



# Wyre Forest District Council

## Site Allocations and Policies Development Plan Document

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

October 2012



## Contents

1.	Purpose of the Report	1
2.	Publication of the Site Allocations and Policies DPD	1
3.	Overview of Representations	1
4.	Summary of the Main Issues Received by Representations	2
5.	How the Representations Have Been Addressed	8
Appendix A	List of People Notified at Publication Stage	10
Appendix B	Summary of Representations	16

## **1 Purpose of this Report:**

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

## **2 Publication of the Site Allocations and Policies DPD:**

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

## **3 Overview of Representations:**

- 3.1 A total of 253 representations were received from 49 respondents. Of these 91 were from specific consultees and 162 were from general consultees. All representations received were duly made.

#### **4 Summary of Main Issues Raised by Representations:**

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

#### **General**

- Suggestion that the Hurcott ADR should be allocated for development during this plan period.
- Western Power Distribution provide advice on consulting them on development proposals and set out their requirements in terms of relocating electricity infrastructure.
- Worcestershire County Council draw attention to their current work to assist economic development in Worcestershire.
- Worcestershire County Council raises concerns relating to the omission of waste from the DPD and conformity with the Waste Core Strategy.
- Worcestershire County Council would welcome greater recognition of the County's role as a Risk Management Authority.
- Worcestershire County Council supports the historic environment content of the DPD.
- Kidderminster Civic Society support the DPD.
- Worcestershire Wildlife Trust support the DPD.
- Wolverley and Cookley Parish Council are happy with the DPD.
- A site within Rock is proposed for residential development.
- Natural England are satisfied with the HRA and Sustainability Appraisal reports and support the DPD.
- Owners of the Lea Castle site are keen to see a planning framework put into place to enable the re-use of the site.
- Worcestershire County Council are pleased with the collaborative working which has taken place but would welcome more detail on delivery.
- Worcestershire County Council consider that the soundness would be improved if the DPD referred to the WMRSS policy of maintaining a 5 year reservoir of employment land.
- West Midlands Police and Hereford and Worcestershire Fire and Rescue Service have commissioned White Young Green to look at the

infrastructure requirements based on the policies within the Adopted Core Strategy, the Site Allocations and Policies and the Kidderminster Central Area Action Plan DPDs.

- Concern that the document does not identify the amount of space required for green infrastructure.
- Concern that Bewdley should receive a higher proportion of the overall development within the District.
- Concern that housing target within the Adopted Core Strategy is out of date as it is based on the RSS2 Panel Report and not the 2012 Worcestershire SHMA.
- Concern that infrastructure improvements should be given equal status within the policies.
- Concern that some sites allocated before 2006 have not been delivered.
- Concern that no land is allocated for delivering open space.
- Support for policy SAL.PFSD1.
- Suggestion that SAL.PFSD1 should be amended to refer to development being in accordance with the vision and objectives in the DPDs.

#### **A Desirable Place to Live:**

- Support for allocating Blakedown Nurseries for 42 dwellings to be delivered between 2011 and 2016.
- Concern that the DPD does not assess demand for or make provision for self-build.
- Concern that definition of PDL is too simplistic.
- Suggestion that land at Chester Road Allotments currently allocated as open space should be allocated for residential development.
- Suggestion that Reilloc Chain should be phased for delivery during 2011-2021 and that it is not necessary for this site and the Oasis Arts and Crafts site to come forward simultaneously.
- Concern that it should be clearer how the Infrastructure Delivery Plan and flooding sequential testing have influenced the site selection.
- Support for the allocation of the former British Sugar site and for it being delivered between 2011 and 2021.
- Suggestion that land at Moorhall Lane, Stourport-on-Severn should be allocated for residential development.
- Bewdley Town Council suggest that housing in Bewdley should not be restricted to affordable housing only.
- Support for exception sites and suggested change of wording for policy.
- Support for including a replacement dwellings in the open countryside policy with some wording changes suggested.
- Suggestion that more emphasis should be placed on Housing Waiting List data than Housing Needs Survey as it is more up to date.
- Concern that wording odds SAL.DPL6 is at odds with the NPPF and is overly restrictive.
- Concern that wording of SAL.DPL7 is too complicated.

- Concern that requirements for Gypsy, Traveller and Travelling Showpeople accommodation should be revisited on a County wide basis.
- Suggestion that a site at Blackstone, Stourport Road, Bewdley be allocated for accommodation for Gypsies and Travellers, suggestion that this could be restricted to over 55s in the travelling community.
- South Worcestershire have expressed concern regarding the allocation of 3 Gypsy and Traveller sites near their boundary and within an area where provision is already concentrated.
- Environment Agency have expressed concerns over the Gypsy and Traveller site allocations in Stourport-on-Severn.
- Concern that the Gypsy and Traveller policy is too detailed and the policy within the Adopted Core Strategy is sufficient, concern that the reasoned justification and policy are not consistent and concern that there is no reference to cross-boundary working to identify the level of provision required.
- Concern that the 12 month marketing period required in policy SAL.DP11 is too long.
- The Theatres Trust suggest additional wording to SAL.DPL11 to reinforce support for community facilities.
- Concern that policy SAL.DPL11 is too onerous for emergency services.
- Sport England have suggested amendments to SAL.DPL12 to bring it into line with the NPPF.

#### **A Good Place to do Business:**

- BAE Systems suggest that SAL.GPB1 should be amended to allow flexibility to allow employment sites to come forward for other uses where there is no reasonable prospect of them being developed for employment use during the plan period.
- St. Francis Group support the allocation of the former British Sugar Site but raise awareness that delivery may be in the region of 12ha subject to further testing.
- Homes and Communities Agency raise concerns regarding the viability of allocating the Lea Castle site for employment uses and raises concern that the PDL boundary does not accurately reflect the development which remains on the site.
- Worcestershire County Council raise some concerns relating to the conformity of policy SAL.GPB1 with the NPPF.
- Worcestershire County Council question the value of paragraph 5.14.
- Concern that SAL.GPB2 is not consistent with the NPPF with regard to sequential testing.
- Concern that SAL.GPB2 should be limited to Bewdley and Stourport-on-Severn with Kidderminster policy set out within the KCAAP and the 300m distance should be reduced.
- Suggestion that a wider range of uses should be permitted in town centres.
- Retail threshold in SAL.GPB3 should be increased to 380 sq m.

- Suggestion that SAL.GPB4 should be amended to allow car showrooms etc on B1, B2, B8 sites to replace policy E2 of the Adopted Local Plan.
- Concern that specialist retailing listed in policy SAL>GPB4 is too narrow.
- Concern that the plan needs to be more flexible to allow development needed to support the tourism industry.
- Request for an additional policy to be included relating to the tourism function of the waterways.
- Support from West Midland Safari Park for policy SAL.GPB5.
- Support for the use of rail to access the Safari Park.

#### **Adapting to and Mitigating Against Climate Change:**

- Suggestion that more flexibility is needed regarding the bus and cycle route networks in areas outlined for comprehensive redevelopment.
- Concern that rural areas will always be dependant on the private car.
- Suggestion that a stand-alone transport document is needed to bring all transport policies together.
- Suggestion that parking policy should be flexible so that needs can be assessed on a site-by-site basis.
- Suggestion that Proposals Map should show most up-to-date information relating to route of Hoo Brook link road.
- Consideration that freight transport at British Sugar site is not deliverable.
- Suggestion that specific sites should be identified for renewable energy.
- Recommendation that policy SAL.CC7 also refers to development improving and enhancing the status of water bodies under the objectives of WFD.
- Suggestion that the policy repeats policy CP02 of the Adopted Core Strategy.
- Worcestershire County Council wish to see an extra policy relating to the Local Flood Risk Management Strategy.
- Environment Agency wish to see an additional paragraph explaining groundwater flooding, and updated information on water quality.

#### **A Unique Place:**

- Suggestion that stronger emphasis need to be given to safeguarding the Green Belt.
- Amendments are suggested to policy SAL.UP1 to bring it into line with the NPPF.
- Suggestion that policy should be cross-referenced to policy SAL.UP11.
- Concern that Borrington Park is shown as playing fields on the Proposals Map.
- Suggestion that the former settling ponds on Wilden Lane be allocated as an ADR under policy SAL.UP2.
- Concern that the list of ADR sites in policy SAL.UP2 is in rank order and that the numbers should be replaced by bullet points for clarity.
- Request for SAL.UP3 to refer to the tourism potential of the Severn and Stour corridors.

- Suggestion that paragraph 7.48 should refer to Historic Environment Record having over 3000 assets registered.
- English Heritage suggest detailed changes to SAL.UP7.
- Request that additional text is added into SAL.UP7 to ensure that measures to minimise water use are included as well as ensuring water is available for fire fighting and that emergency vehicles can access developments.
- Suggestion that the weight of the 45 degree code needs clarification.
- Suggestion that more detailed guidance should be set out on the design of extensions.
- Suggestion that SAL.UP9 should refer to maintenance of landscaping and boundary treatment.
- English Heritage request that an additional clause is added into policy SAL.UP10.
- Suggestion that SAL.UP11 should also deal with enabling development.
- Environment Agency request additional clause in policy SAL.UP11 referring to safe access.
- English Heritage suggest a number of detailed amendments to SAL.UP11.
- Suggestion that the definition of chalet is clarified in policy SAL.UP12.
- Environment Agency suggest an additional clause in policy SAL.UP12 to refer to safe development.
- A number of amendments are suggested to policy SAL.UP13 to improve clarity.
- Suggestion that policy SAL.UP13 is unsound because it is not positive enough.
- Suggestion that an additional policy on the leisure use of the waterways is included.

#### **South Kidderminster:**

- Suggestion that policy SAL.SK1 is unsound because it is not in conformity with the NPPF.
- Suggestion that the plan invites development of Green Belt land and the SSSI.
- Support for policy SAL.SK1 and its role in enhancing the waterways.
- Suggestion that SAL.SK1 should be more flexible to other uses including residential where sites have been marketed for 1 year without success.
- Concern that uses in SAL.SK1 are too narrow as they do not allow for waste uses.
- Environment Agency request that an additional clause is added into policy SAL.SK2 relating to drainage.
- St Francis Group have requested a number of changes to policy SAL.SK2.
- Natural England have requested an additional sentence in the reasoned justification to policy SAL.SK2 highlighting that public access is not possible at the adjacent SSSI because of the sensitivity of the site.



- Suggestion that SAL.SK3 should be amended to allow Reilloc Chain to come forward earlier in the plan period and in advance of Oasis Arts and Crafts.
- Concern that the allocation for SAL.SK4 is too narrow.

#### **West Kidderminster:**

- Suggestion that policy SAL.WK2 should be directly cross-referenced to policy SAL.DPL11.

#### **Kidderminster Smaller Sites:**

- Objection to the removal of Aylmer Lodge from the residential allocations.
- Suggestion that SAL.DPL11 should be cross-referenced within SAL.KSS1 and that the Broadwaters Community Centre site should be enlarged.
- Environment Agency have requested an additional clause in policy SAL.KSS1 to ensure proposals include remediation.

#### **Stourport Town Centre:**

- Environment Agency have requested an additional clause in policy SAL.STC1, SAL.STC2, SAL.STC3 and SAL.STC4 to ensure proposals include remediation.
- Suggestion that policy SAL.STC2 should be revised to include the medical centre currently being discussed.
- The emergency services have requested an amendment to policy SAL.SK2 to reflect the fact that compensatory provision needs to give services the chance to expand.
- Concern that policy SAL.STC4 will increase retail in Stourport beyond need.

#### **Stourport-on-Severn Eastern Approaches:**

- Concern that site SAL.EA1 is too far from the town centre to be suitable for a foodstore and that sites SAL.EA1 and SAL.EA2 should be addressed through one policy.
- Environment Agency have requested an additional clause in policies SAL.EA1,2, 3, 4 and 5 to ensure proposals include remediation.
- Concern over potential loss of car sales space through policy SAL.EA4.
- Concern that the boundary for site SAL.EA5 needs further consideration where the site borders residential properties.
- Concern that policy SAL.EA5 is not clear as to whether or not changes in the current configuration of open space would be permitted to raise funds to deliver public access.

#### **Stourport-on-Severn West:**

- Concern that the DPD fails to identify sufficient residential sites in Stourport-on-Severn and suggests land at Bewdley Road, Stourport-on-Severn should be allocated.
- Support for policy SAL.WS1.

- Concern that the former MIP site is treated differently to the current MTC site in terms of allocation.
- Environment Agency have requested an additional clause in policy SAL.WS1 to ensure proposals include remediation.
- Suggestion that the former Lucy Baldwin site should use both accesses because of the narrowness of Olive Grove.

#### **Bewdley:**

- Suggestion that site SAL.B1 should not be limited to small scale local needs retail as it is within the town centre.
- Environment Agency have requested an additional clause in policies SAL.B1 and SAL.B2 to ensure proposals include remediation.
- English Heritage suggest an amendment to policy SAL.B1 to consider views across the area.
- Suggestion that land at 18 Wyre Hill is allocated for residential development.
- Suggestion that the Lax Lane site in policy SAL.B2 should be allocated for residents parking.
- Suggestion that Unit 2 Greenacres Lane is allocated for residential development.
- Suggestion that new business on the Lax Lane site would be inappropriate.

#### **Rural:**

- Concern that the allocation of the former Blakedown Nurseries site does not sufficiently meet local need and that the words 'affordable' and 'local housing waiting lists' should be deleted.
- Barratt Homes confirm that the Blakedown Nurseries site is deliverable.
- The Coal Authority have requested additional wording in policy SAL.RS2 to refer to prior extraction of coal resources.
- Boundary in SAL.RS2 is considered inappropriate.
- Concern over infrastructure and the deliverability of SAL.RS2.
- Suggested additional wording in SAL.RS2 reasoned justification to allow site to come forward under two separate applications providing a masterplan is in place for the whole site.

#### **Previously Developed Sites in the Green Belt:**

- West Midland Safari Park support the inclusion of the site but feel the DPD is unsound because the boundary does not include all previously developed areas of the park.
- Concern about landscaping and boundary treatment/screening at Lea Castle.
- Suggestion that the car park should be excluded from the site boundary for West Midland Safari Park.
- Range of uses identified for Lea Castle site are too narrow.

#### **Monitoring and Implementation Framework:**

- Suggestion that delivery agencies should be identified.

**Jargon Guide:**

- Suggestion that the definition of PDL should be amended to include the full NPPF definition.
- Suggestion that definition of 'local housing need' should be revised.

**Policies to be Replaced:**

- Suggestion that SALP should contain a schedule of policies which will survive.
- Blakedown Nurseries site – inaccuracy identified with site boundary.

**5. How the Representations Have Been Addressed:**

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

## **Appendix A – List of People Notified at Publication Stage**

### **Specific Consultees**

#### **Wyre Forest District Parish/Town Councils**

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

#### **Adjacent Parish Councils**

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

#### **Other Specific Consultees**

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

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

## **General Consultees**

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

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

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

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

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

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



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

### Appendix B – Summary of Representations Received

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
Western Power Distribution <a href="#">SALPP30</a>	Document	<p>Identifies that Western Power may have electricity circuits in the areas being identified for development which may run on underground or overhead lines. There may also be electricity sub-stations in these areas.</p> <p>Generally developers would be expected to pay for the diversion of less strategic circuits operating at 11,000 Volts or below which may include undergrounding some overhead lines as necessary.</p> <p>Western Power would normally seek to retain the position of electricity circuits operating at 132,000 Volts, and 66,000 Volts and in some cases 33,000 Volts, particularly if the diversion of such circuits would place a financial obligation on Western Power Distribution to either divert or underground them as Western Power Distribution would not be party to any planning application and as such any obligation would also go against the statutory and regulatory requirements on Western Power Distribution to operate an economic and efficient electricity distribution system.</p> <p>Assuming the required minimum statutory clearances can be maintained and WPD can access its pylons/poles, WPD does not generally have any</p>	Comments are noted.

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
		<p>restriction on the type of development possible in proximity to its strategic overhead lines but it would be sensible for planning guidance and layout of developments to take WPD's position into account and consider uses compatible with the retention of strategic overhead lines, for example such as parking, estate roads, commercial uses or open space, within their immediate proximity. It is worth noting that any existing circuits crossing the proposed development areas in the document may run both overhead and underground. In any case WPD should be consulted on detail at an early stage and WPD are always keen to discuss larger sites with the local authorities at an early stage, so that constraints can be taken into account and sites planned in the most effective way.</p> <p>Where WPD have substations on land being considered for development, WPD should be consulted on the detail of proposals in good time to ensure that the required access can be maintained and catered for and that other requirements for development in the vicinity of substations are taken into account.</p>	
Worcestershire County Council <a href="#">SALPP35</a>	Document	WCC is working with partners to develop the frameworks that will assist the fundamental role that the economy has in Worcestershire, including the Worcestershire Infrastructure Strategy, Green Infrastructure Strategy, Renewable Energy Strategy and	These general comments are noted.

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
		<p>Worcestershire Local Flood Risk Management Strategy.</p> <p>Wider regeneration of Kidderminster through Re-Wyre initiative provides a long term vision within which many of the sites identified in the DPDs sit. Early delivery of these sites will provide confidence but will require confidence through public and private sector organisations to maximise sustainable economic impact.</p> <p>WCC has significant concerns with regard to the exclusion of waste management which could usefully and appropriately be located on employment land. Gives significant concerns regarding conformity with the Waste Core Strategy. Would welcome further discussion of this particular matter to reconcile current concerns.</p> <p>Pre-submission documents not currently accompanied by an up to date Infrastructure Delivery Plan, however WCC is happy to support the proposed documents on basis of continued collaboration in the development of both the Wyre Forest Infrastructure Delivery Plan and the Worcestershire Infrastructure Strategy.</p> <p>Would welcome greater recognition of the statutory role of WFDC as a Risk Management Authority and particularly the requirement to have regard to the Local Flood Risk Management Strategy. Welcome the inclusion of a policy that is consistent with this statutory</p>	

<b>Respondent/ Response Number</b>	<b>Paragraph/ Policy</b>	<b>Summary of Representation</b>	<b>Officer Response</b>
		<p>requirement and identified the need for development proposals to have regard to the emerging LFRMS.</p> <p>WCC Archive and Archaeology Service has worked closely with WFDC in drafting of the historic environment content and is supportive of the proposed policies subject to detailed comments being addressed.</p>	
Kidderminster Civic Society <a href="#">SALPP37</a>	Document	The DPDs together provide an excellent proposed plan for the redevelopment of Kidderminster whilst protecting its heritage and retaining economic progress.	Comments are noted.
Worcestershire Wildlife Trust <a href="#">SALPP66</a>	Document	General comment - The Site Allocations and Policies DPD 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.	Support is noted.
Wolverley & Cookley Parish Council <a href="#">SALPP90</a>	Document	Wolverley and Cookley Parish Council has discussed the document and is happy with its content.	Support is welcomed.
Natural England <a href="#">SALPP215</a>	Document	Satisfied that the HRA provides a systematic and appropriately detailed assessment of both DPDs. Consider that the conclusion that the DPDs will not have a significant effect on European protected sites is reasonable.	Comments are noted and support is welcomed.
Natural England	Document	Satisfied that the Sustainability Appraisal has provided a	Support is noted.

<b>Respondent/ Response Number</b>	<b>Paragraph/ Policy</b>	<b>Summary of Representation</b>	<b>Officer Response</b>
<a href="#">SALPP213</a>		systematic assessment of the Pre-Submission sites in terms of consistency with the principles of sustainable development and likely social, economic and environmental effects. Considers that sustainability objectives are clear and relevant and that they have helped to refine emerging policies.	
Natural England <a href="#">SALPP209</a>	Document	<p>Considers that both DPDs, the SA reports and the Habitats Regulations Assessment accord with the legal requirements and guidance and that they are consistent with the NPPF and relevant local policies.</p> <p>Satisfied that site allocations are evidence based and that the environmental considerations and constraints for each site are understood and addressed adequately.</p> <p>Supports the proposed development management policies.</p> <p>Particularly welcomes the guidance provided on green infrastructure, safeguarding local biodiversity and geodiversity, and water quality and quantity. Pleased to note the reference to SUDs and re-wetting of SSSI wetland.</p>	Support is noted.
Homes & Communities Agency	Document	Together these public sector bodies, the land owners of the former Lea Castle Hospital site, are keen to see a planning policy framework established that is suitably	The comments with regard to the future planning policy framework for the former Lea Castle Hospital site are noted.

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
<a href="#">SALPP207</a>		flexible to maximise alternative future uses which are able to support wider housing choice, job creation and necessary infrastructure provision and ensure positive change through delivery of the site's comprehensive redevelopment.	
Worcestershire County Council <a href="#">SALPP224</a>	Document	<p>The County Council is pleased to support the proposed documents on the basis of continued collaboration with Wyre Forest District Council in the development of both the Wyre Forest Infrastructure Delivery Plan and the Worcestershire Infrastructure Strategy. This continued partnership working will assist in demonstrating the Duty-to-Cooperate.</p> <p>Welcome more detail with regard to delivery methods, role, responsibilities etc, especially around transport interchange, railway station etc, and the role planning and the public sector may play in this. For example the KCAAP recognises that development will need to contribute to island improvements at Eastern Gateway, but there may be other schemes that require funding.</p>	Comments are noted. Officers are currently finalising a Draft District wide Infrastructure Delivery Plan which will prioritise infrastructure. WCC will play a key role in this particularly with their role as Local Transport Authority. WCC Officers will note that they were responsible for working up a fully costed scheme for a new station interchange at Kidderminster in 2010.
Worcestershire County Council <a href="#">SALPP226</a>	Document	Advise that the test of soundness would be improved and would align more closely with the Worcestershire Waste Core Strategy (now found sound, adopted November 2012) if WFDC was to propose an additional change so that it referred to the need for all new development to comply with the Waste Core Policy "Making Provision for waste in all new development"	These comments are noted and Officers will consider further minor amendments to the Delivering Sustainable Development Standards section following discussion with WCC under the Duty to Co-operate.

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
J & H Evans <a href="#">SALPP130</a>	Document	<p>We are instructed by our client to promote a 5 Ha site adjacent to Rock Village for housing development. We propose modifications to a number of Core Strategy policies as follows:</p> <p>DS01 - sequential approach - additional point - where land adjacent to listed rural settlements is made available for 40-55% affordable homes and a minimum of 20% Low Cost Housing giving a combined total of 60-70% for benefit of local and District Need.</p> <p>DS04 - provision of affordable and low cost homes as per DS01 revised criteria to be facilitated by Normal Homes as per para.54 NPPF;</p> <p><b>CP04 - insert after 2nd para - adjacent rural settlements where criteria satisfies DS01 &amp; DS04, minimum combined total for affordable and low cost housing will be 60% and maximum 70%;</b></p> <p>CP05 - after 3rd bullet point -density of development in rural settlements should be in accordance with DS01, DS04 and CP04 and 30-45 dph should be regarded as acceptable so it accords with para 52 of NPPF.</p> <p>DPD is not positively prepared for following reason: WFDC states that there is sufficient land to accommodate 4000 houses 2012-26. This fails to take</p>	<p>The latest SHMA (GVA 2012) shows an annual affordable housing need of 210 dwellings. Given the overall quantum of housing development (200 p.a) which was agreed by the inspector at the Core Strategy examination, there is very limited scope to meet need on this scale. The allocation of 4000 dwellings (2006-26) includes provision of affordable housing as well as market housing. The only affordable housing provision which would be in addition to the dwelling requirement would be on rural exception sites. It is possible that part of this site could be considered as a rural exception site under policy DPL2.</p>



Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
		<p>into account annual need to provide 260 affordable homes. CP04 confirms a likely delivery of 60 affordable homes a year. Thus there is a shortfall of 2800 affordable homes 2012-26. Thus the DPD is not in accordance with para.47 of the NPPF.</p> <p>The DPD is not effective for following reasons:-</p> <p>No proper account has been taken of ongoing need to provide affordable and low-cost homes because of need to provide 4000 normal homes. Existing permissions may be uneconomic to build with high % of affordable housing and % is often reduced by LPA to aid development, but this makes the DPD not in accordance with para.47 of the NPPF. Affordable housing deficiency is compounded each year by reduction of affordable housing % on housing sites. DPD is ineffective because it is not delivering the required amount of affordable housing in a 5 year period.</p> <p>The LPA has failed to identify sufficient land to accommodate at least 100 affordable homes annually for the next 5 years and so the DPD is wholly flawed and unsound.</p> <p>The LPA is requested to modify the plan to incorporate 5 hectares of land (or a part of it) in order to provide sufficient land to accommodate at least some of the</p>	

<b>Respondent/ Response Number</b>	<b>Paragraph/ Policy</b>	<b>Summary of Representation</b>	<b>Officer Response</b>
		serious need for affordable and low cost housing. The landowner is also willing to consider making the rest of the field available for facilities such as a primary school, play area and small shops.	
Worcestershire County Council <a href="#">SALPP231</a>	Introduction and Context	Considers submission would be improved if reasoned justification in Part 8 included the terms used in the Proposed Phase 2 Revision WMRSS - that proposals for the Employment Land Provision need to achieve a 5 year reservoir of readily available employment land. These concepts used were accepted by the Panel in their Examination of the proposed Phase 2 Revision. Proposed inclusion of the supporting text along these lines and agree to a Statement of Common Ground to this effect.	Noted. However, the District's Adopted Core Strategy sets out a very clear strategic policy with regard to the retention and provision of employment sites within the District to 2026, which at the time was guided by the WMRSS Phase 2 Revision. It is not therefore considered necessary to introduce this text into the site specific allocations. No further change required.
Core11 <a href="#">SALPP2</a>	Paragraph 1.1	Requests that clarification as to why the Site Allocations and Policies are compliant with legislation is included at paragraph 1.1.	Comments are noted, however it is felt that paragraph 1.2 clarifies the relationship between the Core Strategy and the Site Allocations and Policies DPD.
Core11 <a href="#">SALPP3</a>	Paragraph 1.2	The Core Strategy (2006-2026), should be identified as the prime legal document as adopted by WFDC.	Comments are noted, however it is felt that paragraph 1.2 clarifies the relationship between the Core Strategy and the Site Allocations and Policies DPD.
Core11 <a href="#">SALPP5</a>	Paragraph 1.5	Suggests that walking and cycling infrastructure should be integral to development proposals to be in conformity with the Core Strategy. Suggests that it should be made	Comments are noted, however it is felt that paragraph 1.2 clarifies the relationship between the Core Strategy and the Site Allocations and

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
		clear in the DPD that the Core Strategy is the prime legal document and the Site Allocations and Policies is in conformity with that.	Policies DPD.  The Adopted Core Strategy is part of the development plan for the District, as both the Site Allocations and Policies and Kidderminster Central Area Action Plan DPDs will be once adopted. The NPPF is national policy and is a material consideration in the determination of planning applications.
West Mercia Police <a href="#">SALPP254</a>	Paragraph 1.9	<p>Paragraph 1.9 states that an Infrastructure Delivery Plan (IDP) supported the site selection process leading to the present SAPDPD publication document.</p> <p>WMP and HWFRS are aware that work by Wyre Forest District Council on the IDP is taking place in partnership with Worcestershire County Council's work on an infrastructure plan for Worcestershire as a whole.</p> <p>To assist the two councils with respect to emergency service infrastructure planning matters, WMP commissioned consultants WYG to undertake a Strategic Infrastructure Assessment (SIA) to identify the police infrastructure required to serve growth and identify where and when that infrastructure will be required, based on the proposals in the adopted Wyre Forest Core Strategy, Pre-submission Site Allocations and Policies DPD and the Pre-submission Kidderminster</p>	Comments are noted. The SIA will be used to help inform the development of both the County and the District Infrastructure Delivery Plans.

<b>Respondent/ Response Number</b>	<b>Paragraph/ Policy</b>	<b>Summary of Representation</b>	<b>Officer Response</b>
		Central Area Action Plan DPD.	
Environment Agency <a href="#">SALPP179</a>	Paragraph 1.9	<p>Two of the documents listed are not available for review and we understand that they are still being undertaken by the Council to inform the evidence base.</p> <p>There appears to be no clear cross reference with the evidence base as the Sequential Testing (Flooding) document and Infrastructure Delivery Plan are still being completed. It is difficult to comment on the soundness of the plan as we have not seen the contents of these two key evidence base documents.</p> <p>As the Sequential Testing (Flooding) and Infrastructure Delivery Plan are still being completed it is unclear whether the plan is the most appropriate strategy, when considered against reasonable alternatives, and whether the plan is deliverable over its period i.e. flood risk, environmental infrastructure requirements etc.</p>	<p>Comments are noted. Officers are currently finalising a Draft District wide Infrastructure Delivery Plan which will prioritise infrastructure. This has been used to inform the preparation of the Plan. Furthermore, work has been undertaken in conjunction with the County Council in terms of infrastructure planning and these documents are available to view on the County Council's website.</p> <p>The draft sequential test has also been used to develop the plan, this document has helped to justify the site selection process.</p> <p>These documents will be circulated to the Environment Agency for their comment.</p>
Core11 <a href="#">SALPP6</a>	Paragraph 1.12	Suggests the legality of the document is made clear.	Comments are noted, however it is felt that paragraph 1.2 clarifies the relationship between the Core Strategy and the Site Allocations and Policies DPD.
Core11 <a href="#">SALPP7</a>	Paragraph 2.3	Raises concern that the document does not identify the amount of land required for infrastructure and open	The figures set out within paragraph 2.3 are taken from the Adopted Core Strategy which

<b>Respondent/ Response Number</b>	<b>Paragraph/ Policy</b>	<b>Summary of Representation</b>	<b>Officer Response</b>
		space.	identifies the requirements for the development types listed. There is not set amount of open space which needs to be delivered during the plan period and therefore it would not be appropriate to include a figure for open space within this paragraph.
Shuttes J <a href="#">SALPP73</a>	Paragraph 2.6	Suggests that the development split between the settlements is revisited and that the proportion of development in Bewdley should be increased.	Comments are noted however the indicative splits were established through the Core Strategy and tested at that time. It is therefore not considered appropriate to make changes to the splits within this DPD.
Core11 <a href="#">SALPP9</a>	Paragraph 2.9	Welcomes the specific inclusion of sustainable modes of transport.	Support is noted.
Core11 <a href="#">SALPP10</a>	Paragraph 2.10	Suggests that open space and green infrastructure should be given individual identity and included at 2.9.	Comments are noted, however, landscape character and green infrastructure are included within the list of relevant objectives at paragraph 2.9.
Gemini Properties <a href="#">SALPP25</a>	Paragraph 2.12	<p>Suggests that the housing target within the Adopted Core Strategy is out-of-date as it is taken from the RSS2 Panel Report which is based on 2006 household projections and more recent data is now available.</p> <p>The Worcestershire SHMA (Feb 2012) suggests that Wyre Forest District should deliver between 170 and 370 dwellings per annum, the upper limit being in</p>	The representation is challenging the overall housing target as specified within the Adopted Core Strategy which was subject to examination in 2010. This will be a matter for discussion during the examination.

<b>Respondent/ Response Number</b>	<b>Paragraph/ Policy</b>	<b>Summary of Representation</b>	<b>Officer Response</b>
		excess of the 200 required by the Adopted Core Strategy. The SHMA is also likely to have underestimated numbers as it is based on 2008 population projections and the 2010 population projections suggest a population of 105,300 by 2030. Therefore, the 4,000 dwellings in the Adopted Core Strategy should be seen as a minimum figure to allow additional residential sites to come forward to meet local housing need.	
Core11 <a href="#">SALPP11</a>	Paragraph 2.13	Raises concern that some sites allocated prior to 2006 were insecure and questions whether these sites will be included in shortfall quantum's to avoid repetition of shortfall in land amounts for development. Suggests that clarification of the total land needed for development projects should be provided.	Sufficient sites are allocated to meet the development needs up until 2026. The District Council can demonstrate in excess of a five year housing land supply and the sites allocated for the longer term development needs are considered to be available and deliverable. As the plan period progresses, delivery will be monitored and if necessary, additional sites will be brought forward through a review of the plan.
Shuttes J <a href="#">SALPP74</a>	Paragraph 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".	Comments are noted. Infrastructure requirements are set out within each of the site specific policies where relevant.
Core11 <a href="#">SALPP12</a>	Paragraph 2.15	Questions whether the vision for open space for employment sites has been taken into account in	The requirements for the delivery of green infrastructure and open space are set out within

<b>Respondent/ Response Number</b>	<b>Paragraph/ Policy</b>	<b>Summary of Representation</b>	<b>Officer Response</b>
		calculating the amount of land for commercial developments. Suggests information regarding open space requirements could be shown.	policies SAL.UP2, SAL.UP3 and SAL.UP4.
Shuttes J <a href="#">SALPP75</a>	Paragraph 2.17	Wishes to raise objections raised at the time of the Finepoint Civic Centre proposals and the way in which planning can be used to avoid full discussion. The authority may find it difficult to resist new development under new planning rules and this is confounded by there being no specific locations identified for office buildings.	Both the Site Allocations and Policies and Kidderminster Central Area Action Plan DPDs include a number of sites allocations on which office development is considered to be appropriate.
Core11 <a href="#">SALPP8</a>	Paragraph 2.19	Raises concern that there is no reference to the shortage of open space within the District and that no space appears to be allocated for open space.	Proposals for the delivery of green infrastructure are set out within policies SAL.UP2 and SAL.UP3 as well as within Adopted Core Strategy policy CP13.
Gemini Properties <a href="#">SALPP26</a>	Policy SAL.PFSD1 Presumption in Favour of Sustainable Development	Policy SAL.PFSD1 is supported. It accords with the requirements of the NPPF. The Council's commitment to supporting appropriate development is welcomed.	Support for Policy SAL.PFSD1 is welcomed.
West Mercia Police <a href="#">SALPP251</a>	Policy SAL.PFSD1 Presumption in Favour of Sustainable	Businesses and communities require safe and secure environments within which to grow and flourish. Policy SAL.PFSD1 should therefore directly acknowledge that strong communities must be safe and secure	Comments are noted. Include suggested change as a Minor Amendment to the Plan.  <b>Please refer to Minor Amendment SA - MA1 and KCA - MA5</b>

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
	Development	<p>communities.</p> <p>To resolve the inconsistencies described in Part 6 of these representations we suggest that Policy SAL.PFSD1 is amended as follows: -</p> <p>'Planning applications that accord with the policies a and <b>objectives</b> in the DPDs...'</p>	
Worcestershire County Council <a href="#">SALPP236</a>	Policy SAL.PFSD1 Presumption in Favour of Sustainable Development	Policies SAL.PFSD1 & KCA.PFSD1 are consistent with the NPPF's requirement for the Presumption in Favour of Sustainable Development.	Comments are noted.
Core11 <a href="#">SALPP13</a>	Paragraph 3.1	The NPPF does not supersede any statutory documents already in place. Care must be taken to ensure planning applications meet these constraints.	Comments are noted. The NPPF sets out national planning policy and all local planning policy documents must be in general conformity with it. Where policies were adopted before the NPPF came into place the weight that can be afforded to them is diminished where they are not in general conformity.
Barratt Homes <a href="#">SALPP92</a>	A Desirable Place to Live	Residential Land Allocations Table-Rural Sites- Blakedown- 42 units and timeframe 2011-2016 - Supported.	Support is welcome.



Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
Orme J <a href="#">SALPP1</a>	Paragraph 4.1	<p>Raises concern that demand from people wishing to build their own home has not been assessed and that the DPD is therefore not compliant with the NPPF.</p> <p>Requests that demand from people wishing to build their own home is assessed and that the document makes reference to self build housing.</p>	<p>It is considered that a minor amendment could be incorporated into the pre-submission Site Allocations &amp; Policies DPD to address the issue of self build.</p> <p><b>Please refer to Minor Amendment SA-MA2</b></p>
Watkins R A <a href="#">SALPP48</a>	Paragraph 4.2	<p>In para. 4.12, 3rd line , within the brackets there is specific mention of "and thus excluding garden land ". This is a precise of NPPF Annex 2: definition of pdl and is simplistic.</p> <p>Remove "and thus excluding garden land" from the brackets in line 3 of para 4.12.</p>	<p>It is considered that Paragraph 4.12 provides useful clarification as worded and that no amendments should be made.</p>
Rawlings Mr P <a href="#">SALPP255</a>	Residential Land Allocations	<p>The Chester Road Land Society would like the land identified on the attached plan to be allocated for residential development. The site is currently zoned as Open Space - allotments. However, the Society consider it is not allotments, and has never been, and should be made available for affordable housing with access to be provided through Hardy Avenue onto Offmore Estate. Therefore, there are two elements to the comments:</p> <ol style="list-style-type: none"> <li>1. that the land should not be identified as open space</li> <li>2. that is should be made available for residential</li> </ol>	<p>Comments are noted. However, it is considered that the land identified is not suitable for residential development at this current time. The land is not considered to be in conformity with the Core Strategy for allocation as residential use, it is greenfield in nature and has been zoned as open space since the 1996 Local Plan. The adjacent land (i.e. the remaining open space designation) has been in active use for allotments for a considerable amount of time, identifying that the majority of the site continues to play an</p>

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
		development	<p>important open space function. Furthermore, it is the Council's understanding that the Land Society was originally set up to provide allotments for the estate.</p> <p>Overall, it considered that there are other, more suitable, sequentially preferable sites that can come forward for development to meet the District's housing needs, and this site should retain as currently allocated.</p>
<p>Gemini Properties <a href="#">SALPP24</a></p>	Paragraph 4.8	<p>Wishes to see the phasing amended to allow the Reilloc Chain site to be delivered during the 2011-2021. Considers it unnecessary for both the Reilloc Chain and Oasis Arts &amp; Crafts sites to come forward simultaneously.</p>	<p>It is considered that additional evidence has been provided and discussions progressed with regard to the delivery of development to an earlier timescale on the Reilloc Chain site. A minor amendment has been proposed to amend the residential land allocations for Oasis Arts &amp; Crafts and the Reilloc Chain site to 2011-21. Please refer to the schedule of Minor Amendments.</p>
<p>Environment Agency <a href="#">SALPP184</a></p>	Paragraph 4.8	<p>It is unclear whether the allocation and phasing period for residential sites, shown in the table under paragraph 4.8, has been informed by an Infrastructure Delivery Plan.</p> <p>Paragraph 1.9 of the Development Plan Document (DPD) refers to background studies and technical</p>	<p>Comments are noted. Officers are currently finalising a Draft District wide Infrastructure Delivery Plan which will prioritise infrastructure. This has been used to inform the preparation of the Plan. Furthermore, work has been undertaken in conjunction with the County Council in terms of infrastructure planning and these documents are available to view on the</p>

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
		<p>reports that have been produced to inform the decisions made regarding sites in the DPD.</p> <p>There appears to be no clear cross reference with the evidence base as the Sequential Testing (Flooding) document and Infrastructure Delivery Plan are still being completed. It is difficult to comment on the soundness of the plan as we have not seen the contents of these two key evidence base documents.</p> <p>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.</p>	<p>County Council's website.</p> <p>The draft sequential test has also been used to develop the plan, this document has helped to justify the site selection process.</p> <p>These documents will be circulated to the Environment Agency for their comment.</p>
<p>St Francis Group <a href="#">SALPP198</a></p>	<p>Paragraph 4.8</p>	<p>It is welcomed that the former British Sugar site is identified to deliver approximately 320 dwellings between 2011 and 2021, which is consistent with the Inspector's Report and Core Strategy, which refers to a significant area of residential. It should be noted, however, subject to detailed design of the site and depending upon the appropriate density (to ensure the site is used efficiently yet reflects the local character of the surrounding area), it is possible that the total dwelling</p>	<p>Comments are noted and support is welcomed.</p>

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
		<p>yield could increase.</p> <p>It is welcomed that the timescales for delivering the site have been updated from 2016 to 2021 to 2011 to 2021.</p>	
<p>Millward Mr W <a href="#">SALPP19</a></p>	<p>Policy SAL.DPL1 Sites for Residential Development</p>	<p>Suggests that land at Mortal Lane should be allocated for residential development for the following reasons:</p> <ol style="list-style-type: none"> <li>1) Proximity to town centre - 400 metres to Stourport High Street.</li> <li>2) Benefits of siting - walking distance to shops and offices, with relieve to town centre car parking.</li> <li>3) Adjacent to existing (established) housing and appropriate services such as; gas, electricity and water.</li> <li>4) Topography of site removes majority of any future development away from flooding risk.</li> <li>5) Easy access to site by existing tarmac road.</li> <li>6) Original TPO not substantiated and future TPO likely to be sympathetic to site development, whilst still retaining some woodland features (reference recent correspondence with Mr Alvan Kingston - Arboricultural</li> </ol>	<p>There is no justification for taking land out of the Green Belt to meet Stourport's housing requirement.</p> <p>In line with Policy DS01 of the Adopted Core Strategy, and the SHLAA, the provision of 4,000 new homes will be split 60% Kidderminster, 30% Stouport and 10% Bewdley and rural areas. Policy DS03 states that the focus will be on existing brownfield sites in Stourport. Sites in Stourport either with permission for housing or proposed for allocation in this DPD would provide approximately 1,000 dwellings. This is 31% of the potential capacity of 3,185 in the District (2012-2026) shown on the housing trajectory at April 2012.</p>

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
		<p>Officer).</p> <p>7) Current land owners strongly support the inclusion of key worker and low income homes within their development plans.</p> <p>8) Site's development a natural extension to existing housing plans for the town and would help to meet the likely shortfall of economically viable development land.</p> <p><b>Summary of additional comments:</b></p> <p>Believes the DPDs are unsound because they are not justified and not effective.</p> <p>Stourport is a key location within the District which has seen many changes and the facilities have dramatically fallen short of what residents would expect. The incentive to settle within the town and near its boundaries has been removed because of a failure to maintain appropriate living facilities and to encourage new employers to the town.</p> <p>Stourport should not be seen as a dormitory town for other West Midland conurbations, but as a stand alone town.</p>	

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
		<p>Housing facilities and employment opportunities should attract new residents as well as enabling existing residents to take an optimistic view of their town.</p> <p>There are a number of previously ill-considered sites within the town's boundaries which could be developed. Brownfield sites cost more to develop and therefore provide a reduced incentive to developers.</p> <p>The planning strategy should be revised to recognise all potential sites and not be constricted to rigid frameworks, particularly when previously ill-considered land is currently available that would permit a greater flexibility to planners and a better commercial prospect to developers.</p> <p>Seeks a change to the development plan on the basis that the current plan is not effective or justified. Flexibility would make available land that was previously discarded because of flooding and dubious tree preservation orders, whilst ignoring advantages including topography, proximity to the High Street, reduced parking and associated traffic problems along with the availability of gas, water and electricity services which run alongside the site. Suggests land could accommodate a mixed development with accommodation for key workers and low-income families</p>	

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
		which would encourage new residents to Stourport.	
Campaign to Protect Rural England <a href="#">SALPP132</a>	Policy SAL.DPL1 Sites for Residential Development	<p>It fails to provide a mechanism for limiting the grant of planning permission if the supply of approved sites begins greatly to exceed the target. This is likely to mean that the identified sites will be exhausted too rapidly leading to early encroachment on the Green Belt.</p> <p>Provision is needed, so that the Council by a formal resolution can limit the grant of planning applications of specified types in the event of supply substantially exceeding the target in the plan.</p>	<p>Comments are noted. An indicative phasing period is included within the Part B, site specific, section of the DPD. Although the concerns raised by CPRE are noted it is considered that the NPPF places the onus on allowing sustainable development and that it should be approved without delay. Subject to development proposals meeting the requirements of the plan, it is not considered that the Council should be artificially preventing development from coming forward. This approach is considered to be in line with the NPPF, para 47, where it identifies that local planning authorities should 'boost significantly the supply of housing.'</p>
Core11 <a href="#">SALPP14</a>	Paragraph 4.12	Recognises that all relevant LDF policies are noted but recommends that the Core Strategy is added as the statutory instrument.	Comments are noted. The Adopted Core Strategy is not a statutory instrument.
West Mercia Police <a href="#">SALPP248</a>	Paragraph 4.13	We welcome and support paragraph 4.13 and in particular the inclusion of the suggested wording proposed in our representations to the May 2011 Preferred Options document. In our view, the implementation of paragraph 4.13 in relation to new development proposals will ensure that town centres are more vibrant and safer places.	Comments are noted and support is welcomed.

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
<p>Bewdley Town Council <a href="#">SALPP31</a></p>	<p>Policy SAL.DPL2 Rural Housing</p>	<p>No further comments on the sites within Bewdley set out at Part B.</p> <p>No objection to the policy relating to major tourist attractions and the need for a planning brief and masterplan for the West Midland Safari Park (GPB5).</p> <p>Objects to policy DPL2. The Committee appreciated that the policy will relate in practice only to relatively small sites but disagreed that such should be comprised of 100% affordable housing. Instead it believed each site should be looked at individually from which it may be established that 0% may be the correct figure or alternatively some other figure but less than 100%.</p> <p>If DPL3 is to be applied to allow market housing, the costs of this may be a barrier to the development of small scale sites. Difficult to see how small scale developments of 5 homes or less would be financially viable with a 100% imposition. Either there should be a base line minimum below which the policy would not operate and/or there should be a sliding scale as to the percentage of affordable housing perhaps subject to a maximum of 50%.</p> <p>Considers that the NPPF allows for flexibility in the</p>	<p>Officers note that a number of representations have been received with regard to the flexibility to enable small sites to come forward for development within Bewdley. It is also considered that the publication of the NPPF does allow for more flexibility when considering the viability of development proposals and indeed does recognise that windfall development can make a significant contribution to housing numbers. Taking into account the latest national planning policy position it is considered that some flexibility should be introduced to Policy SAL.DPL1 to enable small sites of 1-5 dwellings to come forward within the settlement boundary of Bewdley without the need for them to provide 100% affordable housing.</p> <p><b>Please refer to Minor Amendments SA-MA2 and SA-MA3.</b></p>



Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
		<p>development process.</p> <p>Wishes to engage in further discussions in advance of the examination process and during round table hearings.</p>	
<p>West Midlands HARP Planning Consortium <a href="#">SALPP39</a></p>	<p>Policy SAL.DPL2 Rural Housing</p>	<p>Supports the policy on exception sites being appropriate and justified. Suggests amending wording as follows:</p> <p>"v. The site should <i>be accessible</i> to local services and facilities by sustainable modes of transport."</p> <p>Believes this change will make the policy more effective.</p> <p>Flexibility to allow market housing to cross-subsidise affordable housing is welcomed and makes the policy compliant with the NPPF.</p>	<p>Support is welcomed. Amend policy wording of 1 v to:</p> <p>"The site should <i>be accessible</i> to local services and facilities by sustainable modes of transport."</p> <p><b>Please refer to Minor Amendment SA-MA3.</b></p>
<p>Watkins R A <a href="#">SALPP50</a></p>	<p>Policy SAL.DPL2 Rural Housing</p>	<p>The "Replacement Dwellings in the Open Countryside" policy is welcomed , BUT:</p> <ol style="list-style-type: none"> <li>1. There is no reference to Listed Building, or Conservation Area as a constraint.</li> <li>2. ii. and iv. need linking, as a "less prominent siting" might require a beneficial change in curtilage.</li> <li>3. iii. the 20% is unnecessarily small and is not justified in the explanatory text. In practice 'PD</li> </ol>	<p>The suggestions with regard to the replacement dwellings in the Open Countryside policy are welcomed.</p> <p><b>Please refer to Minor Amendment SA-MA4.</b></p>

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
		Right' may allow expansion beyond 20%, as extant approvals may also exceed this figure.	
Barratt Homes <a href="#">SALPP93</a>	Policy SAL.DPL2 Rural Housing	P19 - Rural Housing-1.Exception Sites- accepted. The agreed scheme passes the various tests.	Support is welcome.
Harding and Matthews <a href="#">SALPP113</a>	Policy SAL.DPL2 Rural Housing	<p>Puts forward an amendment to address a potential inconsistency between the adopted Core Strategy and the Publication of the Site Allocations and Policies DPD.</p> <p>Policy CP04 of the Core Strategy clearly confirms that the threshold for sites coming forward in Bewdley to deliver affordable housing is 6 or more dwellings, that will apply to all planning applications coming forward either on the specific allocations or as windfall. However, Publication Draft Policy SAL.DPL2 will ensure that all housing coming forward outside of the allocations must be 100% affordable units. Feel that the policy would benefit from slight re-wording to ensure consistency with the Adopted Core Strategy. Without this change the DPD is not sound as it has not been positively prepared, justified, effective or consistent with national policy.</p>	<p>A number of representations have been received with regard to the ability for small sites on previously developed land to come forward for market residential development within Bewdley. Within the recent context of the NPPF and the emphasis on the Presumption in Favour of Sustainable Development and viability of development proposals, in addition to the recognition of the historic importance of windfall development in contributing to housing land supply, Officers consider that there is scope to include flexibility within Policy SAL.DP1 and SALDP.2 which would allow for small sites to come forward for residential development within Bewdley.</p> <p><b>Please refer to Minor Amendments SA-MA2 and SA-MA3.</b></p>
National Farmers	Policy	We appreciate that the District Council understands the	Comments are noted. It is considered that the

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
Union <a href="#">SALPP116</a>	SAL.DPL2 Rural Housing	<p>valuable contribution forestry and agriculture make to the local economy. We acknowledge the fact that housing must be provided where there is a clearly established and functional need. An established and/or functional need is often the case with rural workers, especially those working on farms where a worker requires accommodation within close proximity to the farm buildings. We ask that you take into account the size of housing, providing enough room for a family to live, as often farm workers have, or will have families and these houses are generally long term homes.</p> <p>Villages must be allowed to grow and develop to remain viable centres of community with adequate services.</p> <p>Previously developed land outside villages should be considered for housing development.</p> <p>Development of redundant rural buildings into market housing should be permitted, as it will have the benefit of increasing rural housing stocks.</p>	policy framework provided by the District Council has taken into account the issues raised through this representation.
Campaign to Protect Rural England <a href="#">SALPP133</a>	Policy SAL.DPL2 Rural Housing	The reference to waiting list data should be removed. Where there is no housing needs survey, the answer is that one must be conducted. Waiting list data is a poor indicator of need, since it records gross (not net) demand. As long as the rents of social housing remain at a discount to the market for privately rented houses,	Comments are noted. However, it is considered that Housing Waiting List data is an important indicator of need. This is because, unlike a Parish Need Survey, it is not a snap shot in time and helps to provide a more accurate picture of demand for housing. BY

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
		<p>there will always be a demand for it: who wants to pay £500 per month to a private landlord when they could pay £400 per month to a social landlord?</p> <p>A number of case studies are provided to identify the problems with using waiting list data.</p> <p>We would also suggest that the parish is not necessarily the right unit for a Housing Needs Survey to be conducted. It may be appropriate for the housing needs of a small village to be met in a slightly larger neighbouring village. For example, affordable housing needed for Broome might be met in Blakedown. In such cases, the Survey may relate to more than a parish. Conversely, Cookley and Wolverley are two villages in a single parish, and might appropriately be surveyed separately.</p>	<p>including reference to both indicators it is considered a more accurate picture of need can be provided.</p>
<p>Environment Agency <a href="#">SALPP186</a></p>	<p>Policy SAL.DPL2 Rural Housing</p>	<p>In considering the rural nature and size of the sites, we would recommend including a reference to appropriate drainage infrastructure within this policy, such as: <b>Appropriate arrangements for sewerage treatment must be submitted as part of the application in addition to satisfactory drainage measures, in protecting the water environment.</b></p>	<p>Comments are noted. include suggested wording as part of a Minor Amendment to the policy.</p>
<p>Barratt Homes <a href="#">SALPP94</a></p>	<p>Paragraph 4.17</p>	<p>P20- 4.17 Addressing Local Housing Needs- accepted but clarification needed as Para 20 (P21) also includes a</p>	<p>It is agreed that reference to the Housing Waiting List would also be appropriate within</p>

<b>Respondent/ Response Number</b>	<b>Paragraph/ Policy</b>	<b>Summary of Representation</b>	<b>Officer Response</b>
		reference to the Housing Waiting List as well as a Parish Survey being considered. For consistency the Housing Waiting List reference should also be included in 4.17.	paragraph 4.17 Addressing Local Housing Needs.  <b>Please refer to Minor Amendment SA-MA5.</b>
Barratt Homes <a href="#">SALPP95</a>	Paragraph 4.18	P20- 4.18- the Nurseries site should now be shown as an allocated housing site and within the infill boundary referred to here.	Noted. This will be shown on the Proposals Map.
Barratt Homes <a href="#">SALPP96</a>	Paragraph 4.20	P21- 4.20-The Housing Waiting List should be given at least equal prominence in this paragraph as the Parish Housing Needs Survey. The Needs Survey is a snapshot in time whilst the Council's Housing Waiting List is regularly updated and therefore more robust and certain.	Noted. This will be an issue for the relevant Development Control Case Officer to weigh up with regard to the planning application. No further change required.
Barratt Homes <a href="#">SALPP97</a>	Paragraph 4.25	P22- 4.25- given the current and probable future economic circumstances and our experience on the Blakedown site should the phrase 'small' (element) and the 'no more than 20%' be omitted to give more flexibility. This aspect is covered by the need for a Viability Appraisal to justify any reduction anyway.	It is not considered that this change is necessary since the starting point of the policy would be to secure as much affordable housing as the site can deliver viably. No further change.
Watkins R A <a href="#">SALPP49</a>	Paragraph 4.28	Suggests that the 12 month marketing period is too long and should be reduced to around 6 months.  Suggests that "no interest...from within the locality" is too simplistic and should be a radius of 10 miles from the property not within the administrative boundary and	These comments on the detail of the reasoned justification and are welcomed for clarification purposes. It is considered that clarification regarding "financially viable interest" could be incorporated through a minor amendment. However Officers consider that the current

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
		that interest should be financially viable interest.	definition of locality is appropriate and the marketing period of 12 months is standard practice for conditions and is required to safeguard such properties to meet such a specific need.  <b>Please refer to Minor Amendment SA-MA6.</b>
Core11 <a href="#">SALPP15</a>	Paragraph 4.32	Suggests that the DPD clarifies that open space is a statutory requirement in a developers viability submission.	The viability assessments will need to cover all costs of bringing a site forward, including meeting open space/green infrastructure policy requirements.
Barratt Homes <a href="#">SALPP98</a>	Paragraph 4.32	P23- 4.32- This paragraph needs to have a caveat statement that it relates to allocated and possible urban windfall sites but not to Rural Exception sites. I found the reference to the Council's policy expectations of 30% confusing when read in isolation from the 100% required in Rural Areas.	It is considered that Policy SAL.DPL2 clearly sets out the position and requirements with regard to Exception Sites, which by their very definition would not normally be allocated or permitted as windfall sites unless exceptional circumstances exist. No further change required.
Core11 <a href="#">SALPP16</a>	Paragraph 4.33	Any software packages or tools used by developers and vetted by the council must identify that the software gives guidance on infrastructure and open space as a legal priority.  The idea that a payment can leapfrog this design element is now defunct.	The viability assessments will need to cover all costs of bringing a site forward, including meeting open space/green infrastructure policy requirements.

<b>Respondent/ Response Number</b>	<b>Paragraph/ Policy</b>	<b>Summary of Representation</b>	<b>Officer Response</b>
		Include a requirement that software used in appraisal must have infrastructure and open space capability inbuilt.	
Shuttes J <a href="#">SALPP76</a>	Paragraph 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.	Support is noted. Policies are in place to safeguard employment land supply. All of those sites which are allocated for alternative uses have been identified as being suitable for alternative uses through the Employment Land Review.
English Heritage <a href="#">SALPP216</a>	Policy SAL.DPL4 Flat Conversions	English Heritage welcomes the clear references in the policy to the importance of proposals respecting the appearance and the character of the local area.	Support is welcomed.
West Midlands HARP Planning Consortium <a href="#">SALPP40</a>	Policy SAL.DPL5 Extra Care Provision	We support this policy in being particularly beneficial to promoting the concept of Extra Care housing and in supporting its delivery across the District. This policy is suitably flexible and is considered sound.	Support is welcomed.
Watkins R A <a href="#">SALPP51</a>	Policy SAL.DPL6 Accommodatio n for Dependants	Suggests that current wording overly restrictive and at odds with Para 60 of the NPPF, dependant relatives are not just the elderly or sick and can include grown up children.  Suggests re-wording as follows:  "The development of annex accommodation will be	It is noted that such annexes may also be required to meet other needs, such as grown up children. However it is considered that the policy as it is worded provides the correct level of safeguarding to ensure that a separate dwelling is not created within sensitive Greenbelt and open countryside.

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
		<p>supported subject to the consistency with other Local Plan policies and subject to: i) the scale and design being appropriate to the host dwelling and setting;</p> <p>ii) safeguards being applied to any approval to stop a separate dwelling being created”.</p> <p>Para 4.44 would be amended accordingly.</p>	<p><b>Please refer to Minor Amendment SA-MA7.</b></p>
<p>Campaign to Protect Rural England <a href="#">SALPP134</a></p>	<p>Policy SAL.DPL6 Accommodation for Dependants</p>	<p>The wording should be amended to be less restrictive on the location of the entrance, while requiring that the premises should remain a single dwelling. There is a model planning condition that deals with the issue, and we doubt it is necessary to gold-plate that with a more rigorous requirement</p>	<p>Comments are noted. However, it is considered that the policy should remain as drafted. This is because it is important to ensure that the accommodation provided through this policy is not separate and ensuring a single shared entrance is an important component of this.</p>
<p>Watkins R A <a href="#">SALPP55</a></p>	<p>Policy SAL.DPL7 Residential Caravans and Mobile Homes</p>	<p>Suggests the current policy wording is too complicated. Policy should not distinguish between residential caravans and mobile homes, policy does not include provision for replacement of existing lawful residential caravans and both residential zoning and "within the curtilage" are superfluous.</p> <p>Suggests amending to read:</p> <p><b>Residential Caravans</b> The use of caravans for residential purposes will only be permitted where:</p>	<p>Comments are noted. However, it is considered that the policy as currently worded is appropriate. It should also be noted that the first proposed change is not considered to be required as this does not require planning permission.</p>



Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
		<p>(i) it is the replacement of an existing caravan which is lawful;</p> <p>(ii) to provide temporary accommodation during the construction, alteration or repair of a dwelling or dwellings</p> <p>(iii) to meet temporary or seasonal agricultural or forestry needs”.</p> <p>Para 4.46 would require amendment.</p>	
<p>Shuttes J <a href="#">SALPP77</a></p>	<p>Paragraph 4.47</p>	<p>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.</p>	<p>These comments are noted. However the need for pitches is based on the latest figures from the WMRSS Phase 3 Interim Position Statement - i.e. 35 pitches to 2017. The Worcestershire Authorities continue to discuss Countywide provision under the Duty to Co-operate. No changes required.</p>
<p>Nunn S <a href="#">SALPP106</a></p>	<p>Policy SAL.DPL8 Land Allocations</p>	<p>Considers that the site at Blackstone, Stourport Road, Bewdley should be allocated within the Site Allocations policies as a site for Gypsies and Travellers. Sets out the reasons as to why it should be allocated and that it is deliverable. Highlights a number of concerns with the existing level of provision for Gypsies and Travellers</p>	<p>This Green Belt site was subject to detailed consultation as part of the potential site allocations for Gypsies and Travellers undertaken in 2011. It was subject to many representations and following consultation the Council took the decision not to allocate it</p>

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
		within the District.	based on consultation responses and in particular those received from key stakeholders such as the Environment Agency. No further change is considered necessary and this is an issue for discussion at the examination.
South Worcestershire Development Plan <a href="#">SALPP123</a>	Policy SAL.DPL8 Land Allocations	<p>There are already 8 Gypsy and Traveller sites in or around Sandy Lane in Stourport-on-Severn. An additional 3 sites (land adjacent to Nunn's Corner, the Gables Yard and land opposite The Gatehouse) would lead to 11 sites in a relatively small geographical area - all of which are less than half a mile from the boundaries of Malvern Hills and Wychavon.</p> <p>We consider the proposed allocations in Stourport-on-Severn to be inappropriate for the following reasons:</p> <p>(i) Economic - the Sustainability Appraisal (Paragraph 4.72) demonstrates that the cumulative impact of sites is already starting to impact on the economic sustainability of the location.</p> <p>(ii) Social - the cumulative impact of so many sites in such a small geographical area is likely to create a "ghetto" feeling for both the local traveller community and the settled community. This is likely to have a negative impact on the peaceful and integrated co-existence between the traveller community and the</p>	Written representation from the South Worcestershire Authorities objecting to the allocation of sites at land adjacent to Nunn's Corner, the Gables Yard and land opposite The Gatehouse within the Sandy Lane Area. The allocation of particular sites for Gypsy & Traveller provision is likely to be a matter for discussion at the examination hearings. These sites were allocated following an extensive consultation on potential sites during 2011.

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
		<p>settled community, potentially leading to problems similar to those experienced at Cleeve Prior.</p> <p>(iii) Environmental - it is understood that all the proposed allocations are within Flood Zones 2 and / or 3.</p> <p>(iv) Wyre Forest District Council already recognises the need to resist further traveller sites in this area to maintain a balance between uses - Policy SAL.DPL10 (4) and paragraph 4.71. Proposing more new sites is inconsistent with the need to resist further traveller site development in this area.</p>	
<p>Carpenter T <a href="#">SALPP128</a></p>	<p>Policy SAL.DPL8 Land Allocations</p>	<p>Wishes to put forward land at Blackstone, Bewdley Road Stourport as an allocated site for Gypsies &amp; Travellers. Proposes this land could be passed exclusively for the over 55s in the Gypsy &amp; Travelling community for 8-12 plots.</p> <p>Considers that the site does not encroach on neighbouring properties, or views and that the access to the land is good.</p>	<p>Written representation seeking an additional allocation for a Gypsy &amp; Traveller site. This is likely to be a matter for discussion at examination although the site has been the subject of detailed consultation previously. Objections were received from key stakeholders such as the Environment Agency and Natural England with regard to significant planning constraints.</p>
<p>Environment Agency <a href="#">SALPP187</a></p>	<p>Policy SAL.DPL8 Land Allocations</p>	<p>We accept that your Council have undertaken extensive consultation in establishing the preferred site allocations. However we would like the following representation to be noted:</p>	<p>Comments are noted. However, as pointed out by the representations, these sites now benefit from planning permission and the decision to allocate these sites reinforces the decisions made by members of the Planning</p>

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
		<p>It is disappointing that of the four gypsy/traveller sites selected for allocations, Site J and L are located within Flood Zone 3 ('high risk' floodplain), Site E within Flood Zone 2 and 3 and Site K is located within Flood Zone 2 (medium probability) with the sites vehicular access within Flood Zone 3.</p> <p>Policy SAL.DPL8 is in conflict with Policy CP06 of your Council's adopted Core Strategy. CP06 lists a number of criteria that new sites would need to accord with in meeting the specific needs of gypsies, travellers and travelling showpeople sites within the District. Criteria 5 of this policy states <i>'the site should not fall within areas at higher risk of flooding such as Flood Zone 2 and 3 and its exact location should take account of the Strategic Flood Risk Assessment'</i>.</p> <p>The two sites located within Flood Zone 3 (Site J - Land adjacent Nunn's Corner and Site L - Land opposite the Gatehouse) have recently been subject to planning applications approved by your Council, one for an extension and the other a temporary period for gypsy/traveller use. As a statutory consultee, we were consulted on both planning applications and objected on flood risk grounds. Notwithstanding the Sequential Test requirement (for consideration by your Council in this instance given the scale of the proposal), <b>we raised concerns that it had not been demonstrated that the development could be made safe for occupiers in</b></p>	<p>Committee. The Council has undertaken an extensive consultation on potential new sites and the proposed site allocations reflect the outcome of that consultation.</p>

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
		<p><b>this location.</b> It was assessed that flooding on site would be approximately 800mm deep during a 100 year plus climate change flood event. The vehicular access would also be flooded to a similar depth for Site J and to more than 1m deep for Site L. Your Planning Officer recommended the planning application for Site L was refused on flood risk and the Sequential Test. Your planning committee determined to approve both applications contrary to advice.</p> <p>We are likely to provide similar comments on any future planning application for the above sites, in considering flood risk and safe development requirements.</p>	
<p>South Worcestershire Development Plan <a href="#">SALPP120</a></p>	<p>Paragraph 4.48</p>	<p>The regional Interim Policy Statement, published by the West Midlands Regional Assembly (and approved by Government Office for the West Midlands) in March 2010, indicated that the additional residential pitch requirement for Wyre Forest for the period 2007-17 was 42 pitches (not 35). Given that Wyre Forest has approved 20 pitches since 2006, this would leave 22 pitches still to be allocated to 2017, and a further indicative 15 pitches from 2017-2022.</p>	<p>Written representation questioning the level of pitch provision for the Wyre Forest up to 2017. The South Worcestershire authorities consider it should be 42 pitches rather than 35. This will be a matter for discussion during the examination, but it should be noted that Wyre Forest District Council submitted representations on the Regional Interim Policy Statement stating that the level of need was for 35 pitches. In addition the WMRSS is to be abolished.</p>
<p>National Federation of Gypsy Liaison</p>	<p>Policy SAL.DPL9 Sites for</p>	<p>The appropriate policy was set out in Policy CP06 of the Core Strategy which has been through a rigorous process to establish its effectiveness. That Policy set out</p>	<p>These representations are noted. The reasoned justification at paragraph 4.57 sets out the need for applicants to demonstrate that they have</p>

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
Groups <a href="#">SALPP105</a>	Travelling Showpeople	<p>appropriate criteria for the allocation of sites for travelling showpeople. New and different criteria are unnecessary.</p> <p>The supporting text is inconsistent with the policy. Most notably paragraph 4.57 appears to prioritise a sequential test (connection to main sewerage) which does not appear in the policy wording and will almost certainly prove to be impractical.</p> <p>The supporting text offers no advice on how or when co-operation with neighbouring authorities will be facilitated to ensure need for sites is considered on a cross border basis.</p>	<p>sought a connection to the mains foul sewer in the first instance. It is considered to be consistent with the Policy in that bullet point vii requires adequate access to utility infrastructure. This is required by key stakeholders such as the Environment Agency and Severn Trent Water and it is therefore considered that this requirement should be retained and that the policy does allow for flexibility should this not be the case.</p> <p>The co-operation with neighbouring authorities is an issue for discussion under the Duty to Co-operate and is being discussed with the South Worcestershire Authorities. This will be a matter for further discussion at the examination.</p>
South Worcestershire Development Plan <a href="#">SALPP124</a>	Policy SAL.DPL9 Sites for Travelling Showpeople	<p>There seems to be no justification for further land in Stourport-on-Severn being prioritised over land in other areas in the sequential test for applications within the Green Belt.</p>	<p>The sequential test for identifying a site for travelling showpeople is likely to be a matter for discussion during examination.</p> <p>Officers consider that the sequential test is consistent with the overarching Core Strategy which prioritises development towards previously developed sites within Kidderminster and Stourport-on-Severn as the two main towns within the District.</p>

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
Environment Agency <a href="#">SALPP188</a>	Policy SAL.DPL9 Sites for Travelling Showpeople	We support the inclusion of point ii. and vii. within the policy, which refer to the approval of sites for travelling showpeople where they are not located within areas of higher risk of flooding and where appropriate arrangements for sewerage treatment and drainage have been provided, in ensuring sustainable development.	Comments are noted and support is welcomed.
South Worcestershire Development Plan <a href="#">SALPP125</a>	Paragraph 4.55	South Worcestershire Authorities would be very concerned if Wyre Forest's failure to allocate a site to meet the needs of Travelling Showpeople in the District led to additional need across Worcestershire.	The GTAA did not identify a specific current need or requirement for additional plots for Travelling Showpeople within the District (rather it outlined the need for an additional 22 sites across Worcestershire).  The policy is intended to be proactive to guide the determination of any planning applications which may come forward.
National Federation of Gypsy Liaison Groups <a href="#">SALPP104</a>	Policy SAL.DPL10 Sites for Gypsy and Traveller Use	Considers there is no justification for the design restrictions within Policy SAL.DPL10 and that these are best left to consideration on a site by site basis.  Considers the reasoned justification is inconsistent with the Policy wording and that connection to main sewerage will not be practical.  The supporting text offers no advice on how or when co-operation with neighbouring authorities will be facilitated	The requirement for design standards for gypsy and traveller sites is consistent with National Planning Policy and is considered essential to meet the needs of future residents. It is considered that this forms an essential part of the policy to ensure quality within new developments just as design standards would be applied to new housing developments.  The requirement for connection to main

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
		to ensure needs for sites is considered on a cross border basis.	<p>sewerage in the first instance is required by key stakeholders such as the Environment Agency and Severn Trent who have been consulted on the draft policies. It is not considered that paragraph 4.64 is inconsistent with the policy wording and in particular reflects bullet points iv and v.</p> <p>The issue of co-operation with neighbouring authorities is being addressed through the Duty to Co-operate and will be a matter for discussion at examination.</p>
South Worcestershire Development Plan <a href="#">SALPP126</a>	Policy SAL.DPL10 Sites for Gypsy and Traveller Use	<p>To be consistent with both the Adopted Core Strategy CP06 and Policy SAL.DPL9, Policy SAL.DPL10 needs to make clear that planning permission for gypsy and traveller sites will not be permitted in areas of risk from flooding.</p> <p>The South Worcestershire Authorities consider the principle of SAL.DPL10(4) which proposes resisting further planning applications for gypsy and traveller sites within the Sandy Lane Industrial Estate to be justified. However, to be effective we consider that this policy should be applied immediately, not following implementation of sites identified in SAL.DPL8.</p>	This is an issue for discussion at examination. The sites identified in SAL.DPL8 have been identified following an extensive and objective site search and detailed consultation. As they are identified for allocation it is considered that they should be delivered.
Environment	Policy	We support the inclusion of point iii. under part 2 'Design	Comments are noted and support is welcomed.



Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
Agency <a href="#">SALPP189</a>	SAL.DPL10 Sites for Gypsy and Traveller Use	<p>of Gypsy and Traveller Sites' within the policy, which refers to the approval of sites where all necessary utilities can be provided on site including surface water, foul water drainage and the collection of waste and recycling.</p> <p>We would question why flood risk has not been included under part 1 of the policy in considering sites for 'gypsy and traveller use', when it has been included within Policy SAL.DPL9 for considering sites for travelling showpeople. We would recommend that a line is included in the policy to address this as follows:</p> <p>1. Sites for Gypsy and Traveller Use</p> <p><b>ix. In accordance with Adopted Core Strategy policy CP06, the site does not fall within areas at higher risk of flooding.</b></p>	<p>A response to the allocation of sites has been provided to the previous representation.</p> <p><b>Please refer to Minor Amendment SA-MA8.</b></p>
South Worcestershire Development Plan <a href="#">SALPP127</a>	Paragraph 4.67	<p>The South Worcestershire Authorities do not consider the policy approach in paragraph 4.67 to be sound.</p> <p>Given the concerns about the cumulative impact of sites in Stourport-on-Severn, there appears to be no justification for proposing that the town would be an appropriate location for larger new sites.</p>	<p>This approach is consistent with the Adopted Core Strategy. The cumulative impact of gypsy &amp; traveller sites in Sandy Lane represents only one area of Stourport (which is the second largest town within the District and is therefore considered to be a sustainable location sequentially).</p>
Watkins R A	Policy	Considers requirement for 12 month marketing period is	These representations are noted, however it is

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
<a href="#">SALPP56</a>	SAL.DPL11 Community Facilities	too onerous and marketing before a COU application is submitted should count. Also considers that the policy should refer to a realistic return for the freeholder.	not considered that the Policy as worded is unduly onerous and in order to be in conformity with the Core Strategy and the Government's localism agenda it is necessary to safeguard the District's community facilities wherever possible. It is considered that the Policy as worded provides the scope to do that. No further changes required.
The Theatres Trust <a href="#">SALPP72</a>	Policy SAL.DPL11 Community Facilities	Supports policy SAL.DPL11 but suggests it could be made more robust by stating in the opening sentence that the Council will protect existing community facilities and will resist their loss or change of use unless...	Comments are noted however it is considered that the current wording covers this.
Campaign to Protect Rural England <a href="#">SALPP135</a>	Policy SAL.DPL11 Community Facilities	As the policy is currently drafted it has three statements of equal status, but two are joined by "AND" and two by "OR". This is ambiguous: it is not clear which conjunction has the priority. We would suggest that the paragraphs should renumbered as (a) (i), (a) (ii), and (b).	Comments are noted.  <b>Please refer to Minor Amendment SA-MA10.</b>
West Mercia Police <a href="#">SALPP249</a>	Policy SAL.DPL11 Community Facilities	Whilst we are supportive of our facilities being protected via Policy CP07, we are concerned the three tests of Policy SAL.DPL11 are unduly restrictive and onerous, as currently written, when applied to the emergency services.  To resolve the issues of these representations, we suggest that the following additional paragraph is	Comments are noted.  <b>Please refer to Minor Amendment SA-MA9.</b>

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
		<p>inserted beneath the three tests in Policy SAL.DPL11: -</p> <p><i>'When applying these tests to specific proposals the Council will have full regard to the specific characteristics, needs, service priorities and objectives of the service and/or organisation concerned.'</i></p>	
<p>Sport England <a href="#">SALPP63</a></p>	<p>Policy SAL.DPL12 Educational Sites</p>	<p>Welcomes the reference in the policy to safeguarding the playing fields or providing compensatory provision elsewhere. Suggests amending text to refer to "affecting part of a playing field" and "compensatory re-provision elsewhere". Suggested amendments would bring text into line with Sport England's Playing Fields Policy and paragraph 74 of the NPPF.</p>	<p>Support and comments are noted.</p> <p><b>Please refer to Minor Amendment SA-MA11.</b></p>
<p>Campaign to Protect Rural England <a href="#">SALPP136</a></p>	<p>Policy SAL.DPL12 Educational Sites</p>	<p>As the policy is currently drafted it has three statements of equal status, but two are joined by "AND" and two by "OR". This is ambiguous: it is not clear which conjunction has the priority.</p> <p>We would suggest that the paragraphs should renumbered as (a) (i) - (iii), (b) and (c).</p>	<p>Comments are noted.</p> <p><b>Please refer to Minor Amendment SA-MA12.</b></p>
<p>Worcestershire County Council - Environmental Policy &amp; Strategic Planning <a href="#">SALPP232</a></p>	<p>Paragraph 5.6</p>	<p>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</p>	<p>Agreed. These comments are welcomed although no representations from either the Worcestershire or Greater Birmingham &amp; Solihull LEPs have been received at the pre-submission publication stage.</p>

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
		Allocations DPD.	
BAE Systems <a href="#">SALPP70</a>	Policy SAL.GPB1 Employment Land Allocation	<p>BAE Systems considers that policy SAL.GPB1 should be amended to allow for alternative land uses where there is no reasonable prospect of a site being used for the intended purpose (i.e. employment uses), having regard to market signals, over the Plan period. BAE Systems considers that failure to allow flexibility within the wording of the policy could stifle development and preclude the District Council from meeting the targets set out in its Core Strategy.</p> <p>Considers that the inclusion of the following could result in policy SAL.GPB1 being found 'sound' :</p> <p><i>'Alternative land uses as part of mixed-use employment-led redevelopment may be acceptable where there is no reasonable prospect of a site being used for solely employment purposes over the Plan period'.</i></p>	<p>Policy SAL.GPB1: Employment Land Allocation has been informed by a robust evidence base including a comprehensive assessment of the District's employment land allocations. Some of these have been reviewed and reallocated for mixed use or housing development within the Site Allocations. Hoo Farm and Summerfield were considered to be amongst the District's more viable employment sites it is therefore essential that they are safeguarded during the plan period in order to ensure a sustainable mix of development with sufficient employment land allocated within the District. It is considered that no further change is necessary and that this will be a matter for discussion at examination.</p>
Homes & Communities Agency <a href="#">SALPP214</a>	Policy SAL.GPB1 Employment Land Allocation	<p>The District Council has acknowledged concerns about the viability of employment on this site, it also gave a commitment to explore other options through the Site Allocations process and to actively work with the site owners to consider the future redevelopment of this damaged and derelict site. The landowners have since met with the Council on several occasions to consider future uses for the site, they are therefore disappointed</p>	<p>The comments on behalf of the HCA and other landowners at the former Lea Castle Site are noted. They need to be considered within the context of the NPPF and its approach to the development of Previously Developed Sites within the Green Belt and also the requirement for the viability testing of Local Plan Policies. It is therefore considered that the policy</p>

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
		<p>that the Council has not made any further changes to the policies and the specific inclusion of C3. It is noted that this mix of uses was also supported in separate representations by a wide range of respondents to both consultations on the Site Allocations and on Gypsy/Traveller proposals at Lea Castle.</p> <p>As drafted, the DPD potentially sets up a policy for the site which is undeliverable, leaving considerable uncertainty around the future of this derelict site and the likely negative effect on the local community.</p> <p>The PDS boundary in the SALDPD (Figure 4) does not accurately correspond to the changes in landownership and does not accurately reflect the extent of developed land remaining on the site. To ensure that comprehensive redevelopment proposals for the site can be considered in the future it is requested that the boundary is revised as shown.</p> <p>Identified that guidance in the NPPF requires Councils to respond positively to improve derelict land in areas designated as Green Belt and includes policy changes intended to allow proposals on previously developed sites to be considered more flexibly. The recent Ministerial Statement specifically encourages Councils to make the best use of previously developed land in the</p>	<p>amendments proposed should be further discussed with the HCA under a Statement of Common Ground in order to establish the appropriate amendments to the policy wording.</p>

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
		<p>Green Belt.</p> <p>The HCA, Department of Health and the Warwickshire Primary Care Trust have jointly commissioned Drivers Jonas Deloitte to prepare a detailed viability assessment looking at different redevelopment options including B1 and C2, plus C3. It is the intention to present the findings of the viability work to the Council, findings which they believe will support the case for a revision to Policy SAL.GPB1. It is hoped that this will form the basis for further discussion with the District Council to progress a Statement of Common Ground in order to achieve a deliverable policy for the site.</p>	
Worcestershire County Council <a href="#">SALPP233</a>	Policy SAL.GPB1 Employment Land Allocation	In part 2 of Policy SAL.GPB1 'Employment Land Allocation', it should read "no adverse <i>effect</i> " (rather than <i>affect</i> ).	Noted. Agreed that this typographical error should be included within the schedule of minor amendments.
St Francis Group <a href="#">SALPP200</a>	Policy SAL.GPB1 Employment Land Allocation	As set out previously, the identification of the former British Sugar site within Policy SAL.GPB1 as an employment allocation of approximately 12ha as part of a mix of uses is supported. Again, as identified in respect of the quantum of residential, it should be noted that further testing of the specific allocation on the site (i.e. taking into consideration site constraints and necessary infrastructure) may result in a different figure than 12ha gross.	Comments are noted and support is welcomed.

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
Worcestershire County Council <a href="#">SALPP234</a>	Paragraph 5.13	Raises a number of issues with regard to consistency with the provisions of the NPPF with regard to policy SAL.GPB1. Mainly that the strength of the economic argument in individual cases will be important here, The District Council should also be mindful of government intentions to re-introduce proposals to enable the change of use from commercial to residential.	These comments are noted. It is agreed that clarification should be provided within Policy SAL.GPB1 rather than within the reasoned justification. <b>Please refer to Minor Amendment SA-MA13.</b>
Worcestershire County Council <a href="#">SALPP235</a>	Paragraph 5.14	The value of section 5.14 is questioned, as it essentially just repeats part 2 of the policy itself.	It is agreed that this paragraph of the reasoned justification could be deleted. <b>Please refer to Minor Amendment SA-MA14.</b>
Shuttes J <a href="#">SALPP78</a>	Paragraph 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.	The sites included within the table are those which will be retained for employment use throughout the plan period. 4.20ha of the Morgan Technical Ceramics site will be retained in employment use, the current residential development is taking place on additional land which was previously in the company's ownership.
Shuttes J <a href="#">SALPP79</a>	Paragraph 5.24	Argues that the principles set out are in conflict with the approval of Tesco, Stourport-on-Severn.	The 2004 Adopted Local Plan identifies the Former Carpets of Worth site in Stourport-on-Severn as being potentially suitable for retail uses subject to proposals meeting the retail policies within that plan. Therefore, the Tesco store was in accordance with the policies in place when the decision was made.

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
<p>Arrowcroft Services Ltd <a href="#">SALPP52</a></p>	<p>Policy SAL.GPB2 Town Centre Retail</p>	<p>The wording of the policy is not consistent with the sequential approach to site selection in the NPPF.</p> <p>To accord with para.24 of the NPPF (and so to ensure that this policy 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.</p>	<p>Comments are noted. However, it is considered that the policy is consistent with the NPPF. At paragraph 24 the NPPF identifies that:</p> <p><i>Local planning authorities should apply a sequential test to planning applications for main town centre uses that are not in an existing centre and are not in accordance with an up-to-date Local Plan. They should require applications for main town centre uses to be located in town centres, then in edge of centre locations and only if suitable sites are not available should out of centre sites be considered. When considering edge of centre and out of centre proposals, preference should be given to accessible sites that are well connected to the town centre. Applicants and local planning authorities should demonstrate flexibility on issues such as format and scale.</i></p> <p>The wording included in Policy GPB2 is considered to be consistent with the above paragraph (24) contained within the NNPF.</p>
<p>Campaign to Protect Rural England</p>	<p>Policy SAL.GPB2 Town Centre</p>	<p>1. Policy GPB2 should be limited to Bewdley and Stourport, save for a brief statement that the policy on</p>	<p>Comments are noted. Taking each of these in turn:</p>



<b>Respondent/ Response Number</b>	<b>Paragraph/ Policy</b>	<b>Summary of Representation</b>	<b>Officer Response</b>
<a href="#">SALPP140</a>	Retail	<p>Kidderminster is as set out in KCAAP.</p> <p>2. A wider range of uses (including some healthcare) should be permitted in town centres, particularly on secondary frontages and above or below street level.</p> <p>3. The radius for out-of-centre sites in Bewdley and Stourport should be smaller than 300 metres. If this figure comes from NPPF, SALP should depart from it, setting out reasons - that the small size of the town centre means that 300 metres is excessive.</p> <p>4. The Plan should strongly discourage out-of-centre developments in Stourport and Bewdley, by additionally requiring the applicant to give good reasons why the development could not be located in Kidderminster.</p>	<p>1. Comments are noted. it is considered important to retain the sequential test in the Site Allocations, for consistency, it is cross-referred to in the Kidderminster Central Area Action Plan.</p> <p>2. This is already permitted through section 3 of Policy SAL.GPB3, and the associated footnote - 8.</p> <p>3. The figure is considered to be consistent with the NPPF definition of edge-of-centre and so is to be retained.</p> <p>4. Comments are noted. The Core Strategy already identifies that Stourport and Bewdley will be restricted to local shopping needs only and that large scale retail development should be targeted towards Kidderminster.</p>
West Mercia Police <a href="#">SALPP250</a>	Policy SAL.GPB2 Town Centre Retail	WMP and HWFRS welcome and support Policy SAL.GPB2 and paragraph 5.35. In our view they help ensure that the SAPDPD complies with paragraphs 58, 69 and 156 of the National Planning Policy Framework. This will in turn help to reduce the number of crime and anti-social behaviour incidents within the District.	Comments are noted and support is welcomed.
Shuttes J	Paragraph 5.32	Some elements of D1 uses should be encouraged as	Comments are noted and the policy allows for

<b>Respondent/ Response Number</b>	<b>Paragraph/ Policy</b>	<b>Summary of Representation</b>	<b>Officer Response</b>
<a href="#">SALPP80</a>		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.	this to take place within secondary shopping frontages.
Brook Green Estates Ltd <a href="#">SALPP121</a>	Policy SAL.GPB3 Protecting and Enhancing Local Retail Services	There is no justification for the new retail floorspace threshold of 250 sq m in Policy SAL.GPB3. The threshold presumably relates to local shopping provision and therefore a 280 sq m net limit is appropriate in line with the 1994 Sunday Trading Act which defines a small shop as having a net sales area of less than 280 sq m net. This size of shop will support a local need and therefore is acceptable outside designated centres.	Comments are noted. This is not a new retail floorspace threshold, as it has been a locally set floorspace threshold since 2004. However, the proposed change suggested by this representation, to bring the threshold in line with the 1994 Sunday Trading Act, would not be too dissimilar to the currently set threshold and would bring this is in line with a national definition of a 'small store'.  <b>Please refer to Minor Amendment SA-MA16.</b>
Watkins R A <a href="#">SALPP57</a>	Policy SAL.GPB4 Specialist Retailing	Raises concern that policy E2 of the Adopted Local Plan (2004) allowed car showrooms etc on B1, B2, B8 sites but policy Cp08 of the Adopted Core Strategy which replaces it does not. Suggests that SAL.GPB4 should be amended to specifically mention car showrooms etc.	Noted. It is considered that this would provide useful clarification within policy SAL.GPB4 and should be incorporated as a minor amendment.  <b>Please refer to Minor Amendment SA-MA18.</b>
Thomas Vale <a href="#">SALPP108</a>	Policy SAL.GPB4 Specialist Retailing	Reference should be included to chandlery shops and boat related commercial operations being appropriate at water-based recreational site, such as marinas.	Comments are noted. The policy related to specialist retailing is not supposed to be an exhaustive list, more of a recognition of what specialist retail areas currently exist within the District. However, it is considered that a more generalised, flexible approach to this policy could be included in order to allow for

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
			<p>developments such as the one proposed to come forward.</p> <p><b>Please refer to Minor Amendment SA-MA17.</b></p>
<p>Thomas Vale <a href="#">SALPP109</a></p>	<p>Paragraph 5.49</p>	<p>The emphasis on tourism and its importance to the Wyre Forest is welcomed. There needs to be flexibility in Wyre Forest Council's planning policy to enable development which is required to support the tourism industry in the area. There may be times when such development can not be accommodated within existing town centres or on previously developed land, in these cases consideration should be given to sites close to urban areas.</p>	<p>Comments are noted. This part of the Development Plan refers to the District's existing major tourist attractions and therefore the representation made does not appear to be of relevance here.</p> <p>Notwithstanding this, the comments made within the representation are generally supported. However, it is considered that the Adopted Core Strategy, through Policy CP10: Sustainable Tourism, already provides the policy framework for this type of tourism development to be considered and therefore it is considered that no further change is required for the Site Allocations and Policies DPD.</p>
<p>Thomas Vale <a href="#">SALPP111</a></p>	<p>Paragraph 5.50</p>	<p>It is considered that further policy support should be set out in relation to waterways related tourism development.</p> <p>Request following policy inclusion:</p>	<p>Comments are noted. The request for an inclusion of additional policy has been considered but it is felt that the existing policy framework included in the Core Strategy already provides an appropriate approach to considering this type of development, as</p>

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
		<p><i>'Proposals that enhance the tourism role and function of the waterways network will be fully supported. Such proposals will include the creation of long and short term moorings at new marinas, extensions to existing marinas and other mooring facilities. Ancillary development which supports such development will also be permitted. Such development will be supported subject to the following:</i></p> <ul style="list-style-type: none"> <li><i>a. Development must not result in any unacceptable impacts on flooding, drainage or navigation of the waterway;</i></li> <li><i>b. Development must be acceptable in terms of highways and access; and</i></li> <li><i>c. Development must not have any significant detrimental impacts on the local environment.'</i></li> </ul>	<p>follows:</p> <p>Policy CP15: Regenerating the Waterways already provides a proactive policy approach to considering development by the District's waterways</p> <p>Policy CP10: Sustainable Tourism already covers a number of points in relation to transport links and infrastructure</p> <p>Policy CP02: Water Management, requires development to consider flood risk.</p> <p>Although the policy framework does not explicitly include references to moorings, it is not considered that this would prohibit this type of development from coming forward.</p> <p>It is therefore considered that the inclusion of another policy would just be a repetition of the policies contained in the Core Strategy and would not add further value.</p>
West Midland Safari Park <a href="#">SALPP100</a>	Policy SAL.GPB5 Supporting Major Tourist	WMSLP supports the policy and considers that it is sound because: it has been positively prepared in consultation with the Safari Park; it is justified through the work has been undertaken on the economic impact	Support is welcomed.

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
	Attractions	of development at the Safari Park; it is likely to be effective because it provides a framework for taking development forward through a masterplan; and it is consistent with the NPPF.	
Thomas Vale <a href="#">SALPP112</a>	Policy SAL.GPB5 Supporting Major Tourist Attractions	It is requested that a paragraph be added to the end of Policy SAL.GPB5 stating that other tourism related schemes will be considered within Wyre Forest, including waterways related facilities. This is considered necessary to ensure that much needed waterways development is promoted in the area.	Comments are noted. However, it is considered that this is already dealt with in the Adopted Core Strategy, which states in Policy CP10: Sustainable Tourism that:  <i>"The strategy is to support the local tourism industry through:</i>  <ul style="list-style-type: none"> <li><i>Encouraging developments, projects and initiatives that assist in promoting the waterways as a tourist attraction."</i></li> </ul>
English Heritage <a href="#">SALPP217</a>	Policy SAL.GPB5 Supporting Major Tourist Attractions	English Heritage welcomes the inclusion of a strengthened reference in the policy and reasoned justification to the historic environment and heritage assets of the Wyre Forest.	Support is welcomed.
Shuttes J <a href="#">SALPP81</a>	Paragraph 5.52	Welcomes the use of rail to access the Safari Park and feels it should be encouraged through both the policy and development conditions.	Support is noted.
Worcestershire	Paragraph 6.1	Welcome inclusion of supporting mixed use	Support is welcomed.

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
County Council - Environmental Policy & Strategic Planning <a href="#">SALPP225</a>		developments and the policies to improve pedestrian connectivity through the area. Support the objectives contained within Section 6, Sustainable Transport. This work will be achieved through our ongoing LTP3 Kidderminster Town Centre Strategy Package works which are currently underway.  Will continue to work with WFDC to review the Ring Road and establish improved connectivity across the ring road.	
Core11 <a href="#">SALPP17</a>	Policy SAL.CC1 Sustainable Transport Infrastructure	Suggests that the importance of policy SAL.CC1 is understated and that it should be cross-referenced in many more policies across the DPD.	Comments are noted, however, all planning applications will need to demonstrate that they have met the requirements of this policy and therefore it is not considered necessary to cross-reference it within each of the site specific policies.
Arrowcroft Services Ltd <a href="#">SALPP54</a>	Policy SAL.CC1 Sustainable Transport Infrastructure	Raises concern that part of the Bus Priority Network and Proposed Cycle Route Network crosses through allocations EG5 and EG7 of the KCAAP. Suggests policy SAL.CC1 should be sufficiently flexible so that this does not prejudice the comprehensive redevelopment of the area.	Comments are noted. However, it is not considered that Policy CC1 would prejudice a comprehensive redevelopment of the areas identified. The Policy would just ensure that the transport priority routes were not adversely impacted as a result of the development. It does not prohibit potential changes or deviations from the current network, it merely just ensures that there is no 'adverse impact'.
National Farmers	Policy	Rural areas are reliant on good transport links to	Comments are noted. It is considered that the

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
Union <a href="#">SALPP118</a>	SAL.CC1 Sustainable Transport Infrastructure	<p>invigorate the local economy, increased access to bus transport and better train services will increase accessibility to services.</p> <p>Rural people are likely to remain reliant on private car transport but this does not mean that rural communities are unsustainable.</p> <p>Many rural people commute small distances to work and tend to rely on local facilities. Farms and rural businesses are dependent on HGV and car transport. Any decisions to target employment away from areas reliant on the road network may have a negative effect upon the rural economy and restrict farm diversification.</p> <p>Tourism also relies on access by private car and new tourism enterprises must not be limited to sites that are accessible by public transport routes.</p>	policy framework provided by the District Council has taken into account the issues raised through this representation.
Core11 <a href="#">SALPP18</a>	Paragraph 6.8	Suggests making reference to combining cycling and walking networks provided design is suitable.	<p>Paragraph 6.8 refers specifically to the network of safeguarded cycle routes which appear on the proposals map, many of these are suitable for pedestrians too.</p> <p><b>Please refer to Minor Amendment SA-MA19.</b></p>
Core11 <a href="#">SALPP20</a>	Paragraph 6.10	Suggests that a stand alone document relating to transport is developed to bring together all of the policies	The preparation of a stand-alone transport document is not considered necessary.

<b>Respondent/ Response Number</b>	<b>Paragraph/ Policy</b>	<b>Summary of Representation</b>	<b>Officer Response</b>
		regarding different modes of transport.	
Shuttes J <a href="#">SALPP82</a>	Paragraph 6.14	Considers that parking needs to be reviewed in light of the Portas Review both in terms of planning but also in terms of charging.	Comments are noted. The provision of car-parking needs to be carefully balanced in order not to deter people from visiting the town centre whilst also encouraging the use of sustainable modes of travel.
Arrowcroft Services Ltd <a href="#">SALPP53</a>	Policy SAL.CC2 Parking	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. Suggests policy should incorporate flexibility on a site-by-site basis, requiring parking space numbers to be justified.	Comments are noted.  <b>Please refer to Minor Amendment SA-MA20.</b>
Shuttes J <a href="#">SALPP83</a>	Paragraph 6.18	Suggests more emphasis is required on the provision of the Stourport Relief Road. This will have many benefits including environmental, traffic flows, and a better town centre environment.	Insert an additional sentence at the end of paragraph 6.19 as follows: Policy CP03 of the Adopted Core Strategy identifies the Stourport Relief Road for delivery between 2021 and 2026. The scheme is also identified within LTP3.  <b>Please refer to Minor Amendment SA-MA21.</b>
St Francis Group <a href="#">SALPP201</a>	Policy SAL.CC3 Major Transport	As part of the planning application process for the first phase of redeveloping the former British Sugar site, further work has taken place led by the County Council to identify a suitable route for the relief road to pass	Comments are noted. In terms of the line of the relief road, the proposals map includes an 'indicative line' suggesting where the line may run, this can be updated should further



Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
	Infrastructure	<p>through the site. In light of this, the Proposals Map should incorporate the most up to date information. In addition, the policy should recognise that the preferred route has not been finalised and therefore the route proposed is indicative.</p> <p>As set out previously, the mechanism for seeking contributions towards the implementation of the major transport infrastructure is unclear. Given the Council has not yet put in place procedures to apply a Community Infrastructure Levy, there is a present ambiguity as to how contributions would be sought. Further clarification is required in respect of this issue.</p>	<p>information be available prior to adoption of the document. This policy also refers to the 'indicative line' of the Relief Road to ensure that there is consistency.</p> <p>The Council is currently progressing work on a CIL and, in conjunction with the other District's in Worcestershire and the County Council, have undertaken viability work to assess what charge may be applicable in the District. This work is continuing and will be a key element in funding new infrastructure in the District.</p>
St Francis Group <a href="#">SALPP202</a>	Policy SAL.CC4 Freight	<p>It is important though to note that there is no evidence to justify that freight use, as identified at para 6.24, is practical or viable. This issue has been considered in discussion between St Francis Group and Severn Valley Railway. It was concluded that whilst a link to the former British Sugar site boundary is possible and is shown on the Consented Masterplan it is not practical for rail freight for a number of reasons. Primarily the infrastructure needed to get Freight to the site does not exist, Severn Valley have confirmed that the Viaduct is not capable of handling Freight over and above its current uses as a Heritage Railway. There is also the matter of insufficient demand for large quantities of freight to be transported to Kidderminster and beyond.</p>	<p>Comments are noted. Amend the document to remove the reference to freight potential at the SVR and British Sugar site as it is not considered to be deliverable or achievable.</p> <p>Policy CP03 of the Adopted Core Strategy requires employment development to have regard to the possibility of utilising the existing rail infrastructure for the sustainable movement of freight and to provide sustainable transport links and paragraph 6.43 makes specific reference to freight and passenger rail at the former British Sugar site.</p>

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
			<b>Please refer to Minor Amendment SA-MA22.</b>
St Francis Group <a href="#">SALPP203</a>	Paragraph 6.24	In terms of site specific matters regarding freight, paragraph 6.24 refers to there being sidings on site once used for rail freight. No sidings exist on site at present, they were presumably removed when the rail operation ceased many years ago. A further issue is that there are no established facilities for the onward distribution of freight (i.e. once it arrives there is nowhere for it to go). When all matters are considered together, it is concluded in agreement with Severn Valley Railway that a rail freight connection at the former British Sugar site is not a feasible or viable option. It is recommended that paragraph 6.24 be deleted.	Comments are noted. Amend the document to remove the reference to freight potential at the SVR and British Sugar site as it is not considered to be deliverable or achievable.  <b>Please refer to Minor Amendment SA-MA22.</b>
Environment Agency <a href="#">SALPP182</a>	Paragraph 6.30	Paragraph 6.30 refers to a locally tailored version of the West Midlands Sustainability Checklist being developed to assist developers in achieving targets, as referred to in section 6.11 of the adopted Core Strategy. Whilst we understand the checklist is being developed after the Site Allocations and Policies DPD, it is still unclear when the checklist will be produced and what weight the document will have.	Comments are noted. The Council are envisaging that the locally tailored version of the Sustainability Checklist will be adopted as an SPD.
Shuttes J <a href="#">SALPP84</a>	Paragraph 6.32	Section sets a strategy which the authority should lead by example. It should be considered in all new buildings however, care needs to be taken on older buildings where the financial advantages are not so clear and the	Comments are noted. The policy states that any proposals must be in accordance with all other policies in the LDF, the historic environment is considered at paragraph 6.37.

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
		character of the area can be damaged.	
Worcestershire County Council <a href="#">SALPP181</a>	Paragraph 6.32	<p>Paragraph 6.32 - states that no sites are allocated at the current time however the NPPF states that LPA's should:</p> <ul style="list-style-type: none"> <li>• <i>"Consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure the development of such sources".</i></li> </ul>	Noted. However the evidence base that has been used to inform both the Core Strategy and Site Allocations policies, (which includes WCC's Commissioned study into the identification of such sites for renewable energy schemes across Worcestershire) did not identify any specific deliverable sites and therefore it is not possible to allocate any within the DPDs. No further change required.
National Farmers Union <a href="#">SALPP119</a>	Policy SAL.CC6 Renewable Energy	<p>Some Worcestershire farmers are considering opportunities for growing biofuels (biodiesel and bioethanol) and biomass (for heating etc.) locally. We therefore welcome the policy and its considerations for renewable energy development and on-site energy use.</p> <p>Furthermore, the ability to construct livestock production units and poultry units (including the larger free range units demanded by the consumer) is fundamentally necessary to the future of the rural economy and the management of agricultural land.</p>	Comments are noted and support is welcomed.
English Heritage <a href="#">SALPP218</a>	Policy SAL.CC6 Renewable Energy	English Heritage welcomes the reference in the policy and reasoned justification to the importance of taking into account the historic environment and heritage assets in the consideration of renewable energy proposals.	Support is welcomed.

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
Core11 <a href="#">SALPP21</a>	Paragraph 6.42	Suggests 6.42 should make reference to existing water management shortfalls and the improvements to existing drainage which are necessary.	These issues are set out within the Adopted Core Strategy and it is not considered necessary repeat them here.
Core11 <a href="#">SALPP22</a>	Policy SAL.CC7 Water Management	Supports policy SAL.CC7 but suggests it could include reference to the fact that SUDS incorporated in new development may be influenced by other local or adjoining drainage systems that may be inadequate and will need improvement.	Comments are noted. When developments are implementing SUDS these considerations will be taken into account, as they are relevant factors.
West Mercia Police <a href="#">SALPP247</a>	Policy SAL.CC7 Water Management	<p>WMP and HWFRS are pleased that the robust approach of policy CP02: ' <i>Water Management</i> ' of the adopted Wyre Forest Core Strategy (December 2010) has been carried through into Policy SAL.CC7 and its supporting paragraphs.</p> <p>Having compared the outcomes of "Exercise Watermark" with Policy SAL.CC7 and its supporting paragraphs, we confirm that we support the text as written and commend the Council on their drafting.</p>	Comments are noted and support is welcomed.
Environment Agency <a href="#">SALPP185</a>	Policy SAL.CC7 Water Management	<p>We support the inclusion of this policy and welcome the inclusion of our suggested amended wording (at the preferred options stage) for the SuDS section and paragraph 6.45.</p> <p>We welcome the inclusion of a Water Quality section within this policy, with reference to no deterioration, in line with an objective of the Water Framework Directive</p>	<p>Comments are noted and support is welcomed.</p> <p><b>Please refer to Minor Amendment SA-MA23.</b></p>

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
		<p>(WFD). In considering other objectives of the WFD we would recommend the policy also refers to development improving and enhancing the status of water bodies under the objectives of WFD.</p> <p>Recommended wording: Development proposals will be permitted which:</p> <ul style="list-style-type: none"> <li>• do not lead to deterioration of EU Water Framework Directive water body status,</li> <li>• do not have a negative impact on water quality, either directly through pollution of surface or groundwater, or indirectly through overloading of Wastewater Treatment Works.</li> <li>• help to conserve and enhance watercourses and riverside habitats, where necessary and feasible, through management and mitigation measures for the improvement and/or enhancement of water quality and habitat of any aquatic environment in or adjoining the development site.</li> </ul>	
Worcestershire County Council <a href="#">SALPP239</a>	Policy SAL.CC7 Water Management	Emphasis of Policy SAL.CC7 very much supported. However, Planning authorities should take necessary regard of not just the statutory planning framework and the National FCERM Strategy, but also the Local Flood Risk Management Strategy. In so doing, future developments proposals will need to give proper regard to the local flood risk management strategy including the	These comments are noted and it is considered this requires further discussion under the terms of a Statement of Common Ground.

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
		<p>risk of flooding from surface water, groundwater and ordinary watercourses.</p> <p>We would welcome the inclusion of a policy that is consistent with the above statutory requirement and identifies the need for development proposals to have regard to the emerging strategy. This would also assist in demonstrating the Duty to Co-operate.</p>	
<p>St Francis Group <a href="#">SALPP206</a></p>	<p>Policy SAL.CC7 Water Management</p>	<p>As set out previously, Policy 19, which requires all schemes to implement SUDS, is unnecessary given that Policy CP02 required developers to include SUDS with in new developments. It is considered that the policy does not add to the existing policy requirement, particularly given that the SUDS Approving Body is yet to be established. In addition, the incorporation of SUDS techniques is referred to in Policy 26 in respect of landscaping and boundary treatment, therefore Policy 19 is superfluous.</p>	<p>Comments are noted. However, it is considered that this policy provides further information in relation to SUDS which is supported by other Statutory bodies. The additional information is considered necessary, as is the reference to the SUDS Approving Body, as this helps to ensure that the plan is future-proofed.</p>
<p>Environment Agency <a href="#">SALPP180</a></p>	<p>Paragraph 6.52</p>	<p>We support the inclusion of text on 'Water Quality' with paragraphs 6.52 - 6.54.</p> <p>The text in paragraph 6.52 makes reference to River Quality Objectives (RQOs), taken from the Water Cycle Strategy (WCS). However, RQOs are no longer used in water quality classification as we have now moved to</p>	<p>Comments are noted and support is welcomed. include proposed changes as part of the Minor Amendments, both in relation to the updating of information and in relation to the additional paragraph relating to groundwater.</p>

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
		<p>using Water Framework Directive classification. This classification system incorporates both chemical and ecological elements.</p> <p>We welcome the reference in paragraph 6.54 to ensuring that developments meet the 'no deterioration' objective of the WFD. Another objective of the WFD is: 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.</p> <p>We would recommend a paragraph on groundwater in explaining its context for the District and justification for its inclusion within the Water Quality policy, which we support.</p> <p>We would recommend that paragraph 6.52 is updated to refer to the current classification system.</p> <p>In relation to paragraph 6.54, we would recommend a reference to development contributing to improving the status of water bodies in assisting the WFD objective to achieve good status for all waters by 2027.</p> <p>In relation to groundwater, we would recommend the</p>	

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
		<p>following text:</p> <p><i>The District area overlies a principal aquifer of regional strategic importance. The majority of the sites fall within the combined total source protection zone of a number of public water supply boreholes. The southern extent of the Kidderminster Town centre lies within the inner and outer protection zone of a public water supply borehole. The depth to water table across the area is variable, however many of the sites fall within the valley of the Stour where the water table is shallow. The area is therefore located in a sensitive hydrogeological setting and new development must put measures in place to protect the water environment.</i></p>	
<p>Shuttes J <a href="#">SALPP85</a></p>	<p>Paragraph 7.1</p>	<p>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.</p>	<p>The Green Belt boundary is not being reviewed as part of this plan review and therefore, the Green Belt will remain as originally set out.</p>
<p>Lawrence Recycling &amp; Waste Management <a href="#">SALPP41</a></p>	<p>Policy SAL.UP1 Green Belt</p>	<p>The draft Policy SAL.UP1 has been copied directly from Policy GB.1 of the Wyre Forest District Local Plan. It needs to be updated to reflect chapter 9 of the NPPF, otherwise it will be unsound.</p>	<p>Comments are noted. Replace text as suggested with the exception of removing the clause relating to visual amenity. Paragraph 81 of the NPPF requires planning authorities to 'plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities...to retain and enhance landscapes and visual amenity and</p>



Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
			<p>biodiversity..”. Therefore, it is considered that this clause is in line with national planning policy and is justified.</p> <p><b>Please refer to Minor Amendment SA-MA24.</b></p>
<p>National Farmers Union <a href="#">SALPP117</a></p>	<p>Policy SAL.UP1 Green Belt</p>	<p>We welcome the recognition that agricultural holdings require development in various locations, including greenbelt. We also welcome the consideration for the allowance of renewable energy developments within the green belt where appropriate.</p>	<p>Support is welcomed.</p>
<p>Campaign to Protect Rural England <a href="#">SALPP148</a></p>	<p>Policy SAL.UP1 Green Belt</p>	<p>(a) The relationship between the two parts of the policy is not clear. The conversion of a redundant barn to a house appears to be allowed under part I but prohibited by part II.</p> <p>(b) Item (iv) should be limited to redundant buildings; otherwise farmers will convert barns to other uses and then demand to be allowed to construct new buildings.</p> <p>(c) A cross-reference to Policy UP11 is desirable.</p>	<p>Taking each comment in turn:</p> <p>a) It is considered that the policy is clear and that the conversion of a redundant barn would be allowed, but in accordance with criteria iv.</p> <p>b) It is considered that the criteria included in Policy UP11 is appropriate, and that is what is cross referenced here</p> <p>c) Suggested Minor Amendment to include (UP11) after the sentence included at criteria iv</p> <p><b>Please refer to Minor Amendment SA-MA25.</b></p>
<p>Lawrence Recycling &amp; Waste</p>	<p>Paragraph 7.4</p>	<p>Considers that policy SAL.UP1 is unsound because there is no reference in the NPPF to the visual amenity of the Green Belt. Whilst the visual amenity concept</p>	<p>Paragraph 81 of the NPPF requires planning authorities to 'plan positively to enhance the beneficial use of the Green Belt, such as</p>

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
Management <a href="#">SALPP42</a>		was part of PPG2 it is not included within the NPPF and should similarly be omitted from this DPD.	looking for opportunities...to retain and enhance landscapes and visual amenity and biodiversity..". Therefore, it is considered that this clause is in line with national planning policy and is justified.
Core11 <a href="#">SALPP29</a>	Paragraph 7.7	Notes and welcomes the inclusion of infrastructure policies throughout the DPD. Borrington Parks is shown as a playing field and should be recreation and amenity space.	Comments are noted. There are playing fields within Borrington Park and these are separately identified on the Proposals Map.
Bowdler and Mignuolo <a href="#">SALPP103</a>	Policy SAL.UP2 Areas of Development Restraint	<p>We are instructed by our clients to promote the 3.58 Ha site adjacent to Stourbridge Road (northern section of Hurcott ADR) for housing development. We propose modifications to a number of Core Strategy policies as follows:</p> <p>DS01 - sequential approach - additional point 3 - to include part of site H094;</p> <p>DS05 - to include 130 affordable new homes p.a;</p> <p>CP04 - % level of AH on part of site H094 set at minimum 40%and maximum 50% and low-cost 2/3 bed homes between 10-15%;</p> <p>CP05 - insert 2nd bullet point - 'The ADR site of 3.58 hectares should meet densities of no less than 50</p>	<p>The latest SHMA (GVA 2012) shows an annual affordable housing need of 210 dwellings. Given the overall quantum of housing development (200 p.a) which was agreed by the inspector at the Core Strategy examination, there is very limited scope to meet need on this scale. The allocation of 4000 dwellings (2006-26) includes provision of affordable housing as well as market housing. The only affordable housing provision which would be in addition to the dwelling requirement would be on rural exception sites. This site at Hurcott would not meet the criteria for a rural exception site. The latest housing trajectory (SHLAA 2012) shows a projected housing supply of approximately 4,400 dwellings for the plan period 2006-26. There is no justification at the present time for releasing this land for housing. The site should</p>

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
		<p> dwellings per hectare'.</p> <p>DPD is not positively prepared for following reason: WFDC states that there is sufficient land to accommodate 4000 houses 2012-26. This fails to take into account annual need to provide 260 affordable homes. CP04 confirms a likely delivery of 60 affordable homes a year. Thus there is a shortfall of 2800 affordable homes 2012-26. Thus the DPD is not in accordance with para.47 of the NPPF.</p> <p>The DPD is not effective for following reasons:-</p> <p>No proper account has been taken of ongoing need to provide affordable and low-cost homes because of need to provide 4000 normal homes. Existing permissions may be uneconomic to build with high % of affordable housing and % is often reduced by LPA to aid development, but this makes the DPD not in accordance with para.47 of the NPPF. Affordable housing deficiency is compounded each year by reduction of affordable housing % on housing sites. DPD is ineffective because it is not delivering the required amount of affordable housing in a 5 year period.</p> <p>The LPA has failed to identify sufficient land to accommodate at least 100 affordable homes annually for the next 5 years and so the DPD is wholly flawed and</p>	<p>remain as safeguarded land</p>

<b>Respondent/ Response Number</b>	<b>Paragraph/ Policy</b>	<b>Summary of Representation</b>	<b>Officer Response</b>
		<p>unsound.</p> <p>The LPA is requested to modify the plan to incorporate 3.58 hectares of land presently designated as an ADR in order to provide sufficient land to accommodate at least some of the serious need for affordable and low cost housing.</p>	
<p>Associated British Foods Plc <a href="#">SALPP197</a></p>	<p>Policy SAL.UP2 Areas of Development Restraint</p>	<p>Consider that land at former settling ponds on Wilden Lane is suitable and developable for housing and recreation purposes and should be safeguarded under policy SAL.UP2. 13.5 Ha site is in flood zone 1, near main employment sites and well linked by public transport to town centre. Development of site could provide improved play and sports facilities, formal access, information and parking for the adjacent SSSI, affordable housing and other community facilities. Northern part of site could provide up to 250 dwellings. This area of land meets the criteria set by the NPPF for safeguarded land.</p>	<p>Disagree. The Adopted Core Strategy sets the Development Strategy for the District and it was concluded at the examination process that no circumstances exist to justify a review of the Green Belt boundary. The latest housing trajectory (SHLAA 2012) shows a total housing supply of 4,400 for the plan period 2006-26 so there is no justification for releasing more sites from the Green Belt at this stage.</p>
<p>Canal &amp; River Trust <a href="#">SALPP191</a></p>	<p>Policy SAL.UP2 Areas of Development Restraint</p>	<p>The Canal and River Trust welcome the new wording within SAL.UP2 which emphasises the multi-functional role of the waterways.</p>	<p>Support is noted.</p>
<p>St Francis Group <a href="#">SALPP199</a></p>	<p>Policy SAL.UP2</p>	<p>The policy lists locations from 1 to 5 which imply that there is a sequential approach to be followed, however,</p>	<p>Comments are noted. As identified by the representation it is not intended for the list to be</p>

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
	Areas of Development Restraint	from reading the accompanying text this is not the case. If it were intended, such a mechanism is not justified nor would it be consistent with national policy. To avoid any confusion or ambiguity, it is recommended that the numbered points are replaced with bullets.	a sequential approach, and this is confirmed by the accompanying text. The use of numbering is considered to be useful in identifying which criteria is being used when planning applications are determined. Therefore, it is not suggested that any change is made in this regard.
Thomas Vale <a href="#">SALPP114</a>	Policy SAL.UP3 Providing a Green Infrastructure Network	It is recommended that 'i. River Severn and River Stour Corridors' be revised to include reference to the importance of the River corridors for sustainable tourism and that appropriate facilities should be provided, such as marinas and mooring sites.	Comments are noted. However, it is considered that this is already dealt with in the Adopted Core Strategy, which states in Policy CP10: Sustainable Tourism that:  <i>"The strategy is to support the local tourism industry through:</i> <ul style="list-style-type: none"> <li>• <i>Encouraging developments, projects and initiatives that assist in promoting the waterways as a tourist attraction."</i></li> </ul>
Campaign to Protect Rural England <a href="#">SALPP149</a>	Policy SAL.UP3 Providing a Green Infrastructure Network	(a) KCAAP requires development to have a positive relationship to the canal; this is welcome, but should apply more generally.  (b) Development should not merely "not be detrimental to" the canal's character, but should (where possible) seek to enhance it.  (c) The diversion of a footpath (or other right of way)	Taking these points in turn:  a and b) This is included under Core Strategy Policy CP15, which requires development to contribute positively to the creation of a quality canalside environment. It is therefore considered inappropriate to repeat this is this policy.

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
		should only be allowed, where it is not feasible to design the development around the footpath (etc) and the increase in length caused by a diversion should always be designed to be at a minimum.	c) This point is agreed with and the policy provides for this by including the following sentence: <i>"development along the canal corridor must not have a detrimental impact on the existing sustainable transport route..."</i>
Environment Agency <a href="#">SALPP163</a>	Policy SAL.UP3 Providing a Green Infrastructure Network	<p>We support the inclusion of this policy, particularly part 1(i) on the delivery and enhancement of the River Severn and River Stour Corridors.</p> <p>Similar corridors are also essential along the tributaries of the Severn and Stour. Smaller watercourses offer essential linkages through the landscape and are as important locally as the large Severn and Stour Corridors.</p> <p>A reference to <b>blue infrastructure</b> in the first paragraph for all water bodies, including the tributary corridors, in the District, would address this in working towards the Objectives of the Water Framework Directive.</p>	<p>Comments are noted and support is welcomed.</p> <p><b>Please refer to Minor Amendment SA-MA27.</b></p>
Worcestershire County Council - Environmental Policy & Strategic Planning <a href="#">SALPP241</a>	Policy SAL.UP3 Providing a Green Infrastructure Network	<p>WCC is generally supportive of the approach to Green Infrastructure in Policy SAL.UP3. Infrastructure delivery should include green infrastructure delivery and implementation.</p> <p>Has concerns with potentially narrow approach to the</p>	<p>The comments in relation to Green Infrastructure are noted. However, the policy does not limit Green Infrastructure purely to canals and river corridors. WCC's attention is drawn to the first part of the policy - Providing a Green Infrastructure Network which seeks to enhance and retain open space and green</p>

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
		interpretation of Green Infrastructure limiting it to canals and river corridors.	infrastructure as set out within the Green Infrastructure Strategy. No changes required.
Worcestershire County Council <a href="#">SALPP243</a>	Policy SAL.UP3 Providing a Green Infrastructure Network	<p>Policy SAL.UP3 - Any compensatory provision needs to provide equivalent multi-functionality and needs to take into account the functions served by the areas of GI to be lost and the potential impact on communities.</p> <p>Existing Network - opportunities for new GI provision especially within new developments should be promoted.</p> <p>The role of the Wyre Forest as a sub-regional asset is not explored in any detail and could benefit from greater consideration.</p>	These comments are noted and will be further addressed in detail through the Green infrastructure Strategy which will provide a detailed action plan and strategy for the District to support the planning policies. No further change required.
Sport England <a href="#">SALPP65</a>	Policy SAL.UP4 Open Space and Play Provision	The terms of this policy concerning Open Space and Planning are welcomed.	Support is noted.
Campaign to Protect Rural England <a href="#">SALPP150</a>	Policy SAL.UP4 Open Space and Play Provision	<p>There is no adequate provision for developers to provide for the maintenance in perpetuity of new open space provided by them. This should normally be by the open space being dedicated to a Parish Council (in parished areas) or to the district council (elsewhere).</p> <p>It is possibly that this obligation is covered by planning</p>	Comments are noted. The payment for maintenance of new open space is usually governed through s.106 agreements. The Council have an Adopted Planning Obligations SPD which includes the relevant information.

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
		policy elsewhere, but we do not know where.	
St Francis Group <a href="#">SALPP205</a>	Policy SAL.UP4 Open Space and Play Provision	<p>A playing field is identified on the British Sugar site. It should be noted that the identified land has not been in sporting use for a considerable time.</p> <p>The inclusion of this land as a playing field is simply a continuation of the policies from the Adopted Local Plan, which is now out of date. The identification of the land as a playing field is therefore incorrect and should be removed from the Proposals Map.</p>	Comments are noted. Remove the allocation as currently included on the Proposals Map, include as a Minor Amendment.
Campaign to Protect Rural England <a href="#">SALPP151</a>	Policy SAL.UP5 Providing Opportunities for Safeguarding Local Biodiversity and Geodiversity	<p>Developments near designated sites should seek to enhance them, where possible; and to facilitate access to them, where appropriate.</p> <p>Some additional wording is required to reflect this.</p>	Comments are noted. However, it is considered that the policy already covers this through the first paragraph which states that <i>"All new developments should take steps to enhance biodiversity both within and outside of designated areas"</i> . Steps to enhance biodiversity could include options to open up access, where considered appropriate on a site by site basis.
Worcestershire County Council <a href="#">SALPP238</a>	Policy SAL.UP5 Providing Opportunities for Safeguarding	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	Support is welcomed.



Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
	Local Biodiversity and Geodiversity	they deserve.	
Worcestershire County Council <a href="#">SALPP244</a>	Policy SAL.UP5 Providing Opportunities for Safeguarding Local Biodiversity and Geodiversity	<p>Under Policy SAL.UP5 the up to date biodiversity action plan should be clarified to be the "Worcestershire Biodiversity Action Plan"</p> <p>Special Wildlife Sites - correctly known as "Local Wildlife Sites"</p> <p>Ecological Survey - should refer to the need to survey for protected and priority species.</p>	<p>Comments are noted. It is considered that they could be incorporated as minor amendments to the policy to provide further clarity.</p> <p><b>Please refer to Minor Amendment SA-MA29.</b></p>
Kidderminster Civic Society <a href="#">SALPP32</a>	Paragraph 7.40	<p>Agrees with the Government statement " <i>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</i>".</p>	Comments are noted.

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
Worcestershire County Council <a href="#">SALPP183</a>	Paragraph 7.43	<ul style="list-style-type: none"> <li>Paragraph 7.43: the opening statement - <i>Wyre Forest District contains a variety of heritage assets, including buildings, areas, monuments, landscapes and archaeology</i> - we feel might benefit from clarification.</li> <li>We assume by <i>areas</i> the statement is referring to conservation areas we would welcome clarification on this matter. However, if it is a reference to more generic areas of historic significance then we would welcome the inclusion of a statement that clarifies this for example: areas of special historic character. We understand the ambition to minimise policy wording but would welcome clarification on this matter.</li> </ul>	<p>These comments are considered helpful for clarification purposes.</p> <p><b>Please refer to Minor Amendment SA-MA32.</b></p>
Kidderminster Civic Society <a href="#">SALPP33</a>	Policy SAL.UP6 Safeguarding the Historic Environment	Supports policy SAL.UP6 and argues that the historic environment can be retained whilst creating a new vibrant, sustainable economy in the area.	Support is welcomed.
Roper-Presdee S <a href="#">SALPP38</a>	Policy SAL.UP6 Safeguarding the Historic Environment	Suggests that the requirement for proposals to provide an exceptional design to mitigate against loss of a heritage asset is not proportionate as it requires the same response for both designated and non-designated heritage assets and is contrary to the principles within	<p>Agree that policy should be reworded to bring it into line with the NPPF regarding the 'significance' of a heritage asset.</p> <p>Amend final sentence of criteria (c) to read as follows:</p>

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
		<p>the NPPF.</p> <p>Suggest rewording to "Redevelopment proposals should provide a design which provides an appropriate level of mitigation against the loss of the Heritage Asset in proportion to its significance at national, regional and local level."</p>	<p>'Redevelopment proposals should provide a design which provides an appropriate level of mitigation against the loss of the Heritage Asset in proportion to its significance at national, regional and local level.'</p> <p><b>Please refer to Minor Amendment SA-MA33.</b></p>
<p>Watkins R A <a href="#">SALPP58</a></p>	<p>Policy SAL.UP6 Safeguarding the Historic Environment</p>	<p>SAL.UP6 2 refers to draft Conservation Area Appraisals, however, this should be removed as they have not had a public consultation period. Also, some adopted Appraisals are out of date and the policy should therefore refer to appraisals which have been reviewed within the last 10 years.</p>	<p>Noted. However, Draft Conservation Area Appraisals are usually subject to detailed consultation prior to their adoption. No further change required.</p>
<p>English Heritage <a href="#">SALPP219</a></p>	<p>Policy SAL.UP6 Safeguarding the Historic Environment</p>	<p>Welcome inclusion of this policy which supplements Policy CP11 of the Adopted Core Strategy. Together with commitment to prepare Historic Environment SPD, they provide positive strategy for conservation and enjoyment of historic environment.</p> <p>However, there are inconsistencies with the NPPF:</p> <ul style="list-style-type: none"> <li>i) coverage of heritage assets of archaeological significance</li> <li>ii) policy dealing with harm to heritage assets (criteria a-</li> </ul>	<p>Officers will meet with English Heritage to discuss and agree amendments to the text of policy SAL.UP6 to overcome these objections.</p>

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
		<p>c) and para.7.58</p> <p>iii) enhancement of setting of Conservation Areas (NPPF para.137)</p> <p>iv) terminology, especially in relation to 'significance'</p> <p>v) information requirements for heritage statements as set out in para.7.47 - perhaps better as appendix</p> <p>vi) reference to enabling development at para.7.57 is not compatible with English Heritage guide on Enabling Development and PPS5 Practice Guide.</p>	
<p>Campaign to Protect Rural England <a href="#">SALPP152</a></p>	<p>Policy SAL.UP6 Safeguarding the Historic Environment</p>	<p>To the list at the top of page 85 the following further paragraphs need to be added:</p> <p>(v) Alterations should where possible be reversible. This is most important for the most important assets.</p> <p>(vi) The retention of historic artefacts, such as surviving mill machinery.</p> <p>If it is sought to protect unregistered gardens, there should be a requirement for a local list of protected sites to be produced, probably to be incorporated in the Historical Environment.</p>	<p>Comments are noted. It is not considered appropriate to include the extra criteria within the policy. This is because often, alterations made are not reversible, nor would it be desirable for them to be. With regards to the retention of artefacts, this would be difficult to enforce. In terms of mill machinery, this is usually part of the built fabric of the building and would be protected under the listing. In terms of the reference to unregistered gardens it is proposed that a Minor Amendment is included to remove this sentence.</p> <p><b>Please refer to Minor Amendment SA-MA30.</b></p>

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
Worcestershire County Council <a href="#">SALPP237</a>	Paragraph 7.48	Paragraph 7.48: We consider that the paragraph of statistics should include that the District also contains <i>in excess of 3000 currently known heritage assets recorded on the Worcestershire Historic Environment Record.</i>	Noted, however this paragraph relates specifically to listed buildings and the Local Heritage List, whereas heritage assets encompasses a wider meaning. No change required.
English Heritage <a href="#">SALPP220</a>	Policy SAL.UP7 Quality Design and Local Distinctiveness	<p>English Heritage welcomes emphasis policy gives to securing high quality design. We recommend following minor amendments to improve consistency with NPPF:</p> <ul style="list-style-type: none"> <li>• Criterion (i) Amend last part of sentence ‘...transport infrastructure and landmarks, <i>and draw on the contribution of the historic environment to local character and distinctiveness .</i>’</li> <li>• Criterion (iii): Expand the sentence to include ‘... common building line, <i>historic street pattern, and skyline .</i>’</li> <li>• Criterion (xi): Include a reference to ‘materials’ e.g. ‘.. traditional design <i>and materials ...</i>’.</li> </ul>	<p>Amend Criteria (i), (iii) and (xi) as proposed.</p> <p><b>Please refer to Minor Amendment SA-MA35.</b></p>
West Mercia Police <a href="#">SALPP246</a>	Policy SAL.UP7 Quality Design and Local Distinctiveness	We welcome and support the inclusion of part (vii) in Policy SAL.UP7, 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 commend the Council for the inclusion of this	Comments are noted and support is welcomed. However, it is considered that the proposed changes to the policy are not required. These issues are considered to be picked up by Part B of the Building Regulations. Reference is also made to the

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
		<p>requirement in the Policy. We also commend the Council on the inclusion of part (xii) in Policy SAL.UP7, which requires the provision of secure car parking with adequate natural surveillance.</p> <p>Policy SAL.UP7 should also require new development schemes to incorporate the following: -</p> <ul style="list-style-type: none"> <li>• Automatic water suppression systems</li> <li>• Adequate water supplies for fire fighting</li> <li>• Effective and efficient access for emergency vehicles</li> </ul> <p>The Chief Fire Officers' Association (CFOA), HWFRS and WMP strongly advocate the installation of automatic water suppression systems in <b>all</b> new housing and other developments.</p> <p>We will expect developers to install hydrants attached to the mains suitable for the purposes of fire fighting at their own expense, and to provide funds for their on going maintenance. Locations of hydrants should be approved in consultation with HWFRS. Where hydrants are not feasible suitable alternative water sources, such as gravity tanks, should be installed.</p> <p>To resolve all our concerns expressed in part 6 of these</p>	<p>changes introduced in Wales, but these were contentious and enforced nationally and not on a local scale.</p>

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
		<p>representations, we suggest the inclusion of the following additional design principle in Policy SAL.UP7: -</p> <p><i>(?) Include automatic water suppression systems, provide adequate water supplies for fire fighting and ensure effective and efficient access for emergency service vehicles</i></p>	
Watkins R A <a href="#">SALPP59</a>	Policy SAL.UP8 Design of Extensions	Suggests that the material weight of the 45 degree code requires clarification. If the authority wishes to adopt it then it should be incorporated into SAL.UP7 as it should apply to new development as well as extensions.	It is considered that this would provide useful clarification within the Policy.  <b>Please refer to Minor Amendment SA-MA36.</b>
Shuttes J <a href="#">SALPP86</a>	Policy SAL.UP8 Design of Extensions	These requirements need to be more specific particularly in guidance relating to subservience and not left to unclear and not written Officer preferences.	More detailed guidance on design, including the design of residential and non-residential extensions is set out within the Design Quality SPG. This guidance would be too detailed for inclusion within a DPD.
Campaign to Protect Rural England <a href="#">SALPP153</a>	Policy SAL.UP9 Landscaping and Boundary Treatment	Clause (v) should make reference to long term maintenance, for example lights in public places should be adopted by the relevant lighting authority.	Comments are noted. However, this is generally dealt with under a separate mechanism, i.e. planning obligations. It is not considered appropriate to be so prescriptive within the policy framework.
West Mercia Police <a href="#">SALPP245</a>	Policy SAL.UP9 Landscaping	We welcome and support the inclusion of Policy SAL.UP9 and paragraphs 7.81 – 7.82 in the SAPDPD. We consider them to be excellent in the promotion of	Comments are noted and support is welcomed.

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
	and Boundary Treatment	defensive gardening techniques and commend the Council on their drafting.	
English Heritage <a href="#">SALPP221</a>	Policy SAL.UP10 Advertisements	English Heritage welcomes inclusion of criteria relating to heritage assets. Suggest minor amendment to point (i) ' <i>Conserve the significance of a building, monument, site, place, area or landscape, including its setting</i> ' .	Amend text as suggested (i) ' <i>Conserve the significance of a building, monument, site, place, area or landscape, including its setting</i> ' .  <b>Please refer to Minor Amendments SA-MA37 and SA-MA38.</b>
Watkins R A <a href="#">SALPP60</a>	Policy SAL.UP11 Re-use and Adaptation of Rural Buildings	An existing rural building which is a heritage asset may surely be capable of conservation by the insertion of an economic/residential use if it has extensions, alterations, significant building works etc  The issue of enabling development linked to and within an existing rural heritage building needs to be addressed in the first part of SAL.UP11.	Noted. However, it is considered that rural heritage assets need to be viewed in the same way as other rural dwellings and the conversion for other uses should be where the buildings are appropriate, taking into account the criteria included in this policy, in order to safeguard the character of the landscape. Enabling development would need to be considered on a site-by-site basis.
Watkins R A <a href="#">SALPP61</a>	Policy SAL.UP11 Re-use and Adaptation of Rural Buildings	The final sentence of SAL.UP11 needs "In addition to these criterion, extensions to dwellings created through the re-use and adaptation of rural buildings policies will not be permitted". This is too dogmatic and inflexible.  There should be some cross reference to policy SAL.UP8 (Extensions) such that it is made clear that a building/use allowed under SAL.UP11 can have	These comments are noted. However, the policy of converting rural buildings for alternative uses is predicated on the protection of the character and landscape of the area, as identified by the West Midlands Farmsteads and Landscapes Project. To allow further extensions or alterations to dwellings created through this policy framework would provide



Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
		extensions but the criteria for assessing them will be more strict than SAL.UP8, probably by ensuring that the degree of 'subservience' is greater.	internal inconsistencies in relation to criteria i and ii of the proposed policy. It is therefore considered appropriate to continue this particular policy position.
English Heritage <a href="#">SALPP222</a>	Policy SAL.UP11 Re-use and Adaptation of Rural Buildings	<p>English Heritage welcomes clear reference to the West Midlands Farmsteads and Landscapes Project. However, would suggest minor amendments to text as follows:</p> <p>1) Suggest new additional point (i) '<i>Proposals are based on an appraisal of the character and significance of the farmstead as a whole, its landscape setting and sensitivity to and potential for change.</i>'</p> <p>2) Amend existing point (i) '<i>... or the addition of a large-scale element of new build.</i>'</p> <p>3) Include at point (ii) '<i>...fabric, character, significance or setting...</i>'</p> <p>4) Under Residential Development, expand first paragraph '<i>... or for reasons of sustainability or historical significance an alternative use would be preferable,...</i>'</p> <p>5) Amend 7.94 to refer to importance of ensuring that their significance and landscape setting is not harmed.</p>	<p>Make minor amendments as suggested by English Heritage.</p> <p><b>Please refer to Minor Amendments SA-MA40, SA-MA41 and SA-MA42.</b></p>

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
		<p>6) Amend first sentence of 7.97 to refer to the significance of a building.</p> <p>7) Amend first sentence of 7.98 to ' <i>Residential conversions can be detrimental...</i>'</p> <p>8) Update 7.101 to reflect work that Worcestershire County Council is doing to refine the Project.</p>	
<p>Environment Agency <a href="#">SALPP162</a></p>	<p>Policy SAL.UP11 Re-use and Adaptation of Rural Buildings</p>	<p>We support the inclusion of criteria vi - to ensure appropriate drainage and flood risk mitigation can be provided. A reference to safe development after flood risk mitigation would further clarify the requirements.</p> <p>vi. That appropriate drainage and flood risk mitigation, <b>including safe development requirements, are available for the lifetime of the development.</b></p>	<p>Comments are noted and support is welcomed.</p> <p><b>Please refer to Minor Amendment SA-MA39.</b></p>
<p>Watkins R A <a href="#">SALPP62</a></p>	<p>Policy SAL.UP12 Chalets</p>	<p>Whilst the general thrust of this policy is accepted, its implementation is hindered by a lack of definition of 'chalet'. Core Strategy para 9.20 refers to "around 380 chalets". This stems from data collected by the LPA in the 1990s and updated in the 2000s. That data should be published as background evidence, and to stop disputes over whether a structure is a 'chalet' or not.</p> <p>Also, demanding that replacement chalets should be on a 'like for like' basis in terms of design and materials is</p>	<p>The comments with regard to clarification of the definition of Chalets are helpful.</p> <p><b>Please refer to Minor Amendments SA-MA44 and SA-MA60.</b></p>

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
		unreasonable and in some cases impractical.	
Campaign to Protect Rural England <a href="#">SALPP154</a>	Policy SAL.UP12 Chalets	<p>(a) "Changes to permanent residential occupation" is unclear and weak. "Changes involving an increase in residential occupation, particularly to occupation permanently or for over nine months a year" would be better.</p> <p>(b) The reference to "Permanent Construction" appears to encourage the addition of a brick skin, contrary to paragraph 7.103</p>	<p>Comments are noted. In relation to the terminology used in the policy, it is considered to be appropriate as drafted. Many existing Chalets have occupation for over 9 months of the year but are still classed as 'holiday use'. Therefore the proposed wording would be unworkable.</p> <p>There is a difference between permanent construction and a 'brick skin', this is not what the policy is suggesting. A chalet can be of permanent construction without the addition of a brick skin.</p>
Environment Agency <a href="#">SALPP161</a>	Policy SAL.UP12 Chalets	<p>We support the reference to the floodplain within paragraph two and three in managing the location of chalets and acknowledging the more vulnerable nature of chalet type development</p> <p>For sites that are located within the floodplain, consideration should be given to relocating the caravan(s) to an area of lower flood risk <b>and it must be demonstrated that the development can be made safe for the lifetime of the development.</b></p>	<p>Comments are noted and support is welcomed.</p> <p><b>Please refer to Minor Amendment SA-MA43.</b></p>
Watkins R A <a href="#">SALPP64</a>	Policy SAL.UP13	1. SALUP13 1: Commercial Equestrian Facilities - the	These representations are noted and are considered helpful in providing clarification

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
	Equestrian Development	<p>wording could be improved and clarified</p> <p>2.SALUP13 2: as above</p> <p>3. There should be explicit cross reference in the policy wording to SALUP14 (Agricultural Land Quality)</p> <p>1. Amend wording in SALUP13 1, second paragraph to "the Green Belt or open countryside", and in next sentence amend to "within the Green Belt, applications will also be assessed against Policy SALUP.1"</p> <p>2. In SALUP13 2 changes should be made by referring to " non-commercial leisure use" to better distinguish this part of the policy from the commercial equine facilities in section 1.</p>	<p>within the policy.</p> <p><b>Please refer to Minor Amendment SA-MA45.</b></p>
Campaign to Protect Rural England <a href="#">SALPP155</a>	Policy SAL.UP13 Equestrian Development	<p><b>Policy Unsound: not positive enough</b></p> <p>(a) The excessive use of bridleways by horses churns them up, so that the surface has a deep layer of mud except in the driest weather. This may well be covered by the present wording, but it could usefully be strengthened by adding to the end of the first sentence of the 4th paragraph "for all lawful users, including pedestrians on bridleways" and including the word "possibility" near "capacity."</p>	<p>Taking these points in turn:</p> <p>a) It is not considered appropriate for planning policy to determine the effect horses have on bridleways, especially as they are lawful users as well as pedestrians.</p> <p>b) It is considered that the policy is sufficient as drafted. The size allows for a suitable stable size to be developed whilst also taking into account the potential impact on the immediate</p>

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
		(b) In paragraph 7.107, the use of maxima implies that lesser sizes would be acceptable. Presumably the standards of BHS are minima, not maxima. It would be better to provide a range of acceptable sizes.	landscape.
Watkins R A <a href="#">SALPP67</a>	Paragraph 7.106	<p>Para. 7.106 is worded in such a way that a reader could misinterpret it and believe that the keeping of recreational horses on agricultural land does not require a change of use. Very few recreational horses simply graze on agricultural land and so do not require COU.</p> <p>Reword 7.106 to:</p> <p>"The keeping of horses on agricultural land usually requires an approval for a change of use. Also, any physical development on the land, such as stables, tack rooms, feed stores, jumps and maneges also require express planning consent."</p>	<p>The representation is helpful in providing further clarity and it is considered that Paragraph 7.106 of the reasoned justification could be amended as suggested via a minor amendment.</p> <p><b>Please refer to Minor Amendment SA-MA46.</b></p>
Thomas Vale <a href="#">SALPP115</a>	Paragraph 7.106	<p>It is noted that there is specific policy relating to equestrian development. Such a specific leisure sector policy is supported and it is considered appropriate to include a policy following SAL.UP13 relating to the specific issue of waterways related development.</p> <p>Suggested wording is as follows:</p> <p><i>'Proposals for waterways related development, including</i></p>	<p>Comments are noted. The request for an inclusion of additional policy has been considered but it is felt that the existing policy framework included in the Core Strategy already provides an appropriate approach to considering this type of development, as follows:</p> <p>Policy CP15: Regenerating the Waterways already provides a proactive policy approach to</p>

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
		<p><i>new marinas and associated facilities, will be considered acceptable subject to appropriate assessments of the potential impacts on the character of the landscape and amenity of local residents. In addition such development will be required to demonstrate that they have taken full account of their potential impact on local biodiversity and habitats and wherever possible should incorporate measures to promote and protect biodiversity. Such development will be supported subject to the following:</i></p> <ul style="list-style-type: none"> <li><i>a. Development must not result in any unacceptable impacts on flooding, drainage or navigation of the waterway;</i></li> <li><i>b. Development must be acceptable in terms of highways and access; and</i></li> <li><i>c. Development must not have any significant detrimental impacts on the local environment.'</i></li> </ul>	<p>considering development by the District's waterways</p> <p>Policy CP12: Landscape Character ensures that developments do not adversely affect the surrounding areas</p> <p>Policy CP14: Providing opportunities for local biodiversity and Geodiversity, also ensures that local biodiversity and habitats are protected</p> <p>Policy CP10: Sustainable Tourism already covers a number of points in relation to transport links and infrastructure</p> <p>Policy CP02: Water Management, requires development to consider flood risk.</p> <p>It is therefore considered that the inclusion of another policy would just be a repetition of the policies contained in the Core Strategy and would not add further value.</p>
BAE Systems <a href="#">SALPP71</a>	Policy SAL.SK1 South Kidderminster Enterprise Park	BAE Systems notes that policy SAL.SK1 does not include any positive reference to the existing residential communities or the potential for non-employment development, including quasi retail, in this location.	It is considered that Policy SAL.SK1 provides scope to consider quasi retail development and employment generating uses that are not B1,B2 and B8 and that this is consistent with the NPPF. Furthermore the Council has recently

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
		<p>BAE Systems are of the view that policy SAL.SK1 may be 'unsound' in that it is not consistent with the NPPF. However, we consider that the inclusion of a positive reference to the acceptability of non-employment development could result in policy SAL.SK1 being found 'sound'.</p>	<p>adopted a Local Development Order for the South Kidderminster Enterprise Park to assist development proposals within the area. Officers consider that this policy is NPPF compliant and is soundly based. No further change required.</p>
<p>Revelan Group <a href="#">SALPP195</a></p>	<p>Policy SAL.SK1 South Kidderminster Enterprise Park</p>	<p>The land in Revelan's control has been vacant for a number of years and there is no prospect of it coming forward for an economic use. The SAL.SKI should be amended to introduce greater flexibility to allow for alternative forms of development to come forward.</p> <p>The National Planning Policy Framework (NPPF) seeks to prevent the longer term protection of employment sites.</p> <p>It is, therefore, necessary to consider if there is any evidence to suggest that the land in Revelan groups control will come forward for economic use. In this respect it should be noted that:</p> <ul style="list-style-type: none"> <li>The Land has been vacant and available for development for over 7 years. It has been actively marketed in order to try to find an employment operator. Despite a robust and lengthy marketing campaign the site remains vacant and there is no current live Interest in the</li> </ul>	<p>Comments are noted. However, the Council considers that the policy should remain as worded for a number of reasons. Policy SAL.SK1 is an overarching policy covering the South Kidderminster Area. This Area has been identified as a key priority area for economic development by the Council and it remains the main focus (aside from the town centres) of economic activity in the District. Amongst other things, this area now benefits from a Local Development Order to enable greater flexibility in terms of business development. It is considered important to retain sufficient land to enable business to develop and flourish. Although it is agreed that the current market provides challenging conditions for business development, the plan period covers a period until 2026 and therefore it is considered important to ensure land is available for when market conditions improve.</p>

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
		<p>development of the site.</p> <p>Part of the land in Revelan Group's control was granted planning permission for a car showroom in March 2011 (Application Reference No 1010751/FUL). Unfortunately the proposed operator has now advised Revelan Group that they no longer wish to acquire the site.</p> <p>The only credible interest expressed on the site in recent time has been from non B class uses. However, even this interest has failed to materialise into an active development.</p> <p>The employment land requirements in the Site Allocations and Policies DPD are based upon the requirements of the adapted Wyre Forest Core Strategy. The Wyre Forest Core Strategy is in turn informed by the Wyre Forest Employment Land Review (ELR) of 2007. The ELR employment land requirements are based upon more buoyant economic times. However, even in 2007 the ELR suggested that Wyre Forest would be able to meet its own employment requirements on existing employment sites. It is suggested that the level of employment land identified as being required by the ELR is an over estimate given the recent down turn in the economy. There is, therefore, no quantitative reason for the site to remain protected for employment</p>	<p>In terms of the two sites identified it is considered that there has been interest over the recent past and that there could feasibly continue to be so in the future. The former Romwire site has been subject to market interest, as shown by the representations, which highlight that:</p> <p><i>Part of the land in Revelan Group's control was granted planning permission for a car showroom in March 2011 (Application Reference No 1010751/FUL).</i></p> <p>Although this interest has recently been withdrawn (due to a change in company circumstances) it still shows that there is recent interest in the land for this type of development.</p> <p>In terms of the former Ceramaspeed site, this has only been vacant for a short while and prior to that was fully occupied since its development. Therefore, it is considered the site remains suitable to continue to meet business needs.</p> <p>Furthermore, areas adjoining these two sites have been subject to new development during the economic downturn. This highlights that the</p>



Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
		<p>purposes.</p> <p>Given that there is no evidence to suggest that the site will come forward for an employment use the requirements of NPPF Paragraph 226.4. The site should not be protected solely for employment purposes. Policy SAL.SKI, should be amended to introduce flexibility to allow for the site to come forward for alternative uses.</p> <p>The South Western corner of the land in Revelan Group's control, referred to as Zortec Avenue, adjoins residential properties located at Kinver Avenue and Walton Ash Road West. It is envisaged that this site provides the opportunity to deliver houses in the short term, The site is detached from the main SREC area. Given its proximity to existing residential development the site will be suitable for housing development in the short term.</p> <p>Additional text should be Introduced Into Policy SAL.SKI to confirm that it is appropriate for non- employment uses to be developed in the South Kidderminster Enterprise Park provided that It they can be justified by robust and credible evidence. Core Strategy CPO8 -A Diverse Local Economy, provides guidance something that would be appropriate for a non-employment use to be developed on employment land. It would be consistent and appropriate to introduce similar guidance</p>	<p>location remains attractive to business and that there are opportunities for development to occur, in line with the policies proposed through this DPD.</p> <p>The suggested additional wording proposed through the representation is considered to be a repetition of Core Strategy Policy CP08 and is therefore not considered to be required. The aims of the proposed wording are too similar in nature to existing policy to consider inclusion again through the Site Allocations.</p> <p>In terms of considering residential uses in this particular location, it is felt that this is not currently required - as the Council have identified sufficient land to meet its Core Strategy requirement. furthermore, there are concerns about the compatibility of neighbouring uses and the potential for residential units to cause problems with existing working practices.</p> <p>Overall, it is considered that the policies should remain as drafted as they provide an important economic focus for the District, and help to provide a balanced approach to the future development of the District.</p>

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
		<p>into Policy SAL.SK1 that would allow the development of non-employment uses In the South Kidderminster Enterprise Park. It is suggested that the following text is inserted after the criteria set out in policy SAL.SK1.</p> <p><b><i>"The Council will seek to avoid the long term protection of employment sites where there is no reasonable prospect of the site being used for that purpose. Other uses, including residential development, will be supported where it can be demonstrated that:</i></b></p> <ul style="list-style-type: none"> <li><b><i>• An up to date employment land review identifies the site being suitable for alternative uses or:</i></b></li> <li><b><i>• The continued use of the site for employment purposes is not viable (in physical, operational or commercial terms). Where a site has been marketed for 1 year or more without any credible interest being expressed in the development of the site alternative uses will be considered".</i></b></li> </ul> <p>The above wording will allow for alternative forms of development to come forward on the site. it will ensure that the policies do not stifle the delivery of appropriate uses on sustainable brownfield sites in the Site</p>	

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
		<p>Allocation and Policies DPD.</p> <p>Land at Zortec Avenue should be allocated for residential development by the Site Allocations and Policies DPD.</p>	
<p>Campaign to Protect Rural England <a href="#">SALPP144</a></p>	<p>Policy SAL.SK1 South Kidderminster Enterprise Park</p>	<p>The way the plan is drawn, including Wilden Marshes SSSI and the derelict British Sugar settling pond adjoining Wilden Lane appears to invite the development of the latter, despite their being designated as Green Belt on the proposals map. It would be better to exclude these areas. The result would be to break up the Enterprise Park into two or three discrete areas, but we do not see why this should matter.</p>	<p>Comments are noted. Although the concerns expressed within this representation are noted, it is considered that the boundary should remain as drafted. The policy framework is clear in that these are protected areas and should not be developed on. The policy identifies the potential to improve these areas, maybe through planning gain on neighbouring allocated sites. The map is also consistent with the Local Development Order that exists within this area and therefore it is considered it should remain as drafted to ensure clarity.</p>
<p>Worcestershire County Council - Environmental Policy &amp; Strategic Planning <a href="#">SALPP227</a></p>	<p>Policy SAL.SK1 South Kidderminster Enterprise Park</p>	<p>Concerned over the very precise definitions of the uses proposed for the South Kidderminster Enterprise Park as B1, B2 and B8 development. Waste management development does not necessarily or easily fit into these definitions. As currently written the submission document is not in accordance with the Waste Core Strategy, in that it could exclude waste management which could usefully and appropriately be located on</p>	<p>These comments are noted and will be subject to further discussion under a Statement of Common Ground. With specific regard to the British Sugar Site it should be noted that a planning application has been approved for a mix of uses on the site including an element of residential .</p>

<b>Respondent/ Response Number</b>	<b>Paragraph/ Policy</b>	<b>Summary of Representation</b>	<b>Officer Response</b>
		<p>employment land.</p> <p>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 for this site use class B1, B2 and B8 could deter waste development from this site.</p>	
<p>Canal &amp; River Trust <a href="#">SALPP192</a></p>	<p>Policy SAL.SK1 South Kidderminster Enterprise Park</p>	<p>Supports the requirement to enhance the relationship between the sites and the Staffordshire and Worcestershire Canal, and ensure they incorporate appropriate remediation, building and drainage design in order to deal with any land contamination.</p> <p>Considers that water should not be seen as just a backdrop to development and that the value added needs to be fully explored.</p> <p>Considers that potential contamination of the canal corridor, waterway and ground water from wind blow and, seepage or spillage should be avoided.</p>	<p>Support is noted.</p>
<p>Kidderminster Civic Society <a href="#">SALPP34</a></p>	<p>Former British Sugar Site</p>	<p>Supports the redevelopment of the British Sugar site and the promotion of brownfield sites over greenfield ones.</p>	<p>Support is welcomed.</p>
<p>Core11 <a href="#">SALPP28</a></p>	<p>Policy SAL.SK2 Former British</p>	<p>Core11 notes this policy as compliant. Its vision encompasses all the best development objectives of the</p>	<p>Support is noted.</p>

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
	Sugar Site	LDF Core Strategy 2006-2026 including the Green Infrastructure Study 2010.	
Natural England <a href="#">SALPP210</a>	Policy SAL.SK2 Former British Sugar Site	Sets out some background to Wilden Marsh and Meadows SSSI including its location in very close proximity to the former British Sugar site. Public access is prohibited because of the sensitivity of the site and the response suggests that further guidance be included within the DPD to ensure that public access will continue to be prohibited. Suggests that there may be potential to provide a bird hide and educational interpretation as part of the redevelopment of the former British Sugar site and Natural England are pleased to discuss this further.	Comments are noted. Insert an additional sentence within paragraph 9.30 as follows:  Public access to Wilden Marsh and Meadows SSI is prohibited because of the sensitivity of the site and this should continue, however, the potential exists to provide a bird hide and educational interpretation at the site.  <b>Please refer to Minor Amendment SA-MA48.</b>
Campaign to Protect Rural England <a href="#">SALPP145</a>	Policy SAL.SK2 Former British Sugar Site	(a) Paragraph vii at the top of page 110 should include connectivity across the river Stour into Wilden Marshes.  (b) We would question the desirability of an area of commercial development north of the housing. Conversely, this would allow the amount of housing within the middle CDMAH zone to be reduced. The plan should be labelled as an example of how the policy might be implemented.  (c) There appears to be a landlocked area just outside the site boundary at the northern end of the sewage works. This is currently white land but could	Taking each of these comments in turn:  a) Although the ambition is agreed with, access to the Marshes is purposefully restricted by Natural England in order to protect its important wildlife status  b) The plan included on p111 is a concept plan, as identified by para 9.23. It is proposed to replace this plan with the indicative layout plan which has recently received outline planning approval. However, the approved outline masterplan is not too dissimilar to the plan

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
		<p>conveniently be added to the site, as a long-term development site. Provision should be made to safeguard a means of access to this land.</p> <p>d) An additional paragraph xi encouraging the development to have a positive connectivity with the underpass under the Severn Valley Railway should be included.</p>	<p>included in the DPD.</p> <p>c) The land identified is in a separate ownership but could come forward at a later date. The outline masterplan approval identifies the potential for connections to be made to this site.</p> <p>d) It is considered that the policy already provides for this potential through criteria iii and vii</p>
<p>Environment Agency <a href="#">SALPP165</a></p>	<p>Policy SAL.SK2 Former British Sugar Site</p>	<p>There is currently some inconsistency within the plan on how contaminated land has been picked up for each site, in terms of the wording used the policies it has included in. For consistency we would prefer the following wording to be used for the identified policies.</p> <p><b>- Ensure they incorporate appropriate remediation, building and drainage design in order to deal with any land contamination.</b></p>	<p>Comments are noted.</p> <p><b>Please refer to Minor Amendment SA-MA47.</b></p>
<p>Worcestershire County Council <a href="#">SALPP228</a></p>	<p>Policy SAL.SK2 Former British Sugar Site</p>	<p>Concerned over the very precise definitions of the uses proposed for the South Kidderminster Enterprise Park as B1, B2 and B8 development. Waste management development does not necessarily or easily fit into these definitions. As currently written the submission document is not in accordance with the Waste Core Strategy, in that it could exclude waste management</p>	<p>These comments are noted and will be subject to further discussion under a Statement of Common Ground. With specific regard to the British Sugar Site it should be noted that a planning application has been approved for a mix of uses on the site including an element of residential</p>

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
		<p>which could usefully and appropriately be located on employment land.</p> <p>Annex A of the Waste Core Strategy states "58 areas of search have been identified as being potentially suitable for most waste management facilities" these include the former British Sugar Site. The permitted uses proposed for this site use class B1, B2 and B8 could deter waste development from this site.</p>	
<p>St Francis Group <a href="#">SALPP204</a></p>	<p>Policy SAL.SK2 Former British Sugar Site</p>	<p>As set out previously, the identification of the former British Sugar site as an allocation for mixed use development is supported. However, there are a number of points to highlight in order to ensure the policy is effective and deliverable, which will ultimately improve the soundness.</p> <ol style="list-style-type: none"> <li>1. In terms of the paragraph that specifies the above uses are "subject to sequential test", it is considered that this reference can be removed as evidence has been submitted in support of the planning application for the first phase of redeveloping the former British Sugar site, which demonstrates that retail and hotel elements of the scheme are considered to be acceptable.</li> <li>2. In respect of point ii. as identified earlier within the representations, rail freight is not a viable option and therefore references to rail freight</li> </ol>	<p>Comments are noted and support is welcomed. Taking each of the comments in turn:</p> <ol style="list-style-type: none"> <li>1. Although it is agreed that the recent Planning Permission has justified the use and scale for these types of uses it is considered important for the wording to remain in the policy. This is to future proof the policy and ensure that the future consideration of development at this site in terms of phase 2 and any reserved matters applications does not lead to a 'free for all' on town centre uses.</li> <li>2. Agreed</li> <li>3. It is considered important to retain these criteria as they are considered to be important elements of developing this</li> </ol>

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
		<p>should be removed.</p> <p>3. A number of points listed (iv. v and vii.), as set out previously, repeat national and/or earlier policies set out within the DPD. Such site specific references are considered to be unnecessary.</p> <p>4. The inclusion of an Illustrative Concept Plan of the British Sugar site is supported. It is suggested that this plan is titled in order to avoid confusion should some elements change as a result of more detailed design. In addition , it is recommended that the plan identified is replaced with the consented plan.</p>	<p>site. The reinforcement at the site policy level is considered to be robust and justified.</p> <p>4. Support is noted.</p> <p><b>Please refer to Minor Amendment SA-MA49.</b></p>
Core11 <a href="#">SALPP23</a>	Paragraph 9.25	Welcomes policy 9 and suggests it is promoted in importance.	Support is noted.
Gemini Properties <a href="#">SALPP27</a>	Policy SAL.SK3 Oasis Arts & Crafts and Reilloc Chain	<p>Suggests phasing is inappropriate and should be amended to 2011-2021 as the Reilloc Chain site is vacant and should come forward at a relatively early stage in the plan period.</p> <p>Considers the requirement for the development to front onto both the Stourport Road and Goldthorn Road is too restrictive at this stage, the current indicative layout does not front onto Goldthorn Road and no concern has been expressed over this at pre-application discussion. There is no natural building line on the</p>	<p>A minor amendment has been suggested which would allow the Reilloc Chain element to come forward in advance, providing development is comprehensively designed and takes account of the future development of the Oasis Arts &amp; Crafts site.</p> <p>It is not considered that the requirement for the development to also front on to Goldthorn Road is too restrictive. New development must contribute to place shaping and provide active</p>



Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
		<p>opposite side of Goldthorn Road which the development should respect. The requirement is inappropriate given that masterplanning work does not exist to support it.</p> <p>Whilst the reference to a comprehensive development of the whole site is supported this should not prevent the Reilloc Chain element coming forward in advance of the remainder of the site. Supporting text should confirm that the two sites can be developed independently of each other provided that an appropriate design solution is in place.</p>	<p>frontages in accordance with design guidance.</p> <p><b>Please refer to Minor Amendment SA-MA50.</b></p>
<p>Worcestershire County Council <a href="#">SALPP229</a></p>	<p>Policy SAL.SK3 Oasis Arts &amp; Crafts and Reilloc Chain</p>	<p>Concerned over the very precise definitions of the uses proposed for the South Kidderminster Enterprise Park as B1, B2 and B8 development. Waste management development does not necessarily or easily fit into these definitions. As currently written the submission document is not in accordance with the Waste Core Strategy, in that it could exclude waste management which could usefully and appropriately be located on employment land.</p> <p>Annex A of the Waste Core Strategy states "58 areas of search have been identified as being potentially suitable for most waste management facilities" these include the former British Sugar Site. The permitted uses proposed for this site use class B1, B2 and B8 could deter waste development from this site.</p>	<p>These comments are noted and will be subject to further discussion under a Statement of Common Ground. With specific regard to the British Sugar Site it should be noted that a planning application has been approved for a mix of uses on the site including an element of residential</p>

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
Revelan Group <a href="#">SALPP196</a>	Policy SAL.SK4 Former Romwire Site	<p>Policy SAL.SK4 - Former Romwire site, allocates land in Revelan groups ownership for economic development and other sui generis uses such as car showrooms and vehicle maintenance. However, this policy is considered to be too restrictive. There is no evidence to suggest that the site will come forward for an economic use or a car showroom.</p> <p>It is appropriate to consider whether there is any evidence available to suggest that the Romwire Site will come forward for its allocated economic use. In this respect it is pointed out that:</p> <ul style="list-style-type: none"> <li>Romwire ceased trading in 2001. The buildings on site were demolished in 2009. The site has been actively marketed in order to try to find an operator since 2005. The site has been advertised for design and build opportunities for B1, B2 and B8 trade counter uses and a car showroom. The site is available on a leasehold or freehold basis. Revelan group are prepared to divide the site into a series of plots in order to facilitate its development. However, despite a lengthy and robust marketing campaign it has not been possible to deliver the site for economic uses.</li> </ul> <p>Part of this site was granted planning permission for the</p>	<p>This site is located in an area that has been identified as a key priority area for economic development by the Council and it remains the main focus (aside from the town centres) of economic activity in the District. Amongst other things, this area now benefits from a Local Development Order to enable greater flexibility in terms of business development. It is considered important to retain sufficient land to enable business to develop and flourish. Although it is agreed that the current market provides challenging conditions for business development, the plan period covers a period until 2026 and therefore it is considered important to ensure land is available for when market conditions improve.</p> <p>It is considered that there has been interest over the recent past in this site and that there could feasibly continue to be so in the future. The former Romwire site has been subject to market interest, as shown by the representations, which highlight that:</p> <p><i>Part of the land in Revelan Group's control was granted planning permission for a car showroom in March 2011 (Application</i></p>

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
		<p>development of car showroom in March 2011 (application reference 1010751/FULL). However, the potential occupiers have now advised that they no longer have an interest in acquiring the site.</p> <p>The only other interest expressed in the site was from Countrywide who were interested in acquiring part of the site for a bespoke retail unit. Again this interest: has been placed on hold. Despite a robust and lengthy marketing campaign there is no evidence to suggest that the site will come forward for employment use.</p> <ul style="list-style-type: none"> <li>There is no evidence to suggest there is a quantitative need to protect the site for employment purposes. The employment allocations in the site allocations and policies publication document are placed upon the adopted the Wyre Forest Core Strategy. The employment target in the Core Strategy is in turn based upon the 2007 Employment Land Review: The Employment Land Review was undertaken in more buoyant economic times. The level of employment land that it suggests is required is likely to be an overestimate. There is, therefore, no need to protect the site for employment purposes from a quantitative perspective.</li> </ul> <p>Policy SAL/SK4 should be amended to allow for</p>	<p><i>Reference No 1010751/FUL).</i></p> <p>Although this interest has recently been withdrawn (due to a change in company circumstances) it still shows that there is recent interest in the land for this type of development. Therefore, contrary to the representations which suggest that there is no evidence to suggest this type of use could be implemented, a recent planning permission highlights that the land has been actively pursued for this type of economic use.</p> <p>Furthermore, areas adjoining this site have been subject to new development during the economic downturn. This highlights that the location remains attractive to business and that there are opportunities for development to occur, in line with the policies proposed through this DPD.</p> <p>The suggested additional wording proposed through the representation is considered to be a repetition of Core Strategy Policy CP08 and is therefore not considered to be required. The aims of the proposed wording are too similar in nature to existing policy to consider inclusion</p>

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
		<p>alternative forms of development to take place on site. Additional criteria should be added to the policy to confirm that the Council will consider planning applications for alternative uses, including residential development, if it is demonstrated there is no prospect of a site coming forward for its allocated economic use. Adopting this approach would be consistent with the guidance set out in Core Strategy Policy CPO8 - A Diverse Local Economy, that includes criteria that allow for the development of employment sites for alternative uses in certain circumstances. It is, therefore, suggested that the following text should be added to the policy.</p> <p><b><i>"The development of non-employment uses, including residential development, will be supported where it can be demonstrated that:</i></b></p> <ul style="list-style-type: none"> <li><b><i>• The site is identified in an up to date Employment Land Review as being suitable for alternative use.</i></b></li> <li><b><i>• The continued use of the building, or its redevelopment for employment use, is not viable (in physical, operational or commercial terms). If it can be demonstrated that a site has been marketed for a period of 12 months without any credible interest being expressed support will be given for the development of the site for an alternative use" .</i></b></li> </ul>	<p>again through the Site Allocations.</p> <p>In terms of considering residential uses in this particular location, it is felt that this is not currently required - as the Council have identified sufficient land to meet its Core Strategy requirement. Furthermore, there are concerns about the compatibility of neighbouring uses and the potential for residential units to cause problems with existing working practices.</p> <p>Overall, it is considered that the policies should remain as drafted as they provide an important economic focus for the District, and help to provide a balanced approach to the future development of the District.</p>
Campaign to	Policy SAL.SK4	The policy is too deterministic for a policy intended to	Comments are noted. However, officers

<b>Respondent/ Response Number</b>	<b>Paragraph/ Policy</b>	<b>Summary of Representation</b>	<b>Officer Response</b>
Protect Rural England <a href="#">SALPP146</a>	Former Romwire Site	last 20 years. If the suggested development does not take place, the site should be available for other employment uses.	disagree with the comments as the site is allocated for 'economic development proposes <b>and</b> other sui generis uses...Therefore, it is considered the site is available for a wide range of economic development uses.
Kidderminster Civic Society <a href="#">SALPP36</a>	Policy SAL.WK2 Kidderminster Hospital	Welcomes the retention of the hospital site for medical services and recognises its importance to the District.	Comments are noted.
Campaign to Protect Rural England <a href="#">SALPP156</a>	Policy SAL.WK2 Kidderminster Hospital	Compliance with policy SAL.DP11 should be explicitly required, in the wording of the policy.	Comments are noted.  <b>Please refer to Minor Amendment SA-MA51.</b>
Morgan F <a href="#">SALPP46</a>	Policy SAL.KSS1 Smaller Kidderminster Sites	Objects to the removal of Aylmer Lodge from policy SAL.KSS1 and suggests it should be reinstated.	Comments are noted. It is worth highlighting that the removal of Aylmer Lodge from the DPD related to the size threshold of the site, rather than to any other planning considerations. However, given that the site owners wish to see the allocation restored, and the fact that it was included within the Preferred Options report, it is considered that the reinstatement of the allocation could be supported. It is considered that this would be in the spirit of localism and partnership working.
Campaign to	Policy	(a) The policy should be cross-referenced to DPL11 to	Comments are noted. Consider including a

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
Protect Rural England <a href="#">SALPP141</a>	SAL.KSS1 Smaller Kidderminster Sites	make it clear that that policy also applies, except the Chester Road South site.  (b) Paragraph 11.4 should encourage the incorporation of part of the large rear gardens in Baskerville Road into the site. This will make good use of available urban land.	cross-reference to DPL11 as a Minor Amendment. It is not considered appropriate, however, to include Garden Land in Baskerville Road as part of the allocation at Broadwaters, as this would be contrary to local and national policy.
Environment Agency <a href="#">SALPP166</a>	Policy SAL.KSS1 Smaller Kidderminster Sites	There is currently some inconsistency within the plan on how contaminated land has been picked up for each site, in terms of the wording used the policies it has included in. For consistency we would prefer the following wording to be used for the identified policies.  <b>- Ensure they incorporate appropriate remediation, building and drainage design in order to deal with any land contamination.</b>	Comments are noted.  <b>Please refer to Minor Amendment SA-MA47.</b>
Environment Agency <a href="#">SALPP167</a>	Policy SAL.STC1 Bridge Street Basins Link	There is currently some inconsistency within the plan on how contaminated land has been picked up for each site, in terms of the wording used the policies it has included in. For consistency we would prefer the following wording to be used for the identified policies.  <b>- Ensure they incorporate appropriate remediation, building and drainage design in order to deal with any land contamination.</b>	Comments are noted.  <b>Please refer to Minor Amendment SA-MA47.</b>
Shuttes J <a href="#">SALPP87</a>	Paragraph 12.6	These proposals need to be revisited in the light of the Healthcare scheme currently under consideration.	Healthcare uses would be permissible as they fall into use class D1 and therefore it is not

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
			considered necessary to amend the policy.
West Mercia Police <a href="#">SALPP252</a>	Policy SAL.STC2 Tan Lane and County Buildings	<p>It is important to be aware that the decision making of WMP and HWFRS with respect to how respond to the planned development growth proposed for Stourport-on-Severn is being structured through the Worcestershire ‘<i>Capital &amp; Assets Pathfinder</i>’ (CAP) initiative.</p> <p>As a result of further partnership work with Worcestershire County Council and other partners involved in CAP since May 2011, it is now (at the time of writing) the intention to move the organisations currently located at the County Buildings into a refurbished and modernised Civic Centre (Policy SAL.STC3) to create a multi-use community venue; capable of meeting present and future demands on service provision. The existing County Buildings (except for the fire station) would be demolished and the site sold by Worcestershire County Council for redevelopment. It is unknown whether the receipt from this would be put towards the cost of refurbishing and modernising the Civic Centre. It is important to stress however that all of these proposals are still at the feasibility stage and subject to change.</p> <p>We therefore consider that developer contributions, through the Community Infrastructure Levy (CIL), should be put towards the cost of redeveloping the Civic Centre to enable all the services to be located within it, not just</p>	<p>Comments are noted.</p> <p><b>Please refer to Minor Amendment SA-MA52.</b></p>

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
		<p>WMP, to meet the expected increase in demand for services that is expected to arise.</p> <p>The wording of the final paragraph of Policy SAL.STC2 assumes that moving the different community uses from the County Buildings only requires compensatory provision for how they are now. The current wording makes no allowance for the fact that the community use concerned must have the capacity to expand in any new facility to meet the anticipated increase in demands on them, resulting from the delivery of planned development growth in Stourport-on- Severn.</p> <p>In our view this is unsound and ineffective infrastructure planning, contrary to paragraph 182 of the National Planning Policy Framework, as it takes no account of the impact of development growth upon the ability of the community uses to continue to deliver services as Stourport-on-Severn develops. The amendment to the final paragraph of Policy SAL.STC2, as set out below, is consequently required to resolve this fundamental issue.</p> <p>‘...Proposals will need to ensure that compensatory provision is provided for the existing community uses <b>affected and for their expansion commensurate with development growth in Stourport-on-Severn</b> , if these are not to be retained on site, before considering any future redevelopment.’</p>	



Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
Environment Agency <a href="#">SALPP168</a>	Policy SAL.STC2 Tan Lane and County Buildings	<p>There is currently some inconsistency within the plan on how contaminated land has been picked up for each site, in terms of the wording used the policies it has included in. For consistency we would prefer the following wording to be used for the identified policies.</p> <p><b>- Ensure they incorporate appropriate remediation, building and drainage design in order to deal with any land contamination.</b></p>	<p>Comments are noted.</p> <p><b>Please refer to Minor Amendment SA-MA47.</b></p>
West Mercia Police <a href="#">SALPP253</a>	Policy SAL.STC3 Civic Centre	<p>The relocation of WMP is to be undertaken as part of the ' <i>Capital &amp; Assets Pathfinder</i> ' (CAP) initiative, which involves proactive partnership work between WMP, HWFRS, Worcestershire County Council, Wyre Forest District Council and other partners. Any upgrading of the Stourport-on-Severn fire station will also be co-ordinated through CAP.</p> <p>However, the current wording of Policy SAL.STC3 and supporting paragraph 12.12 makes no reference at all to the above. They both instead imply that there are a number of options are being considered, one of which being the complete redevelopment of the Civic Centre site. This invites the question that if a number of options are being explored, why should WMP, or any other CAP partner, put finance/resources into refurbishing the Civic Centre when it may ultimately be demolished and</p>	<p>Comments are noted. The policy is specifically flexible to allow a number of uses to be considered on this site - including what has been mention in the representations. However, in order to aid clarity it is proposed to include the suggested change to the policy wording as part of a Minor Amendment to the Plan. In terms of subsequent 'protection' of facilities it is considered that this would be adequately covered under Policy DPI11: Community Facilities.</p> <p><b>Please refer to Minor Amendment SA-MA53.</b></p>

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
		<p>replaced with an alternative development?</p> <p>To fully resolve the issues highlighted in Part 6 of these representations and improve the effectiveness of Policy SAL.STC3, we recommend the following amendment: -</p> <p><i>Community Uses (D1 and D2 , <b>including police and fire services</b> )</i></p> <p>In addition, we recommend the following amendments to paragraph 12.12: -</p> <p>The policy position for this site reflects the sites central location and potential to provide a vibrant mixed use development. The Civic Centre currently performs as important role in the community and therefore redevelopment options should ensure that appropriate provision is retained and provided for community uses <b>in the first instance, or compensatory provision provided for</b> such uses.</p>	
<p>Environment Agency <a href="#">SALPP169</a></p>	<p>Policy SAL.STC3 Civic Centre</p>	<p>There is currently some inconsistency within the plan on how contaminated land has been picked up for each site, in terms of the wording used the policies it has included in. For consistency we would prefer the following wording to be used for the identified policies.</p> <p><b>- Ensure they incorporate appropriate remediation,</b></p>	<p>Comments are noted.</p> <p><b>Please refer to Minor Amendment SA-MA47.</b></p>

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
		<b>building and drainage design in order to deal with any land contamination.</b>	
Campaign to Protect Rural England <a href="#">SALPP147</a>	Policy SAL.STC4 Swan Hotel and Working Men's Club	<p>Any retail uses should be concentrated as far as possible at the eastern end of the site and be well-integrated with the existing retail area. However it is doubtful of Stourport needs any significant amount of additional retail provision. If it did this would be an appropriate location, due to its proximity to the town centre.</p> <p>The policy should require retail involving part only of the site to be at the east end and to be well connected to the town centre.</p>	Comments are noted. It is considered that the policy is clear in directing any retail development of this site to the frontage along High Street, which forms part of the existing primary shopping frontage.
Environment Agency <a href="#">SALPP170</a>	Policy SAL.STC4 Swan Hotel and Working Men's Club	<p>There is currently some inconsistency within the plan on how contaminated land has been picked up for each site, in terms of the wording used the policies it has included in. For consistency we would prefer the following wording to be used for the identified policies.</p> <p><b>- Ensure they incorporate appropriate remediation, building and drainage design in order to deal with any land contamination.</b></p>	<p>Comments are noted.</p> <p><b>Please refer to Minor Amendment SA-MA47.</b></p>
Campaign to Protect Rural England <a href="#">SALPP137</a>	Policy SAL.EA1 Carpets of Worth	Even if technically within 300m of the Town Centre, this is essentially an out-of centre site, but it will be a completely different destination and would thus detract from its viability. The edge-of-centre site STC4 would be	Comments are noted. In planning terms, this is an edge of centre site. The policy provides a framework which supports the existing planning approvals on the site and as such is considered

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
		<p>preferable if a supermarket is needed. This follows from the sequential approach in GBP2, which should be cross-referenced.</p> <p>Even though they may in separate ownerships, sites EA1 and EA2 adjoin each other. A single policy covering both would be better.</p>	<p>to be appropriate.</p> <p>EA2 is considered separately due to the different timescales involved in the proposed developments, and to provide continuity with the Adopted Local Plan of 2004 and the Severn Road Development Brief.</p>
<p>Environment Agency <a href="#">SALPP171</a></p>	<p>Policy SAL.EA1 Carpets of Worth</p>	<p>There is currently some inconsistency within the plan on how contaminated land has been picked up for each site, in terms of the wording used the policies it has included in. For consistency we would prefer the following wording to be used for the identified policies.</p> <p><b>- Ensure they incorporate appropriate remediation, building and drainage design in order to deal with any land contamination.</b></p>	<p>Comments are noted.</p> <p><b>Please refer to Minor Amendment SA-MA47.</b></p>
<p>Environment Agency <a href="#">SALPP172</a></p>	<p>Policy SAL.EA2 Cheapside</p>	<p>There is currently some inconsistency within the plan on how contaminated land has been picked up for each site, in terms of the wording used the policies it has included in. For consistency we would prefer the following wording to be used for the identified policies.</p> <p><b>- Ensure they incorporate appropriate remediation, building and drainage design in order to deal with any land contamination.</b></p>	<p>Comments are noted.</p> <p><b>Please refer to Minor Amendment SA-MA47.</b></p>
<p>Environment</p>	<p>Policy SAL.EA3</p>	<p>There is currently some inconsistency within the plan on</p>	<p>Comments are noted.</p>

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
Agency <a href="#">SALPP173</a>	Parsons Chain	<p>how contaminated land has been picked up for each site, in terms of the wording used the policies it has included in. For consistency we would prefer the following wording to be used for the identified policies.</p> <p><b>- Ensure they incorporate appropriate remediation, building and drainage design in order to deal with any land contamination.</b></p>	<b>Please refer to Minor Amendment SA-MA47.</b>
Campaign to Protect Rural England <a href="#">SALPP138</a>	Policy SAL.EA4 Worcester Road Car Garages	Car Sales and Service is an important activity. The retention of the area as such should be a priority. The policy should be subject to a precondition that the existing car sales and service use is no longer viable.	Comments are noted. The policy is flexible to allow a number of options to be considered, including the retention of the existing car sales and service use. It should, however, be noted that earlier representations during the plan preparation, from the site owners, suggested the possibility of considering the site for residential use.
Environment Agency <a href="#">SALPP174</a>	Policy SAL.EA4 Worcester Road Car Garages	<p>There is currently some inconsistency within the plan on how contaminated land has been picked up for each site, in terms of the wording used the policies it has included in. For consistency we would prefer the following wording to be used for the identified policies.</p> <p><b>- Ensure they incorporate appropriate remediation, building and drainage design in order to deal with any land contamination.</b></p>	<p>Comments are noted.</p> <p><b>Please refer to Minor Amendment SA-MA47.</b></p>
Campaign to	Policy SAL.EA5	The very jagged boundary with the gardens of houses in	Comments are noted. The boundary has to be

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
Protect Rural England <a href="#">SALPP139</a>	Baldwin Road	Baldwin Road is unsatisfactory. There should be wording to allow boundary adjustments between area EA5 and these gardens to ensure good use of land.	drawn somewhere and given the different ownerships involved it is considered the proposed line is appropriate. Further discussions on exact siting of development would be a matter for any planning application.
Environment Agency <a href="#">SALPP175</a>	Policy SAL.EA5 Baldwin Road	<p>There is currently some inconsistency within the plan on how contaminated land has been picked up for each site, in terms of the wording used the policies it has included in. For consistency we would prefer the following wording to be used for the identified policies.</p> <p><b>- Ensure they incorporate appropriate remediation, building and drainage design in order to deal with any land contamination.</b></p>	<p>Comments are noted.</p> <p><b>Please refer to Minor Amendment SA-MA47.</b></p>
Canal & River Trust <a href="#">SALPP193</a>	Policy SAL.EA5 Baldwin Road	<p>Welcomes the proposal in the policy for a masterplan to be required for the whole site 'prior to any development being considered' but considers that part 'ii' of the policy requires further deliberation in terms of ensuring that the policy is deliverable. The current requirement to 'retain, enhance and make accessible the public open space that lies within the site boundary' raises two issues. It is unclear whether the requirement is to retain in part or entirely the open space and secondly the open space currently has no public access and is zoned urban open space. Making the space accessible will increase maintenance costs placing an increased burden on the landowner and it needs to be set in the</p>	<p>Comments are noted, however, it is considered that it is more appropriate to address these issues at the planning application stage.</p>

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
		<p>context that the site is in several ownerships which could be addressed through an approach that allows for the reconfiguration of the space and the release of part of it for development. It is unclear whether the policy currently allows for this to happen. Suggests inserting additional reasoned justification:</p> <p><b>This could include the reconfiguration and reduction of the existing open space, providing that the aim of achieving an improved and accessible space is achieved.</b></p>	
Canal & River Trust <a href="#">SALPP194</a>	Policy SAL.EA5 Baldwin Road	Response supports access to the canal but also suggests that consideration needs to be given to the on-going cost and liability to ensure that it is deliverable.	Support is welcomed and concerns regarding deliverability are noted and will be addressed through response number SALPP193.
Coomber E <a href="#">SALPP4</a>	Stourport-on-Severn - West	Raises concern that the DPD fails to identify an adequate land supply in Stourport-on-Severn and suggests that land off Bewdley Road, Stourport-on-Severn, should be allocated.	<p>There is no justification for taking land out of the Green Belt in order to meet the housing requirement.</p> <p>In line with Policy DS01 of the Adopted Core Strategy, and the SHLAA, the provision of 4,000 new homes will be split 60% Kidderminster, 30% Stourport and 10% Bewdley and rural areas. Policy DS03 states that the focus will be on existing brownfield sites in Stourport. Sites in Stourport either with permission for housing or proposed for</p>

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
			allocation in the DPD would provide approximately 1,000 dwellings. This is 31% of the potential capacity of 3,185 in the District (2012-2026) shown on the housing trajectory at April 2012.
Shuttes J <a href="#">SALPP88</a>	Paragraph 14.1	This again needs to be considered as it is currently under development with applications for revisions in hand.	This site is currently derelict, construction is underway on land adjacent to the site.
Bovale Limited <a href="#">SALPP99</a>	Policy SAL.WS1 Former Midland Industrial Plastics Site	<p>We fully support the proposed allocation of the site for a mix of residential and elderly care facility development (proposed Policy SAL.WS1). The site is in full compliance with the site selection criteria set out in paragraph 47 of the National Planning Policy Framework (NPPF). The site is developable and deliverable in that it is (as explained above) a suitable location for development now, is capable of being delivered now and is viable.</p> <p>It is our view that the site is a highly sustainable Brownfield site, not a "fairly sustainable" site as stated in paragraph 14.2 of the DPD.</p> <p>Please also note that we support the change the council has made in terms of no longer including the MIP site and the Morgan Ceramic site within a single policy (the</p>	Comments are noted and support is welcomed.



Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
		<p>previous Policy 49).</p> <p>On a point of clarity, please could you note that depending on market demand for each of these uses, we believe that the whole site would be suitable for Class C3 residential use.</p>	
<p>Campaign to Protect Rural England <a href="#">SALPP157</a></p>	<p>Policy SAL.WS1 Former Midland Industrial Plastics Site</p>	<p>It seems illogical to allow the residential development of one industrial site but make no provision as to the adjacent one if it were to become redundant.</p> <p>Either the wording or the site boundary needs to be changed to include all the industrial land here. If the Council's view is that the rest should stay as industrial, there should be a policy to that effect.</p>	<p>Comments are noted. There is a long history to this area and the proposed site allocation. What should be realised is that the existing employment site is an important employment area and is safeguarded under GPB1 of this DPD. The existing site has recently reinvested money gained from allowing residential development at the front part of the site.</p> <p>The site included in WS1 is considered to be an appropriate residential site in line with the Core Strategy and as indicated by representations received by the site owners. Therefore, no change is proposed to this policy or allocation.</p>
<p>Environment Agency <a href="#">SALPP176</a></p>	<p>Policy SAL.WS1 Former Midland Industrial Plastics Site</p>	<p>There is currently some inconsistency within the plan on how contaminated land has been picked up for each site, in terms of the wording used the policies it has included in. For consistency we would prefer the</p>	<p>Comments are noted.</p> <p><b>Please refer to Minor Amendment SA-MA47.</b></p>

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
		<p>following wording to be used for the identified policies.</p> <p><b>- Ensure they incorporate appropriate remediation, building and drainage design in order to deal with any land contamination.</b></p>	
<p>Shuttes J <a href="#">SALPP89</a></p>	<p>Paragraph 14.4</p>	<p>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.</p>	<p>Comments are noted however, the highways authority have not raised any objections to the site and detailed access arrangements will be addressed through the development management process.</p>
<p>English Heritage <a href="#">SALPP223</a></p>	<p>Policy SAL.B1 Load Street Redevelopment Area</p>	<p>This is a highly sensitive site due to setting in Conservation Area and wider townscape, including views across site from elsewhere such as riverside. Suggest point (vi) is amended ' ... respect their heritage setting in a positive manner <i>including views across the area.</i>'</p>	<p>Amend text at point (vi) ' ... respect their heritage setting in a positive manner <i>including views across the area.</i>'</p> <p><b>Please refer to Minor Amendment SA-MA54.</b></p>
<p>Campaign to Protect Rural England <a href="#">SALPP158</a></p>	<p>Policy SAL.B1 Load Street Redevelopment Area</p>	<p>This site immediately adjoins the town centre and is readily accessible from it. There is no need for it to be limited to "Small scale" or "local needs". If there is a need for additional retail development in Bewdley, irrespective of scale, this is the obvious site for it. If the whole site is not used for retail, then the retail element should be as close to Load Street as feasible. The formal boundaries of the site should not be treated as restrictive if the developer is able to obtain adjacent land</p>	<p>Comments are noted. The retail study undertaken to inform the Core Strategy identifies that the only need for new retail development in Bewdley is for small scale or local needs. This is included in the Adopted Core Strategy and reflected here in the site specific policy. Any other approach would not be consistent with the Core Strategy or the Council's evidence base and therefore no</p>

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
		<p>that he can appropriately incorporate into it.</p> <p>Substantial redrafting is required to allow retail "edge-of-centre" development, but concentrated at the end nearest Load Street.</p> <p>Wording should be added to allow adjacent land to be incorporated into the site, if desired.</p>	<p>change is required.</p> <p>In terms of the boundary drawn, this is considered to be the most appropriate at time of drafting and is in line with previous discussions regarding the development potential in this area.</p>
<p>Environment Agency <a href="#">SALPP177</a></p>	<p>Policy SAL.B1 Load Street Redevelopment Area</p>	<p>There is currently some inconsistency within the plan on how contaminated land has been picked up for each site, in terms of the wording used the policies it has included in. For consistency we would prefer the following wording to be used for the identified policies.</p> <p><b>- Ensure they incorporate appropriate remediation, building and drainage design in order to deal with any land contamination.</b></p>	<p>Comments are noted.</p> <p><b>Please refer to Minor Amendment SA-MA47.</b></p>
<p>Jackson W <a href="#">SALPP44</a></p>	<p>Policy SAL.B2 Smaller Bewdley Sites</p>	<p>Suggests that land adjacent to 18 Wyre Hill, Bewdley should be allocated for residential development in order to improve the conservation area by removing non-conforming uses.</p>	<p>Please see Officer response to Bewdley Town Council's representation. It is considered that this issue can be addressed through a proposed minor amendment to Policy SAL.DPL1. It is not necessary to allocate the site specifically due to its very small size. It could come forward as windfall development under the proposed minor amendment.</p>
<p>Watkins R A</p>	<p>Policy SAL.B2</p>	<p>The best way to enhance the conservation area, and the</p>	<p>The Lax Lane site is one of only three identified</p>

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
<a href="#">SALPP68</a>	Smaller Bewdley Sites	<p>safety of traffic in Lax Lane is to demolish the WRVS building and turn that new area into residents only car parking. That would enable some of the on-street parking in Lax Lane to be removed and the rest also used for residents only</p> <p>1. Policy SAL.B2 Lax Lane replace "Residential Development (C3)" with "Residents only parking".</p>	for residential purposes within Bewdley. The development is proposed for later in the plan period. It is considered that it offers a future opportunity for a small, comprehensive mixed use development and that the policy for residential allocation should remain. No further change necessary.
Harding and Matthews <a href="#">SALPP107</a>	Policy SAL.B2 Smaller Bewdley Sites	<p>Put forward and request that the site known as Unit 2, Greenacres Lane is included within the allocation of smaller sites in Bewdley as set out in the Publication Draft Policy SAL.B2.</p> <p>Considers that the site has significant potential to bring forward a sustainable residential development, follows dialogue with the Council's Planning Officers over the most appropriate way to facilitate residential development at the site. which has the following characteristics:</p> <ul style="list-style-type: none"> <li>- 0.04 hectares</li> <li>- Derelict former light industrial unit, the site is previously developed land in the defined residential area of Bewdley.</li> <li>- Site is no longer considered suitable for a continuation</li> </ul>	<p>A number of representations have been received with regard to the ability for small sites on previously developed land to come forward for market residential development within Bewdley. Within the recent context of the NPPF and the emphasis on the Presumption in Favour of Sustainable Development and viability of development proposals, in addition to the recognition of the historic importance of windfall development in contributing to housing land supply, Officers consider that there is scope to include flexibility within Policy SAL.DP1 and SALDP.2 which would allow for small sites to come forward for residential development within Bewdley. Please refer to the Schedule of Minor Amendments for the Proposed Changes.</p> <p>Due to the site's size it is not considered</p>

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
		<p>of commercial activities due to general lack of demand for light industrial and other commercial activities in Bewdley. Further constrained by the building's severely dilapidated state.</p> <ul style="list-style-type: none"> <li>- Indicative capacity for 1 detached dwelling.</li> <li>- Planning constraint in terms of the majority of the site falling within Flood Zone 2, a small section if the access from Greenacres Lane falls within Flood Zone 3.</li> </ul> <p>Highlights the NPPF's Core Planning Principles which includes a preference for allocations on land with lower environmental value and the promotion of effective use of land by reusing previously developed land.</p> <p>The site's allocation also represents an opportunity for the delivery of housing in Bewdley that meets local needs as our client is seeking to bring it forward to meet their own individual need of a home.</p> <p>It needs to be recognised that there will not be any need for affordable housing as the size of the site means that it cannot support more than one dwelling unit. Applicants have undertaken a robust and comprehensive viability assessment which confirms that it is only a market dwelling that can produce sufficient value to absorb the</p>	<p>necessary to allocate it within the DPD, particularly as it is also washed over by the residential area. It is considered that the proposed changes to Policies SAL.DPL1 and SAL.DPL2 will address the concerns set out in the representation and enable the site to come forward for development.</p>

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
		<p>extensive costs involved in developing the site.</p> <p>- Clear that the site is more suited to residential redevelopment, the surrounding residential character is mainly detached/semi-detached dwellings</p>	
<p>Campaign to Protect Rural England <a href="#">SALPP131</a></p>	<p>Policy SAL.B2 Smaller Bewdley Sites</p>	<p>(a) Lax Lane is primarily a residential area, the introduction of new business uses, as opposed to the continuation of existing ones, is inappropriate.</p> <p>(b) The Workhouse site seems to provide the means of opening up a significant area of back-land for development. The dearth of opportunity sites for housing in Bewdley makes it desirable that the land back gardens, west of High Street should be available for development, as has happened at Burltons Terrace. It is appreciated that garden land is now not considered to be Brownfield land, but housing sites in Bewdley are so scarce that we consider that its use is justified in this case.</p>	<p>Comments are noted. The existing Lax Lane site already caters for small businesses, such as Bewdley brewery, and this policy reflects those current uses.</p> <p>With regards to the Workhouse, this is a proposed conversion of an existing listed building and is not considered to be 'backland or garden development'.</p>
<p>Environment Agency <a href="#">SALPP178</a></p>	<p>Policy SAL.B2 Smaller Bewdley Sites</p>	<p>There is currently some inconsistency within the plan on how contaminated land has been picked up for each site, in terms of the wording used the policies it has included in. For consistency we would prefer the following wording to be used for the identified policies.</p> <p>- <b>Ensure they incorporate appropriate remediation,</b></p>	<p>Comments are noted.</p> <p><b>Please refer to Minor Amendment SA-MA47.</b></p>

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
		<b>building and drainage design in order to deal with any land contamination.</b>	
Churchill and Blakedown Parish Council <a href="#">SALPP45</a>	Policy SAL.RS1 Blakedown Nurseries	<p>Considers that policy SAL.RS1 does not fully address local housing need in Blakedown and is too restrictive. The site is the only deliverable site within the Parish and must therefore provide for local housing needs in a wider sense than just affordable housing. The Parish Council have commissioned a new housing needs survey to determine the true local need.</p> <p>Policy SAL.RS1 does not fully address local needs and is inconsistent with Core Strategy policy DS01.</p> <p>Suggests the policy should be amended to remove the word affordable and remove reference to waiting lists.</p> <p>Suggests replacing "an element of enabling market housing" with "appropriate local housing need".</p>	<p>The Parish Council is seeking common ground with regard to the definition of "Local Housing Need" in that essentially it would like to see this widened to include open market housing such as bungalows to enable older residents to downsize. Officers have considered the matter in some detail along with the Housing Services Manager. The definition of local housing need relates specifically to affordable housing requirements in accordance with definitions set out within the NPPF and Housing Legislation. This is an issue which will require further discussion at the examination.</p>
Barratt Homes <a href="#">SALPP91</a>	Policy SAL.RS1 Blakedown Nurseries	<p>The intention is to provide confidence to the Local Authority that this site is suitable, available and deliverable within the time period set out in the document.</p> <p>The continued dereliction of this previously developed site still raises concern amongst the local residents who appear to accept a residential development as a suitable</p>	<p>Supporting comments are welcomed. The site boundary will be amended on the proposals map prior to submission as identified by the representation.</p>

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
		<p>solution to this problem. BWM consider this land to be a previously developed brownfield site because of its historic use and extent of buildings. It is not covered by any Statutory Designations such as SSSI, National Nature Reserve, Conservation Area, etc and will not therefore affect any interests of acknowledged importance. Its allocation within the emerging plan is therefore sound.</p> <p>The site boundaries for the Blakedown Nurseries land shown on your plans Page 160 are inaccurate. I have attached a plan previously with representations showing the correct boundaries. The discrepancy is the boundary to the side and rear of 30 and 32 Belbroughton Road.</p>	
<p>Environment Agency <a href="#">SALPP190</a></p>	<p>Policy SAL.RS1 Blakedown Nurseries</p>	<p>The Councils Water Cycle Strategy by Royal Haskoning identifies Blakedown Nurseries as requiring a major infrastructure upgrade, which could lead to significant time and cost implications. It is currently unclear how this has been assessed as part of the Development Plan Document (DPD), to support the phasing and delivery of the site.</p> <p>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</p>	<p>Comments are noted. The site is considered to be deliverable as discussions have been held with the site owners and agents who have provided comments to indicate its deliverability. Furthermore, the site has just received planning permission for 44 residential units. Therefore, the timing and deliverability of the site can be fully justified. It should be noted that the Environment Agency were consulted on this application but did not provide comments as it did not fall within their 'consultation checklist'.</p>



Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
		<p>authorities understand district-wide development costs at the time Local Plans are drawn up.'</p> <p>The Infrastructure Delivery Plan should be finalised and published so that it can be viewed and commented on. It should be clear how the plan 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.</p> <p>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, a number of the more rural sites, including Blakedown Nurseries, is identified as requiring one or more major infrastructure upgrades (shown as red box in table 22A-D of the WCS and referred to in paragraph 5.71 of the adopted Core Strategy for phasing and implementation). The Infrastructure Delivery Plan should further clarify the infrastructure requirements and provide an update to support the phasing and delivery of sites within the DPD. Upon receipt of this document we would be able to comment further and update our position.</p>	
The Coal Authority	Policy SAL.RS2	Sets out background to coal reserves in Wyre Forest district and the coal-mining legacy. Considers that	Comments are noted.

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
<a href="#">SALPP43</a>	Land at Clows Top	<p>policy SAL.RS2 is not justified and not consistent with the NPPF and should be re-worded as follows to address the NPPF requirement for prior extraction:</p> <p>"v. The impact of development in terms of the sterilisation of surface coal resources should be taken into account and, where practicable and environmentally feasible, the prior extraction of surface coal resources should be undertaken."</p>	<b>Please refer to Minor Amendment SA-MA55.</b>
Campaign to Protect Rural England <a href="#">SALPP143</a>	Policy SAL.RS2 Land at Clows Top	Wording should be added to allow the rationalisation of the boundary.	Comments are noted. However, the site boundary is considered to be appropriate and is in accordance with land holdings, as confirmed by the site owners.
Environment Agency <a href="#">SALPP164</a>	Policy SAL.RS2 Land at Clows Top	<p>The Councils Water Cycle Strategy by Royal Haskoning identifies land at Clows Top as requiring major infrastructure upgrades, which could lead to significant time and cost implications. It is currently unclear how this has been assessed as part of the Development Plan Document (DPD), to support the phasing and delivery of the site.</p> <p>Paragraph 17.8 of the Site Allocations and Policies DPD refers to redevelopment providing a suitable drainage solution to help alleviate known infrastructure issues within the village. It is unclear how this has been assessed as the Infrastructure Delivery Plan is not</p>	Comments are noted. Discussions with the landowners and agents of the site have helped to identify that the site is considered to be deliverable, and will be done so in a timely fashion. The site has been allocated within the plan due to the certainty provided by the landowners. It has been given a longer phasing period to allow for issues in relation to drainage to be completed in a satisfactory manner. The timing of any infrastructure upgrade will be a matter for the developers, who are seeking to bring forward the site. The site is considered to be consistent with the Core Strategy and the development plan. The

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
		<p>available for review and we understand that this document is still being undertaken by the Council to inform the evidence base.</p> <p>As the Infrastructure Delivery Plan is still being completed it is unclear whether the plan is the most appropriate strategy, when considered against reasonable alternatives, and whether the site is deliverable over its period i.e. environmental infrastructure requirements etc.</p> <p>When comparing the DPD with the WCS, a number of the more rural sites, including land at Clows Top, is identified as requiring one or more major infrastructure upgrades (shown as red box in table 22A-D of the WCS and referred to in paragraph 5.71 of the adopted Core Strategy for phasing and implementation).</p> <p>The Infrastructure Delivery Plan should further clarify the infrastructure requirements and provide an update to support the phasing and delivery of sites within the DPD. Upon receipt of this document we would be able to comment further and update our position</p>	<p>Council's IDP and Water Cycle Strategy both identify that there are concerns relating to drainage within this area. This has been reflected in the policy wording included in the plan and has been taken into account when setting the phasing period.</p> <p>The first draft of the IDP has been circulated to the Environment Agency for their comment.</p>
Moss K <a href="#">SALPP102</a>	Paragraph 17.5	<p>Support for Policy RS2 and for the recognition in the policy that there may be infrastructure and viability issues to be addressed.</p> <p>We fully understand that the Council wish to see an</p>	<p>Comments are noted and support is welcomed.</p> <p><b>Please refer to Minor Amendment SA-MA56.</b></p>

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
		<p>holistic approach to the development of the two land ownerships that make up the allocation. However, when land is in separate ownerships bringing development forward in tandem is not always possible and we would not wish to see an absolute obligation for the two sites to come forward at the same time, albeit that this is a possibility.</p> <p>To address this and to encourage the early development of the site we would suggest the addition of the following words at the end of para 17.5.</p> <p>"this could be either through a single application covering the whole site or alternatively an individual application on each landholding provided that the application demonstrated in a masterplan context how the policy objectives in SAL.RS2 can be achieved"</p>	
West Midland Safari Park <a href="#">SALPP101</a>	Policy SAL.PDS1 Previously Developed Sites in the Green Belt	West Midland Safari Park supports the identification of part of the West Midland Safari Park site as a Previously Developed Site. We consider this policy to be sound and consistent with Green Belt policy in the National Planning Policy Framework.	Support is welcomed.
Homes & Communities Agency <a href="#">SALPP211</a>	Policy SAL.PDS1 Previously Developed	Sets out the background to the former Lea Castle Hospital site, which is 104 hectares, with the Homes and Communities Agency owning 93 hectares, the Coventry & Warwickshire Partnership Trust owning 9 hectares	The comments on behalf of the HCA and other landowners at the former Lea Castle Site are noted. They need to be considered within the context of the NPPF and its approach to the

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
	Sites in the Green Belt	<p>and the Department of Health 1 hectare. Annual estate management costs is significant.</p> <p>The central area of the site currently comprises a mixed cluster of derelict prefabricated buildings previously used as a hospital for people with learning difficulties which has since closed. The buildings have a total estimated footprint of approximately 25,000sq.m and a gross floor area of around 30,000 sq.m.</p> <p>Sets out detail relating to the existing and emerging policy context which originated with the identification of the site as a Major Developed Site in the Green Belt within the 2004 Adopted Local Plan. Under Policy E4 the Local Plan allocates 6 hectares of the site for redevelopment to B1 uses, based on the site coverage ration of approx 26%, which broadly corresponds to the footprint of buildings which were considered surplus at the time. Consequently the opportunity for comprehensive redevelopment of the site under this policy was rendered redundant.</p> <p>In the Site Allocations &amp; Policies DPD the Council acknowledges that Policy E4 failed to stimulate any interest and that due to the majority of the site now being vacant the whole of the site should be reviewed and considered through a planning framework. There are concerns about the viability of continuing the existing</p>	development of Previously Developed Sites within the Green Belt and also the requirement for the viability testing of Local Plan Policies. It is therefore considered that the policy amendments proposed should be further discussed with the HCA under a Statement of Common Ground in order to establish the appropriate amendments to the policy wording.

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
		<p>allocation of the site.</p> <p>The HCA has made several previous representations including most recently to the Preferred Options Paper. The inclusion of C2 along with health uses and sport and recreational facilities did not address the HCA's continuing concerns that greater flexibility should be provided for in the policy. Only by incorporating open market residential (C3) as part of a mix of uses can the necessary infrastructure provision be funded to open up the site and ensure delivery of a comprehensive scheme that will contribute towards Kidderminster's regeneration.</p>	
<p>Homes &amp; Communities Agency <a href="#">SALPP208</a></p>	<p>Policy SAL.PDS1 Previously Developed Sites in the Green Belt</p>	<p>Welcome the inclusion of Lea Castle as a Previously Developed Site. However, the range of uses set out in Policy SAL.PDS1 are objected to as it is considered they render the policy undeliverable.</p> <p>No interest has been shown in the development of the site for employment purposes. Market advice has confirmed not only a lack of interest in development of the site for major commercial development but also highlighted that without some reference to C3 (residential) within the mix of uses considered appropriate, there is little prospect of delivering development on the site.</p>	<p>The comments on behalf of the HCA and other landowners at the former Lea Castle Site are noted. They need to be considered within the context of the NPPF and its approach to the development of Previously Developed Sites within the Green Belt and also the requirement for the viability testing of Local Plan Policies.</p> <p>Furthermore, any proposal would also need to be in conformity with the Adopted Core Strategy, which includes a sequential approach to the allocation of land for new development (Policy DS01: Development Locations), and specifically places a focus on regenerating the</p>

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
		<p>AMEC has undertaken a detailed appraisal of the site which has confirmed that much of the site is enclosed and very well screened thus offering the potential for comprehensive redevelopment without impacting on the openness of the surrounding Green Belt.</p> <p>The landowners of the site believe that its redevelopment can help support the Council's regeneration objectives for the wider Kidderminster area. However, in order to maximise these opportunities it is requested that SAL.PDS1 be re-worded so that dwelling houses is included as an acceptable land use. They include some proposed re-wording of the policy for the Council's consideration.</p> <p>The landowners would be happy to accept a requirement to produce a planning brief/masterplan and for its content to be agreed with the District Council. This is consistent with other major development sites within the District.</p>	<p>urban areas of Kidderminster and Stourport-on-Severn.</p> <p>It is therefore considered that the policy amendments proposed should be further discussed with the HCA under a Statement of Common Ground in order to establish the appropriate amendments to the policy wording.</p>
<p>Campaign to Protect Rural England <a href="#">SALPP142</a></p>	<p>Policy SAL.PDS1 Previously Developed Sites in the Green Belt</p>	<p>It is difficult to know what to do with this brownfield site in the Green Belt. This proposed solution is probably the best. But any development proposals should additionally be required to enhance the existing screening around the site. The site has been screened well with coniferous plantations, but the growth of trees means that lower branches are becoming rather thin, reducing the</p>	<p>Comments are noted. The proposed policy PSD1 includes the following requirement:</p> <p><i>Design and landscaping of development should seek to minimise the impact on the Green Belt through...providing extensive landscaping and tree planting to screen boundaries, where</i></p>

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
		effectiveness of the screening.	<i>appropriate.</i>  It is considered this wording is sufficient to meet the suggestions included in the representation.
Campaign to Protect Rural England <a href="#">SALPP159</a>	Policy SAL.PDS1 Previously Developed Sites in the Green Belt	<p>The car park should be excluded from the application of the policy, and thus from the site boundary OR the car park should be subject to different treatment from the rest of the site, so that new development on it would be limited to such matters as are necessary to its continuance as a car park, possibly the erection of a small kiosk.</p> <p>2. The boundary of the rest of the site is sinuous, but development of new facilities outside but adjacent to the boundary should be permissible.</p>	<p>Comments are noted. A proposed Minor Amendment is suggested for the WMSLP boundary. However, it is considered appropriate to include the car parking areas in the boundary as it relates to the 'Previously Developed' element of the park, and is therefore considered to be in conformity with the NPPF, which refers to previously developed sites in the Green Belt.</p>
Worcestershire County Council <a href="#">SALPP230</a>	Policy SAL.PDS1 Previously Developed Sites in the Green Belt	<p>Concerned over the very precise definitions of the uses proposed for the South Kidderminster Enterprise Park as B1, B2 and B8 development. Waste management development does not necessarily or easily fit into these definitions. As currently written the submission document is not in accordance with the Waste Core Strategy, in that it could exclude waste management which could usefully and appropriately be located on employment land.</p> <p>Annex A of the Waste Core Strategy states "58 areas of</p>	<p>These comments are noted and will be subject to further discussion under a Statement of Common Ground. With specific regard to the British Sugar Site it should be noted that a planning application has been approved for a mix of uses on the site including an element of residential</p>



Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
		search have been identified as being potentially suitable for most waste management facilities" these include the former British Sugar Site. The permitted uses proposed for this site use class B1, B2 and B8 could deter waste development from this site.	
Worcestershire County Council <a href="#">SALPP240</a>	Policy SAL.PDS1 Previously Developed Sites in the Green Belt	Specifies that clarification is required in Green Belt Policy SAL.DPS1 and that policy wording is tightened.	These comments are noted and it is agreed that the policy wording could usefully be tightened.  <b>Please refer to Minor Amendment SA-MA57.</b>
West Midland Safari Park <a href="#">SALPP122</a>	Paragraph 18.13	<p>We consider the DPD to be unsound as amendments are required to the Previously Developed Site Boundary. This is because the boundary proposed is not justified by the previously-developed areas that currently exist on the site and because the policy will not be as effective as it could be if all previously-developed areas are included.</p> <p>The boundary should be amended to include the additional hatched areas shown on our Drawing. This will ensure that the policy reflects what is the case on the ground (hence ensuring it is 'justified') and will result in the policy being more effective.</p>	Comments are noted. The proposed changes suggested by WMSLP are considered to be acceptable, as the areas identified by the Park are considered to be Previously Developed in nature. The proposed changes would still mean that the allocation is centred around the rides and car parking areas and would be consistent with the NPPF. It is considered that this should be included as a proposed minor amendment to the DPD.
Worcestershire County Council	Monitoring and Implementation	No identification of delivery agencies in the Monitoring & Implementation section, however they are identified	Noted, however it is considered that paragraph 19.5 of the reasoned justification provides the

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
<a href="#">SALPP242</a>	Framework	<p>within the Core Strategy.</p> <p>Suggests incorporating table 16.6 from the KCAAP into the Monitoring &amp; Implementation section.</p>	<p>explanation here and includes cross reference to the Core Strategy. No further changes required.</p>
<p>Watkins R A <a href="#">SALPP47</a></p>	Jargon Guide	<p>Suggests that the definition of PDL in the Jargon Guide is amended to include the full definition as set out within the NPPF rather than a precise of it as it currently omits details which could cause confusion. Also suggests including a footnote to say that changes at the national level will automatically be adopted by the LPA.</p>	<p>It is considered that this representation provides useful clarification and that a minor amendment should be submitted to the Jargon Guide which includes the full definition of Previously Developed Land as contained within the NPPF.</p> <p><b>Please refer to Minor Amendment SA-MA59.</b></p>
<p>Churchill and Blakedown Parish Council <a href="#">SALPP69</a></p>	Jargon Guide	<p>The Parish Council suggests a change of the definition of "Local Housing Needs" They consider it is inconsistent with the Adopted Core Strategy which refers to Housing for Local Needs. They have suggested wording as follows:</p> <p>Delete - Local Needs Housing - See Affordable Housing</p> <p>Substitute - Local Needs Housing - Housing which meets household and population projections, taking into account of migration and demographic change, including but not restricted to Affordable Housing.</p>	<p>This is an issue that will require debate at the examination. The Council's definition of Local Housing Need specifically relates to affordable provision as is required through housing legislation. There is nothing to stop market housing to meet an identified local need, such as bungalows coming forward as part of a mix of development proposals, indeed this is positively encouraged through local planning policy within the Core Strategy. However, the District Council is unable to enforce/manage its retention to meet local needs unless it is for affordable housing and therefore such a definition would not be deliverable or realistic.</p>

Respondent/ Response Number	Paragraph/ Policy	Summary of Representation	Officer Response
Natural England <a href="#">SALPP212</a>	Jargon Guide	<p><b>Correction</b> The Jargon Guide refers to Sites of Special Scientific Interest (SSSI) and suggests these are officially notified by English Nature. Please note this responsibility has passed to Natural England.</p>	<p>Comments are noted. <b>Please refer to Minor Amendment SA-MA58.</b></p>
Campaign to Protect Rural England <a href="#">SALPP160</a>	Policies to be Replaced	<p>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.</p>	<p>Comments are noted. Although the intention of the representation is agreed with, it is considered that the schedule remains as drafted. This is because the Adopted Local Plan has been replaced by a suite of documents and not a singular plan. Therefore, the schedule identifies what elements have been replaced, in the same way the Adopted Core Strategy has.</p>