewardship Agreement and is now classed as 'recovering' in terms of its favourable condition status. Natural England would welcome measures to secure and sympathetically manage land adjacent to the SSSI, known as the Former British Sugar Site settling ponds, next to Wilden Lane. This would provide an important ecological buffer, but could also create opportunities for some carefully managed public access. For example, it may be possible to provide a pedestrian route that links to the wider network and contributes to the Council's ambitions for multifunctional green infrastructure. There may also be potential to provide a bird hide and educational interpretation.

Natural England would be pleased to discuss this and other green infrastructure opportunities with the Council in more detail.

Sustainability Appraisal

We are satisfied the Sustainability Appraisal has provided a systematic assessment of the Pre-Submission Sites Allocations and Policies and the Kidderminster AAP in terms of consistency with the principles of sustainable development, and assessment of likely social and economic and environmental effects. We consider the sustainability objectives to be clear and relevant and that these have helped to refine emerging policies.

Habitats Regulations Assessment

We are satisfied the Habitats Regulation Assessment (HRA) provides a systematic and appropriately detailed assessment of the Sites Allocation and Policies and the Kidderminster AAP in terms of their likely effect on European Sites. We consider the Council's conclusion that implementation of the Sites Allocations plan and AAP is not likely to result in significant effect on European protected sites is reasonable.

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.

For any correspondence or queries relating to this consultation only, please contact Amanda Grundy on 0300 060 1454. For all other correspondence, please contact consultations@naturalengland.org.uk.

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

Yours sincerely

Amanda Grundy
Lead Adviser, Sustainable Land Use

**12, Hafren Way
Stourport on Severn,
Worcs.
DY13 8SJ**
tel. 01299 871259
js@anjo.me.uk
6th September 2012

Policy Planning Manager
Wyre Forest District Council
Duke House
Clensmore Street
Kidderminster
DY10 2JX

Dear Sir/Madam,

Local Development Plan

Regarding your letter dated 20th July 2012 received 24th July 2012.

I am disappointed to note that this consultation, as so many of recent times, is over a period when respondents are potentially restricted by family commitments. In this case the annual summer break. In addition proper consideration of the "Policies" offered require significant reference to other "Policies" which for the reasons above reduces the correct depth of comment. This could create a potential for conflict or confusion that may invalidate opinions given. Consequently my observations are of necessity based on limited cross referencing.

SALP DPD

This document requires a thorough review. It has clearly been updated in a piecemeal fashion but time has overtaken it. Therefore some elements do not reflect the current situation.

Clause 2.6/7

Bearing in mind current housing development spread on known sites the illustrated splits need to be revisited attempting to increase the Bewdley element particularly when reviewing the employment spread. This would have both ecological and congestion benefits.

Clause 2.13

The district having had 3320 residential completions over the period 2001 to 2011 and with a further 1500 completions still required infrastructure improvements need to be given more emphasis and equal status in the "Policy".

Clause 2.17 to 19.

On a political point these statements strengthen the objections to location raised at the time of the Finepoint Civic Centre proposals and the way in which planning rules can be used to avoid full discussion. This situation will create a precedent that the Authority may find difficult to resist under the new planning rules and be used to confound any "Policy" that does not forcefully identify office development locations. Ultimately jeopardising ecological/transport/green belt criteria.

Clause 4.37

This potential for town centre and off centre regeneration is to be welcomed but must have sufficient safeguards regarding possible loss of employment space. It is not sufficient to qualify the possible proposals by loss of character to the area.

Clause 4.47 to 73

This section needs to be revisited and allocations balanced on a Countywide basis. This was emphasised by the strength of the earlier public consultation and Political statements. The Baker Report, by the Planning Departments own statements to the public meetings, has been discredited, as it was only a desktop study on a limited brief. There is a need to

consider the full County implications of the Governments latest requirements.

Clause 5.17

This matter needs to be reviewed based on current Planning Approvals/work in hand. Specifically sites such as MTC Bewdley Road Stourport which is under construction.

Clause 5.24 to 26

These principles seem to directly conflict with the development approval for Tesco in Stourport. Although the 300m rule is a matter of conjecture in relation to the point from which it is measured all the other factors appear to be contravened. Another president to allow developers to challenge the Authority.

Clause 5.32 to 36

Some elements of D1 uses should be encouraged as long as they encourage footfall such as dentists and doctors. The principle should be to return main streets to community based uses not just retail.

Clause 5.52 to 55

The rail link to the Safari Park is something to be welcomed and pushed hard to reduce congestion. Unfortunately visitors will still insist on use of the family car, indeed they will need a car for some of the attractions. The wider use of rail as a means of getting to the attraction from further away should also be supported, if not in policies in requirements on the promoter for development conditions.

Clause 6.14

Again a "political issue" in that parking needs to be reviewed in light of the "Potas Review" not only in planning terms but the Authority need to give it consideration in regards to charging, relating to beneficial use.

Clause 6.18

More emphasis is required on the provision of the Stourport relief road. This will have many benefits which will include, environmental, traffic flows and a more comfortable use of the retail and other main street facilities in line with clauses 5.32 to 36.

Clause 6.32

This section sets a strategy that the Authority should lead by example. It should be part of the consideration of all new buildings. However, care needs to be taken on existing buildings where the financial advantages are not so clear and the character of the area can be severely harmed.

Clause 7.1 to 7

Strong emphasis needs to be given to safeguarding the greenbelt generally but specifically the Severn River corridor through Stourport and Bewdley. The current lines based on the residential rear boundaries particularly on the East side need to be sacrosanct.

Clause 7.72 (SAL.UP8)

These requirements need to be more specific particularly in guidance relating to subservience and not left to unclear and none written Officer preferences.

Clause 12.6 (SAL.STC2)

These proposals need to be revisited in the light of the Healthcare scheme currently under consideration.

Clause 14.1 (SAL.WS1)

This again needs to be considered as it is currently under development with applications for revisions in hand.

14.4 (SAL.WS2)

Due to the narrowness of Olive Grove to the North the proposal should emphasise the use of both current access points to maximise the sites use.

A number of these sites require review or reconsideration based on proposals under consideration.

KCAAP DPD

Clause 2.5/6

The vision and objectives have failed. The construction at Finepoint of the new Civic Centre removes an opportunity to draw people in to the major centre of the District (Kidderminster). It is also remote from services and unless a further change of “use” allocations is approved it fragments the principles of district development.

Clause 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 uses” in locations remote from the centre could be beneficial in ecological and general transport terms.

Clause 4.8 to 16

As with the SALP DPD an emphasis on dwellings, which are a general district requirement, needs to 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.

Clause 4.17.

Increased footfall is important in areas of both retained and new retail uses. Class Use D1 should be encouraged amongst traditionally A1 uses particularly as dental/physiotherapy and similar uses can improve activity when A1 units remain vacant for long periods without interest.

Clause 5.10.

Kidderminster requires a compact centre. This needs to use the traditional shopping streets and the existing shopping zones. Further spread will weaken the potential for take up when newer development attracts people away from the small trader. The changes in tenancy over recent years indicates that Crossley Park’s success is because it also offers good free parking and direct pedestrian links to Weavers Wharf and the limited shopping in the traditional centre.

Clause 5.13.

I believe that this part of the Policy could leave the traditional shopping streets unoccupied and existing centres declining when newer centres attract the larger retailers. An effort in both commercial and Planning terms is required to revitalise what exists rather than encouraging a further destination to create the “dumbbell” pattern.

It is clear by the failure to obtain a user that higher class retailers feel that the distance between Weavers Wharf and the old Woolworth building is too far or uninteresting in shopping terms or a use would have been found by now. Likewise the topography between the proposed supermarket off the ring road will not generate footfall of any great consequence. (My reasons are covered later.)

Clause 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.

Clause 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.

Clause 5.43/44

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.

Section 6

Sustainable transport objectives take no account of struggling privatised public transport and the reliance on the private car to get around the district and outer environs. The introduction of a further supermarket by its nature will increase/divert personal transport around the centre. Although having benefits it also means visitors are “in and out” rather than long stay shoppers.

Tourism will rely on personal transport, as by its very nature it is more convenient for the families that are to be attracted to the area. I feel therefore that the objectives need revisiting. Although not simply a Planning matter alternative out of centre stopping points are required with good transport links as walking is not a national forte and the station to shopping is too far for most even if the new link might seem on paper to be more convenient.

Clause 6.22.

In this clause it should be considered that rather than walking “browsing” would be a more appropriate term.

Tourist will not generally walk “long distances” between points but will stroll a significant way around the shopping centre and attractions. It is therefore necessary to consider how visitors move between access points and the centre. This particularly relates to the station and shops. Park and ride may be a solution but from more than one location. I also refer to Clause 5.24 of SALP DPD.

Clause 10.20.

The proposal 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 location will over power 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.

Clause 10.30

Having been involved in the design of supermarket schemes for eight years for the now defunct Safeway and also in the past for Tesco and Sainsbury I feel strongly that this master plan proposal is not appropriate for a number of reasons.

This policy talks of reducing ground cover required for parking and is encouraging decked systems. This scheme has a large parking area that such retailers require for retail psychology reasons. The car park must be big enough to make the store look busy and interesting whilst having sufficient space clearly available to encourage a visit. There will as in the case of other such locations in the town be a reluctance to allow other than minimal parking for other uses or a requirement for over large parking areas to compensate for other shopper take up. A store of 3715sqm is not large but large enough to have a good none food department and ultimately require a filling station. I fear that such a use will result in it becoming a destination in itself with little interaction with the town centre.

Section 11.

The proposed link to Park Street is creditable. The 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.

Section 12.

This section seems to confuse particularly when read with parts of section15 as it talks of regeneration introducing limited shopping. This could, due to its location in the road system, become 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.

Sections 13 and 14.

Clearly the District needs to have long term visions for all the areas of the town but these

sections contain proposals which will require careful reconsideration as the regeneration of Kidderminster proceeds. Due to the current dominance of Worcester, Merry Hill and access to other places of major shopping interest Kidderminster will remain a destination of indifference until the centre is more vibrant and easily accessed.

Consider the importance of Ludlow and others locally as vibrant market towns. Or possibly Malvern as a location that has concentrated its major shopping on the edge of town and encouraged more small traders in the centre. These are currently taking shoppers from Kidderminster because of their atmosphere.

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.

John Shuttes.



Comment

Consultee	Mr Amerjit Sidhu (677764)
Email Address	bobby-35@hotmail.co.uk
Address	27 The Horsefair Kidderminster DY10 2EN
Event Name	Kidderminster Central Area Action Plan Publication
Comment by	Mr Amerjit Sidhu
Comment ID	KCAAPP60
Response Date	12/09/12 17:50
Consultation Point	Policy KCA.Ch8 Horsefair (View)
Status	Submitted
Submission Type	Web
Version	0.1

To which part of the DPD does this representation relate? (Please state paragraph number, policy number, map, table or figure number). Policy KCA.ch8

Please refer to guidance notes for explanation of terms. If you enter **No** to 'Sound', please continue to Q5. In all other circumstances, please go to Q6.

Do you consider the DPD is:

Compliant with the Duty to Cooperate	Yes
Legally Compliant	Yes
Sound	Yes

Do you consider the document is **unsound** because it is not:

Positively prepared	No
Justified	No
Effective	No
Consistent with national policy	No

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

I fully support all aspects of this policy directive.

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? No



Comment

Consultee	Mr Amerjit Sidhu (677764)
Email Address	bobby-35@hotmail.co.uk
Address	27 The Horsefair Kidderminster DY10 2EN
Event Name	Kidderminster Central Area Action Plan Publication
Comment by	Mr Amerjit Sidhu
Comment ID	KCAAPP61
Response Date	12/09/12 17:56
Consultation Point	9.11 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.1

To which part of the DPD does this representation relate? (Please state paragraph number, policy number, map, table or figure number). Churchfields 9.11

Please refer to guidance notes for explanation of terms. If you enter **No** to 'Sound', please continue to Q5. In all other circumstances, please go to Q6.

Do you consider the DPD is:

Compliant with the Duty to Cooperate	Yes
Legally Compliant	Yes
Sound	Yes

Do you consider the document is **unsound** because it is not:

Positively prepared	No
Justified	No
Effective	No
Consistent with national policy	No

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

I support the mixed use redevelopment of Churchfields with a big focus housing. This will be very good for Kidderminster town centre.

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? No



Comment

Consultee	Mr Amerjit Sidhu (677764)
Email Address	bobby-35@hotmail.co.uk
Address	27 The Horsefair Kidderminster DY10 2EN
Event Name	Kidderminster Central Area Action Plan Publication
Comment by	Mr Amerjit Sidhu
Comment ID	KCAAPP75
Response Date	13/09/12 17:50
Consultation Point	9.11 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.1

To which part of the DPD does this representation relate? (Please state paragraph number, policy number, map, table or figure number). Churchfields 9.11

Please refer to guidance notes for explanation of terms. If you enter **No** to 'Sound', please continue to Q5. In all other circumstances, please go to Q6.

Do you consider the DPD is:

Compliant with the Duty to Cooperate	Yes
Legally Compliant	Yes
Sound	Yes
Do you consider the document is unsound because it is not:	
Positively prepared	No
Justified	No
Effective	No
Consistent with national policy	No

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

I would like to register my support and agreement with the emerging vision for the Churchfields site. A housing led regeneration in this area would compliment the existing residential base which sits adjacent to Churchfields. A paralell focus on offices, community facilities and food and drink premises would significantly enhance local employment prospects. The town centre would also stand to benefit from this type of development.



Comment

Consultee	Mr Amerjit Sidhu (677764)
Email Address	bobby-35@hotmail.co.uk
Address	27 The Horsefair Kidderminster DY10 2EN
Event Name	Kidderminster Central Area Action Plan Publication
Comment by	Mr Amerjit Sidhu
Comment ID	KCAAPP76
Response Date	13/09/12 18:14
Consultation Point	9.12 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.1

To which part of the DPD does this representation relate? (Please state paragraph number, policy number, map, table or figure number). Churchfields 9.12

Please refer to guidance notes for explanation of terms. If you enter **No** to 'Sound', please continue to Q5. In all other circumstances, please go to Q6.

Do you consider the DPD is:

Compliant with the Duty to Cooperate	Yes
Legally Compliant	Yes
Sound	No
Do you consider the document is unsound because it is not:	
Positively prepared	No
Justified	No
Effective	Yes
Consistent with national policy	No

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Whilst I would broadly agree with policy ideas for improving the local road infrastructure, I think it is important to highlight the importance of Horsefair and Blackwell Street to the Horsefair local centre. Although it is clear that Blackwell Street is congested with the volume traffic that currently flows through, it is also a vital link with passing trade for local shops. I would prefer to see a clear statement in the policy wording to ensure that Blackwell Street is not truncated as part of any future road scheme.

If the option of designating Blackwell Street as one-way is to be considered then it is my firm view that an effective car parking provision to serve the Horsefair local centre should also be incorporated with any such scheme.

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Blackwell Street should be safeguarded against truncation.

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.

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? No



Comment

Consultee	Mr Amerjit Sidhu (677764)
Email Address	bobby-35@hotmail.co.uk
Address	27 The Horsefair Kidderminster DY10 2EN
Event Name	Kidderminster Central Area Action Plan Publication
Comment by	Mr Amerjit Sidhu
Comment ID	KCAAPP77
Response Date	13/09/12 18:29
Consultation Point	Policy KCA.Ch5 Phase 3a - Churchfields Business Park (View)
Status	Submitted
Submission Type	Web
Version	0.1

To which part of the DPD does this representation relate? (Please state paragraph number, policy number, map, table or figure number). Policy KCA.Ch5

Please refer to guidance notes for explanation of terms. If you enter **No** to 'Sound', please continue to Q5. In all other circumstances, please go to Q6.

Do you consider the DPD is:

Compliant with the Duty to Cooperate	Yes
Legally Compliant	Yes
Sound	No
Do you consider the document is unsound because it is not:	
Positively prepared	No
Justified	No
Effective	Yes
Consistent with national policy	No

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

I would like to draw out the retail element of any redevelopment of the Churchfields Business Park.

Measures are required to ensure that any new retail development on Churchfields should not adversely affect the vitality and viability of the town centre or the Horsefair local centre.

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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.

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? No



Comment

Consultee	Mr Amerjit Sidhu (677764)
Email Address	bobby-35@hotmail.co.uk
Address	27 The Horsefair Kidderminster DY10 2EN
Event Name	Kidderminster Central Area Action Plan Publication
Comment by	Mr Amerjit Sidhu
Comment ID	KCAAPP78
Response Date	13/09/12 18:36
Consultation Point	9.31 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.1

To which part of the DPD does this representation relate? (Please state paragraph number, policy number, map, table or figure number). Churchfields 9.31

Please refer to guidance notes for explanation of terms. If you enter **No** to 'Sound', please continue to Q5. In all other circumstances, please go to Q6.

Do you consider the DPD is:

Compliant with the Duty to Cooperate	Yes
Legally Compliant	Yes
Sound	Yes

Do you consider the document is **unsound** because it is not:

Positively prepared	No
Justified	No
Effective	No
Consistent with national policy	No

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

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.

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? Yes



Comment

Consultee	Mr Amerjit Sidhu (677764)
Email Address	bobby-35@hotmail.co.uk
Address	27 The Horsefair Kidderminster DY10 2EN
Event Name	Kidderminster Central Area Action Plan Publication
Comment by	Mr Amerjit Sidhu
Comment ID	KCAAPP79
Response Date	13/09/12 18:45
Consultation Point	Policy KCA.Ch8 Horsefair (View)
Status	Submitted
Submission Type	Web
Version	0.1

To which part of the DPD does this representation relate? (Please state paragraph number, policy number, map, table or figure number). Policy KCA.Ch8

Please refer to guidance notes for explanation of terms. If you enter **No** to 'Sound', please continue to Q5. In all other circumstances, please go to Q6.

Do you consider the DPD is:

Compliant with the Duty to Cooperate	Yes
Legally Compliant	Yes
Sound	Yes

Do you consider the document is **unsound** because it is not:

Positively prepared	No
Justified	No
Effective	No
Consistent with national policy	No

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

I would like to support the policy approach to toward 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.

Creating an attractive local centre which is convenient to access by pedestrians and motorists will enhance the function of Horsefair and encourage investment in the local area.

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? No



Comment

Consultee	Mr Amerjit Sidhu (677764)
Email Address	bobby-35@hotmail.co.uk
Address	27 The Horsefair Kidderminster DY10 2EN
Event Name	Kidderminster Central Area Action Plan Publication
Comment by	Mr Amerjit Sidhu
Comment ID	KCAAPP80
Response Date	13/09/12 18:59
Consultation Point	Policy KCA.EG1 Comberton Hill Area (View)
Status	Submitted
Submission Type	Web
Version	0.1

To which part of the DPD does this representation relate? (Please state paragraph number, policy number, map, table or figure number). Policy KCA.EG1

Please refer to guidance notes for explanation of terms. If you enter **No** to 'Sound', please continue to Q5. In all other circumstances, please go to Q6.

Do you consider the DPD is:

Compliant with the Duty to Cooperate	Yes
Legally Compliant	Yes
Sound	Yes

Do you consider the document is **unsound** because it is not:

Positively prepared	No
Justified	No
Effective	No
Consistent with national policy	No

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

I support this policy and I believe it is the best way forward to improve the Comberton Hill area in the future.

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? No



Creating a sporting habit for life

Planning Policy Team
Wyre Forest District Council

11 September 2012

Dear Sir / Madam

Kidderminster Central Area Action Plan

Thank you for consulting Sport England on the above document.

Sport England's comments are as follows:-

Page 66 – Policy KCA.Ch4

This policy states that any redevelopment of the former Sladen School should provide suitable compensation for the loss of the existing playing fields. It is noted that indoor and outdoor sports facilities may be acceptable.

Sport England is a statutory consultee for proposals which affect areas of playing fields. Our Playing Fields Policy provides guidance on the way in which Sport England assesses proposals which affect playing fields and in particular how we assess whether any compensation for losses is acceptable. The policy statement can be accessed at:-

http://www.sportengland.org/facilities_planning/playing_field_3.aspx

Wyre Forest's Playing Fields Strategy recognises the need for replacement playing fields to be provided where there is any loss which supports the above approach.

Page 85 - Bromsgrove Street Area – 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 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.

Yours faithfully

Tony Aitchison

, SportPark, 3 Oakwood Drive, , Loughborough, Leicestershire, LE11 3QF
T 020 7273 1777 F E planning.eastmidlands@sportengland.org www.sportengland.org



Creating a sporting habit for life


Tony Aitchison
Planning Manager

T: 020 7273 1762

M: 07879 602883

F: 01509 233 192

E: Tony.Aitchison@sportengland.org

 Wyre Forest District Council	Wyre Forest District Local Development Framework – Site Allocations and Policies and Kidderminster Central Area Action Plan Development Plan Documents (DPDs) Publication Stage Representation Form	Ref: (For official use only)
--	--	---

Please return to: Planning Policy Manager, Economic Prosperity and Place Directorate, Duke House, Clensmore Street, Kidderminster, Worcestershire, DY10 2JX; or by e-mailing this form to Planning.Policy@wyreforestdc.gov.uk

BY 5.30pm on Friday 14th September 2012

This form has two parts –
Part A – Personal Details
Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make and remember to specify which document it relates to. Please specify which DPD you are commenting on.

Part A

1. Personal Details*	2. Agent's Details (if applicable)		
<i>*If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.</i>			
Title	Ms		
First Name	Rose		
Last Name	Freeman		
Job Title (where relevant)	Planning Policy Officer		
Organisation (where relevant)	The Theatres Trust		
Address Line 1	22 Charing Cross Road		
Line 2	London		
Line 3			
Post Code	WC2H 0QL		
Telephone Number	020 7836 8591		
E-mail Address (where relevant)	planning@theatrestrust.org.uk		

Part B – Please use a separate sheet for each representation

Your representation should cover all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

After this stage, further submission will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Name or Organisation :

3. To which DPD does this representation relate? Site Allocations and Policies / Kidderminster Central Area Action Plan (*delete as necessary*)

To which part of the DPD does this representation relate?

Paragraph		Policy KCA.GPB7		Other e.g. Map, table, figure, key diagram	
4. Do you consider the DPD is :					
4.(1) Compliant with the Duty to Cooperate	Yes	probably		No	
4.(2) Legally compliant	Yes	probably		No	
4.(3) Sound	Yes	probably		No	
Please refer to guidance notes for explanation of terms If you have entered No to 4(3), please continue to Q5. In all other circumstances, please go to Q6.					

5. Do you consider the DPD is **unsound** because it is not:

- (1) Positively prepared
- (2) Justified
- (3) Effective
- (4) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Policy KCA.GPB6 Tourism Development

We are pleased to see that live performance venues will be encouraged, but assume this does not refer to theatre use.

Policy KCA.GPB7 Leisure Development

We support the enhancement of the Town Hall in para.5.62 as a multi-functional venue for the arts, but suggest this specific proposal should be contained within this policy as a positive input to the success of the evening economy.

It seems a pity that your one and only theatre, the Rose Theatre, is not included within your cultural leisure offer. Although it is probably just outside the plan boundary (difficult to ascertain), the theatre does provide a significant contribution to the cultural and visitor economy which we feel should be acknowledged in para.5.61.

(Continue on a separate sheet /expand box if necessary)

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

(Continue on a separate sheet /expand box if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Rose Freeman

Date:

11 September 2012

21 August 2012

Delivered by Email

Planning Policy Manager,
Economic Prosperity and Place Directorate,
Duke House, Clensmore Street,
Kidderminster,
Worcestershire
DY10 2JX

Our ref: WESA2007
Your ref: -
E: vbarbaro@turleyassociates.co.uk

Dear Sir or Madam

WYRE FOREST DISTRICT COUNCIL – KIDDERMINSTER CENTRAL AREA ACTION PLAN DPD

I write in respect of the subject document and have been instructed on behalf of Western Power Distribution to make the following consultation response.

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.

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.

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 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.

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.

I trust the information provided is satisfactory and I look forward to receiving your confirmation of receipt of this representation in due course along with the appropriate consultation number for future reference. Should you require any additional information or want to discuss or clarify any matter with a representative from WPD, please do not hesitate to contact me.

Yours faithfully

Veronica Barbaro
Assistant Planner



Wyre Forest District Local Development Framework – Site Allocations and Policies and Kidderminster Central Area Action Plan Development Plan Documents (DPDs) Publication Stage Representation Form

Ref:

(For official use only)

Please return to: Planning Policy Manager, Economic Prosperity and Place Directorate, Duke House, Clensmore Street, Kidderminster, Worcestershire, DY10 2JX; or by e-mailing this form to Planning.Policy@wyreforestdc.gov.uk

BY 5.30pm on Friday 14th September 2012

This form has two parts –
Part A – Personal Details
Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make and remember to specify which document it relates to. Please specify which DPD you are commenting on.

Part A

1. Personal Details*		2. Agent's Details (if applicable)	
<i>*If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.</i>			
Title	Mr		
First Name	Andrew		
Last Name	Morgan		
Job Title (where relevant)	Strategic Planner		
Organisation (where relevant)	West Mercia Police and Hereford & Worcester Fire and Rescue Service		
Address Line 1	Hindlip Hall		
Line 2	PO Box 55		
Line 3	Worcester		
Post Code	WR3 8SP		
Telephone Number	01905 332885		
E-mail Address (where relevant)	andrew.morgan.60139@westmercia.pnn.police.uk		

Part B – Please use a separate sheet for each representation

Your representation should cover all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

After this stage, further submission will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Name or Organisation : West Mercia Police (WMP) and Hereford & Worcester Fire and Rescue Service (HWFRS)

3. To which DPD does this representation relate? Kidderminster Central Area Action Plan (KCAAP)
To which part of the DPD does this representation relate?

Paragraph	Policy	Other e.g. Map, table, figure, key diagram	Housing Objectives, Mixed Use Development Objectives
4. Do you consider the DPD is :			
4.(1) Compliant with the Duty to Cooperate	Yes	x	No
4.(2) Legally compliant	Yes	x	No
4.(3) Sound	Yes	x	No

Please refer to guidance notes for explanation of terms

If you have entered **No** to 4(3), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is **unsound** because it is not:

- (1) Positively prepared
- (2) Justified
- (3) Effective
- (4) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

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.

Including the requirement within both sets of objectives is entirely consistent with and supported by the following: -

- Paragraphs 58 and 69 of the National Planning Policy Framework
- Objective 13 of the Wyre Forest Core Strategy (adopted December 2010)
- A Single Sustainable Community Strategy for Worcestershire
- Wyre Forest Community Safety Partnership – Strategic Objectives Plan 2011/12

(Continue on a separate sheet /expand box if necessary)

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

(Continue on a separate sheet /expand box if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Whilst we consider that these representations present our case fully, we would be prepared to participate at the oral part of the examination should the Council and/or Inspector consider this beneficial to proceedings.

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Andrew Morgan

Date:

12/09/12



Wyre Forest District Local Development Framework – Site Allocations and Policies and Kidderminster Central Area Action Plan Development Plan Documents (DPDs) Publication Stage Representation Form

Ref:

(For official use only)

Please return to: Planning Policy Manager, Economic Prosperity and Place Directorate, Duke House, Clensmore Street, Kidderminster, Worcestershire, DY10 2JX; or by e-mailing this form to Planning.Policy@wyreforestdc.gov.uk

BY 5.30pm on Friday 14th September 2012

This form has two parts –
Part A – Personal Details
Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make and remember to specify which document it relates to. Please specify which DPD you are commenting on.

Part A

1. Personal Details*		2. Agent's Details (if applicable)	
<i>*If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.</i>			
Title	Mr		
First Name	Andrew		
Last Name	Morgan		
Job Title (where relevant)	Strategic Planner		
Organisation (where relevant)	West Mercia Police and Hereford & Worcester Fire and Rescue Service		
Address Line 1	Hindlip Hall		
Line 2	PO Box 55		
Line 3	Worcester		
Post Code	WR3 8SP		
Telephone Number	01905 332885		
E-mail Address (where relevant)	andrew.morgan.60139@westmercia.pnn.police.uk		

Part B – Please use a separate sheet for each representation

Your representation should cover all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

After this stage, further submission will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Name or Organisation : West Mercia Police (WMP) and Hereford & Worcester Fire and Rescue Service (HWFRS)

3. To which DPD does this representation relate? Kidderminster Central Area Action Plan (KCAAP)
To which part of the DPD does this representation relate?

Paragraph	Policy	KCA.Ch2	Other e.g. Map, table, figure, key diagram
-----------	--------	---------	--

4. Do you consider the DPD is :

4.(1) Compliant with the Duty to Cooperate	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(3) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>

Please refer to guidance notes for explanation of terms

If you have entered **No** to 4(3), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is **unsound** because it is not:

- (1) Positively prepared
- (2) Justified
- (3) Effective
- (4) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Under the terms of Policy KCA.Ch2, the three high rise tower blocks of Grasmere Close 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 Churchfields regeneration scheme.

As evidenced by the supporting Strategic Infrastructure Assessment (SIA) to these representations, without suitable compensatory provision of a Police Post policing services will be detrimentally affected in the Churchfields area. A situation that would be clearly contrary to the following: -

- The Council's statutory obligation to consider crime and disorder reduction in the exercise of **all** its duties, as required by Section 17 of the Crime and Disorder Act 1998 (as amended by Schedule 9 of the Police and Justice Act 2006);
- The statutory responsibility of the elected Police and Crime Commissioner to secure an effective and efficient police force for their area, as required by Section 1 of the Police Reform and Social Responsibility Act 2011;

- Paragraph 156 of the National Planning Policy Framework (NPPF), which requires local planning authorities to plan for the security infrastructure needed for their areas;
- The Wyre Forest Community Safety Partnership – Strategic Objectives Plan 2011/12; and
- The Wyre Forest Matters priorities of the Single Sustainable Community Strategy for Worcestershire.

We consequently consider Policy KCA.Ch2 to be ineffective and inconsistent with national planning policy, as currently drafted, when considered against the tests of soundness contained in paragraph 182 of the NPPF.

An amendment to Policy KCA.Ch2 is consequently required to reflect this need for compensatory provision. The suggested amendment is set out in Part 7 of these representations.

(Continue on a separate sheet /expand box if necessary)

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

In view of the issue highlighted in Part 6 of these representations, we suggest the following amendments to Policy KCA.Ch2: -

Policy KCA.CH2

Phase 1 – Grasmere Close

The redevelopment of this area will be expected to include:

- *C3 Dwelling House*
- ***Community Uses (D1, including Police Post)***

Any new development on this site should:

- 1. Provide a strong frontage along Stourbridge Road and Hurcott Road.*
- 2. Provide active frontages and sense of enclosure to all roads within the site.*
- 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.***

Reasoned Justification

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.

It is worth noting in respect of the suggested amendment regarding the Police Post that precedent already exists for this. Policy SAL.STC2 of the Site Allocations and Policies Development Plan Document - Pre Submission Publication Version (July 2012) includes similar wording.

(Continue on a separate sheet /expand box if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Whilst we consider that these representations present our case fully, we would be prepared to participate at the oral part of the examination should the Council and/or Inspector consider this beneficial to proceedings.

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Andrew Morgan

Date:

12/09/12



Wyre Forest District Local Development Framework – Site Allocations and Policies and Kidderminster Central Area Action Plan Development Plan Documents (DPDs) Publication Stage Representation Form

Ref:

(For official use only)

Please return to: Planning Policy Manager, Economic Prosperity and Place Directorate, Duke House, Clensmore Street, Kidderminster, Worcestershire, DY10 2JX; or by e-mailing this form to Planning.Policy@wyreforestdc.gov.uk

BY 5.30pm on Friday 14th September 2012

This form has two parts –
Part A – Personal Details
Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make and remember to specify which document it relates to. Please specify which DPD you are commenting on.

Part A

1. Personal Details*		2. Agent's Details (if applicable)	
<i>*If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.</i>			
Title	Mr		
First Name	Andrew		
Last Name	Morgan		
Job Title (where relevant)	Strategic Planner		
Organisation (where relevant)	West Mercia Police and Hereford & Worcester Fire and Rescue Service		
Address Line 1	Hindlip Hall		
Line 2	PO Box 55		
Line 3	Worcester		
Post Code	WR3 8SP		
Telephone Number	01905 332885		
E-mail Address (where relevant)	andrew.morgan.60139@westmercia.pnn.police.uk		

Part B – Please use a separate sheet for each representation

Your representation should cover all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

After this stage, further submission will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Name or Organisation : West Mercia Police (WMP) and Hereford & Worcester Fire and Rescue Service (HWFRS)

3. To which DPD does this representation relate? Kidderminster Central Area Action Plan (KCAAP)
To which part of the DPD does this representation relate?

Paragraph	Policy	KCA.DPL2	Other e.g. Map, table, figure, key diagram
4. Do you consider the DPD is :			
4.(1) Compliant with the Duty to Cooperate	Yes	<input checked="" type="checkbox"/>	No <input type="checkbox"/>
4.(2) Legally compliant	Yes	<input checked="" type="checkbox"/>	No <input type="checkbox"/>
4.(3) Sound	Yes	<input type="checkbox"/>	No <input checked="" type="checkbox"/>

Please refer to guidance notes for explanation of terms

If you have entered **No** to 4(3), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is **unsound** because it is not:

- (1) Positively prepared
- (2) Justified
- (3) Effective
- (4) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

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.

As demonstrated in the supporting Strategic Infrastructure Assessment (SIA) to these representations, prepared by consultants WYG, certain mixed use developments will require the provision of additional emergency services infrastructure to ensure the vitality and viability of them and the wider town centre. This situation is no different to other supporting uses/infrastructure that will be required to support mixed use developments, such as expanded and/or additional medical facilities.

The Council has already recognised that the emergency services form part of the necessary uses/infrastructure to support new development, as explicitly stated by Policy CPO7 – ‘*Delivering Community Wellbeing*’ of the Wyre Forest Core Strategy (adopted December 2010). It is therefore wholly inconsistent for Policy KCA.DPL2 not to do so as well.

At a national level, the Department of Communities and Local Government published guidance ‘*The Community Infrastructure Levy: An Overview*’ (May 2011) recognises that the police are a legitimate part of the supporting infrastructure for new developments, albeit funded by the Community

Infrastructure Levy (CIL), as stated by paragraph 12 of the guidance document: -

*“The Planning Act 2008 provides a wide definition of the infrastructure which can be funded by the levy, including transport, flood defences, schools, hospitals, and other health and social care facilities. This definition allows the levy to be used to fund a very broad range of facilities such as play areas, parks and green spaces, cultural and sports facilities, district heating schemes and **police stations and other community safety facilities.**”*

In addition, paragraph 156 of the National Planning Policy Framework (NPPF) states that local planning authorities should set out the strategic priorities for their area as part of their Local Plan. Paragraph 156 confirms that this should include strategic policies to deliver ‘*health, **security**, community and cultural infrastructure and other local facilities*’.

Notwithstanding the above points, the lack of reference to the emergency services as 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. All of this if it should come to pass would, ultimately, be in contravention of Section 110 of the Localism Act and Section 17 of the Crime and Disorder Act 1998 (as amended by Schedule 9 of the Police and Justice Act 2006).

We consequently consider Policy KCA.DPL2 to be ineffective and inconsistent with national planning policy when considered against the tests of soundness contained in paragraph 182 of the NPPF.

(Continue on a separate sheet /expand box if necessary)

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

To resolve all of the concerns expressed above, we request that the following amendment is made to Policy KCA.DPL2: -

- *Community uses (including medical **and the emergency services**)*

(Continue on a separate sheet /expand box if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Whilst we consider that these representations present our case fully, we would be prepared to participate at the oral part of the examination should the Council and/or Inspector consider this beneficial to proceedings.

Please note: *The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.*

Signature:

Andrew Morgan

Date:

12/09/12



Wyre Forest District Local Development Framework – Site Allocations and Policies and Kidderminster Central Area Action Plan Development Plan Documents (DPDs) Publication Stage Representation Form

Ref:

(For official use only)

Please return to: Planning Policy Manager, Economic Prosperity and Place Directorate, Duke House, Clensmore Street, Kidderminster, Worcestershire, DY10 2JX; or by e-mailing this form to Planning.Policy@wyreforestdc.gov.uk

BY 5.30pm on Friday 14th September 2012

This form has two parts –
Part A – Personal Details
Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make and remember to specify which document it relates to. Please specify which DPD you are commenting on.

Part A

1. Personal Details*		2. Agent's Details (if applicable)	
<i>*If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.</i>			
Title	Mr		
First Name	Andrew		
Last Name	Morgan		
Job Title (where relevant)	Strategic Planner		
Organisation (where relevant)	West Mercia Police and Hereford & Worcester Fire and Rescue Service		
Address Line 1	Hindlip Hall		
Line 2	PO Box 55		
Line 3	Worcester		
Post Code	WR3 8SP		
Telephone Number	01905 332885		
E-mail Address (where relevant)	andrew.morgan.60139@westmercia.pnn.police.uk		

Part B – Please use a separate sheet for each representation

Your representation should cover all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

After this stage, further submission will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Name or Organisation : West Mercia Police (WMP) and Hereford & Worcester Fire and Rescue Service (HWFRS)

3. To which DPD does this representation relate? Kidderminster Central Area Action Plan (KCAAP)
To which part of the DPD does this representation relate?

Paragraph		Policy	KCA.GPB6	Other e.g. Map, table, figure, key diagram	
-----------	--	--------	----------	--	--

4. Do you consider the DPD is :

4.(1) Compliant with the Duty to Cooperate	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(3) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>

Please refer to guidance notes for explanation of terms

If you have entered **No** to 4(3), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is **unsound** because it is not:

- (1) Positively prepared
- (2) Justified
- (3) Effective
- (4) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

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.

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. A fact which prompted the Council's adopted Churchfields Masterplan Supplementary Planning Document (September 2011) to require all development fronting the Staffordshire & Worcestershire Canal to create a safe, secure and crime free environment.

This issue is also even more pertinent when it is considered that a key thrust of the Council's tourist strategy for Kidderminster is the development of an evening and night-time economy, as stated by paragraph 5.51 of the KCAAP. As explained in our previous representations to the Preferred Options document (May 2011), there is a direct and very well documented relationship between such an economy and the number of incidents that the emergency services are required to deal with on an on-going basis. If this type of economy is not managed very carefully, there could be a serious detrimental impact on the vitality and viability of the town centre, not to mention on the personnel and resources of

the emergency services.

The above point was acknowledged by the only adopted Area Action Plan in WMP's geographical area, the Central Telford Area Action Plan (March 2011) (CTAAP), prepared by Telford & Wrekin Council. Chapter 4 of the CTAAP acknowledged in policy that managing a successful evening and night-time economy requires fully involving and supporting the emergency services.

Finally, 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 which does implicitly acknowledge these issues.

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.

(Continue on a separate sheet /expand box if necessary)

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

To resolve all our concerns and make the KCAAP sound, we suggest the inclusion of the following addition text in Policy KCA.GPB6: -

*'...Within these areas, development **which is demonstrated to create a safe, enjoyable and crime free environment** for the following uses will be specifically encouraged:...'*

(Continue on a separate sheet /expand box if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Whilst we consider that these representations present our case fully, we would be prepared to participate at the oral part of the examination should the Council and/or Inspector consider this beneficial to proceedings.

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Andrew Morgan

Date:

12/09/12



Wyre Forest District Local Development Framework – Site Allocations and Policies and Kidderminster Central Area Action Plan Development Plan Documents (DPDs) Publication Stage Representation Form

Ref:

(For official use only)

Please return to: Planning Policy Manager, Economic Prosperity and Place Directorate, Duke House, Clensmore Street, Kidderminster, Worcestershire, DY10 2JX; or by e-mailing this form to Planning.Policy@wyreforestdc.gov.uk

BY 5.30pm on Friday 14th September 2012

This form has two parts –
Part A – Personal Details
Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make and remember to specify which document it relates to. Please specify which DPD you are commenting on.

Part A

1. Personal Details*		2. Agent's Details (if applicable)	
<i>*If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.</i>			
Title	Mr		
First Name	Andrew		
Last Name	Morgan		
Job Title (where relevant)	Strategic Planner		
Organisation (where relevant)	West Mercia Police and Hereford & Worcester Fire and Rescue Service		
Address Line 1	Hindlip Hall		
Line 2	PO Box 55		
Line 3	Worcester		
Post Code	WR3 8SP		
Telephone Number	01905 332885		
E-mail Address (where relevant)	andrew.morgan.60139@westmercia.pnn.police.uk		

Part B – Please use a separate sheet for each representation

Your representation should cover all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

After this stage, further submission will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Name or Organisation : West Mercia Police (WMP) and Hereford & Worcester Fire and Rescue Service (HWFRS)

3. To which DPD does this representation relate? Kidderminster Central Area Action Plan (KCAAP)
To which part of the DPD does this representation relate?

Paragraph	5.66 – 5.70	Policy	KCA.GPB7	Other e.g. Map, table, figure, key diagram
-----------	-------------	--------	----------	--

4. Do you consider the DPD is :

4.(1) Compliant with the Duty to Cooperate	Yes		No	X
4.(2) Legally compliant	Yes	X	No	
4.(3) Sound	Yes		No	X

Please refer to guidance notes for explanation of terms

If you have entered **No** to 4(3), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is **unsound** because it is not:

- (1) Positively prepared
- (2) Justified
- (3) Effective
- (4) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

As the Council is aware, WMP and HWFRS submitted representations to the Preferred Options (May 2011) in respect of the fact that the guidance on the evening/night-time economy was fragmented and insubstantial. Therefore, the guidance as written was not effective in providing robust and coherent planning policy guidance for this very important type of development.

Whilst Policy KCA.GPB7 and supporting paragraphs 5.66 - 5.70 are an improvement on the dispersed guidance contained within the Preferred Options document, they still do not go far enough in terms of: -

- 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. Whilst this information can be gleaned from reviewing the KCAAP as a whole, it would be much better if a list was provided in a similar manner to that provided in Policy KCA.GPB6 in respect of tourism related development. This would in turn help stakeholders like the emergency services to undertake their own planning work in relation to this type of development.
- 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. This is essential in order to ensure that the public are safe and feel safe and thereby secure the maintenance of The Queen's Peace.

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. The relationship between the partnership working concerning the planning system and that taking place in respect of implementing the revised licensing arrangements under the Police Reform and Social Responsibility Act 2011 also requires explanation in the KCAAP.
4. Providing sufficient encouragement for development proposals relating to the evening and night-time economy to: -
 - Locate in preferred locations for this type of development
 - Positively integrate with surrounding uses
 - Provide a high quality, safe and secure public realm

In our experience, a lack of good quality planning and subsequent follow-up active management after delivery simply equates to a rise in crime and antisocial behaviour levels in direct proportion to the increase in licensed premises. This in turn places excessive and sometimes unsustainable demands on the emergency services and local medical facilities.

Notwithstanding all of these issues, it is also worth noting that the introduction of the National Planning Policy Framework (NPPF) has meant that the previous national guidance on the evening and night-time economy set out in Planning Policy Statement 4 – '*Planning for Sustainable Economic Growth*' (2009) (PPS4) is no longer in place. For the avoidance of doubt at this juncture, the following policies of PPS4 were relevant: -

- EC3.1 (h)
- EC4.1 (f)
- EC4.2; and
- A9 and A12

There is consequently a need for robust guidance to address the KCAAP specific problems highlighted above, but also to address the lack of policy in the NPPF covering the evening and night-time economy.

(Continue on a separate sheet /expand box if necessary)

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

To resolve the issues highlighted above, it would be preferable if the KCAAP included specific policy and detailed supporting guidance in relation to the evening and night-time economy.

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.

At this juncture however we would like to respectfully point out that it is not within the remit of WMP and HWFRS to re-write a significant amount of planning policy and supporting guidance. However, 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.

(Continue on a separate sheet /expand box if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Given the issues highlighted in these representations and the need for a comprehensive re-write of the section of the KCAAP concerning the evening and night-time economy, a representative of WMP and HWFRS is considered desirable at the public examination to discuss the issues further.

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Andrew Morgan

Date:

12/09/12



Wyre Forest District Local Development Framework – Site Allocations and Policies and Kidderminster Central Area Action Plan Development Plan Documents (DPDs) Publication Stage Representation Form

Ref:

(For official use only)

Please return to: Planning Policy Manager, Economic Prosperity and Place Directorate, Duke House, Clensmore Street, Kidderminster, Worcestershire, DY10 2JX; or by e-mailing this form to Planning.Policy@wyreforestdc.gov.uk

BY 5.30pm on Friday 14th September 2012

This form has two parts –
Part A – Personal Details
Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make and remember to specify which document it relates to. Please specify which DPD you are commenting on.

Part A

1. Personal Details*		2. Agent's Details (if applicable)	
<i>*If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.</i>			
Title	Mr		
First Name	Andrew		
Last Name	Morgan		
Job Title (where relevant)	Strategic Planner		
Organisation (where relevant)	West Mercia Police and Hereford & Worcester Fire and Rescue Service		
Address Line 1	Hindlip Hall		
Line 2	PO Box 55		
Line 3	Worcester		
Post Code	WR3 8SP		
Telephone Number	01905 332885		
E-mail Address (where relevant)	andrew.morgan.60139@westmercia.pnn.police.uk		

Part B – Please use a separate sheet for each representation

Your representation should cover all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

After this stage, further submission will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Name or Organisation : West Mercia Police (WMP) and Hereford & Worcester Fire and Rescue Service (HWFRS)

3. To which DPD does this representation relate? Kidderminster Central Area Action Plan (KCAAP)
To which part of the DPD does this representation relate?

Paragraph	Policy	KCA.UP1	Other e.g. Map, table, figure, key diagram
4. Do you consider the DPD is :			
4.(1) Compliant with the Duty to Cooperate	Yes	<input checked="" type="checkbox"/>	No <input type="checkbox"/>
4.(2) Legally compliant	Yes	<input checked="" type="checkbox"/>	No <input type="checkbox"/>
4.(3) Sound	Yes	<input type="checkbox"/>	No <input checked="" type="checkbox"/>

Please refer to guidance notes for explanation of terms

If you have entered **No** to 4(3), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is **unsound** because it is not:

- (1) Positively prepared
- (2) Justified
- (3) Effective
- (4) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

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.

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 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.

We would also like to emphasise that the benefits of implementing Secured by Design are real and can be measured. In one year alone for example, some 700,000 burglaries nationwide could have been thwarted if appropriate Secured by Design measures has been installed, according to Professor Ken Pease OBE and Professor Martin Gill of Perpetuity Research – an independent organisation which specialises in looking at areas of crime reduction, community safety and security. We consequently

welcome and support the commitment by the Council to monitor Secured by Design as a Sustainability Appraisal indicator through the Annual Monitoring Report.

The above notwithstanding, we are of the view that Policy KCA.UP1 should also require new development schemes to incorporate the following: -

- Automatic water suppression systems
- Adequate water supplies for fire fighting
- Effective and efficient access for emergency vehicles

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. These systems are proven to significantly reduce fire deaths, injuries and property damage as a result of fire. This is because they control fires with minimal water and reduce the toxic smoke plume fall out, as well as reducing the contaminated water run off from a fire.

The Welsh Assembly Government has recently passed a law to make the installation of sprinklers compulsory in all new build homes in Wales. The CFOA, HWFRS and WMP firmly endorse this approach, and consider that there are major benefits for developers, communities and the emergency services; not only are domestic sprinkler systems cost-effective, but they also reduce community fire risk and reduce the burdens on fire and rescue services, enabling them to deploy more effectively.

The KCAAP will also need to ensure that all new developments incorporate adequate water supplies for effective fire fighting. Existing HWFRS funding is insufficient to meet the cost of providing fire hydrants in all new developments across the KCAAP geographical area. 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.

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.

One of the simplest ways of ensuring that the emergency services can rapidly access all parts of a development is if it has a dedicated emergency access road that connects with the surrounding highway network. We also stress the need to ensure that proposals for on-street car parking within developments do not hinder emergency services access.

As currently drafted, Policy KCA.UP1 does not take into account any of the above and for this reason we consider it unjustified, according to the tests of soundness set out in paragraph 182 of the National Planning Policy Framework.

(Continue on a separate sheet /expand box if necessary)

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

To resolve all our concerns expressed in part 6 of these representations, we suggest the inclusion of the following additional design principle in Policy KCA.UP1: -

(?) *Include automatic water suppression systems, provide adequate water supplies for fire fighting and ensure effective and efficient access for emergency service vehicles.*

(Continue on a separate sheet /expand box if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Whilst we consider that these representations present our case fully, we would be prepared to participate at the oral part of the examination should the Council and/or Inspector consider this beneficial to proceedings.

Please note: *The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.*

Signature:

Andrew Morgan

Date:

12/09/12



Wyre Forest District Local Development Framework – Site Allocations and Policies and Kidderminster Central Area Action Plan Development Plan Documents (DPDs) Publication Stage Representation Form

Ref:

(For official use only)

Please return to: Planning Policy Manager, Economic Prosperity and Place Directorate, Duke House, Clensmore Street, Kidderminster, Worcestershire, DY10 2JX; or by e-mailing this form to Planning.Policy@wyreforestdc.gov.uk

BY 5.30pm on Friday 14th September 2012

This form has two parts –
Part A – Personal Details
Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make and remember to specify which document it relates to. Please specify which DPD you are commenting on.

Part A

1. Personal Details*		2. Agent's Details (if applicable)	
<i>*If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.</i>			
Title	Mr		
First Name	Andrew		
Last Name	Morgan		
Job Title (where relevant)	Strategic Planner		
Organisation (where relevant)	West Mercia Police and Hereford & Worcester Fire and Rescue Service		
Address Line 1	Hindlip Hall		
Line 2	PO Box 55		
Line 3	Worcester		
Post Code	WR3 8SP		
Telephone Number	01905 332885		
E-mail Address (where relevant)	andrew.morgan.60139@westmercia.pnn.police.uk		

Part B – Please use a separate sheet for each representation

Your representation should cover all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

After this stage, further submission will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Name or Organisation : West Mercia Police (WMP) and Hereford & Worcester Fire and Rescue Service (HWFRS)

3. To which DPD does this representation relate? Kidderminster Central Area Action Plan (KCAAP)
To which part of the DPD does this representation relate?

Paragraph	Policy	KCA.UP5	Other e.g. Map, table, figure, key diagram
-----------	--------	---------	--

4. Do you consider the DPD is :

	Yes	No
4.(1) Compliant with the Duty to Cooperate	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4.(2) Legally compliant	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4.(3) Sound	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Please refer to guidance notes for explanation of terms

If you have entered **No** to 4(3), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is **unsound** because it is not:

- (1) Positively prepared
- (2) Justified
- (3) Effective
- (4) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

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. This was an issue we also highlighted in our representations to consultations held during the preparation of the Churchfields Masterplan Supplementary Planning Document (adopted September 2011) (CMSPD). The result being that amendments were made to Design Principle 4 of the CMSPD.

The solution to these problems must be multi-faceted encompassing design, security infrastructure (e.g. CCTV) and active management measures (e.g. increased security patrols). It will also require active on-going positive collaboration between public agencies, emergency services, stakeholders and members of the public.

Therefore, 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.

(Continue on a separate sheet /expand box if necessary)

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

To resolve the issues highlighted above, we suggest the insertion of the following bullet point in place of the existing part (i) of Policy KCA.UP5: -

(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.

As well as resolving all of our concerns, it will also ensure that Policy KCA.UP5 is much more consistent with the following: -

- Housing Objectives;
- Mixed Use Development Objectives;
- Policy KCA.UP1 (J); and
- Design Principle 4 – Churchfields Masterplan Supplementary Planning Document (adopted September 2011).

(Continue on a separate sheet /expand box if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Whilst we consider that these representations present our case fully, we would be prepared to participate at the oral part of the examination should the Council and/or Inspector consider this beneficial to proceedings.

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Andrew Morgan

Date:

12/09/12



Wyre Forest District Local Development Framework – Site Allocations and Policies and Kidderminster Central Area Action Plan Development Plan Documents (DPDs) Publication Stage Representation Form

Ref:

(For official use only)

Please return to: Planning Policy Manager, Economic Prosperity and Place Directorate, Duke House, Clensmore Street, Kidderminster, Worcestershire, DY10 2JX; or by e-mailing this form to Planning.Policy@wyreforestdc.gov.uk

BY 5.30pm on Friday 14th September 2012

This form has two parts –
Part A – Personal Details
Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make and remember to specify which document it relates to. Please specify which DPD you are commenting on.

Part A

1. Personal Details*		2. Agent's Details (if applicable)	
<i>*If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.</i>			
Title	Mr		
First Name	Andrew		
Last Name	Morgan		
Job Title (where relevant)	Strategic Planner		
Organisation (where relevant)	West Mercia Police and Hereford & Worcester Fire and Rescue Service		
Address Line 1	Hindlip Hall		
Line 2	PO Box 55		
Line 3	Worcester		
Post Code	WR3 8SP		
Telephone Number	01905 332885		
E-mail Address (where relevant)	andrew.morgan.60139@westmercia.pnn.police.uk		

Part B – Please use a separate sheet for each representation

Your representation should cover all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

After this stage, further submission will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Name or Organisation : West Mercia Police (WMP) and Hereford & Worcester Fire and Rescue Service (HWFRS)

3. To which DPD does this representation relate? Kidderminster Central Area Action Plan (KCAAP)
To which part of the DPD does this representation relate?

Paragraph	1.17	Policy		Other e.g. Map, table, figure, key diagram	
-----------	------	--------	--	--	--

4. Do you consider the DPD is :

4.(1) Compliant with the Duty to Cooperate	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(3) Sound	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

Please refer to guidance notes for explanation of terms

If you have entered **No** to 4(3), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is **unsound** because it is not:

- (1) Positively prepared
- (2) Justified
- (3) Effective
- (4) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Paragraph 1.17 states that an Infrastructure Delivery Plan (IDP) supported the site selection process leading to the present KCAAP publication document.

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.

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.

The SIA examines WMP's existing infrastructure in the District and the specific requirements for additional infrastructure to serve the planned growth including the need for: -

- New estate and buildings; and

- New staff and the capital expenditure that will be required to ensure that those staff are suitably equipped to provide the required service to the planned new growth.

The SIA consequently forms an integral part of the representations package and should be read in conjunction with all the comments made.

The SIA does not detail HWFRS's infrastructure requirements, as HWFRS are not seeking the provision of additional infrastructure within the Wyre Forest District. Instead HWFRS, with the full support of WMP, want to ensure that planning policies and guidance in the District provide for the following: -

- Ensure that new developments provide adequate water supplies for effective fire fighting;
- Oblige new development to ensure that the emergency services can rapidly access all areas and buildings swiftly and safely; and
- Encourage developers to install automatic water suppression systems (such as sprinklers and water mist systems) in all new developments.

The above position is consequently reflected in all of the comments made in these representations.

Should any further information be required in relation to the SIA, the above or any other aspect of the representations, please do not hesitate to contact us.

(Continue on a separate sheet /expand box if necessary)

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

(Continue on a separate sheet /expand box if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note: *The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.*

Signature:

Andrew Morgan

Date:

12/09/12



Wyre Forest District Local Development Framework – Site Allocations and Policies and Kidderminster Central Area Action Plan Development Plan Documents (DPDs) Publication Stage Representation Form

Ref:

(For official use only)

Please return to: Planning Policy Manager, Economic Prosperity and Place Directorate, Duke House, Clensmore Street, Kidderminster, Worcestershire, DY10 2JX; or by e-mailing this form to Planning.Policy@wyreforestdc.gov.uk

BY 5.30pm on Friday 14th September 2012

This form has two parts –
Part A – Personal Details
Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make and remember to specify which document it relates to. Please specify which DPD you are commenting on.

Part A

1. Personal Details*		2. Agent's Details (if applicable)	
<i>*If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.</i>			
Title	Mr		
First Name	Andrew		
Last Name	Morgan		
Job Title (where relevant)	Strategic Planner		
Organisation (where relevant)	West Mercia Police and Hereford & Worcester Fire and Rescue Service		
Address Line 1	Hindlip Hall		
Line 2	PO Box 55		
Line 3	Worcester		
Post Code	WR3 8SP		
Telephone Number	01905 332885		
E-mail Address (where relevant)	andrew.morgan.60139@westmercia.pnn.police.uk		

Part B – Please use a separate sheet for each representation

Your representation should cover all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

After this stage, further submission will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Name or Organisation : West Mercia Police (WMP) and Hereford & Worcester Fire and Rescue Service (HWFRS)

3. To which DPD does this representation relate? Kidderminster Central Area Action Plan (KCAAP)
To which part of the DPD does this representation relate?

Paragraph	9.16	Policy		Other e.g. Map, table, figure, key diagram	
-----------	------	--------	--	--	--

4. Do you consider the DPD is :

4.(1) Compliant with the Duty to Cooperate	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(3) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>

Please refer to guidance notes for explanation of terms

If you have entered **No** to 4(3), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is **unsound** because it is not:

- (1) Positively prepared
- (2) Justified
- (3) Effective
- (4) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

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.

The evidence supporting the assertion that additional police infrastructure will be required to support the Churchfields Masterplan site is provided by the supporting Strategic Infrastructure Assessment (SIA) submitted with this representations, prepared by consultants WYG.

As detailed in the SIA, WMP occupy a Police Post situated on the ground floor of the Windermere House high rise tower block at Grasmere Close. 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.

We emphasise that without such compensatory provision, policing services will be detrimentally affected in the Churchfields area. A situation that would be clearly contrary to the following: -

- The Council's statutory obligation to consider crime and disorder reduction in the exercise of **all** its duties, as required by Section 17 of the Crime and Disorder Act 1998 (as amended by Schedule 9 of the Police and Justice Act 2006);
- The statutory responsibility of the elected Police and Crime Commissioner to secure an effective and efficient police force for their area, as required by Section 1 of the Police Reform and Social Responsibility Act 2011;
- Paragraph 156 of the National Planning Policy Framework (NPPF), which requires local planning authorities to plan for the security infrastructure needed for their areas;
- The Wyre Forest Community Safety Partnership – Strategic Objectives Plan 2011/12; and
- The priorities of the Single Sustainable Community Strategy for Worcestershire.

We therefore respectfully seek an amendment to paragraph 9.16 to reflect this requirement for compensatory provision of the Police Post. The suggested amendment is set out in Part 7 of these representations.

The Council should also be aware that a successful regeneration scheme will require the incorporation of measures to prevent and contain fires alongside emergency services infrastructure.

Firstly, adequate water supplies should be provided for effective fire fighting. Existing HWFRS funding is insufficient to meet the costs of providing fire hydrants across the Churchfields Masterplan area. We will therefore expect the developer(s) 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 fire hydrants should be approved in consultation with HWFRS, and where hydrants are not feasible suitable alternative water sources, such as gravity tanks, should be installed.

Secondly, in a related and important matter, the Chief Fire Officers' Association (CFOA), HWFRS and WMP strongly advocate the installation of automatic water suppression systems in new housing and other developments. These systems are proven to significantly reduce fire deaths, injuries and property damage as a result of fire. This is because they control fires with minimal water and reduce the toxic smoke plume fall out, as well as reducing the contaminated water run off from a fire.

It is worth noting that the Welsh Assembly Government passed a law recently to make the installation of automatic water suppression systems compulsory in all new build homes in Wales. The CFOA, HWFRS and WMP firmly endorse this approach, and consider that there are major benefits for developers, communities and the emergency services; not only are domestic sprinkler systems cost-effective, but they also reduce community fire risk and reduce the burdens on fire and rescue services enabling them to deploy more effectively.

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.

(Continue on a separate sheet /expand box if necessary)

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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: -

*'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.**'*

It is worth noting in respect of the suggested amendment regarding the Police Post that precedent exists for this. Policy SAL.STC2 of the Site Allocations and Policies Development Plan Document - Pre Submission Publication Version (July 2012) includes similar wording.

(Continue on a separate sheet /expand box if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Whilst we consider that these representations present our case fully, we would be prepared to participate at the oral part of the examination should the Council and/or Inspector consider this beneficial to proceedings.

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Andrew Morgan

Date:

12/09/12



Wyre Forest District Local Development Framework – Site Allocations and Policies and Kidderminster Central Area Action Plan Development Plan Documents (DPDs) Publication Stage Representation Form

Ref:

(For official use only)

Please return to: Planning Policy Manager, Economic Prosperity and Place Directorate, Duke House, Clensmore Street, Kidderminster, Worcestershire, DY10 2JX; or by e-mailing this form to Planning.Policy@wyreforestdc.gov.uk

BY 5.30pm on Friday 14th September 2012

This form has two parts –
Part A – Personal Details
Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make and remember to specify which document it relates to. Please specify which DPD you are commenting on.

Part A

1. Personal Details*		2. Agent's Details (if applicable)	
<i>*If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.</i>			
Title	Mr		
First Name	Andrew		
Last Name	Morgan		
Job Title (where relevant)	Strategic Planner		
Organisation (where relevant)	West Mercia Police and Hereford & Worcester Fire and Rescue Service		
Address Line 1	Hindlip Hall		
Line 2	PO Box 55		
Line 3	Worcester		
Post Code	WR3 8SP		
Telephone Number	01905 332885		
E-mail Address (where relevant)	andrew.morgan.60139@westmercia.pnn.police.uk		

Part B – Please use a separate sheet for each representation

Your representation should cover all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

After this stage, further submission will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Name or Organisation : West Mercia Police (WMP) and Hereford & Worcester Fire and Rescue Service (HWFRS)

3. To which DPD does this representation relate? Kidderminster Central Area Action Plan (KCAAP)
To which part of the DPD does this representation relate?

Paragraph	Policy	Other e.g. Map, table, figure, key diagram	Strategic Objectives
4. Do you consider the DPD is :			
4.(1) Compliant with the Duty to Cooperate	Yes	x	No
4.(2) Legally compliant	Yes	x	No
4.(3) Sound	Yes		No x

Please refer to guidance notes for explanation of terms

If you have entered **No** to 4(3), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is **unsound** because it is not:

- (1) Positively prepared
- (2) Justified
- (3) Effective
- (4) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

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.

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.

The absence of such a reference is also inconsistent with Development Objective 13 of the Wyre Forest Core Strategy (adopted December 2010), which states that in order to maximise community cohesion and safety, new developments must positively contribute towards crime reduction.

The absence of the reference, which was requested in our representations to the Preferred Options (May 2011) document, also gives the impression that the KCAAP has not taken into account the objective of reducing crime and antisocial behaviour set out in the 'Single Sustainable Community Strategy for Worcestershire' and in the Wyre Forest Community Safety Partnership 'Strategic Objectives Plan 2011/12'.

Finally, the absence of a reference to creating a crime free environment in the Strategic Objectives is wholly inconsistent with the following parts of the KCAAP, which do contain direct references to this issue: -

- Housing Objectives
- Mixed Use Development Objectives
- Urban Design Key Principles

(Continue on a separate sheet /expand box if necessary)

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

In view of our comments above, we suggest that part 12 of the Strategic Objectives is amended as follows: -

12. *Ensure the town is safe, **crime free** and enjoyable for all users*

(Continue on a separate sheet /expand box if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Whilst we consider that these representations present our case fully, we would be prepared to participate at the oral part of the examination should the Council and/or Inspector consider this beneficial to proceedings.

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Andrew Morgan

Date:

12/09/12



Wyre Forest District Local Development Framework – Site Allocations and Policies and Kidderminster Central Area Action Plan Development Plan Documents (DPDs) Publication Stage Representation Form

Ref:

(For official use only)

Please return to: Planning Policy Manager, Economic Prosperity and Place Directorate, Duke House, Clensmore Street, Kidderminster, Worcestershire, DY10 2JX; or by e-mailing this form to Planning.Policy@wyreforestdc.gov.uk

BY 5.30pm on Friday 14th September 2012

This form has two parts –
Part A – Personal Details
Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make and remember to specify which document it relates to. Please specify which DPD you are commenting on.

Part A

1. Personal Details*		2. Agent's Details (if applicable)	
<i>*If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.</i>			
Title	Mr		
First Name	Andrew		
Last Name	Morgan		
Job Title (where relevant)	Strategic Planner		
Organisation (where relevant)	West Mercia Police and Hereford & Worcester Fire and Rescue Service		
Address Line 1	Hindlip Hall		
Line 2	PO Box 55		
Line 3	Worcester		
Post Code	WR3 8SP		
Telephone Number	01905 332885		
E-mail Address (where relevant)	andrew.morgan.60139@westmercia.pnn.police.uk		

Part B – Please use a separate sheet for each representation

Your representation should cover all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

After this stage, further submission will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Name or Organisation : West Mercia Police (WMP) and Hereford & Worcester Fire and Rescue Service (HWFRS)

3. To which DPD does this representation relate? Kidderminster Central Area Action Plan (KCAAP)
To which part of the DPD does this representation relate?

Paragraph	Policy	Other e.g. Map, table, figure, key diagram	Urban Design and Place Making Objectives
4. Do you consider the DPD is :			
4.(1) Compliant with the Duty to Cooperate	Yes	<input checked="" type="checkbox"/>	No <input type="checkbox"/>
4.(2) Legally compliant	Yes	<input checked="" type="checkbox"/>	No <input type="checkbox"/>
4.(3) Sound	Yes	<input type="checkbox"/>	No <input checked="" type="checkbox"/>

Please refer to guidance notes for explanation of terms

If you have entered **No** to 4(3), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is **unsound** because it is not:

- (1) Positively prepared
- (2) Justified
- (3) Effective
- (4) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

The current Urban Design and Place Making Objectives currently make no reference to minimising the opportunities for crime and antisocial behaviour. This is wholly inconsistent with and contrary to the following: -

- National Planning Policy Framework – paragraphs 58 and 69;
- Wyre Forest Core Strategy (adopted December 2010) – Key Issues and Challenges, paragraph 3.12, Development Objective 13 and Policy CP11: 'Quality Design and Local Distinctiveness';
- Policy KCA.UP1 (J);
- Housing Objectives – fourth bullet point; and
- Mixed Use Development Objectives – third bullet point.

If left unaddressed, this issue will affect the resulting effectiveness of the KCAAP once it has been adopted by the Council.

(Continue on a separate sheet /expand box if necessary)

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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: -

- *Create a safe and secure environment which reduces opportunities for crime and anti-social behaviour.*

(Continue on a separate sheet /expand box if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Whilst we consider that these representations present our case fully, we would be prepared to participate at the oral part of the examination should the Council and/or Inspector consider this beneficial to proceedings.

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Andrew Morgan

Date:

12/09/12



Wyre Forest District Local Development Framework – Site Allocations and Policies and Kidderminster Central Area Action Plan Development Plan Documents (DPDs) Publication Stage Representation Form

Ref:

(For official use only)

Please return to: Planning Policy Manager, Economic Prosperity and Place Directorate, Duke House, Clensmore Street, Kidderminster, Worcestershire, DY10 2JX; or by e-mailing this form to Planning.Policy@wyreforestdc.gov.uk

BY 5.30pm on Friday 14th September 2012

This form has two parts –
Part A – Personal Details
Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make and remember to specify which document it relates to. Please specify which DPD you are commenting on.

Part A

1. Personal Details*		2. Agent's Details (if applicable)	
<i>*If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.</i>			
Title	Mr		
First Name	Andrew		
Last Name	Morgan		
Job Title (where relevant)	Strategic Planner		
Organisation (where relevant)	West Mercia Police and Hereford & Worcester Fire and Rescue Service		
Address Line 1	Hindlip Hall		
Line 2	PO Box 55		
Line 3	Worcester		
Post Code	WR3 8SP		
Telephone Number	01905 332885		
E-mail Address (where relevant)	andrew.morgan.60139@westmercia.pnn.police.uk		

Part B – Please use a separate sheet for each representation

Your representation should cover all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

After this stage, further submission will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Name or Organisation : West Mercia Police (WMP) and Hereford & Worcester Fire and Rescue Service (HWFRS)

3. To which DPD does this representation relate? Kidderminster Central Area Action Plan (KCAAP)
To which part of the DPD does this representation relate?

Paragraph	Policy	Other e.g. Map, table, figure, key diagram	Vision
4. Do you consider the DPD is :			
4.(1) Compliant with the Duty to Cooperate	Yes	<input checked="" type="checkbox"/>	No <input type="checkbox"/>
4.(2) Legally compliant	Yes	<input checked="" type="checkbox"/>	No <input type="checkbox"/>
4.(3) Sound	Yes	<input type="checkbox"/>	No <input checked="" type="checkbox"/>

Please refer to guidance notes for explanation of terms

If you have entered **No** to 4(3), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is **unsound** because it is not:

- (1) Positively prepared
- (2) Justified
- (3) Effective
- (4) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

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.

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 detailed in Part 7 of these representations) to fully reflect paragraph 69 of the National Planning Policy Framework (NPPF), which requires planning policies to promote: -

'safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion.'

In addition to this, expanding the Vision as suggested would align it more closely with the objectives of the 'Single Sustainable Community Strategy for Worcestershire' and the Wyre Forest Community Safety Partnership 'Strategic Objectives Plan 2011/12'; both of which envisage reducing crime and antisocial behaviour in the District.

Making the suggested change would also improve the Vision's consistency with the following objectives, policies and text of the KCAAP, including: -

- Housing Objectives;
- Mixed Use Development Objectives;
- Paragraph 5.57, 5.69;
- Policy KCA.GPB7; and
- Policy KCA.UP1

(Continue on a separate sheet /expand box if necessary)

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

In order to resolve the points highlighted in Part 6 of these representations, WMP and HWFRS respectfully suggest the following amendment to the Vision: -

*'...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...'*

(Continue on a separate sheet /expand box if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Whilst we consider that these representations present our case fully, we would be prepared to participate at the oral part of the examination should the Council and/or Inspector consider this beneficial to proceedings.

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Andrew Morgan

Date:

12/09/12

Strategic Infrastructure Assessment

Prepared on behalf of West Mercia Police

in response to pre-submission consultations

Wyre Forest District Council

Site Allocations and Policies DPD and

Kidderminster Central Area Action Plan DPD

September 2012

WYG Planning
Midsummer Court
314 Midsummer Boulevard
Central Milton Keynes
Buckinghamshire,
MK9 2UB
Email: david.alderson@wyg.com
Tel: +44 (0)1908 423 308
Fax: +44 (0)1908 357 750
Mob: +44 (0)7748 233 533

Document Control

Project: Wyre Forest Strategic Infrastructure Assessment

Client: West Mercia Police

Job Number: A066406-19

File Origin:

Document Checking:

Prepared by:	David Alderson Ros Woodhall	Signed:
--------------	-----------------------------	---------

Checked by:	David Alderson Ros Woodhall	Signed:
-------------	-----------------------------	---------

Verified by:	Rebecca Don	Signed:
--------------	-------------	---------

Issue	Date	Status
1	07 Sept 2012	First draft to Client
2	13 Sept 2012	Final Report
3		
4		

West Mercia Police – Strategic Infrastructure Assessment

Contents Page

Preamble	7
Executive Summary	8

Part 1 – Context for the SIA

1.0	Introduction	12
2.0	Methodology for the SIA	15
	Stage 1 – Existing baseline infrastructure	17
	Stage 2 – SIA based upon ACPO formula	18
	Stage 3 – SIA based upon net requirements	18
	Stage 4 – Final SIA	19
	Stage 5 – Annual monitoring and review	19
3.0	Wyre Forest Context	20
	Background: National planning context	20
	NPPF	20
	North Worcestershire Context	21
	Development Plan in Wyre Forest	22
	Wyre Forest Core Strategy 2010	22
	Site Allocations and Policies DPD	23
	Kidderminster Central Area Action Plan DPD	23
	West Mercia Police interests	24
	Infrastructure plan	25
	Housing growth	25
	Population & Household Growth	27
	Core Strategy policies relevant to the provision of Police infrastructure	29
	Draft SAP policies relevant to the provision of Police infrastructure	30
	Draft KCAAP policies relevant to the provision of Police infrastructure	31
	Phasing	33
4.0	West Mercia Police – The Financial Context	34
	‘Planning for the Future’ – ‘Making the Difference’	34
	The Government’s Comprehensive Spending Review	35
	West Mercia/Warwickshire Police Authorities’ Strategic Alliance	35
	Interim financial conclusions	37
	Current & prospective funding mechanisms for Police infrastructure	37
	Capital & Assets Pathfinder (CAP)	39
	The Community Infrastructure Levy & S106 obligations	40
	Other infrastructure funding mechanisms	41

Part 2 - Findings of the SIA

5.0	Overview	43
	Need for Police infrastructure	43
	A - Additional Buildings & Accommodation	44
	Existing estate infrastructure in Wyre Forest (baseline)	44
	Assumptions on future infrastructure requirements	45
	Rationale for selecting sites for new estate infrastructure	46
	Requirements for new estate infrastructure	46
	Stourport-on-Severn	46
	Kidderminster	48
	Grasmere Close (Windermere House)	50
	Cost of new buildings and accommodation	53
	B – Additional Personnel set up costs	53
	Existing staff resources (baseline position)	53
	Assumptions on future personnel requirements	54
	Additional personnel requirements	54
	Additional personnel set-up costs	55
	C – Vehicles & other operational equipment	56
	Existing vehicles infrastructure (baseline position)	56
	Assumptions	57
	Additional vehicles & operational equipment requirements	57
	Cost of vehicles and other operational equipment	57
	D – Central Support Services	57
	Existing staff resources (baseline position)	57
	Assumptions	58
	Additional central support personnel required	58
	Cost of additional central support personnel required	58
6.0	Summary Findings and Conclusions	59
	Principle of requirements	59
	Impact of planned growth	59
	Police officers	61
	Vehicles	61
	Support staff	61
	Total costs	61
	Sustainable communities	62

Table Contents

Table 1 : North Worcestershire Districts Housing Growth Proposals

Table 2: Wyre Forest District : Housing Growth Summary

Table 3: Wyre Forest District : Residential Land Allocations

Table 4: Projected Population & Projected Average Household Size in Wyre Forest
- 2006-2026

Table 5: Wyre Forest Core Strategy Growth Proposals - Population & Dwellings 2006-2026

Table 6: Summary of Works and Costs Required at Kidderminster Police Station

Table 7: Summary of Built Infrastructure Requirements

Table 8: Staffing Levels – Existing and Proposed

Table 9: Staff Set Up Costs

Table 10: Vehicle and Other Equipment Costs

Table 11: Personnel Set Up Costs

Table 12: Summary of Built Infrastructure Requirements

Table 13: Summary of Total Additional Infrastructure Costs

Part 3 - Technical Appendices

Appendix 1 - Wyre Forest Additional Buildings Infrastructure Requirements & Locations

Appendix 2A – Stourport Police Post - Estimated Costs (Civic Centre Refurbishment)

Appendix 2B - Kidderminster Police Station – Estimated Costs

Appendix 3A – Churchfields (Grasmere Close) Police Post Replacement – Estimated Costs

Appendix 3B – Churchfields (Grasmere Close) Temporary Re-provision - Estimated Costs

Appendix 4 – Existing Baseline Assets

Appendix 5 – Types of WMP Buildings & Accommodation

Appendix 6 – West Mercia-Warwickshire Police Strategic Alliance

Appendix 7 – Site Maps for Kidderminster Police Station and Stourport Police Station

Appendix 8 – Home Office Guide to the Police Funding Formula

Appendix 9 – Wyre Forest Core Strategy Key Diagram

Appendix 10 - Methodology presented to the Local Authorities for consultation

Appendix 11 – WMP Capital Investment Programme

Appendix 12 – West Midlands RSS Growth Targets Information

Appendix 13 – ACPO Strategic Growth Toolkit – An Overview

Appendix 14 – WMP Medium Term Financial Plan

Preamble

WYG is an established global management and technical consultancy to the natural and built environment that works in partnership with clients in over 40 countries to help them realise their corporate and project ambitions.

WYG has significant experience in advising clients, including police and local authorities about strategic infrastructure and has previously provided advice about such matters to Thames Valley Police, Newark and Sherwood Council and East Riding Council. We specialise in preparing robust evidence base documents in support of the Local Development Framework (LDF) and Community Infrastructure Levy (CIL) processes and have previously provided advice about such matters to Thames Valley Police, Newark and Sherwood Council and East Riding Council. Our work has ranged from producing complete Infrastructure Delivery Plans (IDP) to smaller studies focused on specific aspects to help strengthen existing evidence base documents.

WYG is also supporting the Nationwide CIL Service with the preparation of a viability appraisal, draft CIL charging schedules and Regulation 123 Infrastructure List for Worthing Borough Council. Our role is to review the available infrastructure evidence base and advise the Council whether it is appropriate and robust enough to support the CIL process.

WYG Planning and Environment has been commissioned by West Mercia Police to undertake a Strategic Infrastructure Assessment to respond to the growth proposals set out in the adopted Wyre Forest Core Strategy and to complement West Mercia Police' submission in response to the consultation on the Wyre Forest Local Development Framework Development Plan Documents: the Site Allocations and Policies DPD and the Kidderminster Central Area Action Plan. This report constitutes that SIA, which examines and calculates the new infrastructure which will be required by West Mercia Police (WMP) to meet the additional demands created by the housing and population growth proposed in these documents.

It is necessarily an assessment based upon current knowledge and assumptions about housing and population growth, levels of operational policing and budgetary constraints. It is an SIA which will be monitored and reviewed annually to reflect changing circumstances and objectives.

Executive Summary

This study sets out West Mercia Police's strategic infrastructure requirements to serve the planned growth in Wyre Forest District to 2026. It seeks to identify the infrastructure required to serve the growth and identify where and when that infrastructure will be required, based on the proposals in the adopted Wyre Forest Core Strategy and the pre-submission Site Allocations and Policies DPD and the pre-submission Kidderminster Central Area Action Plan DPD.

This study examines WMP's existing infrastructure in the area and the specific requirements for additional infrastructure to serve the planned growth including the need for:

- new estate and buildings, and
- new staff and the capital expenditure that will be required to ensure that those staff are suitably equipped to provide the required service to the planned new growth.

The study has been undertaken in the context of a number of significant changes that are taking place within WMP and the wider economic situation and indeed changes to planning legislation and policy. This inevitably creates some uncertainty about the precise shape of WMP in the future. However, this SIA uses the best information available today to examine the current resources available to serve the planned growth and the additional resources that will be required to serve that growth.

The findings of the study are based on the specific requirements of WMP and the planned growth that is set out in the adopted Wyre Forest Core Strategy, the pre-submission Site Allocations and Policies DPD and the pre-submission Kidderminster Central Area Action Plan DPD i.e. the proposal to provide for 4,000 additional new homes in the district to 2026. The study examines the proposed distribution of that growth and seeks to identify the requirements for new police infrastructure to serve that growth.

The study identifies the need for 32 new staff to police the planned growth in the District based on the current and anticipated staffing levels in the near future. Of these 32 staff, 21 will be police officers and 11 will be other support staff. The staff will need to be recruited, equipped and trained and this will result in one off costs of about £254,274.

The staff and other resources will need to be accommodated in new estate to serve the planned growth. The new estate will include the re-provision of some functions of Stourport Police Station in a refurbished suite of the Civic Centre, the extension and partial refurbishment (custody) of Kidderminster Police station and one replacement Police Post at Grasmere Close/Churchfields, in the period to 2026. The cost of the new estate (excluding land) will be approximately £1.574m. This cost excludes any land or buildings acquisition because it is assumed that where necessary, the built infrastructure will be provided to WMP via s106 obligations at nil cost.

The total estimated additional infrastructure costs to meet the planned growth of 4,000 dwellings proposed in the draft SWDP are shown in the following table:

Summary of Total Additional Infrastructure Costs

	Current (net) cost for planned growth (4,000 dw)	Reference from main report
Additional buildings and enhanced accommodation	£1,574,313	Table 7
Additional Officers (set-up costs for 21no. officers)	£76,482	Table 8
Additional vehicles and other operational equipment	£148,070	Table 9
Additional central support staff (set up costs for 11no. support staff)	£29,722	Table 10
Total infrastructure cost	£1,828,587	

On the basis of the adopted Core Strategy additional dwelling requirement of 4000 new houses (2006 – 2026), this overall cost equates to about £457 per dwelling or £5.71 per square metre of residential development (if an average dwelling were about 80 square metres, typical of a new 3 bed house). However, on the basis that only 1465 dwellings remain to be granted planning permission in the Plan period to 2026, the cost per dwelling rises to approximately £1248 and the cost per square metre of residential floorspace to approximately £16.60.

The funding for this additional Police infrastructure necessitated by the additional population growth in Wyre Forest District will need to be secured via s106 obligations and the Community Infrastructure Levy.

WMP is keen to play its role in helping to ensure that the planned growth in Wyre Forest District comes forward in a sustainable way and will require additional funding or alternative provision, via s106 obligations and the Community Infrastructure Levy to ensure that this is possible.

Part 1

Context for the SIA

1.0 Introduction

- 1.1 Wyre Forest District Council adopted its Core Strategy DPD in December 2010. Core Strategy Policy DS01 provides for some 4,000 net additional dwellings between 2006 and 2026. In terms of the indicative location of new dwellings, the Core Strategy indicates that 60% will be provided in Kidderminster, 30% in Stourport-on-Severn and the remaining 10% will be provided in Bewdley and the rural areas.
- 1.2 In July 2012, the Council published the Site Allocations and Policies DPD (SAP) and the Kidderminster Central Area Action Plan DPD (KCAAP) for consultation. Together with the Core Strategy, these documents have informed this SIA.
- 1.3 The Site Allocations and Policy DPD notes that of the 4,000 additional dwellings required by the Core Strategy, 1,254 were completed between April 2006 – March 2012, leaving a balance of 2,746 dwellings to be provided between April 2012 and March 2026. This represents an annual build rate of 196 dwellings per annum. No population estimates have been included; however, according to projections produced by Worcestershire County Council, the population of the district will rise from 97,826 in 2006 to 98,745 in 2011 and to 103,695 in 2026¹. This represents an increase of 5,860 over the plan period and 4,950 between 2011 and 2026.
- 1.4 This scale of population and household growth will have implications for the providers of social infrastructure throughout the area, in terms of additional demands being placed upon their services. West Mercia Police (WMP) is one such provider of social infrastructure.
- 1.5 In order to fulfil its statutory obligations to ensure the proper and effective policing of an increased population and geographical urban expansion, WMP will require additional capital funding to make provision for new strategic infrastructure in Wyre Forest District. This infrastructure will include:
 - buildings and accommodation²
 - personnel set-up costs³
 - vehicles and other operational equipment, and

¹ Based on ONS mid year estimates 2006-10 and ONS 2010 population projections.

² A description of the various WMP property types is included in Appendix 5

³ Set-up costs within Territorial Policing Units and centrally based Protective Services, i.e. their recruitment, training and personal equipment

- central support services including personnel in operational support, human resources and corporate services.

- 1.6 In order to calculate the nature and scale of this additional infrastructure requirement, WYG Planning and Environment has undertaken a Strategic Infrastructure Assessment (SIA), the subject of this report. A methodology for this SIA was formulated in consultation with officers of the Worcestershire local planning authorities including Wyre Forest District Council and Worcestershire County Council, and received their endorsement prior to the assessment being undertaken.
- 1.7 Using the peer group endorsed methodology, this SIA quantifies the new strategic infrastructure that will be required and its approximate phasing in relation to the development growth. This includes new premises to serve development growth in the district. The capital cost of providing this new infrastructure is quantified, using established WMP data and the analyses of WYG's professional quantity surveying consultants. From the total estimated capital cost, calculations have been made of the cost per new dwelling and per capita in terms of the additional population.
- 1.8 The SIA methodology uses WMP primary data and comparable organisation secondary data⁴, to establish an existing baseline position. It then makes moderated projections of what infrastructure will be required in the future to 2026 and the capital costs of providing that infrastructure. The methodology uses sufficiently detailed data to ensure accuracy and credibility whilst avoiding complexity in the way the data is used and interpreted. It is a straightforward and accessible method for the purposes of the SIA. The methodology is described in detail at Section 2 below.
- 1.9 WYG and WMP are confident that the resultant SIA presents robust findings of the additional new infrastructure requirements and their capital costs, based upon currently available knowledge and data. These findings are commended to Wyre Forest District Council as the local planning authority, as an important element of the evidence base for the LDF and the forthcoming formulation of the associated Community Infrastructure Levy regime. Policy CP07 of the Wyre Forest DC Core Strategy (adopted December 2010) makes provision for developer contributions for social infrastructure, including emergency services facilities and services. In

⁴ Thames Valley Police (TVP) data has been used in exceptional instances; TVP are in the same CIPFA family grouping of Police Authorities

this regard, WMP as a partner organisation is committed to engaging with the planning process and to working collaboratively with Wyre Forest District to ensure that planned growth is supported by appropriate infrastructure to create sustainable communities in which people feel safe and which can be policed in the most efficient and effective way.

2.0 Methodology for the SIA

- 2.1 It is important that the methodology employed in the preparation of the SIA is clear, logical and readily understood. It should also be capable of replication across WMP's policing area. It will form part of the evidence base for Development Plan Documents – in this case the Wyre Forest SAP and the KCAAP. It is necessarily robust, in order to withstand scrutiny at public examination.
- 2.2 The methodology summarised below was originally the subject of prior consultation with the Worcestershire Local Planning Authorities on the afternoon of 16th May 2011. The matter was also an item on the agenda of a subsequent meeting of the Worcestershire Infrastructure Steering Group at the county council offices on 25th May, 2011. Following a presentation of the draft methodology, comments and questions were invited and this led to a useful round table discussion which resulted in some refocusing of the methodology. One written comment was received following the meeting. Generally, the WMP initiative and the methodology were welcomed by all the local authorities⁵.
- 2.3 The first of the SIAs for WMP to be completed was the South Worcestershire SIA (November 2011), which has been accepted in the main as a useful, credible and robust document. Worcestershire County Council (WCC) has published recently a consultation document "Planning for Infrastructure in Worcestershire" (Version 2 Draft, June 2012) in which the SIA is referenced. Section 4, 'Infrastructure Requirements' has a sub-section devoted to the Emergency Services (page 105) in which it is noted that WMP has engaged positively with planning policy teams throughout the county, but that new infrastructure schemes are progressing ahead of development plan documents. It is recognised that limited contributions are therefore being received by emergency service infrastructure providers, as reference is being made to currently adopted local planning policies which did not include reference to this type of infrastructure. The schedule of infrastructure requirements identified by the SIA is summarised and the total funding gap of £6.271m is referenced.
- 2.4 This reference to the findings of the SIA is repeated but in a greater level of detail, in the WCC evidence base document "Planning for Infrastructure in Worcestershire - Needs and Issues Research Paper" (June 2012), which was published alongside the above consultation document. Chapter 11 is devoted to the Emergency Services and extensive reference to the findings of the

⁵ A copy of the generic methodology presented to the Local Authorities for consultation is included at Appendix 10

SIA are detailed (pp 148 – 161). Essentially, the infrastructure requirements of WMP as detailed in the SIA are recognised fully.

- 2.5 With specific reference to South Worcestershire, a further document entitled “South Worcestershire Infrastructure Development Plan – Interim Position Statement” (SWIDPIPS) is also currently subject to consultation. SWIDPIPS is complementary to the work undertaken by WCC and its ‘Planning for Infrastructure’ documents (above), which are described as ‘joined-up and parallel work streams’. The SWIDPIPS, Appendix Y, Section E, provides a schedule of WMP infrastructure requirements for South Worcestershire which mirrors the content of the WCC documents and the findings of the WMP SIA November 2011. The WMP SIA is more extensively covered in Section 5E of the SWIDPIPS (pp 44 & 45), in which there is acceptance of the SIA methodology as being robust and credible.
- 2.6 For the purposes of the previous SIA for WMP in South Worcestershire, the impending revision to the ACPO formula⁶ and availability of other data caused a variation in approach to this methodology. The methodology is summarised below.
- 2.7 The broad approach has been to base the requirements for new Police infrastructure to serve the planned growth in the area on:
- the planned growth proposals in Wyre Forest District
 - a review of the capacity of the Police’ existing estate to serve that growth
 - the requirement for new strategic Police infrastructure to serve that growth, and
 - the capital costs of providing that new infrastructure.
- 2.8 This approach sought to examine the overall cost of providing the new additional infrastructure, necessitated by growth, on a “per dwelling” basis. This enabled the overall costs to be spread across the South Worcestershire area. We took the approach of spreading the costs evenly across the study area rather than seek to identify specific costs for specific areas of the planned growth. This is because WMP deploy their resources across a wide area. This modified methodology was recognised as being robust and credible, given the inclusion of the South

⁶ The ACPO formula is a methodology devised by the Association of Chief Police Officers (ACPO) to determine the unit costs of additional policing attributable to development growth.

Worcestershire SIA findings in subsequent WCC and South Worcestershire Development Plan infrastructure planning documents.

2.9 We have therefore replicated this approach for the present Wyre Forest SIA. Whilst the ACPO formula has now been revised, it is a tool chiefly for internal police use only. It is essentially a crime incident based formula as opposed to population growth based formula. It requires data at a local authority level rather than a Territorial Policing Unit (TPU) level (North Worcestershire), which is not available for Wyre Forest.

2.10 For these reasons and to provide for a consistency with the South Worcestershire SIA, we have not undertaken Stage 2 of the methodology, which in any event provided only a sense check.

2.11 In summary the SIA methodology therefore comprises the following stages:

Stage 1 - Existing Baseline Infrastructure

2.12 Stage 1 provides an assessment of the existing police infrastructure and consists of a high-level inventory of WMP's significant infrastructure assets. These include property, equipment, vehicles, and other assets within Wyre Forest District. WMP hold detailed inventories and these have been interrogated to enable a comprehensive database to be compiled. Any existing key deficiencies in infrastructure are identified on the basis of zero growth (to establish a baseline position) but in recognition of PFTF, Making the Difference, and WMP's Strategic Alliance with Warwickshire Police.⁷ These initiatives will have an impact on the way Wyre Forest District is policed and on the infrastructure that will be required.

2.13 This information collected has identified any asset/floorspace capacity likely to be yielded by workforce reductions as a result of Making the Difference. This includes property assets scheduled for disposal. A calculation is then made of the extent of any net capacity/under-capacity arising from the above.

2.14 WMP's capital investment programme is also reviewed as part of this exercise⁸.

⁷ WMP commenced a structural review its organisation entitled "Planning for the Future" (PFTF) in September 2009 in anticipation of a more difficult financial climate. Detailed recommendations were agreed by the Chief Constable and WMPA, and the implementation phase commenced in September 2010 – "Making the Difference". An exploration of the opportunities for collaborative working between forces to enable more efficient and effective policing has led to a Strategic Alliance with Warwickshire Police.

⁸ A summary of WMP's Capital Investment Programme is included in Appendix 11.

Stage 2 - SIA based upon ACPO formula

- 2.15 As noted above this stage has been deemed unnecessary and has not been part of this SIA.

Stage 3 - SIA based upon net requirement

- 2.16 This stage of the SIA considers the infrastructure that will be required to police the new development proposed in Wyre Forest. It is informed by the scale of growth provided for in the Core Strategy and distribution/location of the proposed development as set out in the SAP and KCAAP. It also takes into account WMP's programme for the disposal of assets that are no longer required, of which there are none in Wyre Forest District. It includes moderation of the strategic infrastructure requirements by acknowledging existing deficiencies in infrastructure, spare capacity (from stage 1) and potential disposal receipts.
- 2.17 A schedule of infrastructure requirements has then been compiled based upon net requirements.

Residential Development

- 2.18 The infrastructure costs which have been identified are directly related to the planned growth in the number of dwellings in the study area. We have not differentiated the capital cost across different dwelling sizes at this stage because there are no detailed proposals for a specific mix of housing in any draft policies. The figure that we have prepared is therefore an average figure across a range of dwelling types and sizes.
- 2.19 The introduction of the CIL will, in any event, require that charges are imposed on a cost per square metre of new development. It will therefore be necessary to agree a CIL charge per square metre of residential development to fund police infrastructure in due course.
- 2.20 For the purposes of calculating the average cost per dwelling we have assumed an average floor area of 80 square metres, related to a typical 3 bed dwelling.

Commercial Development

- 2.21 There are significant proposals for leisure and tourism development which will create an attendant need for additional custody facilities and this is explored more fully at paragraphs 3.43 to 3.50 below.

2.22 We have assumed that the planned growth in employment is directly related to the planned growth in new dwellings and have therefore sought to establish a cost per dwelling (and cost per square metre of residential floor area), rather than cost per square metre of employment development.

2.23 Furthermore, although CIL will be chargeable on most development, of the Councils who have already published (or adopted) their draft Charging Schedules, the majority are not proposing to impose a CIL charge on employment development (B1, B2, and B8 uses). The majority are proposing to focus the CIL charge on residential and retail/leisure development.

Stage 4 – Final SIA

2.24 The final SIA includes a spatial representation of new building infrastructure requirements.

2.25 All potential sources of funding for the provision of new police infrastructure are identified and a calculation of the funding gap on individual projects is made. This gap will potentially need to be funded through CIL or s106 obligations.

2.26 The SIA includes also, an indication of the phasing of provision insofar as it is known.

Stage 5 – Annual monitoring and review

2.27 The SIA will be subject to annual review and will be amended in the light of changing circumstances. Any amendments will be the subject of discussion with the local authority partners.

3.0 The Wyre Forest Context

Background: national planning context

- 3.1 The provisions of the Localism Act 2011 pave the way for the revocation of the Regional Spatial Strategy, although this has yet to be implemented. However, prior to the government announcing its intention to revoke regional strategies, the emerging West Midlands Regional Spatial Strategy Phase 2 Partial Review had reached examination stage⁹. The Wyre Forest Core Strategy was prepared in accordance with the then emerging West Midlands Regional Spatial Strategy (WMRSS) and stated that the emerging WMRSS provided the regional context in relation to future residential, employment, office and retail development.
- 3.2 The Localism Act 2011 provides for future decisions on housing and other targets to be made locally. Local planning authorities are responsible for formulating development plan documents (DPDs) based on a sound evidence base supported by the appropriate technical studies. This SIA will be one such study.

NPPF

- 3.3 The National Planning Policy Framework (NPPF) was published in March 2012 and sets out a presumption in favour of sustainable development. It notes that local plans must be prepared with the objective of contributing to the achievement of sustainable development in each of its three dimensions - economic, social and environmental. Whilst replacing all PPSs and PPGs (except the Waste PPS), the NPPF carries forward the provisions relevant to policing, particularly those set out in PPS1, PPS3 and PPS12.
- 3.4 NPPF advises that the social role of planning encompasses contributing to strong, vibrant and healthy communities by providing, inter alia, accessible local services that reflect the community's needs and support its health, social and cultural well-being.
- 3.5 The need for planning policies to ensure the creation of safe and accessible environments, where crime and disorder, and the fear of crime, do not undermine quality of life or social cohesion is referenced in paragraph 58 and similarly in paragraph 69, whilst the need for strategic policies to deliver, inter alia the provision of security infrastructure is set out in paragraph 156.

⁹ A summary of the growth targets envisaged in the emerging RSS is included at Appendix 12 for comparative purposes.

- 3.6 Paragraph 157 states that local plans should be based on co-operation with neighbouring authorities, public, voluntary and private sector organisations. It advises that local authorities should work with other authorities and providers to assess the quality and capacity of infrastructure and its ability to meet forecast demand and take account of the need for strategic infrastructure in their area.
- 3.7 Defence, national security, counter-terrorism and resilience are considered in paragraph 164. This notes the need for local authorities to take advice on these matters from the relevant organisations and advisors.

North Worcestershire Context

- 3.8 Kidderminster Police Station will be refurbished and extended to accommodate operational requirements that have a strategic function across the North Worcestershire TPU (Wyre Forest District, Bromsgrove District, Redditch Borough) e.g. custody facilities and the Major Incident Unit (MIU). Each authority could be reasonably expected to contribute to the costs of providing this infrastructure.
- 3.9 The most recent documents which provide information on future growth in Bromsgrove District and Redditch Borough are the Bromsgrove District Council Draft Core Strategy 2 (January 2011) and the Redditch Revised Preferred Draft Core Strategy 2011 (which is now to be incorporated in a new Local Plan No.4). The former provides for approximately 4,000 new dwellings in Bromsgrove between 2006 and 2021. The latter provides for 2,200 new dwellings to be built in Redditch between 2011 and 2026.
- 3.10 Across the TPU there will be growth amounting to approximately 11,200 new dwellings. Since the extended Kidderminster Police Station will be a strategic facility to serve the three districts, it would be reasonable to apportion the costs of its provision pro rata to the number of dwellings to be provided in each district as shown in the following table.

Table 1: North Worcestershire Districts' Housing Growth Proposals

District	Dwellings to be provided (Approx)	% of total dwellings
Bromsgrove	4,000	36
Redditch	3,200	28
Wyre Forest	4,000	36
North Worcestershire TPU	11,200	100

- 3.11 It would therefore be reasonable to apportion 36% of the costs of the extension to Kidderminster Police Station to growth planned for Wyre Forest District.

Development Plan in Wyre Forest

- 3.12 Wyre Forest District Council adopted its Core Strategy in December 2010. It covers the period 2006 – 2026. This document forms part of the statutory development plan for the District. It largely supersedes the 2004 Adopted Local Plan, although a few policies of the 2004 plan remain in force until the emerging DPDs are adopted. The Core Strategy Key Diagram, which covers the whole District, is reproduced at Appendix 9.

- 3.13 The statutory development plan for Wyre Forest District currently comprises:

- the West Midlands Regional Spatial Strategy (on which the previous assessments of infrastructure requirements have been made);
- “saved” policies of the Worcestershire County Structure Plan
- The Core Strategy 2010
- “saved” policies in the 2004 Local Plan

- 3.14 Although there will be some “saved” policies in other development plan documents that remain in force alongside the Core Strategy and emerging DPDs, the focus of this SIA document is on the proposals for growth within Wyre Forest District, set out in the Core Strategy, SAP and KCAAP. It will further inform future DPDs and SPDs the Council may produce.

Wyre Forest Core Strategy 2010

- 3.15 Wyre Forest District Council adopted its Core Strategy DPD in December 2010. The Adopted Core Strategy identifies that Wyre Forest District Council needs to plan for the following quantum of development from 2006 – 2026:

- Residential: 4,000 dwellings (District wide)
- Employment Land: 44 ha (District wide)
- Retail Space: 25,000 sq m (Kidderminster)

- Office Space: 40,000 sq m (Kidderminster)

3.16 The Council is currently consulting on the pre-submission SAP and KCAAP which, when adopted, will form part of the Development Plan for the District.¹⁰ These DPDs contain more detailed proposals on the distribution of development and identify housing and employment sites to meet the required quantum of development proposed in the Core Strategy. The preparation of this SIA has only been possible since the publication of these DPDs, as without information on the geographical distribution of new housing, the additional built infrastructure requirements for WMP could not have been assessed.

Site Allocations and Policies DPD

3.17 The SAP notes that, of the 4,000 dwellings that the Core Strategy indicates will need to be provided in the District up to 2026, and taking account of dwellings completed since 2006, dwellings under construction and dwellings with planning permission, sites will need to be identified through the site allocations process for an additional 1,465 dwellings¹¹.

3.18 In accordance with the Development Strategy of the Adopted Core Strategy the focus is for residential sites to be allocated on previously developed land, with particular emphasis on Kidderminster and Stourport-on-Severn.

3.19 For employment land, taking account of completions and commitments, the amount remaining to be identified through the site allocations process is approximately 17 ha¹².

Kidderminster Central Area Action Plan DPD

3.20 The KCAAP focuses primarily on the opportunities for regeneration and redevelopment in and adjacent to Kidderminster Town Centre. Since 2009 the District Council has been working in partnership with key regeneration bodies to progress the ReWyre Initiative. Its focus is to promote and improve Kidderminster. The role of the KCAAP is to provide a detailed planning policy framework which sets out the strategy and policies for the development of the town's central area, and helps to achieve this regeneration. It promotes sustainable growth for the

¹⁰ These consultation documents are available at <http://www.wyreforestdc.gov.uk/cms/non-ignl-pages/planning-and-regulatory-servic/planning-policy/sal-dpd.aspx> and <http://www.wyreforestdc.gov.uk/cms/non-ignl-pages/planning-and-regulatory-servic/planning-policy/kcaap-dpd.aspx>

¹¹ Paragraphs 2.13 and 2.14 and related table in the SAP

¹² Paragraphs 2.15 and 2.16 of the SAP

town and encourages the investment and economic, social and environmental development needed to make Kidderminster a prosperous and quality place.

3.21 In terms of housing, the objectives of the KCAAP are to:

- Increase the amount of people living within the town centre
- Regenerate Churchfields as a housing-led urban village
- Create a sustainable and balanced community meeting a variety of needs
- Create a safe environment which reduces opportunities for crime

3.22 In addition to the guidance for Churchfields set out in the KCAAP, the District Council has also produced the Churchfields Masterplan Supplementary Planning Document. The Masterplan provides a detailed design framework to help guide future development in this area.

West Mercia Police interests

3.23 West Mercia Police's interest in the Core Strategy, SAP and the KCAAP is fivefold:

- understanding the planned growth within the area to ensure that its resources are directed to meet the additional demands created by this growth
- securing appropriate contributions (financial and otherwise) via either planning obligations or the Community Infrastructure Levy, from new development approvals, towards the new infrastructure which will be required to support its operations in meeting the demands of the growth
- securing the allocation of land to accommodate the requirements of its estate
- informing the Infrastructure Delivery Plans, which we understand are being prepared by WFDC to support the SAP and the KCAAP and also Worcestershire County Council's county-wide IDP
- seeking policies which recognise and promote community safety as a key aspect of urban design and sustainable development.

3.24 It bears repetition to emphasise that, WMP are committed to engaging with the planning process and to working collaboratively with Wyre Forest District Council to ensure that planned growth is

supported by appropriate infrastructure in order to create sustainable communities in which people feel safe and which can be policed in the most efficient and effective way.

Infrastructure plan

- 3.25 In parallel with the preparation of the SAP and the KCAAP, the Council is working in partnership with Worcestershire County Council to identify the infrastructure which will be required to support these plans. In turn this will inform the Infrastructure Delivery Plan currently being prepared by WFDC. Moreover, under the Capital & Asset Pathfinder initiative, which supports collaborative working between public sector organisations, WMP has engaged positively with both WCC and WFDC to explore potential efficiencies (see para.4.29 below).
- 3.26 Earlier studies commissioned by Worcestershire County Council identified infrastructure requirements required as a result of growth proposals set out in the emerging RSS. These included WMP's estate requirements as was determined at that time.
- 3.27 It is important to note that whilst the infrastructure study demonstrated the need for new buildings to serve the planned growth, it did not identify the additional personnel, equipment and central support and specialist services which will be required, nor did it guarantee funding for that infrastructure. This would have to be secured via the CIL, planning obligations and other sources of funding.

Housing growth

- 3.28 As noted above, the Wyre Forest Core Strategy sets out proposals to develop 4,000 dwellings between 2006 and 2026. The SAP notes that sites for 1,465 new dwellings need to be identified over the remainder of the period to 2026. The SAP therefore sets out the following proposals for housing growth:

Table 2: Wyre Forest District: Housing Growth Summary

Total dwelling Requirement 2006 to 2026 (Approx)	Balance to be Provided to 2026 (Approx)	Dwellings with planning permission	Balance yet to be granted planning permission
4,000	2,746	1,281	1,465

- 3.29 The proposals for the area are shown diagrammatically in the Core Strategy Key Diagram¹³
- 3.30 The SAP identifies sites for approximately 1,900 dwellings, which more than meets the requirement to provide for 1,465 dwellings up to 2026. The SAP notes that this will allow some flexibility in the event that some allocated sites do not come forward. The SAP makes the following allocations:

Table 3: Wyre Forest District: Residential Land Allocations

Location	Approximate number of dwellings	Indicative Timetable
KCAAP Sites		
Churchfields	600	2001-21
Eastern Gateway	130	2016-21
Western Gateway	100	2011-26
Crossley Park and Mill Street	30	2016-21
Castle Wharf	50	2016-21
Heritage Processions	25	2016-21
Oldington and Foley Park		
Former British Sugar Site	320	2011-21
Oasis Arts & Crafts and Reilloc Chain	100	2016-21
Rifle Range Shops and Musketeer PH	23	2021-26
Northumberland Avenue Surgery	10	2011-16

¹³ The Key Diagram is included at Appendix 9

Location	Approximate number of dwellings	Indicative Timetable
Elsewhere in Kidderminster		
Broadwaters Community Centre	10 (Affordable housing)	2011-16
Chester Road South Service Station	20	2021-26
Blakebrook School and County Buildings	50 Mixed use	2016-21
Stourport on Severn		
Eastern Approaches	450	2011-26
Town Centre and Adjacent Sites	120	2011-26
Western Gateway	130	2011-16
Queens Road Shops and Garages	15	2016-21
Robbins Depot, Manor Road	12	2016-21
Bewdley		
Load Street Redevelopment Area	16	2016-21
Lax Lane	10	2021-26
Former Workhouse, High Street	6	2011-16
Rural Sites		
Blakedown Nurseries	42	2011-16
Land at Clows Top	30	2011-16

Population and household growth

- 3.31 The Core Strategy, SAP and KCAAP make no explicit reference to population forecasts for the District. According to projections produced by Worcestershire County Council, the population of

the district will rise from 97,826 in 2006 to 98,745 in 2011 and to 103,695 in 2026¹⁴. This represents an increase of 5,860 over the plan period and 4,950 between 2011 and 2026.

- 3.32 ONS has recently released “headline” population statistics at district level from the 2011 Census. This indicates that in 2011, Wyre Forest had a population of 98,000 in 43,000 households, producing an average household occupancy of 2.28 persons per household. The Census figures indicate that the population of the District is slightly lower than the 2010 projections but with a slightly higher average occupancy; (the 2010 projections indicate an average occupancy rate of 2.25).
- 3.33 Worcestershire County Council will in due course be producing revised population forecasts using 2011 Census data; however these will not be available until 2013. At present therefore the estimates provided above represent the best available information and the current forecasts are summarised in Table 4 below:

Table 4: Projected Population and Projected average household size in Wyre Forest, 2006 - 2026

	2006	2011	2016	2021	2026
Total population ¹⁵	97,826	98,745	100,381	102,109	103,695
Average household size ¹⁶	2.30	2.25	2.20	2.15	2.11

- 3.34 In parallel with the population growth, there will (according to the above projections), be a growth in the number of households of 6,612 over the plan period (a 15.6% increase). This is more than is planned for in the Core Strategy, SAP and KCAAP.
- 3.35 The increase in the number of households reflects changes due to people living longer, often in single elderly households, and trends in relationship break-ups, resulting in more, smaller households.

¹⁴ Based on ONS mid year estimates 2006-10 and ONS 2010 population projections.

¹⁵ Based on ONS mid-year estimates 2006-10 and ONS 2010-based population projections

¹⁶ Based on DCLG estimated household population and household numbers and DCLG 2008-based household projections

- 3.36 Both the scale of growth planned and its geographical distribution will have implications for WMP and its resources. WMP has a statutory duty to ensure adequate policing¹⁷. New development has an impact on policing, and there is a commensurate requirement for infrastructure to enable and support the police in carrying out their statutory duties. At c.4,000 new households accommodating c.6,000 new residents in Wyre Forest to 2026, the attendant increase in demands upon the services provided by WMP is of operational significance. It is a demand which has to be met. This SIA utilises this core data of new household provision and population projection data as the basis for calculating strategic infrastructure requirements.
- 3.37 In addition to the growth in population and households, the Core Strategy and emerging DPDs set out proposals for the provision of new employment sites and policies which aim to increase the potential for growth in tourism and to boost the night time economy (notably in Kidderminster Town Centre). These activities, particularly the growth of the night time economy will also have an impact on the services provided by WMP.

Core Strategy policies relevant to the provision of police infrastructure

- 3.38 The Core Strategy contains recognition of the importance of community safety and the need for infrastructure for the Police:
- Paragraph 2.2 sets out the key issues and challenges that set the context for the Strategy's vision and objectives and the core policies. Under the theme of A Desirable Place to Live, one of the challenges is "How can new development help to alleviate the high levels of concern amongst local residents in relation to crime?"
 - The Core Strategy includes reference (at paragraph 3.12) in its vision for the District that crime and disorder will remain low and local residents will feel safer.
 - Policy CP07: Delivering community well-being supports the provision of community infrastructure and requires new development proposals to contribute towards the retention and formation of sustainable communities within the District. It indicates that developer contributions will be required for social infrastructure including health and

¹⁷ Complementary to this is the obligation established in the Crime & Disorder Act 1998 for Local Authorities to introduce a range of measures to prevent crime and disorder. There is a statutory duty on all local authorities (under s17) to ensure community safety is considered when exercising its functions. This is reinforced by Section 1 of the Police and Social Responsibility Act 2011 which requires the Police and Crime Commissioners to secure an effective and efficient Police Force for their area.

community safety (includes emergency services) facilities and services. However the indicative infrastructure schedule in Appendix B of the Core Strategy does not contain any infrastructure requirements relating to Police infrastructure or facilities, although it is noted that this schedule is intended as a guide not a definitive list of requirements.

- Policy CP11: Quality design and local distinctiveness addresses the issue of designing out crime and indicates that developers will be required to demonstrate how their proposals address community safety and crime prevention in Design and Access Statements.
- Similarly Objective 13 of the Development Objectives seeks to “maximise community cohesion and safety and ensure new developments positively contribute towards crime reduction across the District for the benefit of all residents”.
- The importance of community safety is highlighted in paragraphs 9.12 and 9.13. These paragraphs note that even low levels of anti-social behaviour and fear of crime can have a significant impact on people’s lives and community cohesion. It is also noted that whilst the design of the local environment can contribute to community safety and crime reduction, tackling crime requires other mechanisms.

3.39 Whilst the Appendix B of Core Strategy contains infrastructure schedules, it does not note any specific police infrastructure requirements. However paragraph B3 states that more detailed information on infrastructure requirements including emergency infrastructure will inform the Site Allocations and Policies and Kidderminster Central Area Action Plan DPDs.

Draft SAP policies relevant to the provision of police infrastructure

3.40 Policy SAL.STC2 is a site specific policy relating to two linked sites in Stourport – Tan Lane and County Buildings. Both sites are considered to have potential for redevelopment. Stourport Police Station is currently located within the County Buildings complex, together with a range of community uses. The policy states that proposals will need to ensure that compensatory provision is provided for the existing community uses, if these are not to be retained on site, before considering any future redevelopment.

3.41 Policy SAL.STC3 relates to the Civic Centre site. The policy notes that, following the Council’s move to a new headquarters in 2012, this site has the potential to provide a mix of uses including community use. The policy allows for consideration of a range of alternative uses.

- 3.42 Under the Capital & Asset Pathfinder initiative, which supports collaborative working between public sector organisations, WMP is in discussion with Wyre Forest District to secure space in the Civic Centre as a replacement facility for the existing police station currently located in the County Buildings and costs have been included in the SIA to enable this to proceed. In the event that the Civic Centre site is redeveloped, we have assumed that suitable alternative provision will be made elsewhere for WMP at no additional cost.

Draft KCAAP policies relevant to the provision of police infrastructure

- 3.43 The Strategic Objectives for the KCAAP include to “Ensure the town is safe and enjoyable for all users” (Objective 12). Similarly, the Vision for Kidderminster town centre states “The town centre will be a vibrant, attractive and safe environment in which people wish to spend their time at all times of the day and night, taking advantage of a variety of retail, leisure, learning and employment opportunities”.
- 3.44 In terms of overall housing objectives, the KCAAP includes the objective which seeks to “create a safe environment which reduces opportunities for crime” (see page 13). Similarly, under mixed use development objectives, there is an objective which seeks to “create a safe and secure environment which reduces opportunities for crime” (see page 15).
- 3.45 The theme of promoting and enhancing a mix of retail (including food and drink), leisure and tourism activities permeates the Plan. The Tourism objectives seek to encourage tourist attractions accommodation and facilities and promote Kidderminster as a tourism hub for the District. Similarly, the Leisure Objectives aim to encourage new leisure developments and improve the evening economy.
- 3.46 These leisure objectives are translated into Policy KCA.GPB7 which supports new leisure developments both major and small-scale and specifically encourages developments that enhance the evening and night time economy. Supporting text at paragraphs 5.66 – 5.70 amplifies the Council's approach and notes that at present Kidderminster Town Centre is quiet during the evenings and provides opportunities for anti-social behaviour. It continues by suggesting that an increase in evening activity will improve natural surveillance.
- 3.47 While more activity may have this desirable effect, it is also the case that an increase in the number of leisure activities available during the evening, particularly those where alcohol is sold, will certainly require an increased level of policing. WMP's experience elsewhere and indeed that of other forces nationally confirm that there will be a significant increased demand on resources,

especially the need for additional custody facilities. Custody facilities for Wyre Forest District are provided at Kidderminster Police Station (TPU HQ).

- 3.48 In Telford, where WMP made representations on the Central Telford Action Area Plan (CTAAP) and subsequently provided evidence to the Inquiry, based on the inadequate recognition in the plan of the issues associated with the growth of the night time economy and the lack of a policy framework for their management, led the Inspector to conclude that both supporting text and policy changes should be made to address WMP's concerns.
- 3.49 The Inspector noted in Paragraph 31 of his report that "It is an aspiration of the CTAAP to develop a night time economy and there are proposals to do so but as submitted there were no policies or proposals for its management to avoid the well-known downsides of such activities". He concluded that a number of amendments, including those put forward by WMP were necessary to make the plan sound.
- 3.50 As a result the CTAAP was amended to include a policy to secure developer contributions for delivering infrastructure to support the development proposals for the town centre. The range of infrastructure to be provided under Policy CT23 of the CTAAP includes both site related and strategic infrastructure for a range of social infrastructure providers and specifically includes the police. The Plan was adopted in March 2011.
- 3.51 Finally, the KCAAP notes that the Churchfields area, for which a Masterplan was developed in 2011, is one of the District's biggest housing-led regeneration opportunities. It is envisaged that this area could provide up to 600 new homes. Policy KCA.Ch1 deals with the Churchfields area, which is to be developed in conformity with the Masterplan which has been adopted as SPD. It notes that the priorities for Planning Obligations are also set out in the SPD. Paragraph 9.12 notes that contributions will be sought for a range of important infrastructure, including emergency services facilities.
- 3.52 Policy KCA.Ch2 deals with the Grasmere Close site, which is to be cleared and redeveloped and forms Phase 1 of the Churchfields regeneration project. The site currently contains three tower blocks, one of which houses a police post. WMP will therefore need alternative premises within the wider Churchfields area as a replacement for current provision but also to serve the larger new community. It is noted that the Churchfields Masterplan SPD (Section 10 – Funding mechanisms) provides for s106 contributions for "Upgrade of Police Post". Clearly this will involve replacement premises as the current premises are to be demolished.

Phasing

- 3.53 The Churchfields Masterplan indicates that the Grasmere Close area will form Phase 1 of the regeneration project. The existing police post will be demolished as part of this phase. A temporary police post re-provision may be required if permanent premises are not immediately available.

4.0 West Mercia Police – the Financial Context

‘Planning for the Future’ and ‘Making the Difference’

4.1 In December 2009 the previous Government published a White Paper, ‘Protecting the Public: Supporting the Police to Succeed’, which anticipated a much more difficult financial climate in the years ahead for police forces. In response, WMP commenced a full structural review of its entire organisation entitled ‘Planning for the Future’ (PFTF, September 2009). The objectives of the review were to:

- Structure the Force to deliver a new mission, values and outcomes
- Further improve the policing service provided to the public
- Deliver better value for money
- Generate significant cost savings, and
- Make strategic investments

4.2 In 2010 in response to PFTF, new ways of working were identified in relation to six key work streams:

- Territorial Policing
- Protective Services
- Services to the Public
- Resources
- Law and Governance, and
- Human Resources

4.3 Within these themes further recommendations on organisational change were developed and agreed, resulting in the publication of ‘Making the Difference’ which detailed the 3 year implementation process commencing September 2010. In summary, the key points regarding the results of the review were:

- a reduction of the Force’s workforce by 6%
- a deletion of vacant posts/roles to protect the Force’s remaining workforce
- 55% of roles to be lost over the 3 years to go during the period April 2011 to March 2012

4.4 Overall, once PFTF is complete, the workforce will comprise 2,250 police officers and 1,888 police staff¹⁸. This is the baseline from which the Comprehensive Spending Review (CSR) savings, discussed below, will be made.

The Government's Comprehensive Spending Review (CSR)

4.5 As a result of the CSR, the Government informed WMP on 13 December 2010 of the savings that the Force would have to make during the next four years. In broad terms, WMP will need to save approximately £30 million over that period (a 17% reduction in real terms). Overall, the WMP's budget will be reduced to approximately £200m per year.

4.6 As 80% of WMP's total budget is spent on pay, WMPA have confirmed that a reduction in the Force's personnel is inevitable. Work is on-going in quantifying which and how many posts will be lost and it is undecided how many Police Officer and Police Staff posts will be lost.

4.7 It should be noted however, that the Government has confirmed that funding for Police Community Support Officers (PCSOs) is guaranteed for the two years, 2011 – 2013.

4.8 Whilst PFTF will help mitigate the impact of the CSR settlement, WMP has also been taking other measures to help meet budgetary constraints. These include:

- the postponement of the March 2011 intake of student officers
- closer control of external secondments – due to the freeze on recruitment, requests for secondment are now being considered on a case by case basis by Chief Officers, with the potential impact on service delivery being a key consideration, and
- Regional Collaboration – WMP has announced a 'strategic alliance' with Warwickshire Police and further opportunities for regional collaboration with other Forces in the West Midlands are being examined.

West Mercia/Warwickshire Police Authorities' Strategic Alliance

4.9 In June 2011 a 'Strategic Alliance' between the Police Authorities of West Mercia (Herefordshire, Shropshire, Telford & Wrekin, and Worcestershire) and Warwickshire was agreed. The aim is to deliver policing services across both force areas, more efficiently and effectively in the future,

¹⁸ Based on best available information at 1st August 2012

enabling both forces to meet the challenge of reducing policing budgets and providing greater operational and organisational resilience.

- 4.10 Both forces will retain Chief Constables who remain accountable to their Police Authorities and from November 2012 to the Police & Crime Commissioners for the delivery of policing. Force identities will also be retained within an alliance and both forces and authorities emphasise that local policing priorities agreed with local communities and partners will continue to be addressed.
- 4.11 Both forces will retain their separate governance and accountability arrangements (through their Police Authorities), policing budgets, assets and financial accounting arrangements, including independent financial advice. Most importantly, both forces recognise that policing across both areas must continue to address the greatest harms within each area as well as continuing to operate effectively within communities to address local priorities agreed with the public and local partners.
- 4.12 The professional recommendations include a change to how forces are currently planning to deliver reductions in budget, through the creation of a single change programme, and the necessary legal agreements to enable officers and staff to operate across both force areas. Police Authorities have asked both Chief Constables to progress this single change programme and the detailed design and implementation work required to realise the alliance¹⁹.
- 4.13 In June 2012, both Police Authorities approved a four year plan to deliver high quality, value for money policing services to communities across Warwickshire and West Mercia and achieve a £30.3 million cost reduction. In August 2012, the Warwickshire and West Mercia Chief Officer team met to reaffirm the commitment to deliver the new strategic alliance between the two Police Authorities.
- 4.14 Replacement of the Police Authorities in November 2012 with Police and Crime Commissioners will not affect the principle of progressing the Strategic Alliance.
- 4.15 Consequently, the Making the Difference implementation programme is presently being reviewed in conjunction with the Strategic Alliance review. The baseline staffing levels under PTFP remain relevant, but the scale and rate of other planned staffing and other budgetary reductions are now bound in with the formulation of the implementation plan for the Strategic Alliance.

¹⁹ Further information on the Strategic Alliance including the eight supporting key recommendations agreed by members of both authorities is attached at Appendix 6.

Interim financial conclusions

- 4.16 There has been considerable research and preliminary work in terms of re-engineering WMP's activities in the face of projected budget reductions in the coming years. Presently it is not possible to be precise about future planned staffing levels and operational activities within WMP and its North Worcestershire Territorial Policing Unit (TPU), not least because of the progressing 'strategic alliance' with Warwickshire Police.
- 4.17 However, the PTFP analysis of 2009 provides a robust baseline position from which to project future staffing and operational service levels, including as it does a clear recognition of some planned reductions in these aspects.
- 4.18 This SIA makes reasonable assumptions in using the PTFP analysis and projections as a baseline position. This SIA should seek to make moderating calculations where appropriate and possible, in recognition of the drivers for change and the likelihood of further revisions in staffing and operational service levels.

Current and prospective funding mechanisms for Police infrastructure

- 4.19 The funding of WMP is divided into two broad streams, revenue funding and capital projects. The revenue stream relates broadly to the day-to-day running costs of maintaining the existing Police Force, that being the payment and management of staff, the ongoing costs relating to running and maintaining buildings and equipment and repaying any loans. The capital projects element relates to the provision of additional buildings, equipment and other infrastructure items required to respond to increased pressures placed on the Force as a consequence of growth.
- 4.20 The principal sources of WMP funding are central Government (Home Office) grant and the Council Tax Precept. The WMP budget for the current financial year is set out in the Report of the Chief Constable and Treasurer, February 2012. This report included a Medium Term Financial Plan (MTPF) covering the period of the five financial years 2011/12 through to 2015/16 and the relevant extract is included at Appendix 14.
- 4.21 Grants from Government are of two types: Specific and Formula Funding. It is evident from the MTPF that following the CSR, these are reducing in scale for the next three financial years, with a very modest increase due in the final year, 2015/16. Whilst it is anticipated that income from the Council Tax precept will increase by approximately 2.5% year on year, the total funding gap between WMP income and expenditure increases from a shortfall of £3.23m this current year, for

the next two financial years, to nearly £6m in 2014/15. These annual shortfalls are having to be met by the use of financial reserves which are already heavily depleted.

- 4.22 In effect this means that the Home Office grant is entirely unresponsive to new needs for policing which arise from an increase in population and housing stock and that this is not being offset by modest Council Tax precept increases. Further information on the way in which Home Office funding is calculated is set out in the Plain English Guide to the Police Funding Formula²⁰, although it should be noted that this was published in March 2010 prior to the latest CSR.
- 4.23 Funding received by WMP via the Council Tax Precept is used exclusively for revenue purposes and the income contributes towards the running of the existing Force. It does not include any surplus that could be directed towards capital projects/programmes on the basis that directing funds towards such projects would diminish that available for delivery of the policing service. It is part of the remit of the WMP Authority to allocate funding as considered appropriate to achieve the objective of providing an efficient and effective Police service. It should also be noted that even with revenue raised from the Council Tax precept there has been a recognised funding gap created by inflation and a continuing expansion of the role of the Police service and the demands placed upon it. Indeed, there was no increase in the Council tax precept in the current financial year, 2012/13.
- 4.24 While there has been investment from central Government, this has often been ring-fenced for particular initiatives and has not kept up with the demand for services. This has meant that Police Authorities need an increase of over 5% annually from the Council Tax precept simply to 'stand still' in terms of service provision.
- 4.25 In terms of proportional contributions, as noted above, approximately 37% of revenue funding is derived from Council Taxes (including business rates), with the balance of revenue funding coming from Central Government via Home Office Grant. A small amount of funding is available from the Home Office for specific initiatives but this is extremely limited. The ACPO Strategic Growth Toolkit – An Overview (published June 2010) also provides some information on funding²¹. WMP are now in the position of having to use their own reserves to meet the deficit in the current financial year²².

²⁰ This document is included in Appendix 8

²¹ This document is included in Appendix 13

²² Medium Term Financial Plan, Appendix 14.

- 4.26 The effects of the CSR (see paragraphs 4.5 – 4.8 above) will continue to have a significant impact on the funding available to WMP, particularly for capital projects. As a result, the funding gap will increase, with less money for both revenue spending and capital projects.
- 4.27 WMP's position mirrors the experience of Police Authorities nationally which is that the funding allocated to them via Home Office grant, Council Tax Precept and other specific limited grants is generally insufficient to fund in full, capital expenditure requirements. Capital programmes have to date been funded from a mixture of asset disposal, redirection of revenue funding, financial reserves and prudential borrowing. Financial reserves, built up following previous tranches of asset disposal in the 1980s and 1990s, are close to exhaustion and the Capital Programme now relies upon prudential borrowing. WMP has been financially prudent for several decades, doing everything possible to provide its own funding but has now reached a situation where this no longer possible. Colloquially, 'the family silver was sold long ago and now the cupboard is bare'. In the context of the WMP funding position outlined in this SIA, it is highly unlikely that any capital funding will be available from within existing budgets to fund the infrastructure that will be required to serve the planned growth in Wyre Forest District.
- 4.28 Any borrowing or redirection of funds has an impact on police forces' revenue stream and subsequently the police service within that area. Unless additional funding can be secured towards infrastructure costs, less funding will be available to deliver a visible police profile within communities. This undermines the neighbourhood policing objective, and the government's localism initiatives, of seeking to reduce both the incidents and fear of crime and disorder in local communities.

Capital & Assets Pathfinder (CAP)

- 4.29 WMP has been working with other public sector bodies to identify opportunities to share resources, particularly estates to help reduce costs and provide a more efficient service. This continues a long history of positive engagement between WMP and the Local Authorities and other public organisations. In Wyre Forest a replacement Police Station in a refurbished Stourport Civic Centre has been identified as part of Capital & Asset Pathfinder initiative. This will serve as a replacement for the existing station at Bewdley Road, which will revert to WCC under CAP.
- 4.30 The planned redevelopment of the Bewdley Road site in Stourport will be in accordance with Policy SAL.STC2 of the SAP (July 2012). The planned redevelopment of the Stourport Civic Centre will be in accordance with Policy SAL.STC3 of the SAP (July 2012).

- 4.31 In the unlikely event that any additional resources to serve the planned growth are identified through the CAP in due course, these will be identified in the annual update of this SIA.

Community Infrastructure Levy (CIL) and S106 Obligations

- 4.32 Presently there is no specific and definite mechanism which gears funding streams specifically and directly to new police capital infrastructure provision. Many Police forces have therefore, for several years now, been involved in the town planning process through seeking developer contributions towards the capital costs of providing new infrastructure. Increasingly they have sought to fund capital projects through s106 obligations and are now seeking to do this via CIL.
- 4.33 The police service is recognised as a social infrastructure provider under the provisions of the Planning Act 2008, as expressed consistently in the CIL overview documents published by CLG (paragraph 12 of the latest edition published in May, 2011). Regulations for the introduction of the Community Infrastructure Levy will establish the mechanism by which CIL Charging Authorities (Local Planning Authorities) can channel funding to Police Forces to fund the capital provision of new infrastructure.
- 4.34 Indeed, WMP is recognised in the Shropshire Council LDF Implementation Plan as being a legitimate recipient of CIL funds for major new capital infrastructure. The Shropshire CIL Rationale Background Paper, March 2011, also explicitly added 'police stations' to the list of infrastructure provision to be funded by CIL and identified several specific stations for CIL funding. WMP has worked positively as a member of the Shropshire Strategic Infrastructure Forum on these and other related matters.
- 4.35 The tests set out in CIL Regulation 122 require that a planning obligation is:
- (a) Necessary to make the proposed development acceptable in planning terms
 - (b) Directly related to the proposed development
 - (c) Fairly and reasonably related in scale and kind to the proposed development
- 4.36 We are aware that there have been different interpretations by local authorities, planning inspectors and indeed the Secretary of State of these tests insofar as they relate to the provision of police infrastructure. The methodology utilised in the production of this SIA enables police infrastructure costs to be apportioned on a per dwelling basis in a robust and transparent way for use in either a CIL charging schedule or in a s106 obligation, whichever is appropriate in the particular circumstances of a development proposal.

- 4.37 Wyre Forest Council is working with Worcestershire County Council to develop CIL charging schedules. It is not yet known whether the CIL will be chargeable on all forms of development, including housing, employment and retail development. Developers will be required to contribute towards community infrastructure through CIL and/or Planning Obligations.
- 4.38 In addition to considering the requirement for new infrastructure which is required in connection with residential development, the WMP has considered the need for such infrastructure to support the planned growth of other forms of development. This will necessarily require the provision at a strategic level of centralised support services for which would not necessarily be possible to disaggregate at any point over the projected period of population growth.
- 4.39 In addition to funding via CIL, the system of securing infrastructure to serve a specific development via s106 obligations will remain in place.

Other infrastructure funding mechanisms

- 4.40 In addition to considering the requirement for new infrastructure to serve new residential development, the Police have considered the need for such infrastructure to support the planned growth of other forms of development including leisure and tourism related growth. The proposed expansion of the night time economy in particular will have implications for policing (see paras. 3.43 to 3.50 above).
- 4.41 There may also be other forms of public funding which might be available to fund infrastructure to serve the planned growth in the area. Whilst these are not explored in this study, the SIA will inform such initiatives as the New Homes Bonus (NHB) allocated to local authorities based on the annual number of housing completions within their area, and Tax Increment Financing (TIF) that which might in future be a source of funding.

Part 2

Findings of the SIA

5.0 Overview

Need for Police Infrastructure

- 5.1 West Mercia Police has absorbed the growth in population and household numbers to date within its area. As discussed in Part 1 of this report, it will not be able to continue to absorb further growth in the area without increased capacity in its estate, human resources, vehicle fleet and equipment to support its operational activities.
- 5.2 An earlier infrastructure study (Baker Associates, 2010) indicated the Police buildings infrastructure requirements for the higher level of growth anticipated in the emerging WMRSS. As indicated at the outset, Police strategic infrastructure for the purposes of this study is defined as:
- A additional (including new) buildings and accommodation²³
 - B additional personnel set-up costs²⁴
 - C vehicles and other operational equipment, and
 - D central support services including additional personnel in operational support, human resources and corporate services.

Each of these strategic infrastructure items is examined in terms of:

- existing baseline infrastructure
- additional infrastructure required (moderated as appropriate)
- estimated cost.

- 5.3 The overall growth planned in the area to 2026 can be summarised in terms of the anticipated increase in population and planned additional dwellings in the area as shown in Table 5.

²³ A description of the various WMP property types is included in Appendix 5

²⁴ Set-up costs within Territorial Policing Units and centrally based Protective Services their recruitment, training and personal equipment

Table 5: Wyre Forest Core Strategy Growth Proposals – Population and Dwellings 2006 - 2026

Measure of Growth	Amount	Percentage increase over existing	Period
Population	5,869	6.0%	2006-2026
WF Core Strategy Planned Dwellings	4,000	9.4% ²⁵	2006-2026

- 5.4 The requirement for additional Police infrastructure is related to both the anticipated growth in population (because more people will require more policing) and the planned growth in development which will require policing across a greater geographical area. The planned development growth is principally new housing, but includes also employment, leisure, tourism related and other forms of growth.
- 5.5 The SAP establishes that the growth across the area will be focused on the main settlements of Kidderminster, Stourport and Bewdley. The following section considers the capacity of the existing infrastructure to serve the planned growth and the need for additional infrastructure to serve that growth.

A Additional buildings and accommodation

Existing estate infrastructure in Wyre Forest (baseline position)

- 5.6 WMP's estate in Wyre Forest comprises a range of buildings but does not include the Force's Headquarters (FHQ) at Hindlip Hall (Wychavon DC) which, in addition to housing central support services and training facilities, accommodates a variety of operational units for e.g. Operational Support, Protective Services and Enabling Services. In Wyre Forest, the estate includes the TPU

²⁵ This 9.4% increase is based upon a calculated number of 42,533 households at 2006 (97,826 population divided by 2.3 persons average household size); WCC households projections ONS 2010 based. In fact, the number of projected households for 2026 might be calculated on the same basis as being 49,144 (103,695 population divided by 2.11 persons average household size). In this latter case there would be a household increase of 6611 households or 15.5 % increase. A 9.4 % increase is therefore regarded as being a very conservative estimate of household growth.

Headquarters (Kidderminster), 2no. police stations (Stourport-on-Severn and Bewdley), and 5no. police posts ²⁶.

- 5.7 In terms of custody provision, there are currently 11no. cells and associated facilities in the custody suite at Kidderminster Police Station, serving Wyre Forest District.
- 5.8 The estate currently includes 5 no. Police Posts in the District – four in Kidderminster and one in Stourport. The Police Posts are not necessarily occupied on a full time basis but act to supplement the existing network of Police Stations. These premises provide support facilities for the Police to undertake their operations across a wider geographic area and may be used for a variety of purposes including for visiting members of the public and administration.

Assumptions on future infrastructure requirements

- 5.9 The progress towards a 'Strategic Alliance' Warwickshire Police (see 4.9 – 4.15 above) and 'Making the Difference' reviews will have implications for the future use and occupation of the WMP estate. Operational procedures will also be reviewed and targeted savings sought, as required by the CSR. The reviews are likely to entail an examination of how the estate in general and individual buildings in particular might be used more efficiently. However, there will be no WMP owned sites becoming surplus to operational requirements or available for disposal within Wyre Forest District.
- 5.10 Where appropriate, we have identified requirements for new projects to accommodate the infrastructure required to serve the planned growth. It is important to ensure that the KCAAP and SAP policies support the allocation of such sites for infrastructure where it will be required to serve new development, and that any subsequent DPDs and SPDs recognise any site specific WMP infrastructure requirements.
- 5.11 In the context of the ongoing review of the WMP and reduction in its budget, we have assumed for the purposes of this study that the planned growth in the area will not require any additional facilities or expansion at WMP Force HQ at Hindlip, in Worcester.

²⁶ A schedule and map of the existing estate is included at Appendix 4

Rationale for selecting sites for new estate infrastructure

5.12 The WMP rationale to identifying the need for new estate to serve the planned growth in the study area is to:

- examine the geographic spread of its existing estate in the context of the planned growth in the area
- identify where existing facilities have the capacity to accommodate that planned growth without the need for extension or improvement
- identify where existing facilities could be extended or improved to serve the planned growth
- identify where existing facilities could not be extended or improved to serve the planned growth
- identify the most appropriate locations for new infrastructure (where existing facilities do not exist in proximity to the planned growth, or where existing facilities are incapable of being extended and improved to serve the planned growth)
- specify the most appropriate type of new police accommodation required in relation to the geographical characteristics of the location.

Requirements for new estate infrastructure

5.13 This approach has led WMP to identify a number of locations where existing facilities could be extended and improved to accommodate the planned growth in Wyre Forest, as set out in Tables 2 & 3 (paras 3.28 to 3.30 above).

Stourport-on-Severn

5.14 The existing Stourport Police Station is accommodated in the County Buildings at Bewdley Road, on a site which is subject to a redevelopment proposal under Policy SAL.STC2 (see 3.40 above). There is a current proposal for a new station to be provided within a refurbished office suite within the largely vacated Stourport Civic Centre as part of the Capital & Assets Pathfinder initiative (paras. 3.42 and 4.29 above).

5.15 Stourport Police Station accommodates a Major Incident Unit (MIU), as well as a Safer Neighbourhood Team (SNT). The MIU deals only with the most serious crimes e.g. murder, rape

and kidnap, whilst an SNT, as the name implies, delivers day-to-day neighbourhood policing services to local communities.

- 5.16 Under draft proposals for the Strategic Alliance currently being considered by Chief Officers, there is an option to re-locate and expand the MIU at Kidderminster Police Station and have only an SNT remaining in Stourport to deal with current and anticipated future community policing needs. An MIU would require an additional 30 workstations, which are not available in Kidderminster Police Station which would therefore require expansion to accommodate this relocated requirement (paras. 5.22 – 5.24 below).
- 5.17 The proposals for the refurbished accommodation within the Civic Centre will therefore have to accommodate the SNT and a floorspace of 64 sq m is required for this purpose. There will be a public counter service at Stourport which will be a facility shared with other public service functions in a common reception area for the building. The cost of this refurbishment has been estimated to be £122,337²⁷.
- 5.18 This refurbishment cost is notably less than a typical police station²⁸ which is usually a building capable of accommodating 10 - 40 Police Officers and support staff on shift. Based on a specification provided by WMP, the cost of a typical new police station (excluding land) has been calculated under the earlier South Worcestershire SIA (November 2011), to be £1,625,000. The civic centre refurbishment is therefore considered to be an extremely cost effective solution for the relocation of the existing SNT.
- 5.19 The refurbishment of the Civic Centre is regarded as a strategic infrastructure requirement resulting from the SAP SPD policy SAL.STC2 and would therefore be a legitimate recipient of either CIL or S106 funding, which would reimburse, perhaps retrospectively, the expenditure under the CAP initiative. Indeed, this should be seen as a modest, reasonable and wholly

²⁷ Detailed information on the specification and costs for the refurbishment of the civic centre to provide a new police post have been produced by WYG Trench Farrow, specialist cost consultants and are set out at Appendix 2A.

²⁸ Typical facilities for a new police station would include offices, interview rooms, storage for equipment and possibly a counter service for visiting members of the public to be open on a daily basis. Detailed information on the specification and costs for a new police station have been produced by WYG Trench Farrow, specialist cost consultants for the South Worcestershire SIA. A description of the various types of police accommodation is included at Appendix 5.

justifiable CIL/S106 funding requirement given the costs associated with providing a typical new police station.

Kidderminster Police Station

- 5.20 Kidderminster Police Station provides the HQ of the North Worcestershire TPU (Wyre Forest District, Bromsgrove District, Redditch Borough) and is affected by the growth proposals across the three districts. Kidderminster Police Station will be refurbished and extended to accommodate operational requirements that have a strategic function across the North Worcestershire TPU e.g. custody facilities and the Major Incident Unit (MIU). Each authority could be reasonably expected to contribute to the costs of providing this infrastructure and again it is considered to be a reasonable and wholly justifiable CIL/S106 funding requirement, given the population growth across the TPU.
- 5.21 In terms of custody facilities, 8no. additional cells will be required triggering the need for an extension of the Station. These will be required principally to meet the demands of expanded evening and night-time economies, especially in Kidderminster, as described at paras. 3.40 -3.46 above. WMP do not currently have information on the cost of providing these additional cells; however on the basis of information from Thames Valley Police, the cost per cell would be £53,000 i.e. £424,000 for 8no. cells. In addition the proposed new Joint Police and Fire Station in Bromsgrove will not include custody provision and it is proposed therefore that the custody suite at Kidderminster Police Station will share responsibility for coverage of that District with Worcester Police Station. Lastly, the custody extension would be able to accommodate any overspill from Redditch District, should this arise, which currently has 10 cells serving it at Redditch Police Station. It should also be noted that the 8no. additional cells will also require the appointment of an additional custody sergeant for Kidderminster Police Station.
- 5.22 Within a Major Incident Unit there are approximately 25no. full time officers who work throughout the year. When an incident occurs this number rises to 50 at the height of an investigation into a major crime, before being wound down gradually over time (depending on progress into an investigation). With regard to the MIU, 30no. additional work stations would be required to meet the demands of a re-located and expanded MIU team, if indeed Kidderminster Police Station is the chosen location. These would be mothballed until a serious crime occurs. In the meantime they would be used by other teams and/or for training purposes. The mothballed facility is referred to as a Major Incident Room (MIR).

- 5.23 As there is no space within the existing station to accommodate this, an extension would be required. It is anticipated that any such extension would be linked with the expanded custody block, in order that suspects can be held and questioned. The MIU would serve the whole District and North Worcestershire more generally. As noted above, it has not yet been confirmed as to where the MIU from Stourport Police Station will be relocated. Kidderminster Police Station is the obvious option, but it is only one of a number being considered by Chief Officers.
- 5.24 On the basis of an assumption that the MIU will be relocated to Kidderminster Police station, the floorspace of the extension required to accommodate an additional 55 officers has been calculated to be 754 sq m, the cost of which has been estimated as £2,042,600²⁹.
- 5.25 It has also been identified that the 11no. existing custody cells at Kidderminster require upgrading and refurbishment to meet modern standards commensurate with the new cells to be added. The cost of this work has been estimated as £330,000²⁹.
- 5.26 For the purposes of this SIA it seems reasonable and prudent to estimate the costs of Kidderminster Police Station extension, to include both the expanded custody and MIU elements, but to apportion the cost to the growth planned for Wyre Forest District at 36%, in accordance with the calculation of apportioned growth across the three North Worcestershire authorities, explained at Table 1 and 3.9 above.
- 5.27 Table 6 summarises the elements of works required at Kidderminster Police station and their associated costs, on the basis of the assumptions mentioned, and provides a total cost of works attributable to Wyre Forest District planned population growth of £1,217,976.

²⁹ Detailed information on the specifications and estimated costs have been produced by WYG Trench Farrow, specialist cost consultants and are included at Appendix 2B.

Table 6: Summary of Works and Costs Required at Kidderminster Police Station

Project Description	Estimated Cost	Apportioned Cost at 36% Population Growth Across North Worcestershire TPU	Cost Attributable to Wyre Forest District Population Growth
Provision of an additional 8no. cells	£424,000	£152,640	£152,640
Extension to station to accommodate MIU - an additional 55 officers – 754sq.m	£2,042,600	£735,336	£735,336
Refurbishment of 11no. cells in existing building	£330,000	Not Applicable	£330,000
Total Estimated Cost			£1,217,976

Grasmere Close (Windermere House) replacement Police Post

- 5.28 The KCAAP, Policy KCA.Ch2, deals with the Grasmere Close site, which is to be cleared and redeveloped and forms Phase 1 of the Churchfields regeneration project. The site currently contains three tower blocks, one of which houses a police post. WMP will therefore need alternative premises at Grasmere Close or within the wider Churchfields area as a replacement for current provision but also to serve the larger new community. It is noted that the Churchfields Masterplan SPD (Section 10 – Funding mechanisms) provides for s106 contributions for “Upgrade of Police Post”. Clearly this will involve replacement premises as the current premises are to be demolished.
- 5.29 Police Posts can be rooms within larger buildings (for example within a community facility), or as a small free-standing facility. They provide accommodation for 3 – 10 Police Officers and Police Community Support Officers (PCSOs) on shift. They are not always for public use. Police Posts usually consist of an office (or offices) and possibly a shared interview room, W.C. and kitchen area. Freestanding Police Posts typically have an internal floor area of approximately 60sq.m, with 2 parking spaces immediately outside.

- 5.30 A generic specification for Police Posts, together with a plan, has been provided by WMP. This plan has been used to develop an outline cost for developing such a facility including all fees, equipment and VAT, but excluding land costs. The cost is estimated at £159,000³⁰. It is expected that the land/building will be acquired at nil cost through S106 agreements as appropriate to the respective development proposals.
- 5.31 It is possible that following the demolition of the tower blocks there would be a requirement for a temporary facility, pending any longer term redevelopment proposals which might include this Police Post. These costs have been estimated to be £75,000³⁰. Overall therefore, it is reasonably assumed that the cost of the Grasmere Close Police Post re-provision could amount to £234,000.
- 5.32 Table 7 sets out where new estate will possibly be required to serve the planned growth in the area, because the existing estate is insufficient to support the delivery of an expanded police service because of either geographical distances or size of accommodation³¹. All of the facilities identified in the table are necessitated by the planned growth in the area, rather than to accommodate any shortfall in such accommodation for the existing population. None of the accommodation proposed would be required if no growth was proposed (see Appendix 1).

³⁰ Detailed information on the specification and costs for the provision of a generic Police Post have been produced by WYG Trench Farrow, specialist cost consultants and are included at Appendix 3B.

³¹ The additional buildings requirements are detailed in a schedule Appendix 1 and mapped on its accompanying tab.

Table 7: Summary of Built Infrastructure Requirements

Site	Reason	Planned Growth	Draft Policy Requirement	Nature of Provision	Cost Attributable to WFDC Population Growth
Stourport Replacement Police Station	To serve as a replacement to the existing station at Bewdley Road. Existing station to be disposed through CAP	727 dwellings in Stourport	Policies SAL.STC3 and SAL.STC2 of the SAP refer	New station within Stourport Civic Centre refurbishment as part of the Capital & Assets Pathfinder initiative.	£122,337
Kidderminster Territorial Policing Unit HQ	To meet growth requirements identified in Core Strategy and allocated through the SAP and the KCAAP	4000 dwellings in total across the district (approx 1465 yet to be granted planning permission) 5869 population growth across WFDC Employment land: 44ha Retail space: 25,000 sq m - Kidderminster	To meet growth requirements identified in Core Strategy, SAP and KCAAP Policy provision for site to be reserved for police purposes No specific reference to requirement for Police infrastructure	Rationalisation and extension of facilities at TPU HQ existing site, including: custody suite expansion by 8no.cells extension to provide MIU refurbishment of 11no. existing cells	£1,217,976
Churchfields Police Post	Grasmere Close Police Post, due to be demolished as part of Churchfields regeneration scheme	600 dwellings (approx 190 yet to be granted planning permission) Some additional employment land	Policy KCA.Ch2 of the KCAAP Refers Churchfields Masterplan (section 10) - reference to Police Post Re-provision	New Police Post required within the development, possibly temporarily pending permanent replacement	£234,000
Total Cost Attributable to Wyre Forest District Population Growth					£1,574,313

Cost of new buildings and accommodation

- 5.33 From Table 7 above, the total cost of new built infrastructure to serve population growth in Wyre Forest will be £1,574,313. There is no funding available from the disposal of existing sites, as none are forthcoming from these proposals. The Stourport PS site will revert to WCC as the landowner. The total cost of provision excludes any land acquisition at Churchfields because it is assumed that the land required for the police post will be provided to WMP via s106 obligations at nil cost.
- 5.34 The precise timing of the provision of each of the identified elements of estate infrastructure will depend to a significant extent on progress on the individual developments. WMP recognises that the provision of specific new infrastructure might require agreement as a result of a particular planning permission possibly as part of a s106 obligation, whilst remaining consistent with any CIL charging schedule provisions.

B Additional personnel set up costs

Existing staff resources (baseline position)

- 5.35 In the context of the uncertainty about the future organisation and staffing numbers for WMP, we have used the current planned staffing levels, (reduced establishment base as proposed in 'Making the Difference', and set out in Table 8 below) as a basis for calculating the additional staffing requirements to serve the planned growth in the area. The staffing levels below (identified as budgeted posts), are for the whole of the WMP area and include the various support staff, many of whom provide services across the WMP area and not just within the Wyre Forest District³².
- 5.36 They reflect the baseline position of 4129 posts across the Force area that is anticipated by the end of March 2013 by which time, the final phase of the three year implementation phase of the staff reductions agreed in 'Making the Difference' will have been completed.

³² Detailed staffing data for budgeted posts 1st Aug 2012 can be found at Appendix 4

Assumptions on future personnel requirements

- 5.37 The population of WMP's area is currently about 1,189,700 and the area accommodates about 503,000 dwellings (WMP Joint Policing Plan 2011 to 2014). The total levels of staffing across the whole of the WMP area have been used to calculate pro-rata requirements for additional personnel required to serve the proposed population and housing growth in Wyre Forest. As noted above, it is based on the outcome of the implementation of 'Making the Difference'.
- 5.38 This initiative predated the CSR and it is possible that in due course that the outcome of this might lead to further changes to the number of established posts. Other factors, e.g. the Strategic Alliance with Warwickshire Police and the arrival of the Police & Crime Commissioner in November may also have implications for future staffing levels across the Force area.

Additional personnel requirements

- 5.39 Table 8 below shows the current budgeted posts and estimated additional personnel numbers required to serve the Core Strategy's additional 4,000 dwellings completed/planned for Wyre Forest.

Table 8: Staffing levels – Existing and Proposed

Command Area	Budgeted Posts (BP)	Approx Population per BP	Dwellings per BP	Pro Rata BP Requirement for 4,000 additional dwellings
Strategy & Legal Services	60	19,800	8,400	0.5
Corporate Services	346	3,400	1,500	2.5
Human Resources	197	6,000	2,600	1.50
Operational Support	723	1,600	700	6.0
Protective Services	963	1,200	500	8
Territorial Policing	1840	600	300	13.5
Overall Figure	4129	300	121	32

5.40 This shows that 1 member of personnel (staff/officers) is required to serve approximately every 121 dwellings or 300 people. A total of some 32 additional personnel will therefore be required to serve the planned growth of 4,000 new dwellings in the Wyre Forest area. This calculation accounts for the required growth in central and specialist services in addition to Wyre Forest specific requirements.

5.41 The personnel requirements include both officers and support staff; broadly the Protected Services and Territorial Policing units comprise mainly officers - the visible police presence - and the remaining units provide support functions. For the purpose of this assessment we have assumed that the 32 additional personnel will comprise 21 officers and 11 staff.

Additional personnel set up costs

5.42 It is important to note that in considering personnel costs, we have only included the cost of staff set up for additional members of staff i.e. recruitment, uniform and personal equipment (where relevant) and basic office furniture and ICT. We have not at present included any allowance for training of additional officers and the set up costs are therefore very conservative.

5.43 We have used information provided by WMP for the recruitment costs per post for officers and staff. Similarly we have used WMP's standard costs for furniture/ICT on a per post basis. The cost of uniform and personal equipment for police officers and PCSOs varies according to their particular role. We have therefore used a median cost in order to avoid undue complexity.

5.44 As noted above we have estimating that additional staff will comprise 21 officers and 11 support staff. Table 9 shows the estimated personnel set up costs for additional growth of 4,000 dwellings proposed in the SWDP.

Table 9: Staff Set-Up Costs

Additional Officers	Set up cost per officer	Pro rata requirement for 21 officers
Recruitment	£1,060	£22,260
Training	N/A	
Uniform & Personal equipment ³³	£940	£19,740
Standard equipment (ICT and furniture)	£1,642	£34,482
Total set up cost (21no. officers)	£3,642	£76,482

C Vehicles and other operational equipment

Existing vehicles infrastructure (baseline position)

5.45 Information supplied by WMP shows that the current vehicle fleet for the North Worcestershire TPU comprises 79 cars/vans and 21 bicycles. Based on the number of budgeted posts in the TPU (305 posts in total), this equates to a ratio of 1 vehicle per 3.9 budgeted posts and 1 bicycle per 15 budgeted posts.

Assumptions

5.46 For the purpose of this assessment we have assumed that the current ratio of personnel to vehicles and personnel to bicycles will apply to the additional personnel required as a result of the growth proposed in Wyre Forest District. This comprises the 21 additional posts in Territorial Policing and Protective Services. We have assumed there would not be any requirement for vehicles or other equipment arising as a result of the additional personnel required in central support services.

5.47 Vehicle costs have been capitalised on 5 year lifetime costs for a low/medium size vehicle (excluding fuel). Bicycle costs are established at £1,299 per cycle, with an additional

³³ Appendix 1 refers

maintenance charge of £297 per bicycle per annum, or £1,486 per 5 years, capitalised. The total cost of providing each new cycle and maintaining it for 5 years is therefore £2,785.

- 5.48 We have not at this stage included any costs for specialist operational equipment, and the cost estimates in this section are therefore moderated conservatively.

Additional vehicles and operational equipment requirements

- 5.49 On the basis of an additional 32 staff in the territorial Policing and Protective Services, it is calculated that there will be a requirement for an additional 19 vehicles and 9 bicycles.

Cost of vehicles and other operational equipment

- 5.50 The costs of vehicles (both motorised and bicycles) based on 21 additional officers required as a result of planned growth are shown below:

Table 10: Vehicle and Other Equipment Costs

Additional vehicles and other operational equipment	Cost per item	Current cost for planned growth (4,000 dw)
5no. Motorised	£28,500	£142,500
2 no. Bicycles	£2,785	£5570
Other equipment	N/A	
Total costs	£31,285	£148,070

- D Central support services including additional personnel in operational support, human resources and corporate services

Existing staff resources (baseline position)

- 5.51 The existing personnel resources in central support services are shown in Table 8 at 5.39 above and take account, as noted, of planned staff reductions through the implementation of Making the Difference. In total, the number of budgeted posts in central support services is 1,341.

Assumptions

- 5.52 It is assumed that standard set-up costs (recruitment, furniture and ICT) will apply for the additional central and support staff necessitated by population growth, as they do for officers.

Additional central support personnel required

- 5.53 As detailed at 5.41 above, an additional 11 central and support personnel will be required as a result of the planned population growth in Wyre Forest. These will include any function not involved in delivery of front-line services to the public e.g. Operational Support staff (e.g. forensics), Human Resources, Strategy and Legal services and corporate services.

Cost of Additional Central Support personnel required

- 5.54 The additional personnel set-up costs of central and support staff are set out in Table 11 below

Table 11: Personnel Set-Up Costs

Additional central support services	Set up cost per member of staff	Pro rata requirement for 11 staff
Recruitment	£1,060	£11,660
Standard equipment (ICT and furniture)	£1,642	£18,062
Total costs	£2,702	£29,722

6.0 Summary Findings and Conclusions

Principle of requirement

- 6.1 The principle of providing for police infrastructure to support the planned growth in development in the area through the planning system is supported by draft policies in the Wyre Forest Core Strategy, the SAP and KCAAP DPDs, primary and secondary legislation.

Impact of planned growth

- 6.2 The SIA confirms that the existing police infrastructure in the area is inadequate to serve the planned growth of 4,000 dwellings to 2026. Of these, 1465 new dwellings have yet to be granted planning permission. Additional infrastructure will therefore be required to accommodate the completed and planned development. Without that additional infrastructure, WMP will not be able to continue the current and planned levels of policing across its area. The absence of this important infrastructure will hamper the WMP ability to contribute towards ensuring that the planned growth in Wyre Forest is developed in a “sustainable” manner.

- 6.3 The infrastructure required to serve the planned growth comprises the following elements:

- A additional (including new) buildings and accommodation³⁴
- B additional personnel set-up costs³⁵
- C vehicles and other operational equipment, and
- D central support services including additional personnel in operational support, human resources and corporate services.

³⁴ Appendix 1 refers

³⁵ Set-up costs within Territorial Policing Units and centrally based Protective Services their recruitment, training and personal equipment

Summary of Findings

Table 12: Summary of Built Infrastructure Requirements

Site	Reason	Planned Growth	Draft Policy Requirement	Nature of Provision	Cost Attributable to WFDC Population Growth
Stourport Replacement Police Station	To serve as a replacement to the existing station at Bewdley Road. Existing station to be disposed through CAP	727 dwellings in Stourport	Policies SAL.STC3 and SAL.STC2 of the SAP refer	New station within Stourport Civic Centre refurbishment as part of the Capital & Assets Pathfinder initiative.	£122,337
Kidderminster Territorial Policing Unit HQ	To meet growth requirements identified in Core Strategy and allocated through the SAP and the KCAAP	4000 dwellings in total across the district (approx 1465 yet to be granted planning permission) 5869 population growth across WFDC Employment land: 44ha Retail space: 25,000 sq m - Kidderminster	To meet growth requirements identified in Core Strategy, SAP and KCAAP Policy provision for site to be reserved for police purposes No specific reference to requirement for Police infrastructure	Rationalisation and extension of facilities at TPU HQ existing site, including: custody suite expansion by 8no.cells extension to provide MIU refurbishment of 11no. existing cells	£1,217,976
Churchfields Police Post	Grasmere Close Police Post, due to be demolished as part of Churchfields regeneration scheme	600 dwellings (approx 190 yet to be granted planning permission) Some additional employment land	Policy KCA.Ch2 of the KCAAP Refers Churchfields Masterplan (section 10) - reference to Police Post Re-provision	New Police Post required within the development, possibly temporarily pending permanent replacement	£234,000
Total Cost Attributable to Wyre Forest District Population Growth					£1,574,313

6.4 The total cost of these new buildings will be £1,574,313. This cost excludes land acquisition because it is assumed that the land/buildings required for the infrastructure will be provided to WMP via s106 obligations at nil cost.

Police officers

6.5 The new estate will be required to accommodate an additional 21 no. police officers to serve the planned growth of 4,000 new dwellings. The personnel set up cost for 21 officers will be about £76,482.

Vehicles

6.6 We estimate that an additional 5 no. motorised vehicles and 2 no. bicycles will be required for these personnel. The initial cost of providing these vehicles and bicycles will be about £148,070.

Support staff

6.7 We have estimated that an additional 11 no. central and support personnel will be required to serve the planned growth. We have calculated the set-up cost for these staff to be about £29,722.

Total costs

6.8 The total estimated additional infrastructure costs to meet the planned growth of 4,000 dwellings proposed in the Core Strategy are shown in the following table:

Table 13: Summary of Total Additional Infrastructure Costs

	Current (net) cost for planned growth (4,000 dw)	Reference from report above
Additional buildings and enhanced accommodation	£1,574,313	Table 7
Additional Officers (set-up costs for 21no. officers)	£76,482	Table 8
Additional vehicles and other operational equipment	£148,070	Table 9
Additional central support staff (set up costs for 11no.support staff)	£29,722	Table 10
Total infrastructure cost	£1,828,587	

- 6.9 On the basis of the original Core Strategy additional dwelling requirement of 4000 new houses, this overall cost equates to about £457 per dwelling or £5.71 per square metre of residential development (if an average dwelling were about 80 square metres, typical of a new 3 bed house). However, on the basis that only 1465 dwellings remain to be granted planning permission in the Plan period to 2026, the cost per dwelling rises to approximately £1248 and cost per square metre of residential floorspace to approximately £16.60.
- 6.10 The funding for this additional Police infrastructure necessitated by the additional population growth in Wyre Forest District will need to be secured via s106 obligations and the Community Infrastructure Levy.

Sustainable communities

- 6.11 WMP is highly unlikely to secure the funding that will be required to provide the strategic infrastructure that is needed to serve the planned growth in Wyre Forest outside the planning system. There is a real risk that we will create communities which will not be sustainable in the sense of prejudiced public safety and the experience and/or perception of crime and disorder. Objective 13 of the Core Strategy seeks "To maximise community cohesion and safety and ensure new developments positively contribute towards crime reduction....across the District for the benefit of all residents".
- 6.12 Reducing grants from central Government and constrained Council Tax precept increases mean that the WMP annual funding gap will increase for the next three years to approximately £6m in 2014/15. This is despite prolonged and systematic efforts to successfully realise efficiency savings. The funding gap is now being met by the use of diminishing financial reserves.
- 6.13 It is therefore crucial that the funding for new WMP capital infrastructure is secured through s106 obligations and the Community Infrastructure Levy. In this way, WMP will be able to make a full contribution to the creation of sustainable communities in which people feel safe and which can be policed in the most efficient and effective way.
- 6.14 To conclude, WMP looks forward to continuing to work in partnership with Wyre Forest District on the SAP and KCAAP DPDs, and other DPDs and SPDs and proposals for CIL, to ensure that the necessary police infrastructure is provided to serve the planned growth in a timely manner.

Part 3

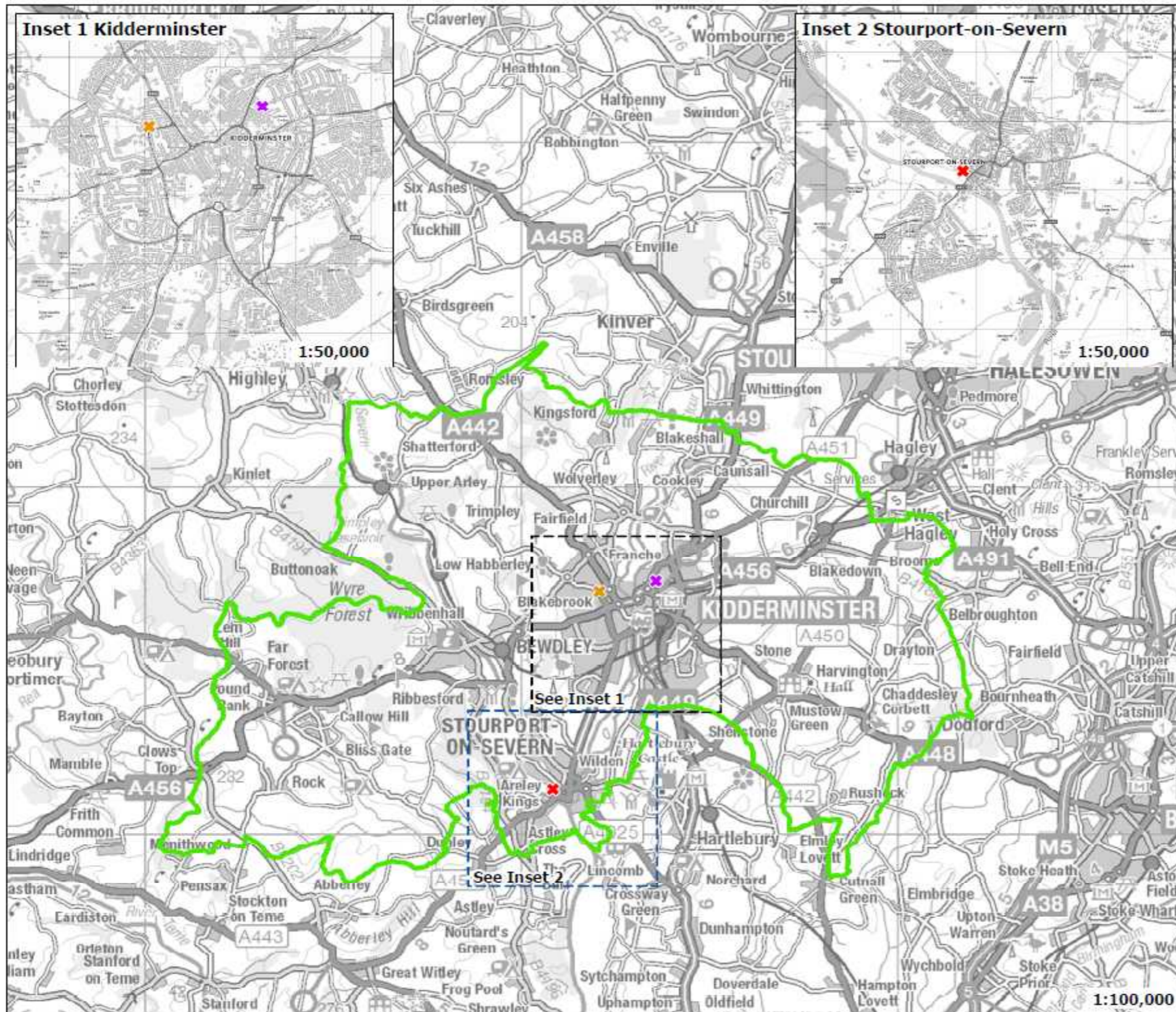
Technical Appendices

Appendix 1

Wyre Forest Additional Buildings Infrastructure Requirements & Locations

Appendix 1 - Wyre Forest Additional Buildings Infrastructure Requirements & Locations

District	Type	Project Description	Reason	Existing or Future Deficit	Essential or Desirable	Priority	Scope of Developer Contributions	Lead Agency	Other Agencies	£Cost	Phasing	Infrastructure Dependencies	Risk	Comments	Date of last update
Wyre Forest	Police	Replacement Police Post in Stourport Civic Centre refurbishment as part of the Capital & Assets Pathfinder initiative.	To serve as a replacement to the existing station at Bewdley Road. Existing station to be disposed through CAP. To meet growth requirements identified in WFDC Core Strategy & SAP (700+ new dwellings). Policy SAL.STC2 refers.	Future	Essential	High		WFDC through CAP initiative	WMP	122,337	As per delivery of the SAP and KCAAP			Policies SAL.STC3 and SAL.STC2 of the SAP DPD refer	Sep-12
Wyre Forest	Police	Kidderminster TPU HQ - Extension to station to accommodate relocation of Major Incident Unit - 754 sq m (Pending formal decision)	To meet growth requirements identified in WFDC Core Strategy, SAP and KCAAP. To meet growth requirements across North Worcestershire TPU. MIU will be displaced as a result of SAP Policy SAL.STC2.	Future	Essential	High		WMP		2,042,600	As per delivery of the SAP and KCAAP			£735,336 is the cost attributable to WFDC population growth. Remaining costs to be apportioned to population growth in Redditch and Bromsgrove Districts	Sep-12
Wyre Forest	Police	Kidderminster TPU HQ - Provision of an additional 8no. cells	To meet growth requirements identified in WFDC Core Strategy, SAP and KCAAP. To meet growth requirements across North Worcestershire TPU	Future	Essential	High		WMP		424,000	As per delivery of the SAP and KCAAP			£152,640 is the cost attributable to WFDC population growth. Remaining costs to be apportioned to population growth in Redditch and Bromsgrove Districts	Sep-12
Wyre Forest	Police	Kidderminster TPU HQ - Refurbishment of 11no. cells in existing building	To meet growth requirements identified in Core Strategy, SAP and KCAAP	Existing/Future	Essential	High		WMP		330,000	As per delivery of the SAP and KCAAP				Sep-12
Wyre Forest	Police	Churchfields Police Post	Replacement of Grasmere Close Police Post, due to be demolished as part of Churchfields regeneration scheme. 600 new dwellings proposed in KCAAP. Policy KCA.Ch2 also refers.	Future	Essential	High		WFDC/WMP	Developer	234,000*	As per delivery of the SAP and KCAAP			*Cost of permanent repovision £159k plus cost of temporary re-provision £75k	Sep-12
									Total	2,918,937					



WYG Planning & Environment
part of the WYG group



West Mercia Police

Wyre Forest District SIA

**Buildings
Infrastructure
Requirements**

02

Key

Wyre Forest District

Infrastructure Requirements

- Extension to Territorial Policing Unit Headquarters
- Replacement Police Station
- Replacement Police Post

NB: This plan does not cover the WMP Force HQ facility at Hindlip near Worcester.

0 0.5 1 2 3 4 5 Km
1:100,000 @A3 Do not scale from this drawing



A066406-19
A066406-19 02 Buildings Infrastructure Requirements

August 2012

5th Floor, Longcross Court, 47 Newport Road, Cardiff CF24 0AD
Tel: +44 (0) 29 2082 9200 Fax: +44 (0) 29 2045 5321
Email: info@wyg.com www.wyg.com

Based upon the Ordnance Survey map with the permission of The Controller of Her Majesty's Stationery Office, © Crown copyright. WYG Environment Planning Transport Limited 2012. Licence no: All 1000 17603

© WYG Environment Planning Transport Ltd 2012 Registered in England Number: 3050297

Appendix 2A

Stourport Police Post (Civic Centre Refurbishment)

Appendix 2B

Kidderminster Police Station Estimated Costs



SUMMARY
Estimate for New Police Post in Stourport Civic Centre

Basis of estimate of construction costs:

West Mercia Police drg: "Feasibility Stouport Police Post - scheme 1"
Floor plans and survey information for Stourport Civic Centre
Priced at 4th quarter 2011 - updated to 3rd quarter 2012
Assumed existing building shell is sound and requires no repair
Assumed adequate foul drainage capacity adjacent to building
Assumed utility supplies available from main building - allowance for distribution only
No allowance required for external works
No contribution required towards general building refurbishment including adjacent entrance area and corridor

Estimate of Construction Costs

Based upon the information provided and assumptions listed, we would recommend the following budget for the fitting out of the Police Post within the Stourport Civic Centre: £122,000

We would make the following provisional allowance for other project costs including, professional fees, IT fit out £40,000

TOTAL PROJECT COST
(see exclusions) **£162,000**

Assumptions/ Exclusions

No allowance for VAT
No allowance for project finance or future inflation (beyond date of report)
No allowance for purchase of land or lease costs
No allowance for Internal police staff costs in project management etc
Assumed copiers etc will be leased - therefore no capital allowance
Average allowance for furniture and IT fit-out - no specification or scope
Lump sum allowance for professional fees



SUMMARY
Estimate for New Police Post in Stourport Civic Centre

Package Nr	Package Name	Package Cost £	Prelims 20%	Contingency 8%	Total	Rates per unit area	
						64 m2 £/m2	689 ft2 £/ft2
<u>Demolitions and alterations</u>							
1000	Alterations to building shell - strip out	7,500.00	1,500.00	675	9,675	151.17	14.04
<u>Substructure</u>							
1100	Foundations and slab	-	-	0	0	0.00	0.00
1200	Drainage	6,500.00	1,300.00	585	8,385	131.02	12.17
<u>Superstructure</u>							
2100	External Walls	2,500.00	500.00	225	3,225	50.39	4.68
2200	Roof	-	-	0	0	0.00	0.00
2300	Windows and doors	1,050.00	210.00	95	1,355	21.16	1.97
2400	Internal walls and doors	9,400.00	1,880.00	846	12,126	189.47	17.60
<u>Services</u>							
3100	Electrical Installations	6,120.00	1,224.00	551	7,895	123.36	11.46
3200	Mechanical + PH Installations	9,000.00	1,800.00	810	11,610	181.41	16.85
3300	Security Installations	5,500.00	1,100.00	495	7,095	110.86	10.30
3400	Specialist Installations	10,000.00	2,000.00	900	12,900	201.56	18.73
<u>Finishings</u>							
4100	Floor	6,105.00	1,221.00	549	7,875	123.05	11.43
4200	Wall	2,850.00	570.00	257	3,677	57.45	5.34
4300	Ceiling	2,560.00	512.00	230	3,302	51.60	4.79
4400	Decoration	1,250.00	250.00	113	1,613	25.20	2.34
4500	Fittings/ furniture	19,500.00	3,900.00	1,755	25,155	393.05	36.51
<u>External Works</u>							
5100	Hard landscape	-	-	0	0	0.00	0.00
5200	Soft landscape	-	-	0	0	0.00	0.00
5300	Street Furniture/ Fittings	5,000.00	1,000.00	450	6,450	100.78	9.36
5400	Utilities	-	-	0	0	0.00	0.00
	Sub- Total £	94,835.00	18,967.00	8,535.15	122,337.15	1,911.52	177.58
9100	Preliminaries	20%	18,967.00			inc	
9200	Overheads and profit (included on summary)	0%	-			inc	
			113,802.00			1,911.52	177.58
9300	Contingency	7.5%	8,535.15			inc	
	TOTAL cost of Estimate for New Police Post in		122,337.15			1,911.52	177.58

Client: **West Mercia Police**
 Project: **Strategic Infrastructure Assessment - Sep 2012**
 Report: **Estimate for New Police Post in Stourport Civic Centre**
 Date: **06 September 2012**

TRENCH FARROW
Jon. Tylee

Estimate for New Police Post in Stourport Civic Centre

Package Nr	Item Nr	Dimension Reference	Item Description	Quantity	Unit	Rate	Item Total	Group Total
1000	1,000.00		<u>Alterations to building shell - strip out</u>					
	1,000.05		Allowance for stripping out existing partitions, finishings, services etc and making good	1	sum	7,500.00	7,500.00	7,500.00
1100	1,100.00		<u>Foundations and slab</u>					
	1,100.05		Assumed no works required in existing building		m2	120.00	No Quantity	0.00
1200	1,200.00		<u>Drainage</u>					
	1,200.05		Foul Drains to and including adjacent manhole circa 1m deep	1	sum	1,500.00	1,500.00	
	1,200.10				sum	1,500.00	No Quantity	
	1,200.15		Allowance for drain runs and connections to mains sewers - say 30m n.e. 2m deep, backfill with exc mats and make good	30	m	150.00	4,500.00	
	1,200.20		CCTV and testing on completion	1	sum	500.00	500.00	
2100	2,100.00		<u>SUPERSTRUCTURE</u> <u>External Walls</u>					6,500.00
	2,100.05		Assumed no works required in existing building		m2	120.00	No Quantity	
	2,100.10				sum		No Quantity	
	2,100.15		Signage/ Branding	1	sum	2,500.00	2,500.00	2,500.00
2200	2,200.00		<u>Roof</u>					
	2,200.05		Assumed no works required		m2	120.00	No Quantity	
	2,200.10				sum	500.00	No Quantity	
2300	2,300.00		<u>Windows and doors</u>					0.00
	2,300.05		Minor overhaul and repair of existing windows 0.9 * 1.5m (guessed size)	7	nr	150.00	1,050.00	
	2,300.10		Assumed external door is part of main building refit		nr		No Quantity	
	2,300.15				nr		No Quantity	
2400	2,400.00		<u>Internal walls and doors</u>					1,050.00

Client: **West Mercia Police**
 Project: **Strategic Infrastructure Assessment - Sep 2012**
 Report: **Estimate for New Police Post in Stourport Civic Centre**
 Date: **06 September 2012**

TRENCH FARROW
Jon. Tylee

Estimate for New Police Post in Stourport Civic Centre

Package Nr	Item Nr	Dimension Reference	Item Description	Quantity	Unit	Rate	Item Total	Group Total
	2,400.05		Timber stud walls, insulation, 2 layers p/bd each side	60	m2	80.00	4,800.00	
			Timber doorset; door, frame, ironmongery					
	2,400.10		single	2	nr	500.00	1,000.00	
	2,400.15		fire door; 1/2 hr FR	4	nr	900.00	3,600.00	
			SERVICES					9,400.00
3100	3,100.00		Electrical Installations					
	3,100.05		Small power, inc external charge point	64	m2	40.00	2,560.00	
	3,100.10		Lighting + emergency lighting	64	sum	40.00	2,560.00	
	3,100.15		External lighting fixed to building		sum	500.00	No Quantity	
	3,100.20		Dimplex heating units (PC supply £100); wall mounted		sum	200.00	No Quantity	
	3,100.25		BWIC	1	sum	1,000.00	1,000.00	
								6,120.00
3200	3,200.00		Mechanical + PH Installations					
	3,200.05		Radiators and distribution (boilers etc in main building)	1	sum	3,000.00	3,000.00	
	3,200.10		Hot & cold water supply to toilets and shower; Upvc waste water	1	sum	2,000.00	2,000.00	
	3,200.15		Sink + sanitary ware to w.c.	2	sum	1,500.00	3,000.00	
	3,200.20		shower	1	sum	750.00	750.00	
	3,200.25		BWIC	1	sum	250.00	250.00	
								9,000.00
3300	3,300.00		Security Installations					
	3,300.05		Fire alarm system	1	sum	500.00	500.00	
	3,300.10		Intruder alarm, external monitoring facilities and links to centre	1	Prov	5,000.00	5,000.00	
								5,500.00
3400	3,400.00		Specialist Installations					
	3,400.05		Hydraulic platform lift including gates etc	1	sum	10,000.00	10,000.00	
								10,000.00
4100	4,100.00		INTERNAL FINISHINGS					
			Floor					
	4,100.05		new levelling screed etc; prepare floor	64	m2	20.00	1,280.00	
	4,100.10		Marley vinyl safety floor to toilets/ locker room, coved skirting	15	m2	60.00	900.00	
	4,100.15		Carpet tiles; decorated timber skirting to lobby & office areas	49	m2	75.00	3,675.00	
	4,100.20		entrance mat inc mat well	1	item	250.00	250.00	
								6,105.00
4200	4,200.00		Wall					
	4,200.05		Ceramic tiles to toilets and locker room	50	m2	45.00	2,250.00	

Client: **West Mercia Police**
 Project: **Strategic Infrastructure Assessment - Sep 2012**
 Report: **Estimate for New Police Post in Stourport Civic Centre**
 Date: **06 September 2012**

TRENCH FARROW
Jon. Tylee

Estimate for New Police Post in Stourport Civic Centre

Package Nr	Item Nr	Dimension Reference	Item Description	Quantity	Unit	Rate	Item Total	Group Total
	4,200.10		Splash backs		m2	75.00	No Quantity	
	4,200.15		Skim coat to dry lining; beads etc	50	m2	12.00	600.00	
4300	4,300.00		Ceiling					2,850.00
	4,300.05		Suspended ceiling; concealed grid; perimeter trim	64	m2	40.00	2,560.00	
								2,560.00
4400	4,400.00		Decoration					
	4,400.05		Painting plaster walls, 1 u/ct 3ct vinyl silk	50	m2	10.00	500.00	
	4,400.10		Painting timber, primer, 1 u/c, 2coat gloss	1	sum	750.00	750.00	
								1,250.00
4500	4,500.00		Fittings/ furniture					
	4,500.05		work stations	6	nr	1,500.00	9,000.00	
	4,500.10		interview room furniture	1	sum	5,000.00	5,000.00	
	4,500.15		lockers	12	nr	250.00	3,000.00	
	4,500.20		allowance for additional cupboards/ cabinets etc	1	sum	2,500.00	2,500.00	
								19,500.00
5100	5,100.00		EXTERNAL WORKS					
			Hard landscape					
	5,100.05		Parking area		m2	70.00	No Quantity	
	5,100.10		Pathways (1.5m wide)		m	50.00	No Quantity	
								0.00
5200	5,200.00		Soft landscape					
	5,200.05		Topsoil, seeding, planting		prov	1,000.00	No Quantity	
								0.00
5300	5,300.00		Street Furniture/ Fittings					
	5,300.05		Allowance for car park signage, line marking, branding	1	item	5,000.00	5,000.00	
	5,300.10				item		No Quantity	
								5,000.00
5400	5,400.00		Utilities					
			Incoming mains; connections					
	5,400.05		water/ drainage		item	1,200.00	No Quantity	
	5,400.10		electricity		item	900.00	No Quantity	
	5,400.15		BT		item	0.00	No Quantity	
								0.00
9100	9,100.00		Preliminaries					
	9,100.05		15.50% of total price	20%		94,835.00	18,967.00	
9200	9,200.00		Overheads and profit					18,967.00

Client: **West Mercia Police**
 Project: **Strategic Infrastructure Assessment - Sep 2012**
 Report: **Estimate for New Police Post in Stourport Civic Centre**
 Date: **06 September 2012**

TRENCH FARROW
Jon. Tylee

Estimate for New Police Post in Stourport Civic Centre

Package Nr	Item Nr	Dimension Reference	Item Description	Quantity	Unit	Rate	Item Total	Group Total
	9,200.05		included in rates	0%		113,802.00	0.00	0.00
9300	9,300.00		<u>Contingency</u>					
	9,300.05		separate cost plan allowance	7.5%		113,802.00	8,535.15	8,535.15
To Summary £							122,337.15	122,337.15



SUMMARY
Estimate for extension to Kidderminster Station - 754m2

Basis of estimate of construction costs:

Correspondence from Andrew Morgan indicated number of work stations and number of cells required.
 WYG assumption that MIU is to be largely independent from main station - hence provision on space analysis
 Priced at 3rd quarter 2012

Estimate of Construction Costs

Based upon an analysis of costs for other Police projects, we would recommend a budget of £1,900/m2 for the construction of an additional 635m2 of accommodation at Kidderminster Police Station:

		Construction Costs £	Other Costs £	Total Costs £
Extension to station to accommodate an additional 55 officers	754m2	£1,432,600	£610,000	2,042,600
Provision of an additional 8nr cells	8nr	£424,000		424,000
Refurbishment of 11nr cells in existing building	11nr	£330,000		330,000
				<u>2,796,600</u>

Additional Costs

Assumptions/ Exclusions

No allowance for VAT		nil		
No allowance for project finance or future inflation (beyond date of report)		nil		
No allowance for purchase of land		nil		
No allowance for Internal police staff costs in project management etc		nil		
Assumed copiers etc will be leased - therefore no capital allowance		nil		
Profession and Statutory fees	175k/ project (average)		175,000	
Legal fees etc	30k/ project		30,000	
Additional project contingency allowance	10% average		100,000	
removal of contamination/ remediation				
additional obligations imposed by LPA				
Archaeology/ Environmental surveys or mitigation				
Allowance for the provision of IT equipment (network cabling, computers, copiers, telephones etc)				
structured cabling		25,000		
work station equipment		55,000		
general equipment - printers, servers etc		70,000		
		<u>150,000</u>	150,000	
Allowance for client fit-out (loose furniture etc)				
assume 55nr workstations @ £1,000		55,000		
common filing etc		30,000		
reception, tea points etc		70,000		
		<u>155,000</u>	155,000	
Estimate of total additional costs per 754m2 police station			<u>610,000</u>	

KIDDERMINSTER POLICE STATION PROPOSED EXTENSION SPACE ANALYSIS							
	Quantity	Unit	m2/unit	Total Area - m2		Total Area - ft2	
Cellular Offices							
Senior officers	1	nr	15	15		161	
Senior officers	1	nr	12	12		129	
Senior officers	1	nr	9	9		97	
	1				36		388
Meeting Rooms							
4 person	2	nr	15	30		323	
6 person	1	nr	20	20		219	
Conference	1	nr	60	60		646	
	4				110		1,187
Open Plan							
General areas + circulation	55	nr	9.00	495	495	5,328	5,328
Central Services/Ancillary							
Tea point/ Vending		nr	15	0		0	
Kitchen	1	nr	30	30		323	
Reception	1	nr	25	25		269	
Stores	2	nr	9	18		194	
Post Room	1	nr	18	18		194	
Copy Room	1	nr	10	10		108	
Bulk Filing (inc in open plan)							
Sick Room/ Area		nr		0		0	
Computer room (MCR)	1	nr	12	12		129	
					113		1,216
TOTAL (ALL FUNCTIONS)				754 m2	8,119 ft2		

£/m2 study (New build)

Police stations

Rate per m2 gross internal floor area for the building Cost including prelims.
Last updated 10-Sep-2011 12:09.

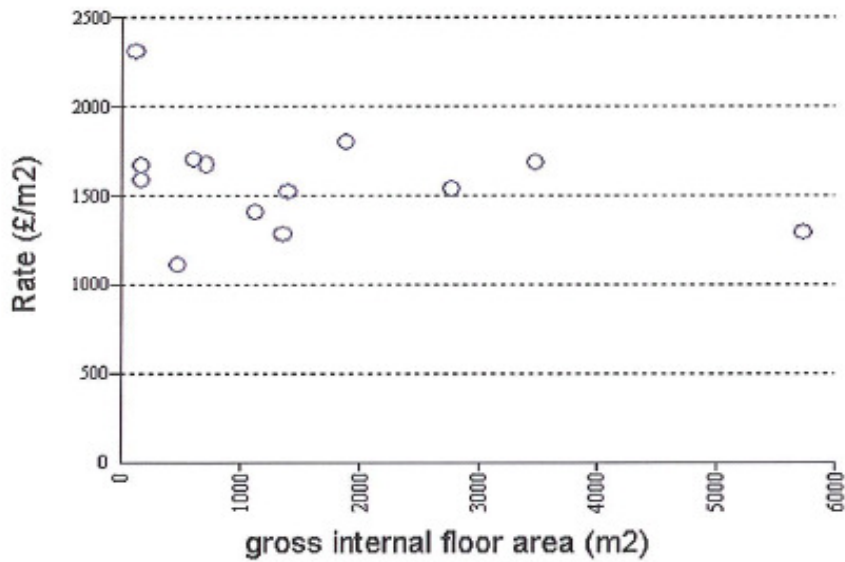
At 3Q2011 prices (based on a Tender Price Index of 225) and UK mean location (Location index 100).

Maximum age of results: 15 years (default)

Mean	Median	Range	Standard Deviation	Sample
1582	1586	1108 - 2309	296	13

Deciles									Quartiles	
1	2	3	4	5	6	7	8	9	1 st	3 rd
1282	1336	1475	1534	1586	1669	1676	1695	1782	1405	1682

Building cost per m2 against floor area



£/m2 study (New build)

Police admin/control buildings

Rate per m2 gross internal floor area for the building Cost including prelims.
Last updated 10-Sep-2011 12:09.

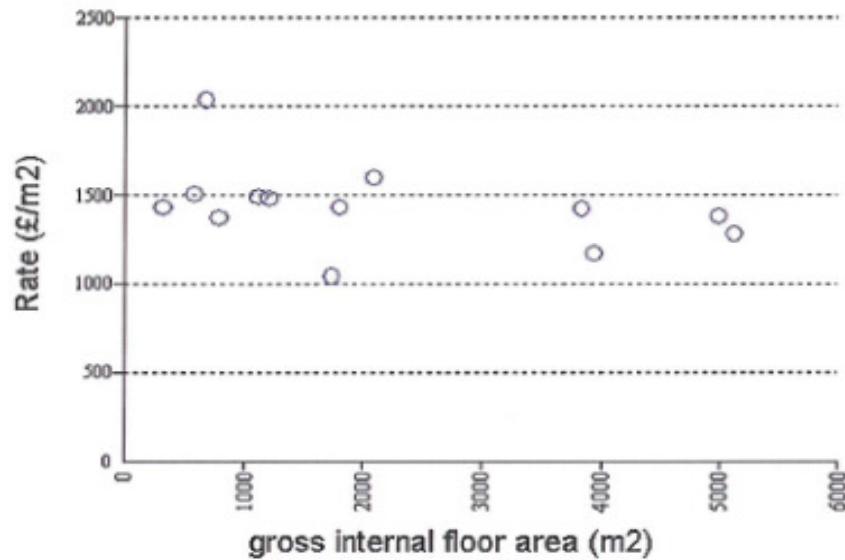
At 3Q2011 prices (based on a Tender Price Index of 225) and UK mean location (Location index 100).

Maximum age of results: 15 years (default)

Mean	Median	Range	Standard Deviation	Sample
1433	1429	1040 - 2034	233	13

Deciles									Quartiles	
1	2	3	4	5	6	7	8	9	1 st	3 rd
1191	1320	1378	1415	1429	1441	1483	1496	1574	1375	1487

Building cost per m2 against floor area



Appendix 3A

Churchfields (Grasmere Close) Police Post Replacement Estimated Costs

Appendix 3B

Churchfields (Grasmere Close) Temporary Re- provision Estimated Costs



SUMMARY
Estimate for New Residential Police Point

Basis of estimate of construction costs:

West Mercia Police drg: "Residential local police post/ temp sales office - Worcester"
 West Mercia Police draft Performance specification for Worcester Residential New Police Post
 Priced at 4th quarter 2011 - updated to 3rd quarter 2012

Estimate of Construction Costs

Based upon the information provided and assuming a single project built in-situ, we would recommend the following budget for the construction of the Residential Local Police Post: **£104,000**

We would make the following provisional allowance for other project costs including, professional fees, site abnormals, furniture and IT fit out **£55,000**

TOTAL PROJECT COST
(see exclusions) £159,000

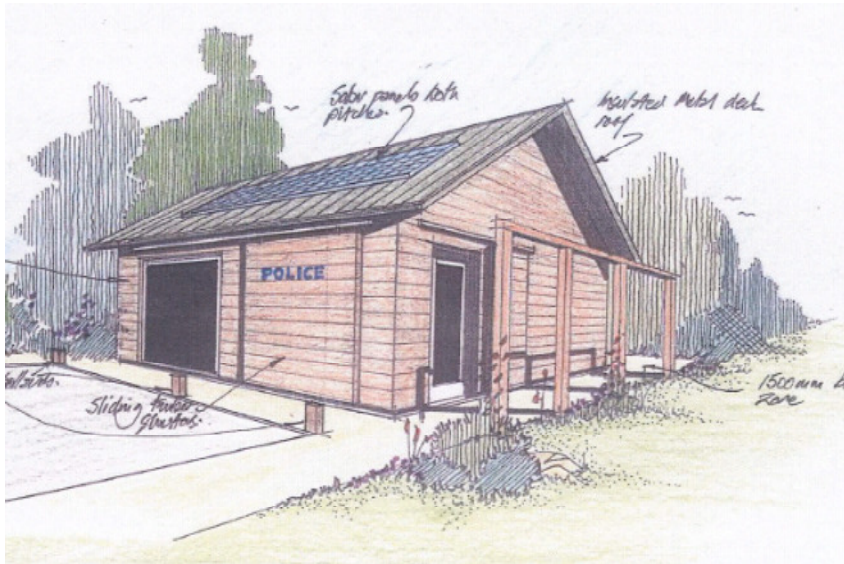
It should be noted that the headline cost includes approximately £39,000 of works associated with specialist installations for solar panels, security systems, shutters and external works

We would recommend considering off-site manufacture by a timber frame (or mobile home) company which could produce sizable savings. A multi project order should produce economies of scale and significantly reduce supply prices.

Similarly, we would expect the costs of professional fees etc to reduce if a multi-project contract is let.

Assumptions/ Exclusions

- No allowance for VAT
- No allowance for project finance or future inflation (beyond date of report)
- No allowance for purchase of land
- No allowance for Internal police staff costs in project management etc
- Assumed copiers etc will be leased - therefore no capital allowance
- Notional allowance for abnormals - additional contingency 10%
- Average allowance for furniture and IT fit-out - no specification or scope
- Lump sum allowance for professional fees





SUMMARY
Estimate for New Residential Police Point

Package Nr	Package Name	Package Cost £	Prelims	Contingency	Total	Rates per unit area	
			12%	8%		36 m2 £/m2	388 ft2 £/ft2
<u>Substructure</u>							
1100	Foundations and slab	4,320.00	518.40	363	5,201	144.48	13.42
1200	Drainage	7,100.00	852.00	596	8,548	237.46	22.06
<u>Superstructure</u>							
2100	External Walls	11,500.00	1,380.00	966	13,846	384.61	35.73
2200	Roof	4,820.00	578.40	405	5,803	161.20	14.98
2300	Windows and doors	12,850.00	1,542.00	1,079	15,471	429.76	39.93
2400	Internal walls and doors	3,300.00	396.00	277	3,973	110.37	10.25
<u>Services</u>							
3100	Electrical Installations	3,350.00	402.00	281	4,033	112.04	10.41
3200	Mechanical + PH Installations	3,000.00	360.00	252	3,612	100.33	9.32
3300	Security Installations	5,500.00	660.00	462	6,622	183.94	17.09
3400	Specialist Installations	12,500.00	1,500.00	1,050	15,050	418.06	38.84
<u>Finishings</u>							
4100	Floor	1,930.00	231.60	162	2,324	64.55	6.00
4200	Wall	1,350.00	162.00	113	1,625	45.15	4.19
4300	Ceiling	1,200.00	144.00	101	1,445	40.13	3.73
4400	Decoration	1,550.00	186.00	130	1,866	51.84	4.82
4500	Fittings/ furniture	2,750.00	330.00	231	3,311	91.97	8.54
<u>External Works</u>							
5100	Hard landscape	5,450.00	654.00	458	6,562	182.27	16.93
5200	Soft landscape	1,000.00	120.00	84	1,204	33.44	3.11
5300	Street Furniture/ Fittings	650.00	78.00	55	783	21.74	2.02
5400	Utilities	2,100.00	252.00	176	2,528	70.23	6.52
	Sub- Total £	86,220.00	10,346.40	7,242.48	103,808.88	2,883.58	267.89
9100	Preliminaries	12%	10,346.40			inc	
9200	Overheads and profit (included on summary)	0%	-			inc	
			96,566.40			2,883.58	267.89
9300	Contingency	7.5%	7,242.48			inc	
	TOTAL cost of Estimate for New Residential Police Point £		103,808.88			2,883.58	267.89

Client: **West Mercia Police**
 Project: **Strategic Infrastructure Assessment - Sep 2012**
 Report: **Estimate for New Residential Police Point**
 Date: **06 September 2012**

TRENCH FARROW
Jon. Tylee

Estimate for New Residential Police Point

Package Nr	Item Nr	Dimension Reference	Item Description	Quantity	Unit	Rate	Item Total	Group Total
1100	1,100.00		<u>Foundations and slab</u>					
	1,100.05		Excavate for foundations and slab, cart away, 1m deep strip foundations, 150thick suspended slab, 100 insulation, 75 screed	36	m2	120.00	4,320.00	
								4,320.00
1200	1,200.00		<u>Drainage</u>					
	1,200.05		Foul Drains to and including adjacent manhole circa 1m deep	1	sum	1,500.00	1,500.00	
	1,200.10		Surface Water drains to and including adjacent manhole circa 1m deep	1	sum	1,500.00	1,500.00	
	1,200.15		Allowance for drain runs and connections to mains sewers - say 30m each; n.e. 2m deep, backfill with exc mats	60	m	60.00	3,600.00	
	1,200.20		CCTV and testing on completion	1	sum	500.00	500.00	
2100	2,100.00		<u>SUPERSTRUCTURE</u> <u>External Walls</u>					7,100.00
	2,100.05		Timber frame wall, timber weatherboard cladding, insulation, dry lining	75	m2	120.00	9,000.00	
	2,100.10		Allowance for wind posts, structural reinforcement	1	sum		Not Priced	
	2,100.15		Signage/ Branding	1	sum	2,500.00	2,500.00	
								11,500.00
2200	2,200.00		<u>Roof</u>					
	2,200.05		Timber roof trusses, insulated metal roof deck (solar panels msd e	36	m2	120.00	4,320.00	
	2,200.10		Rainwater goods	1	sum	500.00	500.00	
								4,820.00
2300	2,300.00		<u>Windows and doors</u>					
			Aluminium windows; St Gobain low E planitherm ultra tinted safety glass; double glazed					
	2,300.05		0.60 * 1.20m	2	nr	500.00	1,000.00	
	2,300.10		1.00 * 1.20m	2	nr	650.00	1,300.00	
	2,300.15		2.00 * 2.00m	1	nr	2,000.00	2,000.00	
			Aluminium double glazed entrance door; St Gobain low E planitherm ultra tinted safety glass					
	2,300.20		0.9 * 2.00m; power operated, push pad controls	1	nr	2,000.00	2,000.00	
			Timber shutters to doors and windows; sliding track system; power operated					
	2,300.25		0.60 * 1.20m	2	nr	750.00	1,500.00	
	2,300.30		1.00 * 1.20m	2	nr	900.00	1,800.00	
	2,300.35		2.00 * 2.00m	1	nr	2,000.00	2,000.00	
	2,300.40		0.9 * 2.00m	1	nr	1,250.00	1,250.00	
2400	2,400.00		<u>Internal walls and doors</u>					12,850.00



SUMMARY Estimate for Temporary Police Point

Basis of estimate of construction costs:

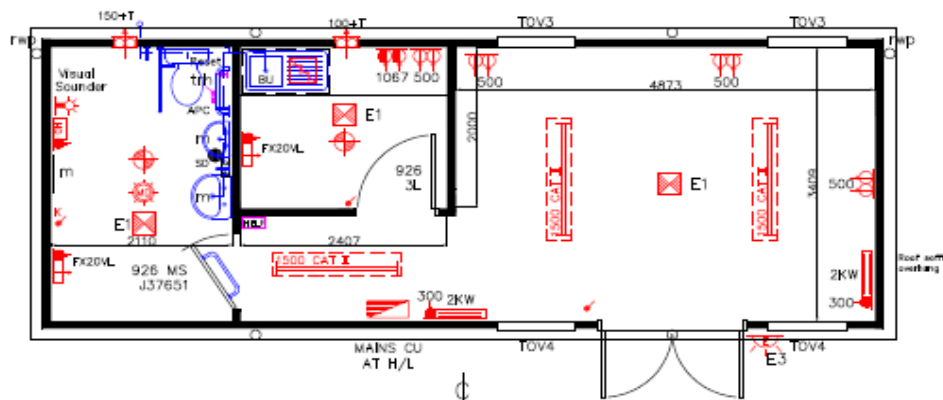
Unit purchased and installed at Abbotswood, Romsey 35m² (see photo)
 Priced at 4th quarter 2011 - updated to 3rd quarter 2012

Estimate of Construction Costs

Based upon the information provided and assuming a single project built in-situ, we would recommend the following budget for the construction of the Temporary Police Post:	£50,000
We would make the following provisional allowance for other project costs including, professional fees, site abnormalities, furniture and IT fit out	£25,000
TOTAL PROJECT COST (see exclusions)	<u>£75,000</u>

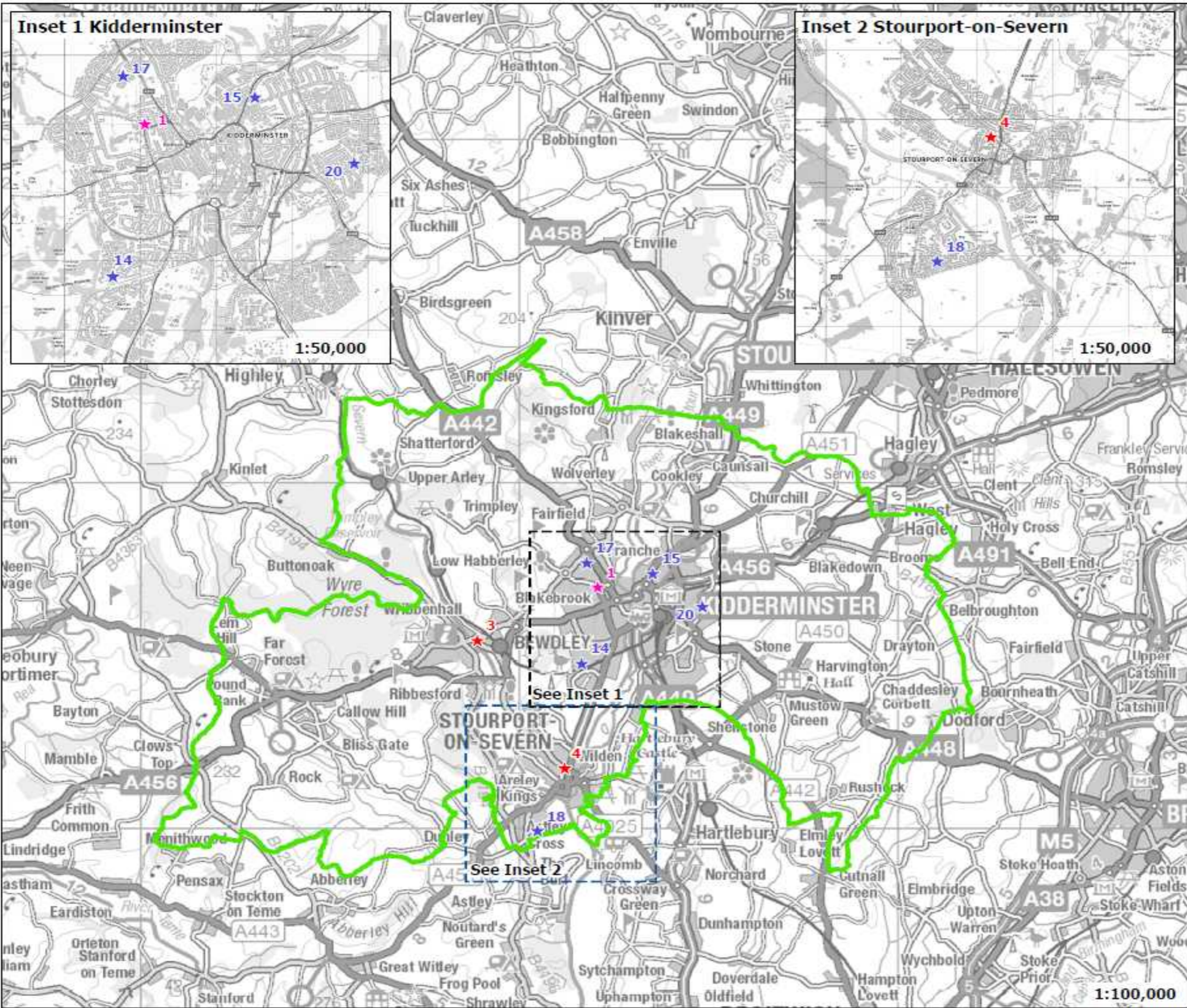
Assumptions/ Exclusions

- No allowance for VAT
- No allowance for project finance or future inflation (beyond date of report)
- No allowance for purchase of land
- No allowance for Internal police staff costs in project management etc
- Assumed copiers etc will be leased - therefore no capital allowance
- Notional allowance for abnormalities - additional contingency 10%
- Average allowance for furniture and IT fit-out - no specification or scope
- Lump sum allowance for professional fees



Appendix 4

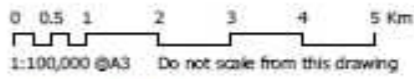
Existing Baseline Assets



Existing Buildings Infrastructure **01**

- Key**
- Wyre Forest District
 - ★ Territorial Policing Unit Headquarters
 - ★ Police Station
 - ★ Police Post

NB: This plan does not cover the WMP Force HQ facility at Hindlip near Worcester.



A066406-19
A066406-19 01 Existing Buildings Infrastructure

5th Floor, Longcross Court, 47 Newport Road, Cardiff CF24 0AD
Tel: +44 (0) 29 2082 9200 Fax: +44 (0) 29 2045 5321
Email: info@wyg.com www.wyg.com

Based upon the Ordnance Survey map with the permission of The Controller of Her Majesty's Stationery Office, © Crown copyright, WYG Environment Planning Transport Limited 2012, licence no: AR 1000 17603

© WYG Environment Planning Transport Ltd 2012 Registered in England Number: 3050297

Appendix 4 - Schedule of WMP Wyre Forest Premises and Services Delivered from HQ Sites Sep-12

WMP Premises within the Wyre Forest District

Ref:	Wyre Forest (part of North Worcestershire TPU)	Leashold/Freehold	Property Type
1	Kidderminster Territorial Policing Unit Headquarters, Habberley Road, Kidderminster. DY11 6AN	FH	TPUHQ
3	Bewdley Police Station, 15 Kidderminster Road, Bewdley. DY12 1AQ	FH	P Station
4	Stourport on Severn Police Station, County Buildings, Bewdley Road, Stourport-on Severn. DY13 8YZ	FH	P Station
14	Birchen Coppice Police Post, Birchen Coppice Middle School, Woodbury Road, Kidderminster. DY11 7JJ	LH	P Post
15	Windermere House, Grasmere Close, Kidderminster. DY10 2PD	LH	P Post
17	Franche School Police Post, Chestnut Grove, Franche, Kidderminster. DY11 5QB	LH	P Post
18	The Walshes Police Station, 36 Old Ford Walk, Stourport on Severn. DY13 0DW	LH	P Post
20	Comberton Police Post, Queen Elizabeth Road, Kidderminster. DY10 3BD	LH	P Post

Headquarters-Based Services Delivered to the Wyre Forest Area

The following services are centrally managed from our headquarters sites:

Operational Support:

Command & Control and Communications
Safeguarding Services
Criminal Justice Services

Protective Services:

Major Crime
Intelligence
Public Protection
Specialist Crime
Force Operations
Forensic Services

Enabling Services:

Finance
Information Management and Technology
Estate Services
Fleet Management
Procurement
Resource Management
Professional Standards
Personnel
Learning & Development
Strategy & Change
Legal Services
Performance
Corporate Communications
Change and Strategic Partnerships

Appendix 4 - Summary

**West Mercia Police
Force Summary September 2012**

	Police Officers			Police Staff (inc CSOs)			Specials Actual	CSOs		
	BP	FTE	Actual	BP	FTE	Actual		BP	FTE	Actual
Territorial Policing	1498	1424.8	1448	342	310.7	326	292	283	255.9	261
Protective Services	633	579.5	585	330	306.4	347				
Operational Support	77	76.7	77	654	566.4	649				
Human Resources	37	34.6	35	160	138.0	149				
Strategy & Legal Services	1	4.0	4	59	51.7	63				
Chief Officers & Corporate Services	4	4.0	4	342	309.5	335				
Police Authority				9	7.4	8				
Total	2250	2123.6	2153	1896	1690.1	1877	292	283	255.9	261.0

	Police	Staff	Specials	CSO
Total Career Breaks	18	20		0
Total Secondments	12	7		0
Number of female	626	1144	101	125
Number of BME	40	26	5	6

**Police Staff Budgeted Posts - Actual Strength
1st September 2012**

	Total			Command			Grades 7-13			Grades 4-6			Grades 1-3		
	BP	Staff	FTE	BP	Staff	FTE	BP	Staff	FTE	BP	Staff	FTE	BP	Staff	FTE
Territorial Policing															
South Worcestershire	58	53	52.3												
North Worcestershire	54	50	49.7												
Herefordshire	36	30	29.5												
Shropshire	78	76	74.1												
Telford & Wrekin	46	44	42.4												
Command Support	36	41	33.9												
Crime Management	34	36	32.6												
Sub-total	342	330	314.5	0	0	0.0	9	8	7.0	325	312	300.6	8	10	6.9
Protective Services															
Sub-total	330	351	311.4	0	0	0.0	79	89	83.1	169	181	160.5	82	81	67.8
Operational Support															
Sub-total	646	656	577.1	0	0	0.0	15	15	14.5	406	404	369.6	225	237	193.0
Human Resources															
Sub-total	160	148	137.0	0	0	0.0	91	84	79.7	38	38	35.2	31	26	22.1
Strategy & Legal Services															
Sub-total	59	63	51.6	0	0	0.0	29	35	30.3	23	20	16.7	7	8	4.6
Corporate Services															
Sub-total	342	327	300.6	1	1	1.0	125	109	106.7	104	101	94.3	112	116	98.6
Police Authority															
Police Authority	9	8	7.4												
Total	1888	1883	1699.6	1	1	1.0	355	346	326.7	1067	1056	978.9	465	478	393.0

The departments above encompass the following:

Protective Services	Operational Support	Human Resources	Strategy & Legal Services	Corporate Services
ACPO Firearms	Casualty Reduction Partnership	Human Resources	Strategy & Legal Services	Chief Officer Command Team
Central Counties Air Ops Unit	Command Control & Comms	Learning & Development	Corporate Communications	Estate Services
Force Operations	Criminal Justice	Personnel	Legal Services	Finance
Forensics	Operations	Professional Standards	Performance	IMTD
Intelligence	Safeguarding Services		Strategy & Change	Procurement
Major Investigation Unit			Sub-total	Resource Management
Public Protection Unit				Transport
Safer Roads Partnership				
Specialist Operations				

Police Budgeted Posts - Staffing Levels 1st September 2012

Territorial Policing	FTE	BP	Staffing
Territorial Policing	1	1	100.0%
South Worcestershire	257	271	95.0%
North Worcestershire	288	305	94.3%
Herefordshire	155	173	89.3%
Shropshire	263	269	97.8%
Telford & Wrekin	182	193	94.5%
Command Support	18	18	99.4%
Crime Management	276	268	103.0%
Sub total	1440	1498	96.1%

Protective Services	FTE	BP	Staffing
Sub total	581	633	91.7%
Operational Support	FTE	BP	Staffing
Sub total	77	77	99.5%
Human Resources	FTE	BP	Staffing
Sub total	35	37	94.6%
Strategy & Legal Services	FTE	BP	Staffing
Sub total	4	1	400.0%
Corporate Services	FTE	BP	Staffing
Sub total	5	4	125.0%

Staffing using Full Time Equivalent			
	FTE	BP	Staffing
Force Staffing Total	2141.3	2250	95.2%

Staffing using Actual Strength			
	Actual	BP	Staffing
Force Staffing Total	2169	2250	96.4%

Appendix 5

Types of WMP Buildings & Accommodation

Appendix 5

TYPES OF WEST MERCIA POLICE BUILDINGS & ACCOMMODATION INFRASTRUCTURE

The different types of WMP infrastructure should be understood as follows: -

Territorial Policing Headquarters

These facilities function as command and control centres, normally on a county wide basis. They encompass offices, usually a call management centre, facilities for specialist police units and a custody suite. A building/complex of this type would typically provide accommodation for approximately 300-400 Police Officers and support staff on shift.

Section Station

This is a facility which is capable of accommodating approximately 50 Police Officers and support staff working on shift. A typical station of this type would include offices, interview rooms, data rooms, briefing rooms and storage for equipment. They typically occupy sites of approximately 1 hectare.

Police Station

These are building capable of accommodating 10 - 40 Police Officers and support staff on shift. Typical facilities include offices, interview rooms and storage for equipment.

Police Post

These can be found as rooms within larger buildings, or as a small free-standing facility. They provide accommodation for 3 – 10 Police Officers and Police Community Support Officers (PCSOs) on shift. They are not always for public use. They usually consist of an office/offices and possibly a shared interview room, W.C. and kitchen area. Freestanding Police Posts typically have an internal floor area of approximately 60sq.m, with 2 parking spaces immediately outside.

A map which shows the location of WMP's existing infrastructure in Wyre Forest is included at Appendix 4.

Appendix 6

West Mercia-Warwickshire Police

Strategic Alliance

Appendix 6

West Mercia/Warwickshire Police Authorities' Strategic Alliance

In August 2012, the Warwickshire and West Mercia Chief Officer team met to reaffirm the commitment to deliver the new strategic alliance between the two Police Authorities.

The two authorities are working in alliance and whilst almost all business areas and teams will combine to deliver services, they will continue as two forces retaining separate identities.

Chief Constables and Deputy Chief Constables remain accountable personally for policing in their force area.

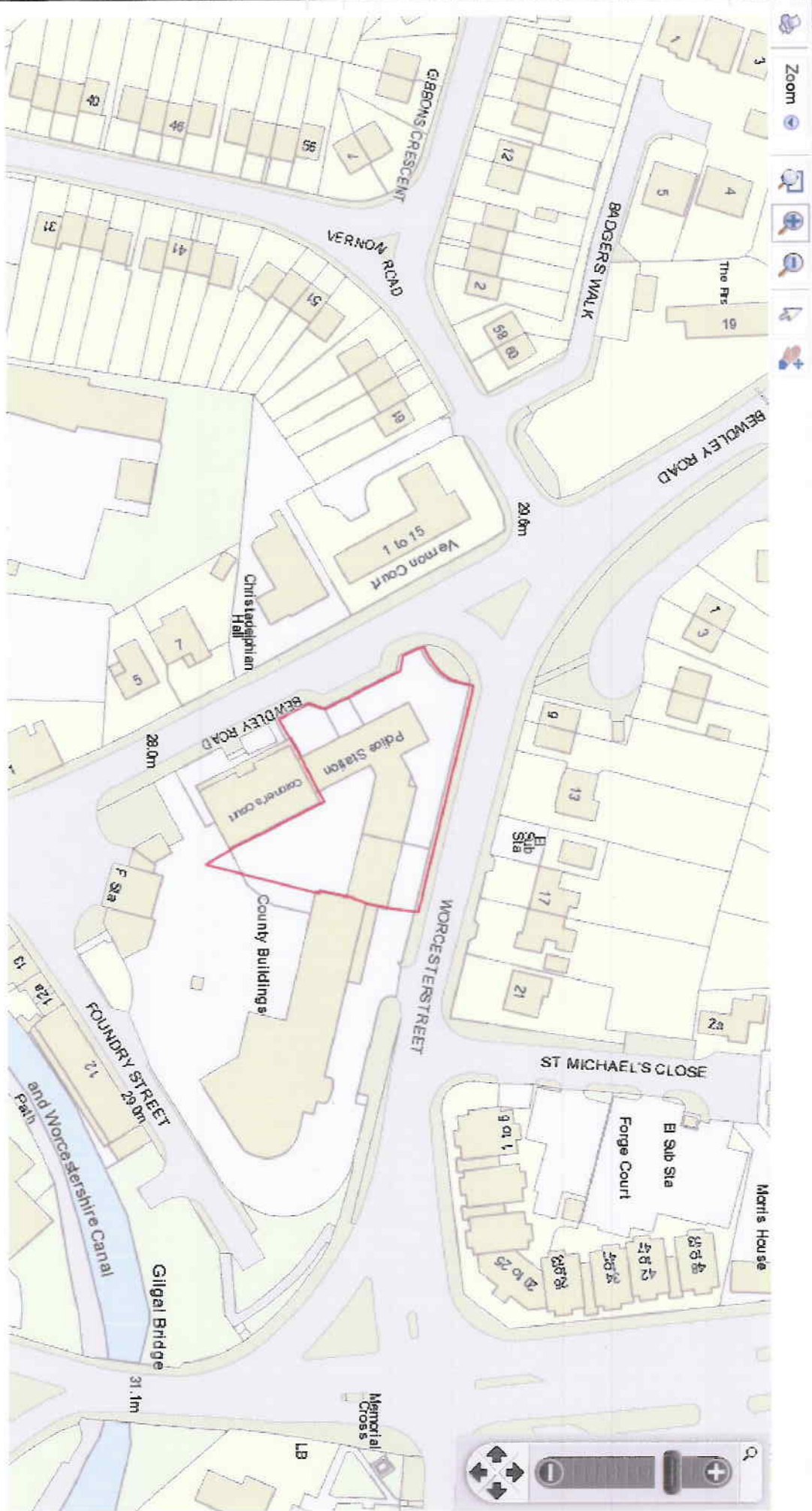
Replacement of the Police Authorities in November 2012 with Police & Crime Commissioners will not affect the principle of progressing the strategic alliance.

Set out below are the key recommendations for the Strategic Alliance from June 2011.

1. The executive leadership model to consist of two Chief Constables and two Deputy Chief Constables, commissioning services provided by three directorates in alliance – Protective Services, Local Policing and Enabling Services. The concept of this shared commissioning role and the relationship between CC roles and DCC roles requires immediate work to define.
2. These three directorates should be led by two Assistant Chief Constables and a Director of Enabling Services. The portfolios of these chief officers need to be confirmed including the amount of delegated authority and independence around financial decisions as well as the nature of governance and reporting requirements.
3. The chief officers should be appointed as soon as possible to provide the necessary momentum and oversight of the ongoing design while driving out further efficiencies as yet unidentified. For the same reason, the Alliance Programme Director should be appointed at the earliest stage as it should become the one change programme for both forces.
4. The chief officers should work with the Police Authorities to understand and shape how their respective management and governance roles will operate to complement this model. This will give rise to the necessary initial section 23 arrangements.
5. Both forces' underpinning values, strategic objectives and performance approaches should be aligned as quickly as possible.
6. Operational decisions should be based upon addressing the greatest harms within each policing area. Chief Officers should urgently develop a model to address tasking and operational deployment across both force areas based on a commissioning approach. This approach will be subject to annual review by their respective governing bodies advised by their respective treasurers.
7. We will ensure that diverse local communities continue to receive the policing services they need within Herefordshire, Shropshire, Telford & Wrekin, Warwickshire and Worcestershire. We will maximise this by developing a model of local policing within the Alliance approach while reflecting local differences.
8. Each Chief Constable will have access to independent financial advice. An early review is required to provide clarity over financial arrangements. The two organisations will need to maintain their own balance sheets, retain their own assets and meet the costs that fall exclusively on their own force area. New alliance services covering both forces will be apportioned on an appropriate basis (the default will be that net revenue expenditure which suggests apportionment broadly 31% for Warwickshire and 69% for West Mercia).

Appendix 7

Site Maps of Kidderminster Police Station & Stourport Civic Centre



X: 381225.467448, Y: 271822.744792 (METER)

0 feature selected

1: 1250.00

329.74 x 164.04 (m)

Powered by

MapGuide

© Crown copyright and database right 2011. Ordnance Survey 100024393

Measure Area



© Crown Copyright and database right 2011. Ordnance Survey 100024393

This plan was printed from SIGnet on 05-Jul-2011 and is not for use within a legal document.

Kidderminster Police Station



Appendix 8

Home Office Guide to the Police Funding Formula



PLAIN ENGLISH GUIDE TO THE POLICE FUNDING FORMULA

Introduction

What is the Police Funding Formula?	The Police Funding Formula (PFF) is essentially a calculation that uses various data sources (such as population density) to share money between police authorities in England and Wales. It is not a calculation of absolute needs i.e. it does not estimate how much each force needs independently of other forces. Instead it shares out the amount of money designated for police funding between forces based on their relative needs compared to each other.
Why is the Police Funding Formula important?	The PFF is important because it is used to divide the majority of the money available for total police funding between forces. Consequently, the results of the PFF have a significant impact on how much money a force will receive in order to police its local area.
Is the PFF used to distribute all funding from central government to the police?	<p>There are 4 main sources of funding from central government to the police. Two are from the Home Office and two are from the Department for Communities and Local Government (DCLG) in England and the Welsh Assembly Government (WAG) in Wales:</p> <ol style="list-style-type: none">1. The Police Grant (from the Home Office)2. Revenue Support Grant (from DCLG and WAG)3. Redistributed Business Rates (from DCLG and WAG)4. Specific Grants (from the Home Office) <p>For the first three of these the Home Office, DCLG and WAG distribute around £8.5bn using the PFF. For the distribution of Revenue Support Grant and Redistributed Business Rates, DCLG and WAG take into account the 'relative resources' as well as the 'relative needs' expressed through the PFF. To do this, WAG and DCLG include the council tax base in their calculations so that the total payment (including that from the Home Office) takes this into account. This is because some areas will have a higher tax base (i.e. more band-D equivalent properties) to levy council tax from. Taking this into account goes some way to levelling the playing field in terms of access to local tax funding.</p> <p>The fourth source of police funding is a set of grants for specific purposes (totalling around £2.5bn) which are distributed on a different basis to the PFF, with the exception of the capital grant which does use the PFF¹.</p>
Is the PFF the right way to distribute police funding?	<p>Designing a system to fund the 43 police forces of England and Wales is complex. The PFF is a way to measure the need for policing in areas relative to each other. It uses a range of indicators that are available on a consistent basis for all police authorities.</p> <p>The limitations of available data mean that the PFF cannot capture every factor that will affect relative need for policing in an area. But the model is designed to be able to provide a good statistical prediction of relative police workload across the country. We are constantly trying to improve it, and this is currently being done by the Police Allocation Formula Working Group (PAFWG) which is an official-level working group made up of officials from Home Office, DCLG and WAG and representatives from police authorities, the Association of Police Authorities (APA) and the Association of Chief Police Officers (ACPO). After the PAFWG has made its recommendations, ministers will decide on which they wish to include in a public consultation where anyone from police authorities, and other authorities with an interest in policing, together with the general public, can make representations to the Home Office and DCLG/WAG. This process ensures that the formula is scrutinised and can be discussed by a wide range of stakeholders.</p>

¹ Note that the Crime Fighting Fund also partially uses the PFF to distribute funding.

How the Police Funding Formula distributes funding

How does the PFF divide funding by activities that the police perform (police workload)?

The first step of the PFF is to divide everything the police service has to do to police the country (total police workload) into eleven categories (tasks). Seven of these relate to reducing/investigating different types of crime². The other four are as follows: providing reassurance to the public, providing assistance at or reducing road traffic accidents, providing assistance with non-crime incidents and policing special events such as protest marches or football matches.

Using data that the police provide on how they spend their time we know that some of these activities take up more police time than others. As a result more funding is allocated by reference to activities which take up a lot of police time, like investigating violent crime, and less by reference to activities which take up less time, like policing special events. For example we allocate 60% of funding on the basis of reducing/investigating crime nationally. It is important to note that although this is how the PFF allocates funding, police authorities and forces do not have to spend their budget according to this allocation. They get a lump sum and are free to spend it according to their assessment of local priorities.

How does the PFF take into account the different policing needs of different areas?

So far we have divided funding by reference to duties that all police forces need to perform. But, we know, from crime statistics, that different forces will have different amounts of work in each of these categories, and this obviously impacts on the workload of the police in different areas. For example, urban forces will tend to have more violent crime than rural forces, but rural forces tend to have more road traffic accidents than urban ones. To deal with this the PFF allocates a bigger share of the funding for a particular category (e.g. vehicle crime, reducing road traffic accidents etc.) to forces which have greater needs in that area. For example, a bigger proportion of the funding allocated for burglary will go to forces in which burglary is more likely to happen and a lower proportion to forces in which burglary is less likely. Again, it is important to note that although funding is based on police activity, like how much burglary there is in an area, police authorities and forces do not have to spend their funding in line with the way the total amount of money received has been calculated.

This raises the question: How does the formula know which areas have a greater need for funding for certain categories (such as robbery or providing public reassurance) and which have less? The PFF does this by predicting the relative workload (or need) for each category of police activity for each force based on socio-economic and demographic factors (e.g. amount of bars per hectare in an area).

If we take 'providing assistance at and reducing road traffic accidents' as an example, population sparsity is the predictor we use because across England and Wales this tends to be higher in areas where there are more road traffic accidents. This means that a police force area that has a very low population density (i.e. high population sparsity) will be allocated more of the funding that is available for the traffic accidents category than an area with high population density. This relationship is given at the bottom of page 6 on The Police Grant Report³. So, for a given force:

$$\text{Traffic accident workload} = 1.1555 \times \text{population sparsity}$$

The number we multiply population sparsity by, 1.1555, is generated by a statistical technique⁴ and represents the relationship between population sparsity and traffic accident workload on average in England and Wales. It is important to note that although population sparsity is used in this case, this does not mean that population

² The seven crime types are as follows: More serious violence/sexual offences, less serious violence, robbery, vehicle crime, domestic burglary, other crime (high cost), other crime (low cost).

³ The Police Grant Report 2010/11 can be found at <http://police.homeoffice.gov.uk/publications/finance-and-business-planning/draft-police-grant-report-10-112835.pdf?view=Binary>

⁴ A weighted least squares regression is used to generate this coefficient

sparsity particularly causes road traffic accidents. It only means that population sparsity has a statistical relationship with road traffic accidents. The equations for the other police workloads can be found in the Police Grant Report and can be understood in exactly the same way as the above example⁵.

How does the PFF deal with the different costs of wages in different parts of England and Wales?

We know that there are regional differences in costs across England and Wales and the PFF incorporates these by adjusting funding by a factor called the Area Cost Adjustment (ACA). This factor compares wages, and rental rates for business premises, across England and Wales and ensures that the differences for equivalent services are taken into account. For example, a cleaner in a police station in Northumbria earns less than a cleaner in a City of London police station. Thus the City of London gets a higher ACA factor than Northumbria.

How does the PFF fit in with the minimum increase in annual funding guaranteed to all police authorities?

In this Spending Review⁶ period, each police authority is assured a minimum percentage increase of 2.5% ('the floor') in grant year-on-year. Those police authorities that get less than this based purely on the formula are topped up so that their grant increase equals 2.5%. In order to pay for this any force receiving an increase based purely on the formula that is greater than 2.5% has their grant increase above 2.5% scaled back by a standard proportion. For example, if Force A has only received an increase of 2.4%, in order to meet its floor increase it needs another 0.1%. Now, if Force B received a 2.7% increase on last year, part of the 0.2% increase above the 2.5% floor would be used to finance the cost of providing the floor for Force A. This process is commonly referred to as floor damping. Note that this does not mean that all the forces end up receiving a 2.5% increase because those that receive an increase above 2.5% only have part of their funding scaled back so that they are still above the 2.5% floor.

Frequently asked questions

1. *What are Rule 1 Grants?*

These are similar to the floor damping mechanism mentioned above. The reason this is done separately from floor damping is that floor damping is done by DCLG for English authorities. Rule 1 is the equivalent for Wales with South Wales being scaled back because it is above the floor and this money then being redistributed to the other Welsh forces. However, this redistribution is not sufficient to bring the other Welsh forces up to the 2.5% floor increase. During this Spending Review period the Home Office pays a further grant called The Welsh Top-Up Grant so that they attain the floor increase.

2. *What are Rule 2 Grants?*

This is an amalgamation of five specific grants that are not distributed on the basis of the PFF. They are as follows: the Rural Policing Fund, the Forensic DNA grant, the Integrated Police Learning and Development Programme, the London and South East Allowances, and Special Priority Payments. They were combined into one non-ring fenced grant to give police authorities more control over how they are used.

3. *What is the Metropolitan Police Service Special Payment?*

The Metropolitan Police Service has duties related to its national and international capital city functions which other forces don't have. These factors are difficult to include in the PFF and so this grant is given instead.

4. *How do the top-ups listed in the Police Grant Report correspond to the 11 categories of police workload mentioned in this document?*

The top-ups correspond to the categories as given in the table below:

⁵ In the Police Grant Report each crime equation is given the label 'crime top-up'. See table at end of document for details on how the crime top-ups in the Grant Report correspond to the 11 categories of police workloads mentioned above.

⁶ Comprehensive Spending Reviews (CSRs) are carried out by HM Treasury, usually every three years to set the spending limits for Government departments and public services. The current CSR runs until the end of the financial year 2010-11.

Crime Top-Up in Police Grant Report	Police Workload category
Special Events Basic Amount	Policing special events
Police Crime Top-Up 1	Violence against the person (more serious) and sexual offences
Police Crime Top-Up 2	Robbery
Police Crime Top-Up 3	Violence against the person (less serious)
Police Crime Top-Up 4	Vehicle crime
Police Crime Top-Up 5	Burglary
Police Crime Top-Up 6	Other crime (high cost)
Police Crime Top-Up 7	Other crime (low cost)
Police Incidents Top-Up	Providing assistance with non-crime incidents
Police Fear of Crime Top-Up	Providing reassurance to the public
Police Traffic Top-Up	Providing assistance at or reducing road traffic accidents
Police Sparsity Top-Up ⁷	A top-up that addresses the specific needs of forces in rural areas

Police Finance and Pensions Unit, Police Reform and Resources Directorate, Home Office, London.
15 March 2010.

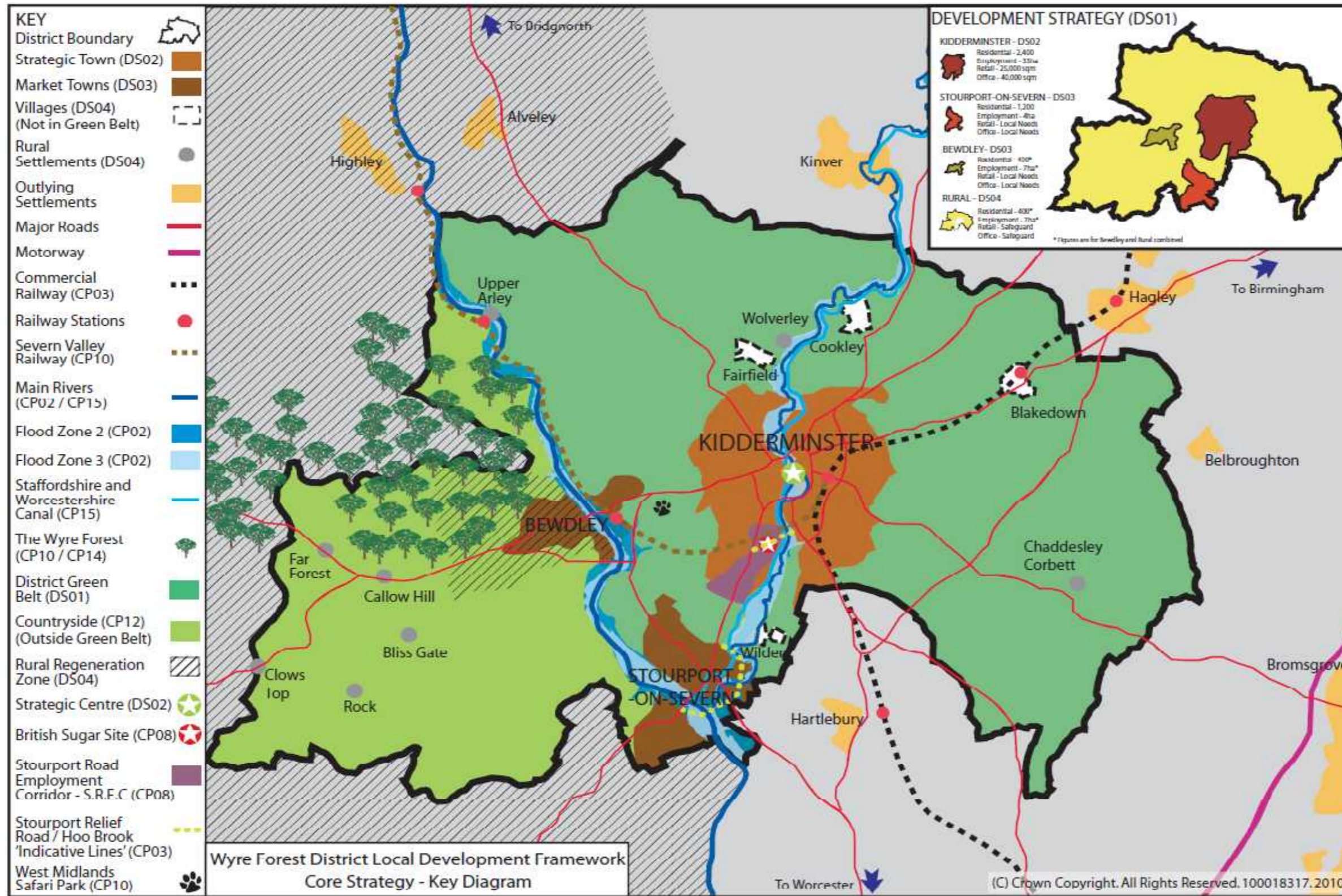
⁷ Note that this is not one of the eleven categories of police workload. It is a top-up for rural forces.

Appendix 9

Wyre Forest Core Strategy Key Diagram



APPENDIX 8 - WYRE FOREST CORE STRATEGY - KEY DIAGRAM



DEVELOPMENT STRATEGY (DS01)

KIDDERMINSTER - DS02



Residential - 2,400
Employment - 33ha
Retail - 25,000 sqm
Office - 40,000 sqm

STOURPORT-ON-SEVERN - DS03



Residential - 1,200
Employment - 4ha
Retail - Local Needs
Office - Local Needs

BEWDLEY - DS03

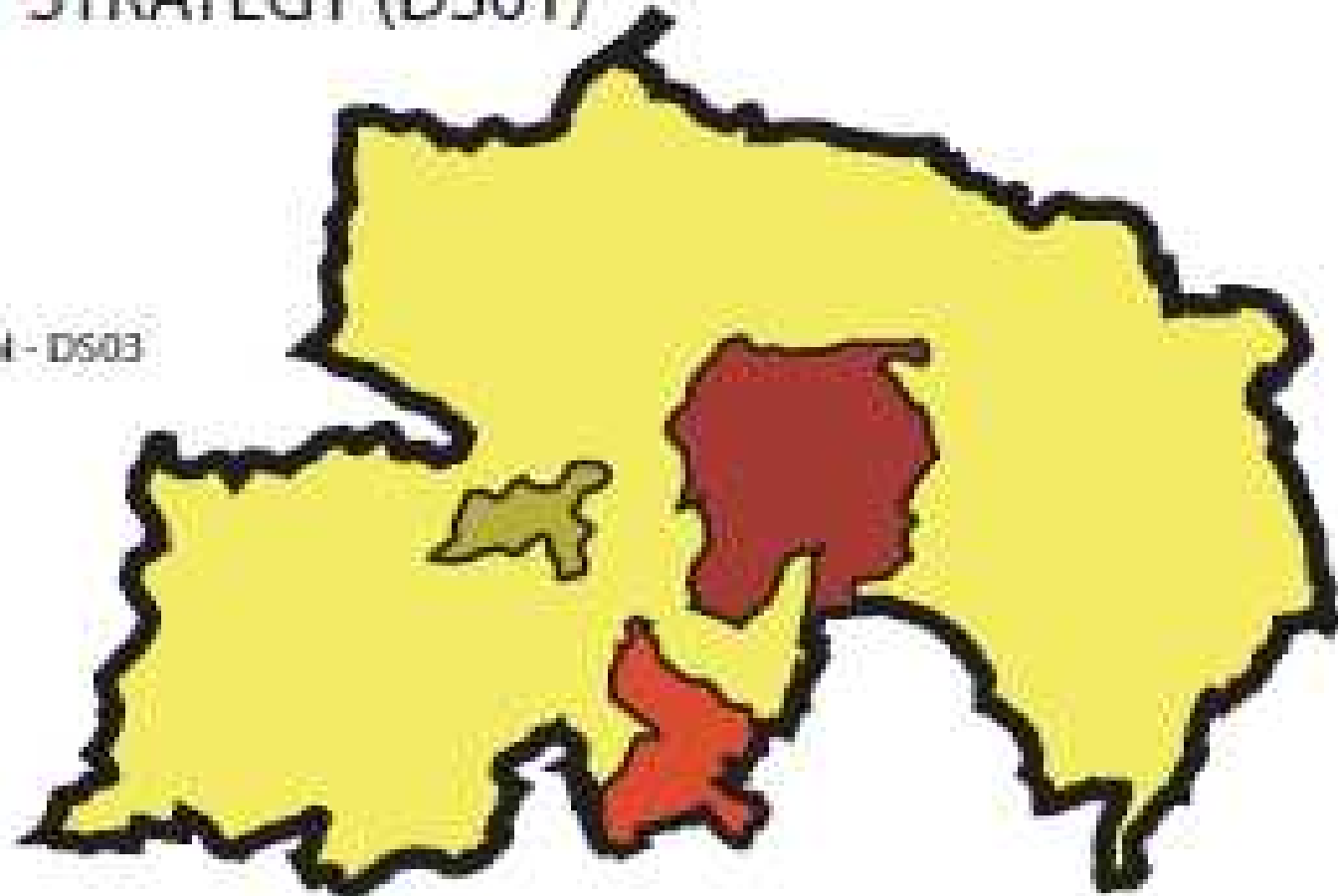


Residential - 400*
Employment - 7ha*
Retail - Local Needs
Office - Local Needs

RURAL - DS04



Residential - 400*
Employment - 7ha*
Retail - Safeguard
Office - Safeguard



* Figures are for Bewdley and Rural combined

Appendix 10

Methodology presented to the Local Authorities for consultation

Appendix 10 - Generic Methodology for Strategic Infrastructure Assessments



Work Stages & Tasks	Factors for Consideration	Outputs	Value Quantification
Stage 1 Existing Baseline Infrastructure			
Establish extent, availability and quality of information held by WMP on existing, significant infrastructure assets: property, equipment, vehicles, other			
Existing Asset Base Produce a baseline spatial representation (i.e mapping) of significant property assets, if possible, disaggregated on TPU area basis		Mapping Document	
Compile a baseline high-level inventory of equipment/vehicles/other capital assets, if possible disaggregated on TPU area basis		Inventory Document	
Existing Deficiencies Identify existing key deficiencies in infrastructure on basis of zero growth but in recognition of PFTF, Making the Difference		Deficiencies Schedule	
Identify asset/floorspace capacity likely to be yielded by Force workforce reductions (Making the Difference)		Capacity Schedule	
Net [Surplus/Shortfall] Capacity Calculate net capacity/under-capacity following Making the Difference		Schedule of net capacity available - floorspace - equipment - vehicles - other	E Quantification required
Review WMP Capital Investment Programme	2010-2011 *New command and control system *Operational Data Store *Sexual Abuse and Referral Centre *New police station at Market Drayton *Custody improvements at Telford *New police station at Bromsgrove *Central store at Defford	Comparison with net capacity to identify any opportunities (highly unlikely)	
Stage 2 SIA based upon ACPO Formula			
ACPO Formula Run standard (or amended) ACPO formula based upon policing costs data provided by WMP. Business crime to be estimated as a percentage of overall crime			
Generate total overall cost of policing population growth NB: tolerances of population projections to be recognised on LPA basis			E Quantification required
Generate cost (developer contribution) per new dwelling/sq m commercial floorspace			E Quantification required
SI Aspirations Express overall cost as actual provision of additional infrastructure at strategic and local level recognising not just population growth but also real numbers/location housing growth as expressed in LDF or equivalent documents			
Identify planned and aspirational infrastructure: 1. Strategic projects (including Force-wide apportionments) 2. TPU and local projects To be cognisant of opportunities for more efficient ways of working - vehicles, equipment, central services, forensics etc and stemming from PFTF and Making the Difference		SI Aspirations Schedule of new infrastructure requirements	E Quantification required To be commensurate with line 14 above
Spatial representation of additional infrastructure requirements		Annotated mapping document	
Stage 3 SIA based upon net requirement			
Disposal of Assets		Disposals Schedule	E Quantification required
Moderation of SI Aspirations, acknowledging existing deficiencies in infrastructure, spare capacity (from stage 1) and potential disposal receipts			
SIA based upon moderated net requirements		First Draft SIA Document	E Quantification required
Stage 4 Final SIA			
Spatial representation of net infrastructure requirements, if appropriate with recognition of S106 v CIL funding issues			
Identification of all potential sources of funding for the provision of new police infrastructure (including potential for New Homes Bonus contributions)			
Calculation of shortfall to be funded, potentially through CIL			
Calculation of E contribution per dwelling/commercial floorspace			
Phasing of provision in relation to amount and location of growth			
Draft costed SIA sense checked and subject to internal WMP consultation		Final Draft SIA	
Draft costed SIA sense checked and subject to external consultation with LPA(s)			
Final revisions		Publication of Final SIA	
Stage 5 Annual monitoring and Review			

Appendix 11

WMP Capital Investment Programme

Appendix 11 - Summary of WMP Capital Programme – Buildings

Detailed Projects – Buildings Title	Estimated Project Total £000
<u>Core Capital</u>	
Disability Discrimination Act	£1,726.50
Environmental Improvements	£300.00
Total Core Capital	£2,026.50
<u>Work in Progress</u>	
New Bromsgrove Police Station	£10,538.00
New Bewdley Station	£175.00
Hindlip Space Audit	£200.00
Shrewsbury Joint Agency Interviewing Facility	£400.00
Total Work in Progress	£11,313.00
Total Buildings	£13,339.50

Appendix 12

West Midlands RSS Growth Targets Information

Appendix 12 – West Midlands RSS Growth Targets Information

RSS Growth targets

The Regional Strategy (RS) for the area assumed growth of 10,500 dwellings in Worcester, 9,100 dwellings in Wychavon and 4,900 dwellings in Malvern Hills (a total of 24,500) from 2006 to 2026 as per the table below:

Local Authority Area	Overall requirement 2006 to 2026	Within the City/Town	Urban Extensions	Rural Areas
Worcester	10500	3,200	3,500 at Worcester West 3,000 at Worcester South 500 at Fernhill Heath 500 at Kilbury Drive	
Wychavon	9100	1180 in Evesham 395 in Droitwich Spa 285 in Pershore	1,500 at Offenham Road in Evesham 800 at Hampton in Evesham 1,800 at South Droitwich (Copcut) 250 north of Pulley Lane at Droitwich 1000 within 3 urban extensions at Pershore	1900
Malvern Hills	4900	1700 - Great Malvern	1,600 in two urban extensions to Great Malvern	1,600

The current proposals in the SWDP assume a lower level of growth than anticipated in the RSS. The SWDP has a different time horizon to the RSS and it proposes about 20% fewer new dwellings and a 30% lower annual build rate.

Appendix 13

ACPO Strategic Growth Toolkit

An Overview

ACPO STRATEGIC GROWTH TOOLKIT

An Overview

June 2010

*Association
of Police
Authorities*



The Toolkit

- 1) The Association of Chief Police Officers (ACPO) and the Association of Police Authorities (APA) have prepared a toolkit (The Toolkit) to equip forces with a standardised approach to assess the impact of planned growth and to encourage them to engage actively with Local Planning Authorities (LPAs), developers and landowners through the planning system. The Toolkit provides:
 - a) guidance to police forces on how to present a case for securing developer contributions towards policing infrastructure to ensure the delivery of safe and sustainable communities. It establishes a basis for securing developer contributions towards policing which accords with the advice in Circular 05/2005 and CIL Regulation 122.
 - b) advice to police forces on engaging with LPAs to assist in the Forward Planning of local areas.
- 2) This overview of the Toolkit provides local planning authorities and other parties involved in the development process with an understanding of its purpose, and an expectation of how police forces will be engaging with the planning process now and in the future.

Creating Safe and Sustainable Communities through the Planning System

- 3) Historically, police involvement in the planning system has been limited to providing advice on Secured by Design and crime and safety issues as a consultee to planning applications. There has been a long held view by local authorities and applicants that Secured by Design mitigates crime in full and therefore guarantees safe communities.
- 4) Whilst Crime Prevention advice and the implementation of Secured by Design (SbD) in particular aids significant improvements to the safety of local environments, designing out crime alone will not meet all the needs of a modern police service or its local community. Judicious and careful design can assist enormously in this aim and will be championed wherever possible. However, whilst it is acknowledged that design and layout is proven to influence criminal behaviour, new development continues to place a significant additional burden on the police service which is obliged to tackle a wide range of incidents from anti-social behaviour (ASB) to terrorism. Designing out crime and the need for new police infrastructure are therefore not mutually exclusive.

- 5) Additional growth has arisen as a consequence of the housing targets set by Regional Spatial Strategies in England and the Government household projections in Wales. The extent of long term population growth expected to be accommodated by new housing and development across England and Wales is substantial, and will have an unavoidable impact on police resources. While RSS's may be replaced the housing and population growth and demand remains significant in most LPAS.
- 6) In order to maintain adequate levels of policing in the face of an expanding population and associated new housing and economic growth, investment into resources is a necessity to mitigate the resulting impacts. This must be addressed through the planning system.
- 7) There is a direct proven link between new development and the need for new police infrastructure. New development attracts and/or accommodates new population, placing additional pressure on police forces. As the population grows so does the incidence of crime and disorder. New developments can create new or significantly altered communities, and change the character of others, with differing impacts on policing. Accordingly, additional staff, equipment and facilities are required by the police to maintain current levels of resources relative to a greater population.
- 8) PPS12 advises local authorities to engage with police forces through the development of strategic plans for their areas and to understand infrastructure requirements across all services. There has been a misconception that policing is fully funded by the Home Office and Council Tax precept and therefore any infrastructure funding necessary to meet planned development has been or will be met. However, these sources of funding are for revenue expenditure and do not provide for the costs of new growth related infrastructure provision. While borrowing is theoretically possible, it is unsustainable because of its impact on police revenue budgets.
- 9) Therefore, the police require the mitigation of the direct impact of development via Section 106 developer contributions, as is the case with other public infrastructure providers subject to similar resourcing arrangements. ACPO has recognised the significance of the impact of growth by developing the Toolkit and some forces have identified levels of growth as a strategic risk. LPAs are obliged to seek to reduce crime and disorder by the terms of Section 17 of the 1998 Crime and Disorder Act through all its services. Accordingly, the police welcome the opportunity to work in partnership with LPAs towards safety and social sustainability.



The Purpose of the Toolkit

- 10) The Toolkit guides forces in assessing and highlighting the impact of new development, and establishes a national approach to securing planning obligations commensurate with that growth, in order for forces to maintain an adequate level of service. The Toolkit advocates forces engaging in the planning system and encourages involvement in the preparation of Local Development Documents.

What Local Planning Authorities Can Expect from the Police

- 11) The Toolkit recommends proactive engagement by the police with local planning authorities (LPA), to ensure key national, regional and local objectives to reduce crime and the fear of crime are delivered through the Local Development Framework. Often at a local level community safety is a key theme in Sustainable Community Strategies, and as such, should be delivered in spatial terms through the planning system.
- 12) Local authorities should expect to see a change in the level of engagement received from their local police force in the planning process where resourcing permits. This would include some or all of the following:
 - a. LPAs should be provided with a single point of contact at their local force for planning matters – a growth lead and an Architectural Liaison Officer (ALO) or Crime Prevention Design Adviser (CPDA);
 - b. The police growth lead should ensure regular involvement of the police in public and stakeholder consultation events on planning policy documents, to secure clearer policy objectives for safer communities and recognition of the need for police infrastructure to meet the needs of growth.
 - c. Seek robust policies on Crime Prevention through Environmental Design (Secured by Design).
 - d. The police should have a clear understanding of the local authority's future plans to address growth.
 - e. The Police will be involved in Local Strategic Partnerships and Community Safety Partnerships (formerly known as Crime and Disorder Reduction Partnerships) establishing key local objectives and priorities on crime and disorder through the Sustainable Community Strategy, which in turn informs the Local Development Framework. Future growth is expected to be addressed in these forums.

- f. The police should contribute positively to LPA infrastructure planning evidence gathering exercises.
- g. Claims for developer contributions are supported by national guidance and Leading Counsel's written advice.
- h. Developer contributions or obligations in lieu should be supported by infrastructure planning to identify items of infrastructure required to meet the needs of development. This is a key component of the Toolkit which introduces specificity and provides connectivity between the obligation sought and the delivery of infrastructure to secure safer communities. The Toolkit recommends the use of infrastructure plans to underpin all claims for contributions, informed by a robust consideration of the anticipated operational impacts of growth on the Force concerned.
- i. Local Authorities can start to see a consistent approach from forces nationally to requests for developer contributions. This is based on a standard formula to calculating developer contributions, establishing a direct relationship between development, local population growth and the level of police resources required. Some Forces have been using an alternative formula approach which is expected over time to be replaced with the recommended one. The formula is suitable for application to the new CIL regime with some limited modification.
- j. The Police have prepared a "Compendium of Crime Prevention and reduction Advice in the Planning System" This compendium has been produced to assist those operating within the planning system to appreciate the range of national advice and legislation ALO/CPDA's use when considering designs, or planning out opportunities for crime to occur in the built environment. The Compendium draws together all relevant national documents into an easy to use format to assist all stakeholders in the planning process in recognising the need for a consistent approach to safe and inclusive design.

What the Police Expect from the Planning System

- 13) The Police expect Government Planning Policy messages on crime and disorder, and the creation of safer communities to be carried through into Local Development Frameworks. PPS1 is underpinned by an objective to create safer communities and reduce opportunities for crime. PPS12 advises that the police are a key infrastructure provider who should be consulted on its infrastructure requirements arising from new development. Accordingly, the police expect to be effectively engaged in local policy development and to receive specific and sufficient recognition within Local Development Framework policies regarding:
 - The need to plan for safer communities;
 - Identification of the police as a key infrastructure service provider and recipient of developer contributions to fund growth-related infrastructure requirements; and
 - Reference to crime prevention through environmental design with development proposals achieving Secured by Design standards and similar Safer Parking standards through a certification process.
- 14) The police will also expect to engage with LPAs through the development control process. Where planning applications are submitted to the local authority for development proposals, the police may submit a claim for developer contributions as part of the Section 106 Agreement towards police infrastructure costs necessary to mitigate the impact of the development. In such cases, the police would expect to:
 - a. Establish an early dialogue with LPA officers to discuss the opportunities to secure developer contributions towards police infrastructure;
 - b. Have developer contribution claims considered fairly and reasonably alongside all other infrastructure claims
 - c. To be involved in any consideration of issues such as scheme viability that may impact on the scale of contributions secured.
- 15) The Toolkit advocates partnership working with LPAs and recommends the use of a Memorandum of Understanding between forces and LPAs to set out practical working arrangements. The police should always be prepared to defend a case for contributions through application and appeal stages, if necessary, regardless of the strength of local policy support for police contributions.

A Nationally Consistent Approach

- 16) Where forces are able to provide the required resource, LPAs should expect to receive transparent and clear infrastructure planning by police forces to establish the impact of growth on its operations. Local police forces are being recommended to prepare policing plans to set out the infrastructure plan for the Core Strategy period, providing an understanding of the existing police assets, and the additional burden on infrastructure imposed by new development.
- 17) A nationally consistent approach to policing plans and presentation of the formula-based approach to calculating developer contributions is set out within the Toolkit. The recommended structure of a [Policing Plan](#) and [Presentation Document](#) structure are set out in Annex A and B.
- 18) The Policing Plan will be supported by a Presentation Document setting out the methodology for calculating developer contributions and the cost of infrastructure items identified by the policing plan.
- 19) An outline of the police contributions Presentation Document is set out in the Annex B

Managing Expectations

- 20) Some forces are not able to resource a dedicated growth lead which may limit their ability to fully engage the planning system locally. Allowances will need to be made for this when consulting forces, and a lack of or limited response is not indicative of a lack of intent, interest or justification for recognition. Forces will undertake to use reasonable endeavours to respond as best they can within their own resource circumstances.
- 21) Forces are aware that planning obligations are sought for growth related infrastructure costs, and not to supplement other areas. Forces are also aware that scheme viability may be an bona fide issue in some cases, and where that is proven to be the case, are prepared to work with LPAs in determining the appropriate approach to take in relation to planning obligation requirements.



Relevant Q&A Issues

- 22) ACPO and the APA are promoting a national approach among police forces towards developer contributions and infrastructure planning for new police infrastructure to address growth impacts. However, it is recognised that the introduction of the police as a claimant of developer contributions into local areas which have traditionally not sought such contributions may be met with challenge by some.

In order to dispel some common misconceptions about the police service, its funding arrangements and legitimacy of any claims for contributions the Toolkit sets out a number of Question and Answer scenarios to assist Police Forces. A few scenarios are set out below with summaries of the appropriate responses set out in the Toolkit.

Q1 The Police are funded via the Home Office and Central Government. There is no justification for additional funding from planning obligations.

- A1 The funding allocated to Police Authorities via Home Office grant, Council Tax Precept and other specific limited grants is generally insufficient to fund in full request for capital expenditure. Capital programmes are funded generally from a mixture of asset disposal, redirection of revenue funding and prudential borrowing. Any borrowing or redirection of funds will have an impact on a police forces' revenue stream and subsequently the police service within that area. Unless additional funding can be secured towards infrastructure costs, less funding will be available to deliver a visible Police profile within communities, undermining the neighbourhood policing objective of reducing both the incidents and fear of crime and disorder.

Q2 Policing is a public service funded by other means and extends beyond the parameters of planning obligations.

- A2 Community safety is a key planning objective enshrined within PPS1 and is a legitimate spatial planning consideration. The means of delivering community safety inevitably takes a variety of forms from design of buildings and layout planning to the provision of new dedicated police infrastructure. As there is insufficient funding to deliver infrastructure out of existing taxation, contributions from development can be justified against the tests in CIL Regulation 122.

Q3 Section 106 contributions towards policing are inappropriate and contrary to the tests respect of Circular 05/2005 (partially appropriate to CIL Regulation 122 on planning obligations).

A3 The CIL Regulation 122 tests require obligations to meet the following tests:

- a) necessary to make the development acceptable in planning terms;
- b) directly related to the development; and
- c) fairly and reasonably related in scale and kind to the development.

Developer contributions towards policing based on the Toolkit's formula-based approach meet these tests on the following grounds:

a) With an increase in population there is an increase in development (dwellings/employment) to support that population. Housing development is the spatial consequence of population increase and changes to demographics which can lead to a need for policing infrastructure. It is appropriate to conclude that it will have a direct impact on the ability of the police to provide an adequate service and therefore seek contributions from housing and other development.

b) The formula-based approach anticipates that there will not necessarily be a direct relationship between population growth and housing growth based on current household size. A discount factor is therefore applied to ensure there is proportionality between new population and new dwellings. It is appropriate to seek contributions towards community safety from employment and housing developments which will have a direct impact on delivery of the police service in an area.

c) The formula based approach serves to ensure that development proposals will contribute towards the appropriate proportion of police infrastructure to maintain the ratio of police staff and accommodation to the expanded population.

Q4 A development scheme has fully incorporated Secured by Design principles to minimise the potential for crime. Therefore the scheme would not place any additional burden on the Police to justify seeking contributions.

A4 The inclusion of design measures to reduce opportunities for crime will assist in delivering sustainable communities. However, designing out crime and disorder will certainly not remove all activity and there remains a key role for the police to play in both responding to crime and disorder and in prevention and reducing the fear of crime and disorder. Secured by Design incorporates measures to increase natural surveillance. This in turn not only aids preventing crime but contributes to the detection of crime and ASB which otherwise may have gone undetected. Therefore infrastructure delivery is required in addition to design measures.

Q5 Section 106 contributions should not be used to remedy existing deficiency.

A5 The Methodology does not seek to address existing deficiencies in service provision; it is based on population increases and is proportionate to an acceptable level of service required to support that population.

Q6 There is no evidence to suggest that new residents will engage in criminal activity and therefore no direct link between crime and development.

A6 Whilst it is not possible to prove that any particular development will have a definite impact on crime rates, it is reasonable to assume an average rate of incidents per quantum of population. It will only ever be reasonable to assume that an existing ratio will continue unless there is clear evidence to assume otherwise. New developments and their occupants can generate the need for police involvement through being a target/victim or perpetrator/cause of crime and disorder on or off site.

Securing Contributions - Examples of Success

23) An increasing number of Forces within England and Wales have already made, or are making, significant efforts to establish policy support for planning obligations towards police infrastructure. Details of further such cases nationally and where achieved locally can be provided on request from your local police Force.

Further Contact

- 24) Forces actively involved in growth planning welcome any opportunity to discuss the police approach with planning authorities, developers or other interested parties to enhance engagement at a local level, to address relevant issues, and develop constructive working arrangements
- 25) Please contact your local force growth lead for further details. If unknown, please contact the non-emergency police switchboard or Local Strategic Partnership or Community Safety Partnership.



*Association
of Police
Authorities*



Annex A: Policing Plan

Characteristics of the Local Authority Area

Brief description of the district/unitary area, typical crime issues, size of main towns etc.

Current Operational Premises within the LPA

- a) Existing Premises
Brief description of each Police Station/facility
- b) Current Planned Projects
Brief description of proposed facilities, as relevant

Key Current Issues and Priorities

General Trend in Crime and Disorder

Brief description of the types of crime problems affecting the district/unitary.

Current Resource Capacity

Property and Staff

Brief description of current staff resources and the need for additional staff and property to meet the demands arising from growth.

Expected Impact of Planned Growth Within the Local Authority Area (& Where relevant a wider police Command Area or other Adjacent LPAs)

The need for full time equivalent staff, at all operational and support levels including the local Police Area Command(s) and force level.

Requirements for Policing the Expanded LPA to Ensure an Effective Police Service Delivery to Current Standard

Property Requirements

The need for additional vehicles, for example:

- Patrol or Neighbourhood Policing car
- Neighbourhood Policing vans or mobile Police Stations
- Bicycles





Annex B: Police Contributions Presentation Document

Introduction

- National Planning Policy context to policing and securing safer environments
- PPS1
- Safer Places – The Planning System and Crime Prevention
- Planning & Compulsory Purchase Act 2004

Definition of Community Safety

Safety and security is a fundamental requirement of sustainable communities, it covers a wide range of activity designed to reduce the likelihood of crime, disorder anti social behaviour, road casualties and fires which impact on people's quality of life. Importantly it also involves reducing the fear of crime, to promote people's sense of well-being, and reducing the harm caused by drug and alcohol misuse and behaviour damaging to the environment.

Why Community Safety from a Policing Perspective is so important

Description of the form police community safety infrastructure takes locally including a description of the typical hierarchy of police facilities and services.

New Developments

Outline of formula-based approach to seeking contributions from development schemes to ensure there is transparency and consistency in the approach to calculation of contributions.

The formula-based approach applies a cost per new dwelling and unit of business floorspace to all development. The methodology proposes that any increase in population within a policing area will have an impact on the ability of the police force to deliver an efficient and effective policing service. Accordingly it is appropriate to require a proportionate contribution from each new unit of accommodation that has an impact on delivery of the service.

To enable continued delivery of an efficient and effective police service in response to planned growth, the



Presentation Document will identify where expansion of infrastructure will be required including reference to increasing capacity outside a local planning authority area, for instance at county/force level(s).

Reference made to the Policing Plan and how the area would be policed by the additional infrastructure.

It will not be the case that each individual development will give rise to a direct need for a specific item of infrastructure. However all development will contribute towards a cumulative impact on delivery of the policing service, and as such it will be appropriate to pool contributions, in accordance with the advice currently contained at paragraphs B21-24 of Circular 05/2005 and paragraphs 2.18-2.20 of the DCLG Planning Obligations: Practice Guidance.

Pooled contributions would be used by the Police to provide additional policing infrastructure required to maintain an efficient and effective policing service within the local policing area. This could take a variety of forms ranging from purpose-built new facilities, to extension and adaptation of existing buildings to create additional capacity e.g. standard office accommodation and larger custody provision.

In accordance with guidance within Circular 05/05 the Police Authority would be required to ring fence contributions and report to the Local Planning Authority on how monies generated through planning obligations had been used. Any monies not expended within a timescale to be specified within the legal agreement would be returned.

Methodology for Calculating Contributions

STEP 1

Derive an incident ratio per head of population.

STEP 2

Establish an acceptable ratio of incidents to police officers.

STEP 3

Derive the additional infrastructure requirement from the additional staff quotient numbers required to provide effective policing.

STEP 4

Divide the projected infrastructure costs by the planned number of new dwellings to give a standard charge per dwelling. This figure requires adjustment to determine a new resident occupancy rate per new dwelling and a proportionate charge per new dwelling.

STEP 5

Apportion the total cost per dwelling between residential and employment development.

STEP 6

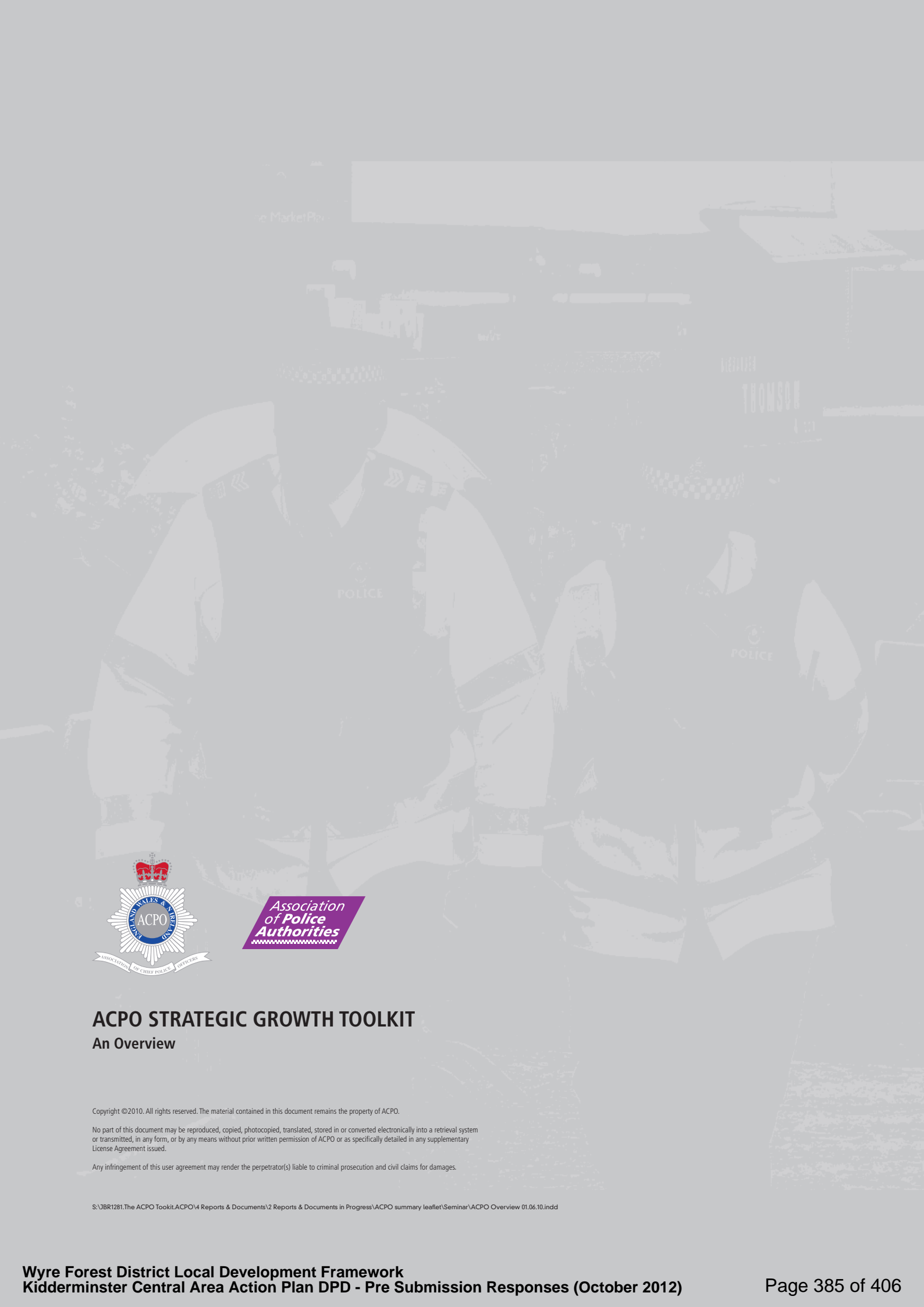
Adjust the standard charge per dwelling to reflect occupancy rates of new residents. This is achieved by dividing the projected number of new residents by the forecast number of dwellings.

Worked Example of Formula

Developer contributions by Use Class (based on accepted residential ratios and employment densities):

- Residential
- Retail (A1-A5)
- Leisure/recreation
- Hotels
- B1 Offices
- B1 Light Industrial
- B2 General Industrial
- B8 Warehousing





ACPO STRATEGIC GROWTH TOOLKIT

An Overview

Copyright ©2010. All rights reserved. The material contained in this document remains the property of ACPO.

No part of this document may be reproduced, copied, photocopied, translated, stored in or converted electronically into a retrieval system or transmitted, in any form, or by any means without prior written permission of ACPO or as specifically detailed in any supplementary License Agreement issued.

Any infringement of this user agreement may render the perpetrator(s) liable to criminal prosecution and civil claims for damages.

S:\JBR1281.The ACPO Toolkit\ACPO\4 Reports & Documents in Progress\ACPO summary leaflet\Seminar\ACPO Overview 01.06.10.indd

Appendix 14

WMP Medium Term Financial Plan

Appendix 14

WMP Medium Term Financial Plan (February 2012)

	Year 1 2011/12 £m	Year 2 2012/13 £m	Year 3 2013/14 £m	Year 4 2014/15 £m	Year 5 2015/16 £m
West Mercia net spending before specific grants	218.188	211.314	214.535	218.811	223.425
<u>Medium term budget reductions</u>					
Strategic Alliance 2013/14			-5.000	-5.000	-5.000
2014/15				-6.000	-6.000
2015/16					-6.073
	218.188	211.314	209.535	207.811	206.352
<u>Funding</u>					
Specific grants	-7.723	-8.415	-0.711	-0.711	-0.711
Formula Funding grants	<u>-126.204</u>	<u>-119.720</u>	<u>121.237</u>	<u>116.834</u>	<u>118.794</u>
	-133.927	-128.135	-121.948	-117.545	-119.505
Council tax	<u>-79.352</u>	<u>-79.949</u>	<u>-81.861</u>	<u>-84.317</u>	<u>-86.847</u>
Total funding before use of reserves	-213.279	-208.084	-203.809	-201.862	-206.352
Gap before use of reserves	4.909	3.230	5.726	5.949	0
Use of reserves		-3.230	-5.726	-5.949	0
Met by underspend in 2011/12	-4.909	-	-	-	-
Budget imbalance for the year	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Cumulative total of medium term reductions			-5.000	-11.000	-17.073

Elaine Wilcox

From: Nick Willcox [nick.willcox@btinternet.com]
Sent: 24 August 2012 17:01
To: Wyre Forest Planning Policy; office@wyreforestconservatives.com
Subject: Comberton Island Consultation

Dear Planning Policy Department,

We tried to comment on the Comberton Island proposals using the web site "add coments" box, however it refused to accept any data telling us it was "not available for consultation".

What we wished to say was that whilst supporting the idea of improving the access to town from the Comberton Hill area and agreeing that the pedestrian subways are distinctly off putting, we are convinced that the last thing Kidderminster [or the environment in general] needs is another set of traffic lights. In addition given the speed that some motorists choose to drive around the ring road, relying on frequently ignored or jumped red lights to ensure safe passage does not inspire us with confidence.

Is there no way to allow the pedestrians to be above the traffic, maybe with a Victorian style lattice work footbridge for one section & some paved areas such as those found around Paradise circus [and some other islands] in central Birmingham. Presumably the cost of such a scheme will be too great so we will be saddled with something that will probably contribute more to the rush hour traffic chaos at this point & will finish up costing far more in the long run. This higher cost however will be borne by the individual motorist & businesses by time delays & fuel consumption & not the highways authority, who will however need to cover the continual running & long term maintainance costs of complex electrical equipment.

Yours faithfully
The Willcox family
123 Sutton Park Road

CD/1732A/54(14Sept12)WyreForest

Local Development Framework Team
Planning Department
Wyre Forest District Council
Duke House
Clensmore Street
Kidderminster
DY10 2JX

Peacock & Smith Limited
Suite 9C
Joseph's Well
Hanover Walk
Leeds
LS3 1AB
T: 0113 243 1919
F: 0113 242 2198
E: planning@peacockandsmith.co.uk
www.peacockandsmith.co.uk

14 September 2012

Dear Sir/ Madam

**WYRE FOREST DISTRICT COUNCIL: LOCAL DEVELOPMENT FRAMEWORK
COMMENTS ON BEHALF OF WM MORRISON SUPERMARKETS PLC**

We write on behalf of our client, Wm Morrison Supermarkets Plc ('Morrisons'), in respect of the emerging Local Development Framework. As such, we thank you for providing us with an opportunity to comment on the publication Site Allocations and Policies DPD and the Kidderminster Central Area Action Plan DPD.

Morrisons is a major food and grocery store operator, which currently operates a store on Green Street in Kidderminster Town Centre and would therefore like to be kept informed of documents which will comprise the Local Development Framework.

Our client has the following comments to make on the Kidderminster Central AAP.

Appendix C - Primary Shopping Area designation

We object to the map contained at Appendix C which shows the extent of the proposed Primary Shopping Area for Kidderminster Town Centre. In particular, our client objects to the exclusion from the Primary Shopping Area of the existing Morrisons store at Green Street. The store lies to the south east of the identified Primary Shopping Area.

The store is a key anchor store for Kidderminster Town Centre, and generates a significant number of linked trips between the store and the town centre, thus helping to ensure that the vitality and viability of Kidderminster Town Centre is maintained. We therefore suggest that the boundary of the Primary Shopping Area is amended to include the Morrisons store at Green Street.

Policy KCA.HP1: Heritage Processions Area

We object to the above policy which relates to the Heritage Processions Area and identifies a list of various uses which will be promoted. Our client objects to the restrictive nature of the range of uses which the Council will promote in the area.

Managing Director: Peter R.B. Wood Dip TP, MRTPI
Directors: Chris Creighton BA (Hons), MTP, MRTPI
Mark Eagland BA (Hons), MTP, MRTPI
Senior Associates: Cassie Fountain BA (Hons), Dip TP, MRTPI
Ed Kernsley BA (Hons), Dip TP, MRTPI
Steve Buckley BA (Hons), BPI, MRTPI
Anthony Ferguson MA (Hons), MRTPI
Associates: Sarah Worthington MPhil (EnvPI), MAUED, MRTPI
Jon Beeson BA (Hons), Dip TP
Gareth Glennon BA (Hons), MA, MRTPI
Cara Ware MTCP (Hons), MRTPI
Consultant: Robert Smith Dip TP, MRTPI
London Office Address:
Second Floor 1 Naoraji Street London WC1X 0GB T:0203 122 0030

In the current economic climate, it is suggested that the Council should encourage a wide range of uses, to assist in ensuring development can proceed with viable schemes, which can benefit the area.

We therefore suggest that the following text is deleted:

"A mix of uses in this area will be promoted, including:

- *C1 Hotel*
- *C2 Residential Institutions*
- *C3 Residential*
- *B1(a) Office*
- *B1(c) Light industrial*
- *D1 Non-residential Institutions"*

And replaced with the following:

"A mix of uses will be promoted in this area appropriate to the edge-of-centre location"

Policy KCA.HP2: Frank Stone

We object to the above policy which relates to the Frank Stone building and identifies a list of acceptable uses.

Our client considers that the range of uses identified as acceptable are unnecessarily restrictive and inconsistent with the range of uses identified in paragraph 15.14 which includes *"other employment uses"*.

We therefore suggest that the following is deleted:

"On the Frank Stone site the following uses will be acceptable:

- *C3 Residential*
- *B1a Office*
- *B1c Light Industrial*
- *D1 Non-residential Institutions"*

And replaced with the following:

"The Frank Stone site will be suitable for a range of commercial or residential uses"

We trust that the above is self-explanatory and that amendments to the document will be made in-line with our recommendations. Please do not hesitate to contact Clare Dickinson or Kate Tinsley at the address overleaf should you have any queries.

Yours faithfully



PEACOCK AND SMITH

Elaine Wilcox

From: BEVERLEY DREW [beverleydrew@virginmedia.com] on behalf of Wolverley and Cookley Town clerk
Sent: 12 September 2012 12:14
To: Wyre Forest Planning Policy
Subject: Pre submission publication of Wyre Forest District Site Allocations and policies and Kidderminster Central Area Action Plan Development Plan Documents

Dear Rebecca

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 therein,

Kind Regards,

Mrs Bev Drew
Clerk to Wolverley & Cookley Parish Council

01562 850435 / 07702 521072

wolverleyandcookleyparishcouncil.org.uk
bev100@tiscali.co.uk



Ms Rebecca Mayman
Planning Policy Manager
Wyre Forest District Council

14 September 2012

Our ref: MW/HLB
Ask for: Martyn Wilson

Dear Ms Mayman

Pre-Submission Publication of Wyre Forest District Site Allocations and Policies Development Plan Document (DPD) and Kidderminster Central Area Action Plan Development Plan Document (DPD)

Recommendation: That these comments are taken into account in the determination of this proposal.

Worcestershire County Council welcomes the opportunity to comment on the above consultation. Officer comments on the consultation are set out in the following pages. These comments include those from Strategic Planning & Environmental Policy, Minerals & Waste, Transport, Economy and Worcestershire Archive & Archaeology Service.

In responding to the impact of the economic recession on Worcestershire, the County Council has set out a new vision and strategic direction which recognises the fundamental role that the economy has in contributing to the economic, environmental and social prosperity of Worcestershire's communities. The new corporate Plan 'A Prosperous Worcestershire' reflects the need for change within key "areas of focus" including:

- **Open for Business** - to include the needs of business, infrastructure, flood risk and transport.
- **The Environment** - to include green infrastructure (biodiversity, landscape, archaeology), flood risk and the built environment.

Ahmed Goga
Head of Economic
Development and
Planning

County Hall
Spetchley Road
Worcester
WR5 2NP

The County Council is working with partners to develop the frameworks that will assist the delivery of this new direction including the Worcestershire Infrastructure Strategy, Green Infrastructure Strategy, Renewable Energy Strategy and the Worcestershire Local Flood Risk Management Strategy. The County Council has linked the response set out below to these areas of focus.

Long term restructuring of the economy is required to address enduring issues of business disinvestment, unemployment, poor skills and low aspiration in both Kidderminster and the wider Wyre Forest District.

The wider regeneration of Kidderminster articulated through the ReWyre initiative provides a long term vision within which many of the sites identified in the submission documents sit. Early delivery of these sites will provide confidence, but will require co-ordination between public and private sector organisations to maximise sustainable economic impact.

The County Council is keen to play an active role in working with and supporting partners including the Worcestershire LEP, the ReWyre Board and the North Worcestershire Economic Development and Regeneration team, in shaping the future prosperity of Kidderminster and Wyre Forest District.

Notwithstanding this, the County Council is however required to balance its statutory responsibilities with its role as a partner in the regeneration of both Wyre Forest District and Kidderminster. The County Council has highlighted areas which it considers require further consideration in order to safeguard and future proof the performance of the environment, economy and infrastructure and these include:

Open for Business

The Council has significant concerns with the Submission document as currently written, in that it is considered to not be in accordance with the Waste Core Strategy and could exclude waste management, which could usefully and appropriately be located on employment land. The permitted uses proposed in the Submission for this site, Use Classes B1, B2 and B8, could deter waste development from the site.

If the document were to proceed as currently worded it would give us significant concerns regarding conformity with the Waste Core Strategy. In the spirit of the Duty to Cooperate we would welcome further discussion of this particular matter to reconcile current concerns.

To pass the test of soundness a *"plan should be deliverable over its timeframe and based on effective joint-working on cross-boundary strategic priorities such as sound infrastructure delivery planning"*. The pre-submission documents are not currently accompanied by an up to date Infrastructure Delivery Plan. However, the County Council is happy 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.

The Environment

The County Council welcomes the emphasis placed on promoting opportunities to improve water quality, the re-charge water bodies and the use of SuDS to reduce the risk of flooding and considers this to pass the test of soundness.

However, we would welcome greater recognition of the statutory role of Wyre Forest District Council as a Risk Management Authority (as defined by the Flood and Water Management Act) and particularly the requirement to have regard to the Local Flood Risk Management Strategy (LFRMS). 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 LFRMS.

Worcestershire Archive & Archaeology Service has worked closely with Wyre Forest District Council in drafting of the historic environment content in the DPD and is supportive of the proposed policies subject to the detailed comments that follow being addressed.

Open for Business

Site Allocations & KCAAP - Infrastructure Delivery

1. To pass the test of soundness a *"plan should be deliverable over its timeframe and based on effective joint-working on cross-boundary strategic priorities such as sound infrastructure delivery planning"*. The pre-submission documents are not currently accompanied by an up to date Infrastructure Delivery Plan. However, 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.
2. We would welcome more detail with regard to delivery methods, role, responsibilities etc, especially around transport interchange, railway station etc, and the role planning and the public sector may play in this.

For example the KCAAP recognises that development will need to contribute to island improvements at Eastern Gateway, but there may be other schemes that require funding.

Site Allocations & KCAAP – Transport

3. We welcome the inclusion within the documents of supporting mixed use developments within the KCAAP. Correctly located and designed mixed use sites can help to reduce the need to travel and therefore reduce the impact development will have on the transport network. The policies to improve pedestrian connectivity throughout the area are also welcomed which as above can have a positive impact on the transport network.
4. We support the objectives contained within Section 6, Sustainable Transport. We will continue to work closely with Wyre Forest to realise their ambitions for Kidderminster. This work will be achieved through our ongoing LTP3 Kidderminster Town Centre Strategy Package works which are currently underway.
5. We will also continue to work with Wyre Forest District Council to review the Ring Road and establish to what extent it is possible to improve pedestrian and cycle connectivity across and through the ring road but still providing appropriate vehicle 'space' to ensure the economic vitality of the Town centre.

Site Allocations & KCAAP - Minerals and Waste Planning

6. The County Council is in general supportive of the approach to promoting sustainable economic growth in Wyre Forest and Central Kidderminster. However, notwithstanding the above we would advise that the test of soundness would be improved and would align more closely with the Worcestershire Waste Core Strategy (now found sound, to be adopted in November 2012) if Wyre Forest DC was to propose an "Additional change" so that it referred to:
7. The need for all new development to comply with the Waste Core Policy "Making Provision for waste in all new development" (ref WCS14 in all currently published documents but to be WCS 16 in the version to be adopted, currently being formatted.) That policy states that *"proposals for new development will be permitted where:*
 - *they incorporate facilities into the design that allow occupiers to separate and store waste for recycling and recovery; or*

- *developer contributions are made, for proposals where this is more appropriate than provision of on-site facilities; or*
 - *the existing provision is adequate".*
8. The supporting text in the WCS states:
9. *"The level of onsite provision of facilities for the separation or storage of waste should be adequate to meet the needs of the proposed development and the type and amount of waste arising from occupation.*
10. *On smaller sites provision might include collection points for segregated waste. On larger sites, particularly where significant areas of new housing or employment land are proposed, waste storage facilities will almost always be needed and provision might also include on-site treatment facilities such as community composting, anaerobic digestion forming part of a district heating system or, in the case of industrial operations, the management of specific wastes produced on site.*
11. *The ADEPT report "Making Space for Waste" (The Association of Directors of Environment, Economy, Planning and Transport guidance "Making Space for Waste Designing Waste Management in New Developments: A Practical Guide for Developers and Local Authorities" available on www.worcestershire.gov.uk/wcs) sets out specifications for the minimum standards for the type, and scale of facilities and vehicular manoeuvrability needed for new residential, commercial and mixed use developments. All applications will be assessed against this or other appropriate guidance. 7.5. Where developer contributions are more appropriate than on site provision, the level of contribution will be determined in accordance with the City, Borough, District or County Council's policy on developer contributions as appropriate".*
12. The council is concerned with the very precise definitions of the uses proposed for the South Kidderminster Enterprise Park and Previously Developed Sites in the Green Belt, specifically that Policies SAL.SK1, SAL.SK2, SAL.SK3, SAL.PDS1 (Rushock) are defined rather precisely as "B1, B2 and B8 development).
13. Waste management development does not necessarily or easily fit into these definitions; appeal decisions have determined some waste development to

be B2, some "sui generis" and (with the exception of landfills and incinerators) they are best considered as akin to B2.

14. As currently written the Submission document is not in accordance with the Waste Core Strategy, in that it could exclude waste management which could usefully and appropriately be located on employment land. Annex A of the Waste Core Strategy states *"58 areas of search have been identified as being potentially suitable for most waste management facilities"* these include the Former British Sugar Site. The permitted uses proposed in the Submission for this site, Use Classes B1, B2 and B8, could deter waste development from the site.
15. The council considers that the Submission would be improved if the supporting text in part 8 of the Submission included the terms used in the proposed Phase Two Revision of the WMRSS, that proposals for the Employment Land Provision needed to achieve a 5 year reservoir of *"readily available employment land"* outside of town centres, regional employment sites, regional and major investment sites would include *"land suitable for development within use classes B1 (except offices located in town centres), B2 and B8 uses and also some sui generis uses such as waste management facilities which have characteristics and require land and property requirements that would normally only be found in employment areas."* (Source: WMRSS Phase 2 Revision p96 footnotes 1 and 2) These concepts and the terms used were accepted by the Panel in their Examination of the proposed Phase 2 revision.
16. The Council would welcome the inclusion by Wyre Forest District Council of the "Additional Changes" to the Publication document proposed above and the inclusion of the supporting text along these lines and will readily agree to a Statement of Common Ground to this effect.

Site Allocations DPD - A Good Place to do Business

17. Section 5.6 refers to the importance of planning documents reflecting the aims and ambitions of the LEPs, but this must be a two-way exchange. It is equally important for the LEPs to take account of the aims and ambitions of the Core Strategy, and to help inform and influence planning documents such as the Site Allocations DPD.
18. In part 2 of Policy SAL.GPB1 'Employment Land Allocation', it should read *"no adverse effect"* (rather than *affect*).

19. Section 5.13 states that "future proposals to convert new buildings [created by redevelopment of existing rural buildings to economic use] into residential dwellings will be prohibited". The strength of the economic argument in individual cases will be important here, as the NPPF states (at section 51) that local planning authorities "*should normally approve planning applications for change to residential use and any associated development from commercial buildings (currently in the B use classes) where there is an identified need for additional housing in that area, provided that there are not strong economic reasons why such development would be inappropriate*". This approach also seems important enough to warrant inclusion in the policy itself, rather than being part of the reasoned justification.
20. The District Council should also be mindful of government intentions to re-introduce proposals to enable the change of use from commercial to residential announced September 2012 by the Secretary of State.
21. The value of section 5.14 is questioned, as it essentially just repeats part 2 of the policy itself.

The Environment

KCAAP & Site Allocations - A Proactive Approach to Sustainable Development

22. Policy SAL.PFSD1 & KCA.PFSD1 'Presumption in Favour of Sustainable Development' are both designed to reflect the presumption in favour of sustainable development in the NPPF, and does so.

Site Allocations - Renewable Energy Policy

23. Paragraph 6.32 – states that no sites are allocated at the current time however the NPPF states that LPA's should:
24. "*Consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure the development of such sources*".

Site Allocations - Historic Environment

25. Worcestershire Archive & Archaeology Service has worked closely with Wyre Forest District Council in drafting of the historic environment content in the DPD and policy. So, overall we are very happy with the product all bar a couple of points, which are:
26. Paragraph 7.43: the opening statement - *Wyre Forest District contains a variety of heritage assets, including buildings, areas, monuments, landscapes and archaeology* – we feel might benefit from clarification.
27. We assume by *areas* the statement is referring to conservation areas we would welcome clarification on this matter. However, if it is a reference to more generic areas of historic significance then we would welcome the inclusion of a statement that clarifies this for example: areas of special historic character. We understand the ambition to minimise policy wording but would welcome clarification on this matter.
28. Paragraph 7.48: We consider that the paragraph of statistics should include that the District also contains *in excess of 3000 currently known heritage assets recorded on the Worcestershire Historic Environment Record*.
29. The council strongly supports the way sites of geological interest are addressed in paragraphs 7.31, policy SAL.UP5, paragraph 7.35 and the associated table and the inclusion, by name, of all the sites of geological interest in the district. We believe that this in accordance with the NPPF and reflects the attention and protection they deserve.

Site Allocations & KCAAP – Water Management and addressing flood risk

30. The emphasis in this policy and the reason and justification in promoting opportunities to improve water quality, the re-charge of water bodies (to prevent drying out) and the use of SuDS to reduce the risk of flooding are very much welcomed.
 31. However, notwithstanding the above, in addition to the SAB function the Flood and Water Management Act places a statutory duty on Worcestershire County Council as the Lead Local Flood Authority to prepare a Local Flood Risk Management Strategy for Worcestershire (currently being developed).
 32. Wyre Forest District Council is a Risk Management Authority (as defined by the Act) and has a "*duty to exercise their flood risk management functions in a manner consistent with local and national strategies and to have regard to those strategies in their other functions*".
-

33. Developers will also have a vital role to play in delivering the outcomes of risk management strategy. Planning authorities should take necessary regard of not just the statutory planning framework and the National FCERM Strategy, but also the Local Flood Risk Management Strategy. In so doing, future developments proposals will need to give proper regard to the local flood risk management strategy including the risk of flooding from surface water, groundwater and ordinary watercourses.
34. 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.

Site Allocations - Green Belt

35. Policy SAL.PDS1 – assume paragraph requires a bullet point.
36. Previously Developed Sites in Green Belt Policy SAL.DPS1 (ii) states that new development should not exceed the height of existing builds and other structures. This appears to at least partly duplicate (a) which states new development should not normally protrude above the existing development and trees. However, (ii) is much stronger in its wording stating "should not" whereas (a) states "not normally". We would welcome consistency in the terminology used.

Site Allocations - Green Infrastructure

37. The County Council is generally supportive of the approach to Green Infrastructure in Policy SAL.UP3. We would however refer to our previous comments at paragraph 1 (of this document) with regard to infrastructure delivery and this should include green infrastructure delivery and implementation.
38. The County Council does however have general concerns with regard to the potentially narrow approach to the interpretation of GI, limiting it to canals and river corridors (please see appendix 1). We would welcome the opportunity for collaborative working on this matter via the Worcestershire Green Infrastructure Partnership.

Monitoring and Implementation

Site Allocations & KCAAP

39. The monitoring and implementation section does not directly identify delivery agencies i.e. those who are responsible for implementing the policies. As identified under the test of 'soundness' for the plan to be effective, however, delivery agencies and implementation are identified in the Core Strategy which it should be read in conjunction with.
40. The table under paragraph 16.6, in the Kidderminster Central Area Action Plan DPD, would also be relevant and useful in this document.
41. It is not clear why all the policies in the KCAAP, have not been included under the table entitled 'Relevant Core Strategy Policies', as they would seem relevant to e.g. Policy KCA.CW1 Castle Wharf mentions Core Strategy Policy CP01, but this is not highlighted in the table.

Appendix 1 – Green Infrastructure comments

Kidderminster KCAAP

Green infrastructure objectives and policy	The listed objectives are very limited; including the role of GI in recreation, landscape enhancement (in an urban context), 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. Policy should be expanded to reflect a greater range of objectives.
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.

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 to deliver biodiversity.
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.

Site Allocations and Policy

Policy SAL.UP3	
Compensatory provision	Any compensatory provision for the loss of GI needs to provide equivalent (or enhanced / increased) multi-functionality.
Compensatory provision	The location of any compensatory provision needs to take into account the functions served by the areas of GI to be lost, and their social, economic and environmental value and the potential impact of the loss of GI on existing communities.
Existing network	There is considerable emphasis within the policy on existing GI corridors. Whilst enhancements to benefit these corridors are to be encouraged, opportunities for new GI provision, especially within new developments or in areas identified as lacking in existing GI provision should be promoted, to provide a

	range of functions including landscape, and biodiversity enhancements, climate change adaptations, informal recreation etc.
Wyre Forest	The role of the Wyre Forest as a GI asset not only for the District, but also as a sub-regional asset is not explored in any detail, and could benefit from greater consideration to both develop its potential and also to develop social and environmental links where appropriate.
SAL.UP5	
Up to date biodiversity action plan	This should be clarified to be the Local Biodiversity Action Plan, or Worcestershire Biodiversity Action Plan (two different ways of referring to the same document)
Special wildlife sites Ecological survey	The correct nomenclature is Local Wildlife sites. Refer to the need to survey for protected and priority species.



Wyre Forest District Local Development Framework – Site Allocations and Policies and Kidderminster Central Area Action Plan Development Plan Documents (DPDs) Publication Stage Representation Form

Ref:

(For official use only)

Please return to: Planning Policy Manager, Economic Prosperity and Place Directorate, Duke House, Clensmore Street, Kidderminster, Worcestershire, DY10 2JX; or by e-mailing this form to Planning.Policy@wyreforestdc.gov.uk

BY 5.30pm on Friday 14th September 2012

This form has two parts –
 Part A – Personal Details
 Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make and remember to specify which document it relates to. Please specify which DPD you are commenting on.

Part A

1. Personal Details*

2. Agent's Details (if applicable)

**If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

Title	Mr		
First Name	Steven		
Last Name	Bloomfield		
Job Title (where relevant)	Conservation Officer – Planning		
Organisation (where relevant)	Worcestershire Wildlife Trust		
Address Line 1	Lower Smite Farm		
Line 2	Hindlip		
Line 3	Worcester		
Post Code	WR3 8SZ		
Telephone Number	01905 754 919		
E-mail Address (where relevant)	stevenb@worcestershirowildlifetrust.org		

Part B – Please use a separate sheet for each representation

Your representation should cover all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

After this stage, further submission will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Name or Organisation :

3. To which DPD does this representation relate? **Kidderminster Central Area Action Plan** (*delete as necessary*)

To which part of the DPD does this representation relate?

Paragraph		Policy		Other e.g. Map, table, figure, key diagram	Whole Document
-----------	--	--------	--	--	----------------

4. Do you consider the DPD is :

4.(1) Compliant with the Duty to Cooperate	Yes	X		No	
4.(2) Legally compliant	Yes	X		No	
4.(3) Sound	Yes	X		No	

Please refer to guidance notes for explanation of terms

If you have entered **No** to 4(3), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is **unsound** because it is not:

- (1) Positively prepared
- (2) Justified
- (3) Effective
- (4) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

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 to be sound in this regard.

(Continue on a separate sheet /expand box if necessary)

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

N/A

(Continue on a separate sheet /expand box if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

N/A

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

|

Date:

7.9.2012