



Wyre Forest District Council

Representations made to the

**Pre Submission Publication Version of the
Site Allocations and Policies DPD**

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

October 2012



Site Allocations and Policies DPD Pre Submission Publication Version - Index of Responses (October 2012)

Respondent	Response No	Part of Document	Supporting Document	Page
Arrowcroft Services Ltd	SALPP52	Policy SAL.GPB2.Town Centre Retail		1
	SALPP54	Policy SAL.CC1.Sustainable Transport Infrastructure		
	SALPP53	Policy SAL.CC2.Parking		
Associated British Foods Plc	SALPP197	Policy SAL.UP2.Areas of Development Restraint	Yes	14
BAE Systems	SALPP70	Policy SAL.GPB1.Employment Land Allocation		20
	SALPP71	Policy SAL.SK1.South Kidderminster Enterprise Park		
Barratt Homes	SALPP92	4.A Desirable Place to Live		25
	SALPP93	Policy SAL.DPL2.Rural Housing		
	SALPP94	4.17.Paragraph		
	SALPP95	4.18.Paragraph		
	SALPP96	4.2.Paragraph		
	SALPP97	4.25.Paragraph		
	SALPP98	4.32.Paragraph		
	SALPP91	Policy SAL.RS1.Blakedown Nurseries		
Bewdley Town Council	SALPP31	Policy SAL.DPL2.Rural Housing		29
Bovale Limited	SALPP99	Policy SAL.WS1.Former Midland Industrial Plastics Site		31
Bowdler and Migniuolo	SALPP103	Policy SAL.UP2.Areas of Development Restraint	Yes	37
Brook Green Estates Ltd	SALPP121	Policy SAL.GPB3.Protecting and Enhancing Local Retail Services		58
Campaign to Protect Rural England	SALPP132	Policy SAL.DPL1.Sites for Residential Development		60
	SALPP133	Policy SAL.DPL2.Rural Housing		
	SALPP134	Policy SAL.DPL6.Accommodation for Dependants		
	SALPP135	Policy SAL.DPL11.Community Facilities		
	SALPP136	Policy SAL.DPL12.Educational Sites		
	SALPP140	Policy SAL.GPB2.Town Centre Retail		
	SALPP148	Policy SAL.UP1.Green Belt		
	SALPP149	Policy SAL.UP3.Providing a Green Infrastructure Network		
	SALPP150	Policy SAL.UP4.Open Space and Play Provision		
	SALPP151	Policy SAL.UP5.Providing Opportunities for Safeguarding Local Biodiversity and Geodiversity		
	SALPP152	Policy SAL.UP6.Safeguarding the Historic Environment		
	SALPP153	Policy SAL.UP9.Landscaping and Boundary Treatment		

Site Allocations and Policies DPD Pre Submission Publication Version - Index of Responses (October 2012)

Respondent	Response No	Part of Document	Supporting Document	Page
Campaign to Protect Rural England	SALPP154	Policy SAL.UP12.Chalets		60
	SALPP155	Policy SAL.UP13.Equestrian Development		
	SALPP144	Policy SAL.SK1.South Kidderminster Enterprise Park		
	SALPP145	Policy SAL.SK2.Former British Sugar Site		
	SALPP146	Policy SAL.SK4.Former Romwire Site		
	SALPP156	Policy SAL.WK2.Kidderminster Hospital		
	SALPP141	Policy SAL.KSS1.Smaller Kidderminster Sites		
	SALPP147	Policy SAL.STC4.Swan Hotel and Working Men's Club		
	SALPP137	Policy SAL.EA1.Carpets of Worth		
	SALPP138	Policy SAL.EA4.Worcester Road Car Garages		
	SALPP139	Policy SAL.EA5.Baldwin Road		
	SALPP157	Policy SAL.WS1.Former Midland Industrial Plastics Site		
	SALPP158	Policy SAL.B1.Load Street Redevelopment Area		
	SALPP131	Policy SAL.B2.Smaller Bewdley Sites		
	SALPP143	Policy SAL.RS2.Land at Clows Top		
	SALPP142	Policy SAL.PDS1.Previously Developed Sites in the Green Belt		
SALPP159	Policy SAL.PDS1.Previously Developed Sites in the Green Belt			
SALPP160	B.Policies to be Replaced			
Canal & River Trust	SALPP191	Policy SAL.UP2.Areas of Development Restraint		153
	SALPP192	Policy SAL.SK1.South Kidderminster Enterprise Park		
	SALPP193	Policy SAL.EA5.Baldwin Road		
	SALPP194	Policy SAL.EA5.Baldwin Road		
Carpenter T	SALPP128	Policy SAL.DPL8.Land Allocations		155
Churchill and Blakedown Parish Council	SALPP45	Policy SAL.RS1.Blakedown Nurseries		157
	SALPP69	A.Jargon Guide		
Coomber E	SALPP4	14.Stourport-on-Severn - West	Yes	166
Core11	SALPP2	1.1.Paragraph		171
	SALPP3	1.2.Paragraph		
	SALPP5	1.5.Paragraph		
	SALPP6	1.12.Paragraph		
	SALPP7	2.3.Paragraph		

Site Allocations and Policies DPD Pre Submission Publication Version - Index of Responses (October 2012)

Respondent	Response No	Part of Document	Supporting Document	Page
Core11	SALPP9	2.9.Paragraph		171
	SALPP10	2.1.Paragraph		
	SALPP11	2.13.Paragraph		
	SALPP12	2.15.Paragraph		
	SALPP8	2.19.Paragraph		
	SALPP13	3.1.Paragraph		
	SALPP14	4.12.Paragraph		
	SALPP15	4.32.Paragraph		
	SALPP16	4.33.Paragraph		
	SALPP17	Policy SAL.CC1.Sustainable Transport Infrastructure		
	SALPP18	6.8.Paragraph		
	SALPP20	6.1.Paragraph		
	SALPP21	6.42.Paragraph		
	SALPP22	Policy SAL.CC7.Water Management		
	SALPP29	7.7.Paragraph		
	SALPP28	Policy SAL.SK2.Former British Sugar Site		
SALPP23	9.25.Paragraph			
English Heritage	SALPP216	Policy SAL.DPL4.Flat Conversions		215
	SALPP217	Policy SAL.GPB5.Supporting Major Tourist Attractions		
	SALPP218	Policy SAL.CC6.Renewable Energy		
	SALPP219	Policy SAL.UP6.Safeguarding the Historic Environment		
	SALPP220	Policy SAL.UP7.Quality Design and Local Distinctiveness		
	SALPP221	Policy SAL.UP10.Advertisements		
	SALPP222	Policy SAL.UP11.Re-use and Adaptation of Rural Buildings		
	SALPP223	Policy SAL.B1.Load Street Redevelopment Area		
Environment Agency	SALPP179	1.9.Paragraph		220
	SALPP184	4.8.Paragraph		
	SALPP186	Policy SAL.DPL2.Rural Housing		
	SALPP187	Policy SAL.DPL8.Land Allocations		
	SALPP188	Policy SAL.DPL9.Sites for Travelling Showpeople		
	SALPP189	Policy SAL.DPL10.Sites for Gypsy and Traveller Use		

Site Allocations and Policies DPD Pre Submission Publication Version - Index of Responses (October 2012)

Respondent	Response No	Part of Document	Supporting Document	Page
Environment Agency	SALPP182	6.3.Paragraph		220
	SALPP185	Policy SAL.CC7.Water Management		
	SALPP180	6.52.Paragraph		
	SALPP163	Policy SAL.UP3.Providing a Green Infrastructure Network		
	SALPP162	Policy SAL.UP11.Re-use and Adaptation of Rural Buildings		
	SALPP161	Policy SAL.UP12.Chalets		
	SALPP165	Policy SAL.SK2.Former British Sugar Site		
	SALPP166	Policy SAL.KSS1.Smaller Kidderminster Sites		
	SALPP167	Policy SAL.STC1.Bridge Street Basins Link		
	SALPP168	Policy SAL.STC2.Tan Lane and County Buildings		
	SALPP169	Policy SAL.STC3.Civic Centre		
	SALPP170	Policy SAL.STC4.Swan Hotel and Working Men's Club		
	SALPP171	Policy SAL.EA1.Carpets of Worth		
	SALPP172	Policy SAL.EA2.Cheapside		
	SALPP173	Policy SAL.EA3.Parsons Chain		
	SALPP174	Policy SAL.EA4.Worcester Road Car Garages		
	SALPP175	Policy SAL.EA5.Baldwin Road		
	SALPP176	Policy SAL.WS1.Former Midland Industrial Plastics Site		
	SALPP177	Policy SAL.B1.Load Street Redevelopment Area		
	SALPP178	Policy SAL.B2.Smaller Bewdley Sites		
SALPP190	Policy SAL.RS1.Blakedown Nurseries			
SALPP164	Policy SAL.RS2.Land at Clows Top			
Gemini Properties	SALPP25	2.12.Paragraph		273
		Policy SAL.PFSD1.Presumption in Favour of Sustainable Development		
	SALPP26			
	SALPP24	4.8.Paragraph		
	SALPP27	Policy SAL.SK3.Oasis Arts & Crafts and Reilloc Chain		
Harding and Matthews	SALPP113	Policy SAL.DPL2.Rural Housing	Yes	288
	SALPP107	Policy SAL.B2.Smaller Bewdley Sites	Yes	
Homes & Communities Agency	SALPP207	.Site Allocations and Policies Publication (July 2012)		458
	SALPP214	Policy SAL.GPB1.Employment Land Allocation	Yes	

Site Allocations and Policies DPD Pre Submission Publication Version - Index of Responses (October 2012)

Respondent	Response No	Part of Document	Supporting Document	Page
Homes & Communities Agency	SALPP211	Policy SAL.PDS1.Previously Developed Sites in the Green Belt	Yes	458
	SALPP208	Policy SAL.PDS1.Previously Developed Sites in the Green Belt	Yes	
J & H Evans	SALPP130	.Site Allocations and Policies Publication (July 2012)	Yes	467
Jackson W	SALPP44	Policy SAL.B2.Smaller Bewdley Sites		478
Kidderminster Civic Society	SALPP37	.Site Allocations and Policies Publication (July 2012)		483
	SALPP32	7.4.Paragraph		
	SALPP33	Policy SAL.UP6.Safeguarding the Historic Environment		
	SALPP34	.Former British Sugar Site		
	SALPP36	Policy SAL.WK2.Kidderminster Hospital		
Lawrence Recycling & Waste Management	SALPP41	Policy SAL.UP1.Green Belt		486
	SALPP42	7.4.Paragraph		
Millward Mr W	SALPP19	Policy SAL.DPL1.Sites for Residential Development		490
Morgan F	SALPP46	Policy SAL.KSS1.Smaller Kidderminster Sites		498
Moss K	SALPP102	17.5.Paragraph		501
National Farmers Union	SALPP116	Policy SAL.DPL2.Rural Housing		503
	SALPP118	Policy SAL.CC1.Sustainable Transport Infrastructure		
	SALPP119	Policy SAL.CC6.Renewable Energy		
	SALPP117	Policy SAL.UP1.Green Belt		
National Federation of Gypsy Liaison Groups	SALPP105	Policy SAL.DPL9.Sites for Travelling Showpeople		505
	SALPP104	Policy SAL.DPL10.Sites for Gypsy and Traveller Use		
Natural England	SALPP215	.Site Allocations and Policies Publication (July 2012)		513
	SALPP213	.Site Allocations and Policies Publication (July 2012)		
	SALPP209	.Site Allocations and Policies Publication (July 2012)		
	SALPP210	Policy SAL.SK2.Former British Sugar Site		
	SALPP212	A.Jargon Guide		
Nunn S	SALPP106	Policy SAL.DPL8.Land Allocations		516
Orme J	SALPP1	4.1.Paragraph		519

Site Allocations and Policies DPD Pre Submission Publication Version - Index of Responses (October 2012)

Respondent	Response No	Part of Document	Supporting Document	Page
Rawlings Mr P	SALPP255	.Residential Land Allocations	Yes	521
Revelan Group	SALPP195	Policy SAL.SK1.South Kidderminster Enterprise Park	Yes	529
	SALPP196	Policy SAL.SK4.Former Romwire Site	Yes	
Roper-Presdee S	SALPP38	Policy SAL.UP6.Safeguarding the Historic Environment		543
Shuttles J	SALPP73	2.6.Paragraph		545
	SALPP74	2.13.Paragraph		
	SALPP75	2.17.Paragraph		
	SALPP76	4.37.Paragraph		
	SALPP77	4.47.Paragraph		
	SALPP78	5.17.Paragraph		
	SALPP79	5.24.Paragraph		
	SALPP80	5.32.Paragraph		
	SALPP81	5.52.Paragraph		
	SALPP82	6.14.Paragraph		
	SALPP83	6.18.Paragraph		
	SALPP84	6.32.Paragraph		
	SALPP85	7.1.Paragraph		
	SALPP86	Policy SAL.UP8.Design of Extensions		
	SALPP87	12.6.Paragraph		
South Worcestershire Development Plan	SALPP123	Policy SAL.DPL8.Land Allocations		550
	SALPP120	4.48.Paragraph		
	SALPP124	Policy SAL.DPL9.Sites for Travelling Showpeople		
	SALPP125	4.55.Paragraph		
	SALPP126	Policy SAL.DPL10.Sites for Gypsy and Traveller Use		
	SALPP127	4.67.Paragraph		
	Sport England	SALPP63	Policy SAL.DPL12.Educational Sites	
SALPP65		Policy SAL.UP4.Open Space and Play Provision		
St Francis Group	SALPP198	4.8.Paragraph		556
	SALPP200	Policy SAL.GPB1.Employment Land Allocation		

Site Allocations and Policies DPD Pre Submission Publication Version - Index of Responses (October 2012)

Respondent	Response No	Part of Document	Supporting Document	Page
St Francis Group	SALPP201	Policy SAL.CC3.Major Transport Infrastructure		556
	SALPP202	Policy SAL.CC4.Freight		
	SALPP203	6.24.Paragraph		
	SALPP206	Policy SAL.CC7.Water Management		
	SALPP199	Policy SAL.UP2.Areas of Development Restraint		
	SALPP205	Policy SAL.UP4.Open Space and Play Provision		
	SALPP204	Policy SAL.SK2.Former British Sugar Site		
The Coal Authority	SALPP43	Policy SAL.RS2.Land at Clows Top		559
The Theatres Trust	SALPP72	Policy SAL.DPL11.Community Facilities		564
Thomas Vale	SALPP108	Policy SAL.GPB4.Specialist Retailing		567
	SALPP109	5.49.Paragraph		
	SALPP111	5.5.Paragraph		
	SALPP112	Policy SAL.GPB5.Supporting Major Tourist Attractions		
	SALPP114	Policy SAL.UP3.Providing a Green Infrastructure Network		
	SALPP115	7.106.Paragraph		
Watkins R A	SALPP48	4.2.Paragraph		579
	SALPP50	Policy SAL.DPL2.Rural Housing		
	SALPP49	4.28.Paragraph		
	SALPP51	Policy SAL.DPL6.Accommodation for Dependants		
	SALPP55	Policy SAL.DPL7.Residential Caravans and Mobile Homes		
	SALPP56	Policy SAL.DPL11.Community Facilities		
	SALPP57	Policy SAL.GPB4.Specialist Retailing		
	SALPP58	Policy SAL.UP6.Safeguarding the Historic Environment		
	SALPP59	Policy SAL.UP8.Design of Extensions	Yes	
	SALPP60	Policy SAL.UP11.Re-use and Adaptation of Rural Buildings		
	SALPP61	Policy SAL.UP11.Re-use and Adaptation of Rural Buildings		
	SALPP62	Policy SAL.UP12.Chalets		
	SALPP64	Policy SAL.UP13.Equestrian Development		
	SALPP67	7.106.Paragraph		
	SALPP68	Policy SAL.B2.Smaller Bewdley Sites		
SALPP47	A.Jargon Guide			

Site Allocations and Policies DPD Pre Submission Publication Version - Index of Responses (October 2012)

Respondent	Response No	Part of Document	Supporting Document	Page
Western Power Distribution	SALPP30	.Site Allocations and Policies Publication (July 2012)		628
West Mercia Police	SALPP254	1.9.Paragraph		630
	SALPP251	Policy SAL.PFSD1.Presumption in Favour of Sustainable Development		
	SALPP248	4.13.Paragraph		
	SALPP249	Policy SAL.DPL11.Community Facilities		
	SALPP250	Policy SAL.GPB2.Town Centre Retail		
	SALPP247	Policy SAL.CC7.Water Management		
	SALPP246	Policy SAL.UP7.Quality Design and Local Distinctiveness		
	SALPP245	Policy SAL.UP9.Landscaping and Boundary Treatment		
	SALPP252	Policy SAL.STC2.Tan Lane and County Buildings		
West Midland Safari Park	SALPP100	Policy SAL.GPB5.Supporting Major Tourist Attractions		798
	SALPP101	Policy SAL.PDS1.Previously Developed Sites in the Green Belt		
	SALPP122	18.13.Paragraph	Yes	
West Midlands HARP Planning Consortium	SALPP39	Policy SAL.DPL2.Rural Housing		805
	SALPP40	Policy SAL.DPL5.Extra Care Provision		
Wolverley & Cookley Parish Council	SALPP90	.Site Allocations and Policies Publication (July 2012)		810
Worcestershire County Council	SALPP35	.Site Allocations and Policies Publication (July 2012)		811
	SALPP224	.Site Allocations and Policies Publication (July 2012)		
	SALPP226	.Site Allocations and Policies Publication (July 2012)		
	SALPP231	1.Introduction and Context		
	SALPP236	Policy SAL.PFSD1.Presumption in Favour of Sustainable Development		
	SALPP232	5.6.Paragraph		
	SALPP233	Policy SAL.GPB1.Employment Land Allocation		
	SALPP234	5.13.Paragraph		
	SALPP235	5.14.Paragraph		
	SALPP225	6.1.Paragraph		

Site Allocations and Policies DPD Pre Submission Publication Version - Index of Responses (October 2012)

Respondent	Response No	Part of Document	Supporting Document	Page
Worcestershire County Council	SALPP181	6.32.Paragraph		811
	SALPP239	Policy SAL.CC7.Water Management		
	SALPP241	Policy SAL.UP3.Providing a Green Infrastructure Network		
	SALPP243	Policy SAL.UP3.Providing a Green Infrastructure Network		
	SALPP238	Policy SAL.UP5.Providing Opportunities for Safeguarding Local Biodiversity and Geodiversity		
	SALPP244	Policy SAL.UP5.Providing Opportunities for Safeguarding Local Biodiversity and Geodiversity		
	SALPP183	7.43.Paragraph		
	SALPP237	7.48.Paragraph		
	SALPP227	Policy SAL.SK1.South Kidderminster Enterprise Park		
	SALPP228	Policy SAL.SK2.Former British Sugar Site		
	SALPP229	Policy SAL.SK3.Oasis Arts & Crafts and Reilloc Chain		
	SALPP230	Policy SAL.PDS1.Previously Developed Sites in the Green Belt		
	SALPP240	Policy SAL.PDS1.Previously Developed Sites in the Green Belt		
	SALPP242	19.Monitoring and Implementation Framework		
Worcestershire Wildlife Trust	SALPP66	.Site Allocations and Policies Publication (July 2012)		823

Response to Consultation on:

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

6 September 2012

1. Introduction

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

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

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

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

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

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

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

Paragraph 5.8 and KCA.GPB1

To accord with paragraph 24 of the NPPF (and so to ensure that this paragraph is sound), it should also be noted that sites which are allocated for retail development should be preferred locations for retail development along with locations within the Primary Shopping Area of Kidderminster.

Paragraphs 5.10 and 5.15

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

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

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

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

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

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

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

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

Policy KCA.GPB7

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

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

Proposed **Policy KCA.GPB7** is therefore too restrictive. Given that D2 leisure and A3 and A4 food and drink uses are 'town centre uses', the AAP should recognise that such uses may also be acceptable on other sites but without a proviso that these should be "*smaller scale*". We recognise, however, that such recognition should be subject to there being an appropriate mix of uses on those other sites so that the aims of site-specific policies are not prejudiced.

Eastern Gateway

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Policy SAL.GPB2

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

Policy SAL.CC2

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

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

Policy SAL.CC1

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

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

Montagu Evans LLP
6 September 2012



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

Ref:

(For official use only)

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

BY 5.30pm on Friday 14th September 2012

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

Part A

1. Personal Details*		2. Agent's Details (if applicable)	
<i>*If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.</i>			
Title	Mr		Mr
First Name	Daniel		Paul
Last Name	Carter		Burley
Job Title (where relevant)	Director		Partner
Organisation (where relevant)	Arrowcroft Services Ltd		Montagu Evans LLP
Address Line 1	<i>Contact Agent</i>		5 Bolton Street
Line 2			London
Line 3			
Post Code			W1J 8BA
Telephone Number			020 7493 4002
E-mail Address (where relevant)			paul.burley@montagu-evans.co.uk

Part B – Please use a separate sheet for each representation

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

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

Name or Organisation : Arrowcroft Services Ltd

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

To which part of the DPD does this representation relate?

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

4. Do you consider the DPD is :

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

Please refer to guidance notes for explanation of terms

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

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

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

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

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

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

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

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

To accord with paragraph 24 of the NPPF (and so to ensure that this 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.

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

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

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

Yes, I wish to participate at the oral examination

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

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

Signature:

Date:

6 Sep 2012



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

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Part A

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

Part B – Please use a separate sheet for each representation

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

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Name or Organisation : Arrowcroft Services Ltd

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To which part of the DPD does this representation relate?

Paragraph		Policy	SAL.CC2	Other e.g. Map, table, figure, key diagram	
-----------	--	--------	----------------	--	--

4. Do you consider the DPD is :

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

Please refer to guidance notes for explanation of terms

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

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.

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

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

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Date:

6 Sep 2012



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Job Title (where relevant)	Director	Partner
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Telephone Number		020 7493 4002
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Part B – Please use a separate sheet for each representation

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Name or Organisation : Arrowcroft Services Ltd

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

Paragraph	Policy	SAL.CC1	Other e.g. Map, table, figure, key diagram	Proposals Map
4. Do you consider the DPD is :				
4.(1) Compliant with the Duty to Cooperate	Yes			No
4.(2) Legally compliant	Yes			No
4.(3) Sound	Yes			No

Please refer to guidance notes for explanation of terms

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

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The first draft of the KCAAP Proposals Map indicates that part of a Bus Priority Network crosses proposed site allocation EG5. It also indicates that part of a Proposed Cycle Route Network crosses through proposed site allocation EG5 and proposed site allocation EG7. These designations could prejudice the comprehensive planning of those sites.

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

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

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

Signature:

[

Date:

6 Sep 2012



JONES LANG
LASALLE*

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pcter.leaver@eu.jll.com

14 September 2012

Dear Sir/Madam

**Site Allocations and Policies Development Plan Document
Pre-Submission Publication Version July 2012
Land at Wilden Lane, Kidderminster**

Introduction

These representations are submitted on behalf of ABF Limited, the owner of the above site.

These representations refer specifically to Policy SAL..UP2 – Areas of Development Restraint. This policy lists six sites in the District that are considered to meet the criteria for safeguarded land.

It is considered that land at Wilden Lane possesses a number of attributes that make it a suitable and developable development site for housing and recreational purposes. These attributes, and the potential for development, are explored below.

Characteristics and Attributes of Wilden Lane

The site presents a strategic development opportunity. A plan of the site is attached.

The site is 13.5 hectares in size and comprises the former settling ponds of the former British Sugar Factory in Stourport Road.

The site is situated in Flood Zone 1. As such, it is sequentially preferable to other potential sites in the District that are in Flood Zones 2 and 3.



The site is well related to the various industrial estates off Worcester Road at Hoobrook and the Strategic Employment Area of Stourport Road that will potentially be connected to Worcester Road by the proposed link road. The location of the site close to these employment areas is an important sustainability credential. People should have the opportunity to live close to where they work to reduce the need to travel and dependency on private motor vehicles.

The site is not far from the town centre. It is well linked by public transport and there is a relatively direct route, along Worcester Road. Chester Road South links the site to Kidderminster Railway Station. Access to the motorway network is relatively simple. Altogether, the site is highly accessible for all modes of transport.

The site lies opposite dwellings on Rhuddlan Way and Hopton Drive, both accessed off Wilden Lane. Development of the settling ponds site would generate an attractive residential environment, but should also benefit the existing residents to the east. Additional residential development could stimulate community wide improvements, including improved accessibility and contribution towards public open space and public transport.

Development of this site would allow the opportunity for significant formal contributions to be secured by the Council, subject to viability. Up to 50% of the site could contribute to social infrastructure. The site could provide:-

- Improved local play and formal sports facilities to the south of the town.
- Formal access, visitor information signage and parking for the SSSI (see below for further details of the extent of the SSSI).
- Affordable housing - the Strategic Housing Market Assessment highlights a need across the housing market area, particularly for large family dwellings.
- Other community facilities or social infrastructure contributions.

The balance of the site, most likely in the northern half of the settling ponds, could yield up to 250 houses.

The settling ponds site is well contained by the Wilden Marsh and Meadows SSSI. A plan showing the extent of the SSSI is attached also. This SSSI is the subject of a management improvement scheme by Worcestershire Wildlife Trust.

The site is available and under single ownership. There would be no issues with assembling the site. It is a suitable location for development. There are no identified constraints, such as industrial neighbours that could cause statutory nuisance, nor is it an important public amenity in an area with an identified deficiency. Furthermore, the development of the site is eminently achievable. It is considered that there are no constraints that could significantly impede development.



In conclusion, the former settling ponds site would be sustainable, accessible, deliverable and developable. The site could help to deliver some significant social infrastructure improvements.

Criteria for Safeguarding Land

As set out in Paragraph 7.9 of the DPD, Paragraph 85 of the NPPF provides guidance on identifying safeguarded land in their plans. Essentially, the guidance is to locate safeguarded land between the urban area and the Green Belt, in order to meet long term development needs.

The land at Wilden Lane adjoins the urban edge of Kidderminster and, as has been set out above, is well related to existing housing and employment land. Moreover, the designation of this site, or part of it, as an Area of Development Restraint will not compromise the fundamental aim of the Green Belt, that is to prevent urban sprawl and avoid coalescence of settlements. Instead, as has been referred to above, the site will be well contained by the Wilden Marshes and Meadows SSSI.

Attached to these representations is a marked up copy of the proposals map. We have identified the potential extent of the new Area Development Restraint by way of a thick blue line.

It is considered that this new Area of Development Restraint has as much development potential, if not more, than the six sites already identified by Policy SAL.UP2. Moreover, it meets the criteria set by NPPF.

On this basis, we submit that this site should be designated as an additional Area of Development Restraint and that Policy SAL.UP2 should be amended to add reference to this site.

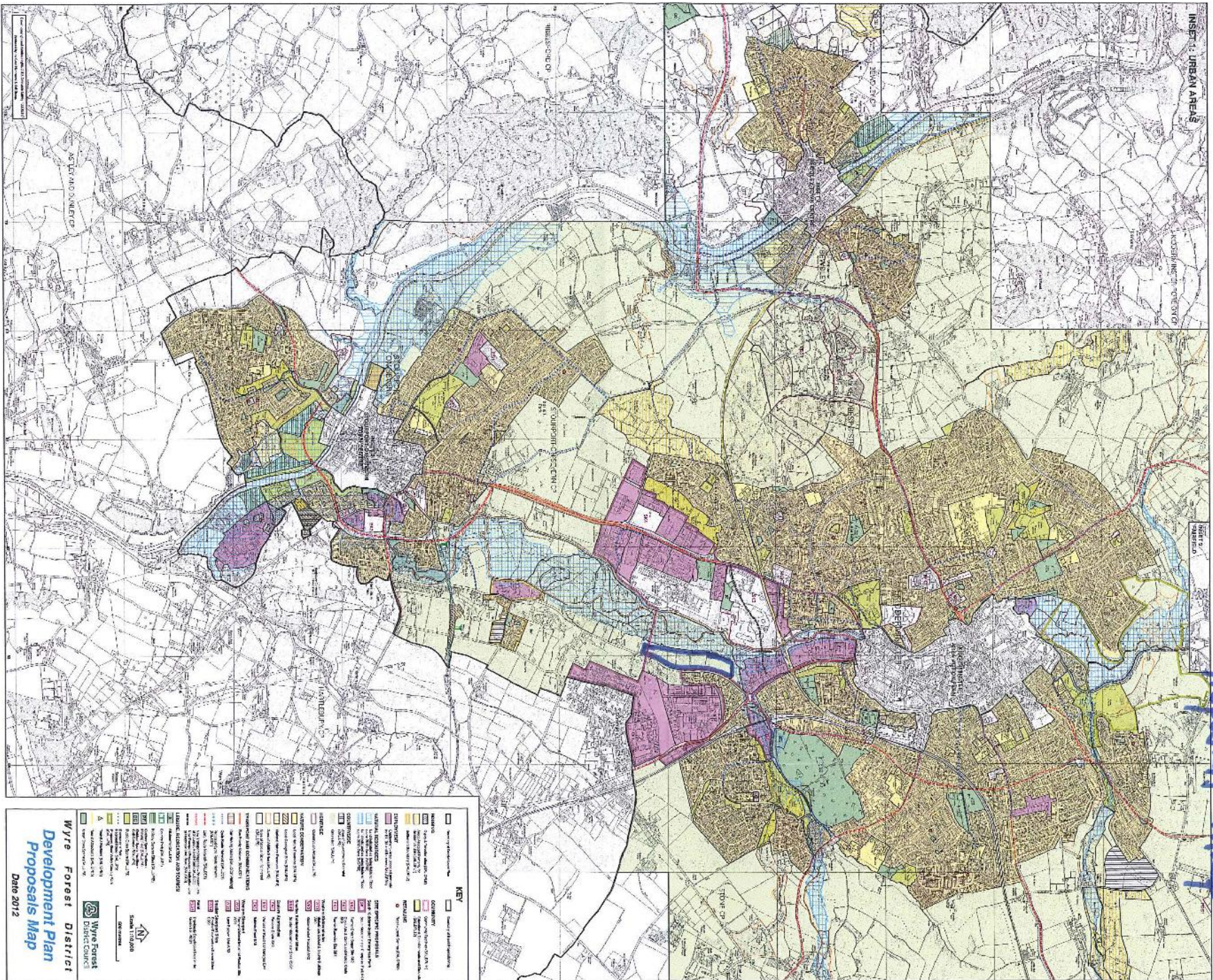
We trust that these representations are clear. However, please do not hesitate to contact the writer if there are any points that require clarification.

Yours faithfully

Peter Leaver
Director

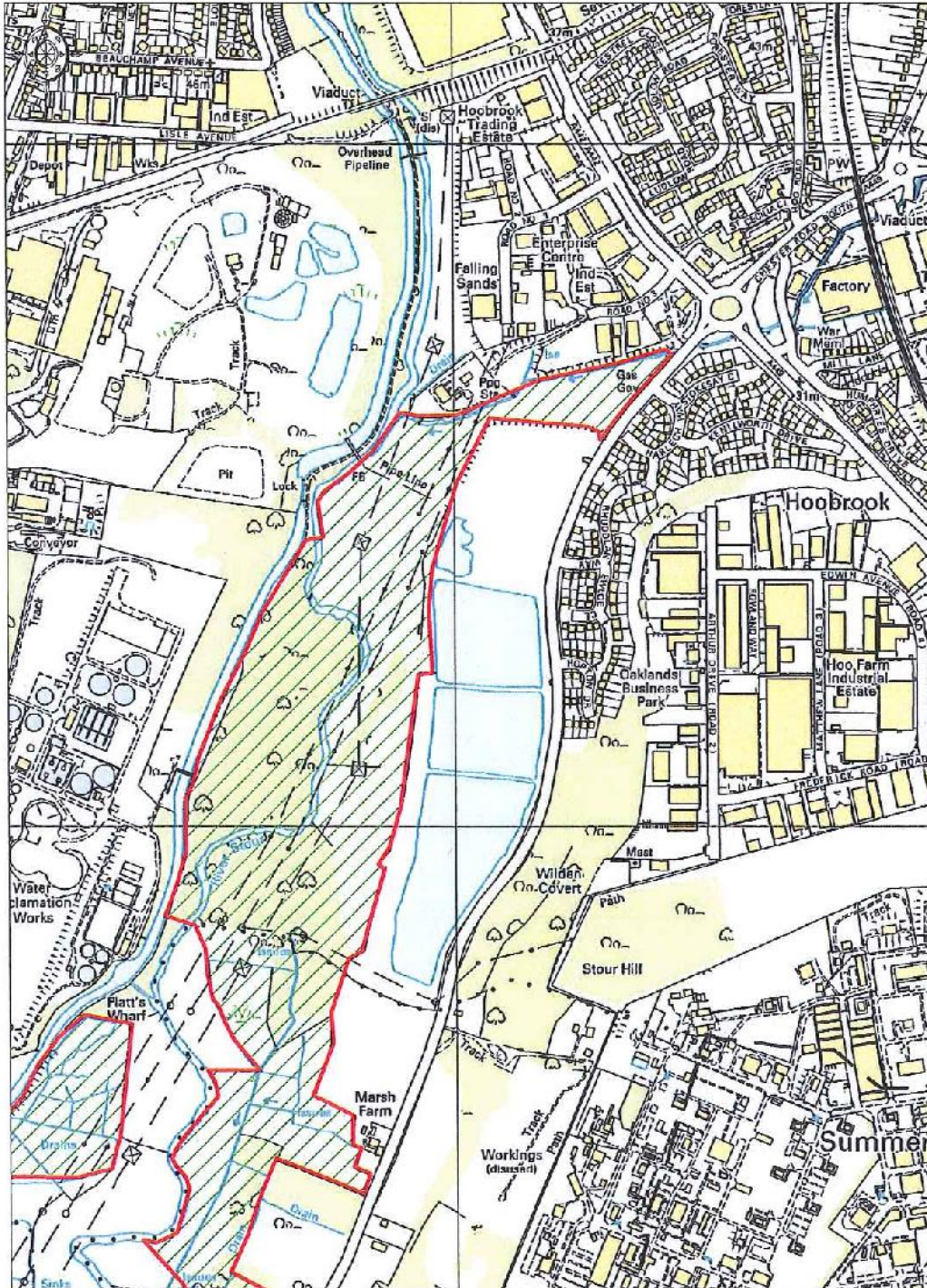
Enclosures

Site Plan
Plan of the Wilden Marsh and Meadows SSSI
Marked up copy of the Proposals Map



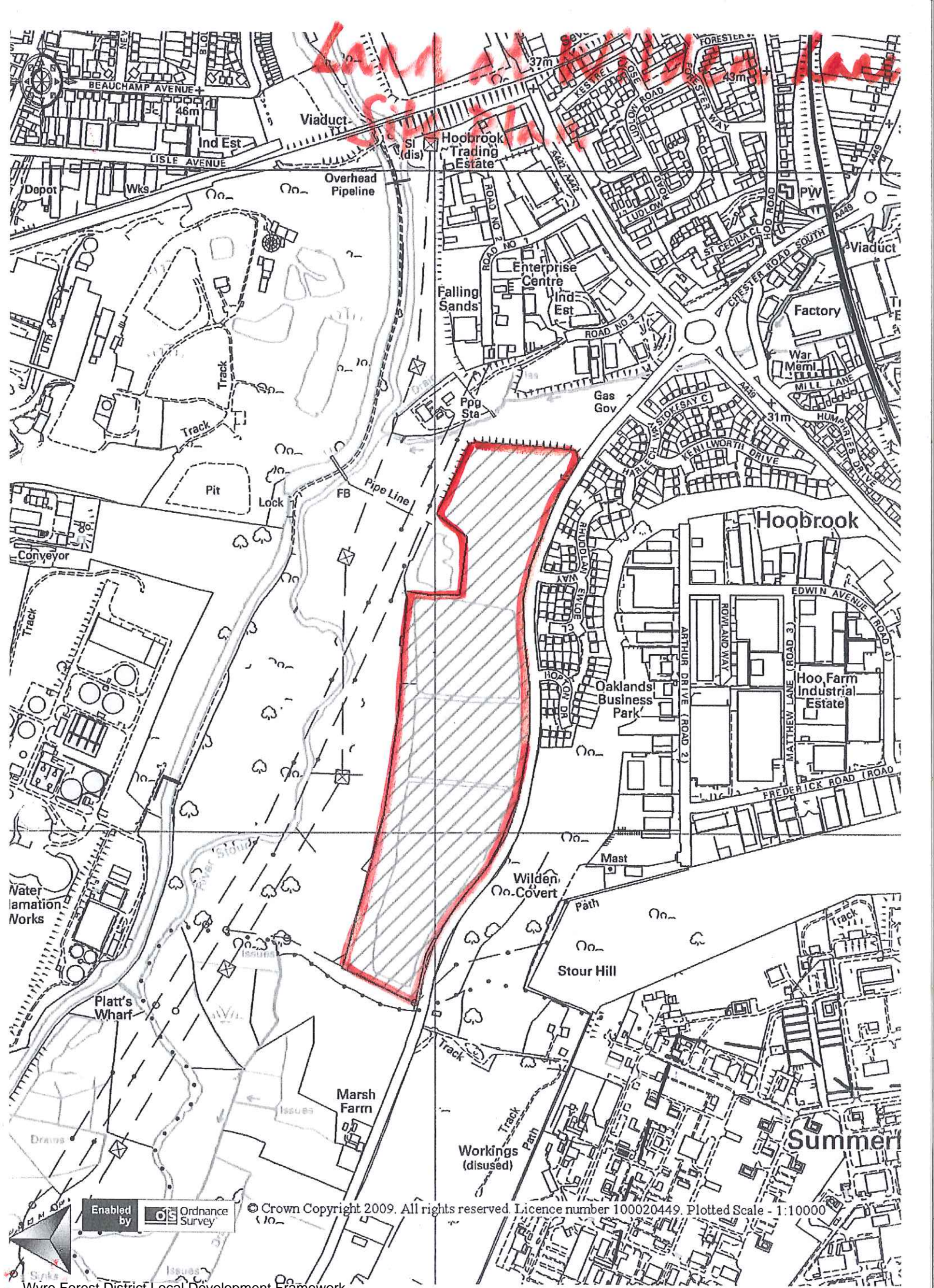
*Land at Wilden Lane
Marked up copy of
Proposals Map*

Wilden Marsh and Meadows SSSI in Proximity to the former Settling Ponds



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 Licence number 1000704-9, Plot 1 Size - 1:10000

This plan is published for the convenience of identification only and although believed to be correct is not guaranteed and it does not form any part of any contract. © Crown Copyright. All rights reserved.
 Licence Number 100017559



LITTLEWOOD

Summer

Enabled by Ordnance Survey

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Planning Policy Manager
Economic Prosperity and Place Directorate
Duke House
Clensmore Street
Kidderminster
Worcestershire
DY10 2JX

7 September 2012

By Post and Email

Dear Sir / Madam,

WYRE FOREST DISTRICT COUNCIL - SITE ALLOCATIONS AND POLICIES DEVELOPMENT PLAN DOCUMENT: PRE-SUBMISSION PUBLICATION VERSION (JULY 2012)

BAE SYSTEMS - SUMMERFIELD LANE, KIDDERMINSTER

CBRE Limited acts as planning advisors to BAE Systems with respect to their freehold land interests at Hoo Farm (Worcester Road), Summerfield (land within Wyre Forest District Council – Worcester Road) and the land which separates the two sites. CBRE Limited is instructed by BAE Systems to submit representations to the Wyre Forest District Council – Site Allocations and Policies Development Plan Document (SAP DPD): Pre-Submission Publication Version (July 2012) in respect of their freehold land interests. BAE Systems welcomes the continued opportunity to engage with the District Council regarding their emerging planning policy documents.

Site Description & Background

The District Council will be familiar with the nature, extent and location of BAE Systems' freehold land interests. The sites are located approximately 3 miles to the south of Kidderminster town centre and to the west of Worcestershire Road (A449). The Summerfield site is divided between the Local Authorities of Wyre Forest District Council and South Worcestershire.

The developed sites (i.e. Hoo Farm and Summerfield) are occupied by a mixed variety of approximately 100 buildings, which are mainly low rise, sparsely populated, industrial premises as a consequence of the explosive substances currently produced onsite. There are also a variety of brick built structures and several storage / workshop buildings. The sites have a relatively level topography, with a slight slope from the south which rises to the north. Both sites are accessed from Worcestershire Road.

Roxel UK Rocket Motors Limited occupies the sites on a long term lease from BAE Systems which expires in 2018. Roxel UK Rocket Motors Limited specialises in the design, development and mass production of rocket motors, propulsion units, pyromechanisms and gas generators, principally for supply to the defence industry for use in tactical missiles. There are approximately 230 people employed at the sites on either a full or part time basis.

Planning Policy Context

Policy E.2 of the Wyre Forest Local Plan (January 2004; amended January 2007 and December 2010) allocated the sites for employment (i.e. Class B) uses. Policy E.2 was superseded in December 2010 following the adoption of the Wyre Forest Core Strategy (December 2010) by policies DS01 and CP08. Policy CP08 notes that applications for expansion, updating and intensification of employment uses on existing sites will be supported where they do not compromise the activities of the employment area or conflict with other policy objectives in the Local Development Framework.

It is in this context that the comments set out below are made. Officers have confirmed that the comments can be submitted in letter form.

Representations to the Site Allocations and Policies Development Plan Document: Pre-Submission Publication Version (July 2012)

On the Urban Areas Proposals Map (First Draft) which accompanies the SAP DPD, the sites are within an area allocated for primarily B1, B2 and B8 employment uses (SAL.GPB1). Worcestershire Road is also identified as being within the 'Lorry Route Network' (policies SAL.CC1).

Policy SAL.GPB1: Employment Land Allocation

Do you consider the SAP DPD is:

- **Compliant with the Duty to Cooperate** – Yes;
- **Legally compliant** – Yes;
- **Sound** – No.

Do you consider that the DPD is unsound because it is not:

- **Positively prepared** – No;
- **Justified** – No;
- **Effective** – No;
- **Consistent with national policy** – Yes.

Please give details of why you consider the SAP DPD is not legally compliant or is unsound.

BAE Systems welcomes policy SAL.GPB1 which safeguards Hoo Farm (Worcester Road), Summerfield (land within Wyre Forest District Council – Worcester Road) and the land which separates the sites for continued economic generating uses. BAE Systems considers that the continued use of the sites will assist the District Council in achieving its aspirations for Kidderminster and the District by maintaining and attracting businesses.

However, BAE Systems considers that the wording of the policy may be contrary to the National Planning Policy Framework (NPPF) (March 2012). The NPPF has a presumption in favour of sustainable development. At paragraph 22, the NPPF explicitly states that:

'Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities.'

The adopted Core Strategy sets out the overarching strategy and vision for the District up to 2026. Once adopted, the SAP DPD is to allocate and designate areas of land for particular uses, most notably land to deliver housing, in order to meet the requirements set out in the adopted Core Strategy. BAE Systems is of the view that the Plan period for the SAP DPD is to be consistent with the SAP DPD (i.e. up to 2026).

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.

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

As noted above, BAE Systems are of the view that policy SAL.GPB1 may be 'unsound' in that it is not consistent with the NPPF. However, we consider that the inclusion of following could result in policy SAL.GPB1 being found 'sound':

'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'.

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

Yes. BAE Systems would like to participate in the oral part of the examination on this matter.

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

As the sites owned by BAE Systems are explicitly allocated for employment purposes, it considers it important to participate in all relevant topics to ensure a comprehensive and co-ordinated approach is taken.

Policy SAL.SK1

Do you consider the SAP DPD is:

- **Compliant with the Duty to Cooperate** – Yes;
- **Legally compliant** – Yes;
- **Sound** – no.

Do you consider that the DPD is unsound because it is not:

- **Positively prepared** – No;
- **Justified** – No;
- **Effective** – No;
- **Consistent with national policy** – Yes.

Please give details of why you consider the SAP DPD is not legally compliant or is unsound.

BAE Systems welcomes the District Council's recognition that the area to the south of Kidderminster Town Centre, which includes its landholdings, provides real development opportunities and potential for change. In addition, it welcomes the recognition that the area is a thriving mix of businesses and residential communities combined with some of the most important natural habitat within the County and that the diverse nature of the area provides a number of opportunities to consider new development.

However, 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. BAE Systems considers that this may be contrary to the NPPF, principally for the reasons set out in its representations to policy SAL.GPB1 (i.e. that planning policies should avoid the long term protections of sites allocated for employment use where there is no reasonable prospect of a site being used for that purposes and that applications for alternative uses should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities). BAE Systems considers that policy SAL.SK1 may be 'unsound' on this point.

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

As noted above, 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'.

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

Yes. BAE Systems would like to participate in the oral part of the examination on this matter.

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

As BAE Systems land holdings are located within the South Kidderminster Enterprise Park, it considers it important to participate in all relevant topics to ensure a comprehensive and co-ordinated approach is taken.

I trust that the above is helpful. I would be grateful if you could confirm receipt of this letter and that the representations have been duly made. As noted, BAE Systems considers it necessary to participate in the oral examination and look forward to hearing from the Inspector regarding the arrangements for this. I would also be grateful if BAE Systems can be kept up-to-date on the process of consideration of these representations.

Yours faithfully

JONATHAN STODDART
DIRECTOR - PLANNING
CBRE Limited for and on behalf of BAE Systems

C.c. R. Boucher, BAE Systems.

Wyre Forest District Council

Local Development Plan

SITE ALLOCATIONS AND POLICIES

DEVELOPMENT PLAN DOCUMENT(DPD)

JULY 2012

REPRESENTATIONS ON BEHALF OF BARRATT WEST MIDLANDS

Date: 12th September 2012



Introduction

These representations are made on behalf of Barratt West Midlands (BWM) who have an interest in the Blakedown Nurseries site on Belbroughton Road in Blakedown.

This statement presents Barratt's response to the SITE ALLOCATIONS AND POLICIES DEVELOPMENT PLAN DOCUMENT(DPD) specifically its land interest at the Blakedown Nurseries site.

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.

BWM has already been in dialogue with the Parish Council and nearby local residents about the principle and form of a potential future development and will continue with that process.

This has culminated in the submission of a formal planning application for 42 units (L.A.Ref No. 12/0114/FULL) that received a Delegated Approval, subject to a Section 106 Agreement, at Planning Committee on 11th September 2012. This application was a detailed proposal with specific access, layout and design considered. BWM are continuing to finalise the Section 106 Agreement, comply with the associated planning conditions and wish to commence development as soon as possible.

The format of the response raises comments on individual matters in the order they appear in the document but are only related to those matters specifically concerning the Blakedown site and not the whole document or policies contained therein.

Specific Comments

1. P16- Residential Land Allocations Table-Rural Sites-Blakedown- 42 units and timeframe 2011-2016 – Supported.
2. P19 – Rural Housing-1.Exception Sites- accepted. The agreed scheme passes the various tests.
3. P20- 4.17 Addressing Local Housing Needs- accepted but clarification needed as Para 20 (P21) also includes a 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.
4. P20- 4.18- the Nurseries site should now be shown as an allocated housing site and within the infill boundary referred to here.
5. 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.

6. 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.
7. P23- 4.32- This paragraph needs to be caveated with the 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.
8. P159- Supported.
9. 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.

The allocation of the site at Blakedown is welcomed as is the acknowledgement that the development should be brought forward in the period 2011-2016. The land is in a highly sustainable location particularly given its good transport links to the Conurbation.

Given that the site is currently designated as an Area of Development Restraint in the Adopted Wyre Forest District Council Local Plan of January 2004 and its predecessor of May 1996 its inclusion in this emerging Local Development Plan is right and proper. It accords with Government Policy to consider these designations first when new plans are being prepared and were the reason for the designation in the 2004 Plan.

BWM generally supports the principles and strategy of the Plan to target growth and regeneration to the main towns and does not intend to criticise other specific sites within the document or whether they are deliverable.

The development of the site will be in line with government policies relating to sustainable economic growth. This land will add to the portfolio of residential sites across the District, is in a highly sustainable location, will produce job creation/retention in the housing sector and will assist in helping to maintain vital Village services/facilities such as shops and community uses.

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 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.

The land and its established use is as a commercial Nursery. That use included head office administration for 6 such Nurseries, retail sales, vehicle maintenance for delivery trucks/cars, a landscaping business and the generation of significant numbers of vehicles at different times including weekends. The proposed residential use will have less vehicular impact and with planning obligation requirements will provide benefits for the Village as a whole. This is not a windfall site but land that has been identified for a residential reuse for some time.

BWM would respectfully request that the above comments are taken into account in the further consideration of the Emerging Local Plan.

Mark Kowalski

Planning Manager

12/09/2012

SITE ALLOCATIONS AND POLICIES DEVELOPMENT PLAN DOCUMENT

REPRESENTATIONS FROM BEWDLEY TOWN COUNCIL

The Planning Committee of the Town Council met on 3rd September to consider the Site Allocations and Policies DPD.

In terms of Part B of the document, the Committee had no further comments as to the three sites - Load Street Redevelopment, Lax Lane and Former Workhouse which were all welcomed.

As to Part A of the document the Committee raised no objection to the policy relating to major tourist attractions and in particular the need for a planning brief and masterplan for the West Midlands Safari Park (GPB5)

However, it had misgivings about Policy DPL2 namely the policy as to housing in rural areas which included Bewdley where it was proposed that planning permission may only be granted for schemes of 100% affordable housing subject to certain criteria. The Committee appreciated that in Bewdley 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%.

The Committee accepted what is the current position that when dealing with applications for larger scale housing development eg six or more units, it is not unreasonable for an insistence that a proportion of the dwellings be of an affordable category. However, the justification that smaller sites should also be subject to such condition is more difficult.

In Bewdley, due to its topography including propensity to flooding, there are few sites that could be allocated for large scale developments. It follows therefore the Council is concerned mainly with what may be small windfall sites eg infill in larger garden or conversion of large houses or other buildings to residential flats.

The Committee questioned the viability of such developments being allocated for 100% affordable housing. However their attention was drawn to policy DPL3 which originates in the Core Strategy and which enables applicants to demonstrate (if such is the case) that a development would not be financially viable if there was to be an insistence on affordable housing being provided.

The Committee was though particularly concerned that in relation to the town centre which is a conservation area with a large number of listed buildings and buildings that if not listed are of some age and character, that the prospect of an affordable housing requirement (even if subject to the viability test) is going to be very off-putting to would-be developers. Instead there will be there temptation for owners to allow buildings to fall into relative disrepair on the grounds that the cost of converting an old building or constructing a new building in close proximity to an historic one is far more substantial than to build a dwelling in a green-field site on the outskirts of the town centre.

In the current development plan sites that could only accommodate 5 or fewer houses were not required to provide affordable housing or that percentage was less than 100%. This latest policy proposal is somewhat draconian and would discourage development even on sites that obviously with the passage of time lent themselves to some form of development that arguably improved the overall amenity of the area. It may result in stagnation of the land and no increase in the housing stock which is undesirable.

If the answer lies with policy DPL3 then the costs of working through what may be a complex exercise in itself with surveyors and accountants will be a significant barrier to development particularly where the applicant may only be seeking one or perhaps two dwellings.

Overall the Committee had qualms as to the rigid and demanding nature of this policy. The Policy's starting point was that all sites were subject to the requirement and that the percentage of affordable housing units was then 100% subject to the viability test.

The Committee felt that this raised the threshold far too high. It was difficult to foresee how small scale developments of say 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 some maximum eg 50% though one then has to accept that with small numbers dealing with percentages becomes difficult.

A further view was that this policy does not chime well with what appears to be intention of the National Planning Policy Framework that the system should allow for flexibility in the development process. To have systems requiring viability tests in marginal situations relating to small scale development seems contrary to the general thrust of the new regime. Far better it would seem to get developers coming forward and negotiating terms with the planning authority as to conditions by which the community might otherwise benefit eg tidying up of eyesores or some monetary contributions to amenity schemes than to put them off altogether.

In all of the above we are certain that careful drafting could produce a result and outcome that would be acceptable to both Councils and with that in mind the Town Council would very much like to engage in further discussions in advance of any referral to the Inspector and/or at the public examination/round table conversation at the appropriate time.

Stephen Inman
Town Clerk
12th September 2012



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

Ref:

(For official use only)

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

BY 5.30pm on Friday 14th September 2012

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

Part A

1. Personal Details*

2. Agent's Details (if applicable)

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

Title		Mr
First Name		James
Last Name		Hollyman
Job Title (where relevant)		Planning Consultant
Organisation (where relevant)	Bovale Limited	Harris Lamb Limited
Address Line 1	c/o agent	75 – 76 Francis Road
Line 2		Edgbaston
Line 3		Birmingham
Post Code		B16 8SP
Telephone Number		0121 213 6022
E-mail Address (where relevant)		james.hollyman@harrislamb.com

Part B – Please use a separate sheet for each representation

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

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

Name or Organisation :

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

To which part of the DPD does this representation relate?

Paragraph		Policy		Other e.g. Map, table, figure, key diagram	
		SAL.WS1			

4. Do you consider the DPD is :

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

Please refer to guidance notes for explanation of terms

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

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

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

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

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

Harris Lamb Planning Consultancy has been instructed by Bovale Limited to make representations with regard to the former Midland Industrial Plastics (MIP) site at Steatite Way, Stourport-on-Severn. This site is identified in the SAPDPD as allocation SAL.WS1.

The north-western boundary of the site adjoins the residential development of Steatite Way which was developed in the late 1980s and early 1990s. The sites south-west boundary abuts a ridge which drops vertically to the rear gardens of residential properties fronting onto Lower Lickhill Road. The north east edge of the site faces Bewdley Road; further residential development is located on the opposite side of the Bewdley Road. The south-east boundary of the site is currently flanked by the Morganite Ceramics factory building and its yards and areas of amenity space. Outline planning permission for up to 150 dwellings has been approved on the northern section of this site. Once this planning permission has been implemented the application site will be flanked on all four sides by residential development.

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.

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.

The site is in fact highly accessible, being situated close to Bewdley Road which is one of the primary arterial routes serving the town. The character of the area surrounding the site is very much residential and the site is within the main urban area of the town. The many facilities and services of Stourport town centre are only around a kilometre away. Bus routes 11, 12 and 300 operate along the Bewdley Road and stops are located within 80 metres of the site entrance. The site is also within walking distance of the town centre, two local primary schools and Stourport High School. A small convenience store is located to the south east of the site on Bewdley Road.

The site is capable of delivering a high quality residential development in a sustainable location as required by paragraph 56 of the NPPF. As required by paragraph 61, the site provides good connections between people and place and successfully integrates the new development into its natural and built context.

Section 8 of the NPPF seeks to ensure that planning decisions promote healthy communities. In particular, paragraph 69 of the NPPF which promotes the design of safe and accessible environments where crime and disorder, or the fear of crime does not undermine the quality of life and community cohesion. Clear and legible pedestrian routes and high quality public spaces can be delivered by the site.

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 previous Policy 49).

I trust that you have found these representations useful. If you have any queries, or would like to discuss this matter further then please do not hesitate to contact me.

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

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

Not applicable

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

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

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

Yes, I wish to participate at the oral examination

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

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

Signature:

[Handwritten Signature]

Date:

12/9/12

Elaine Wilcox

From: James Hollyman [james.hollyman@harrislamb.com]
Sent: 18 September 2012 15:49
To: Wyre Forest Planning Policy
Subject: Wyre Forest District Local Development Plan
Attachments: Plan reps.pdf

Thank you for your acknowledgement of our duly made representations (copy attached).

We confirm that we agree that the former MIP site is suitable for both residential and care facility development, and as we stated the site is a highly sustainable site for residential development.

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.

We would appreciate your acknowledgement of this email please
Kind regards.

James Hollyman BA (Hons) MA MRTPI
Planning Consultant

DDI: +44(0)121 213 6022 Mobile +44(0)07789 178 570

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From: Wyre Forest Planning Policy [<mailto:planning.policy@wyreforestdc.gov.uk>]
Sent: 12 September 2012 14:35
To: James Hollyman
Subject: Wyre Forest District Local Development Plan

For the attention of James Hollyman

Thank you for your responses, on behalf of Bovale Ltd, to the Publication version of the Site Allocations & Policies DPD.

Yours sincerely

Planning Policy
Economic Prosperity and Place Directorate
Wyre Forest District Council

Regulated by RICS. Harris Lamb accept no legal responsibility for the contents of this message. Any opinions expressed in this email are those of the individual and not necessarily of the firm, unless expressly stated to be so. If you receive this in error, please contact the sender and delete it from your system. This email and any attachments are intended for the addressee only and may contain information which is confidential or legally privileged. If you are not the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this communication and any attachments is strictly prohibited. This email does not form the basis of a contract.

Land Research & Planning Associates Ltd.

PO Box 265 Malvern Worcestershire WR14 9BZ

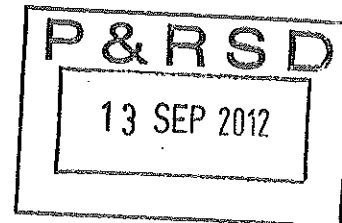
13 September 2012

The Planning Policy Manager
Economic Prosperity & Place Directorate
Duke House
Clensmore Street
Kidderminster, Worcestershire
DY10 2JX

With Compliments

By Royal Mail Special Delivery

When replying by Royal Mail please reply to the PO Box No. 265 above



Land Research & Planning Associates Ltd.

PO Box 265 Malvern Worcestershire WR14 9BZ

12 September 2012

The Planning Policy Manager
Economic Prosperity & Place Directorate
Duke House
Clensmore Street
Kidderminster, Worcestershire
DY10 2JX



By Royal Mail Special Delivery

Dear Sir/Madam

Re: Site Allocations & Policies as part of Wyre Forest District Local Development Framework – Publication Stage Representation Form – Part of the ADR Site No. H094: at Hurcott [off the A451 Stourbridge Road]. In the ownership of: Mr Peter Bowdler & Mrs Frances Migniuolo & Families.

We are instructed by Mr Peter Bowdler & Mrs Frances Migniuolo & families to submit the duly completed Representation Form along with a) The WFDC Plan showing the whole of the land designated as an ADR Site No. H094 and b) An OS Plan (scale 1/1250) showing the land edged red in the ownership of our clients.

It will be noted that in order to include the said land in the ownership of our clients to be now incorporated in full into the Development Plan Documents; representations have been made to modify certain existing Policies. These suggestions are to incorporate a greater percentage than normally expected of Affordable Homes and in addition a substantial percentage of Low Cost Housing, thereby bringing a possible combination of the two, up to a maximum of 65%. Whilst paragraph 54 of the NPPF cannot apply to this edge of Kidderminster Site (because it appertains to facilitating Affordable Homes in Rural Areas) nevertheless it is submitted that the same principal should be seriously considered to apply here. The landowners simply cannot be expected to promote all the land for Affordable Housing when it is designated as an ADR, as seems to be the possible concept in the Final Sustainability Report at No. 3 (July 2012).

However in reference to the attached representation form, it is important to understand that such representations contained therein should **not** in any event be considered in any manner or form to create a binding contract between the landowners and WFDC. That said the representations that have been made on behalf of the landowners are made in the utmost good faith. Accordingly we consider that such opens up a marvellous opportunity for the Council, as the LPA, to be able to regularise the deficiency of Affordable and Low Cost Homes whilst providing all types of homes required so as to be in accordance with paragraphs 47 & 50 of the NPPF.

The LPA is therefore invited to consider & comment back upon the representation as soon as convenient. Should the LPA consider that constructive discussion in how the representation could be progressed and that such should take place well before the EIP; then we can confirm that our clients would be pleased to meet with LPA at everyone's earliest mutual convenience.

Yours faithfully

Sue Fellows

S.M FELLOWS MD: Land Research & Planning Associates Ltd.

E-mail susan@lrpa.co.uk

Enc. Representation Form - OS Plan edged in red – WFDC Site Plan H094 - Report

*Registered Office: Curo House Westonhall Road Stoke Prior Bromsgrove B60 4AL
Company Registration No. 6170460*



Wyre Forest
District Council

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

Ref:

(For official use only)

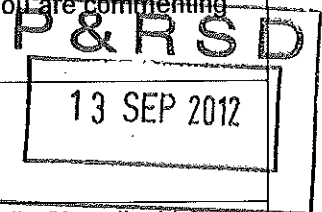
Please return to: Planning Policy Manager, Economic Prosperity and Place Directorate, Duke House, Clensmore Street, Kidderminster, Worcestershire, DY10 2JX; or by e-mailing this form to Planning.Policy@wyreforestdc.gov.uk

BY 5.30pm on Friday 14th September 2012

This form has two parts –

Part A – Personal Details

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



Part A

1. Personal Details*

2. Agent's Details (if applicable)

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

Title	Mr & Mrs	Mrs
First Name	Peter & Frances	Susan M.
Last Name	Bowdler & Migniuolo	Fellows
Job Title (where relevant)	Acting owners of the land as brother & sister	Managing Director
Organisation (where relevant)	Acting on behalf of themselves and representing their families as joint owners of the land	LAND RESEARCH & PLANNING ASSOCIATES LTD
Address Line 1		PO BOX 265
Line 2		MALVERN
Line 3		WORCESTERSHIRE
Post Code		WR14 9BZ
Telephone Number		07973 310255
E-mail Address (where relevant)		susan@lrpa.co.uk

Part B – Please use a separate sheet for each representation

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

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

Name or Organisation : LAND RESEARCH & PLANNING ASSOCIATES LTD. on behalf of MR PETER BOWDLER and FAMILY and MRS FRANCES MIGNIUOLO and FAMILY

Land Research & Planning Associates Ltd. are instructed to make representations to the Wyre Forest & District Council Site Allocations Local Development Framework in regard to 3.58 hectares or thereabouts of land in the ownership of Mr Peter Bowdler & Mrs Frances Migniuolo & Families adjacent to the A451 Stourbridge Road SO 8478 (E.384980 N.278390 est. Middle of field)

The representation to promote this land for Housing Development to be included in the Local Plan is set out below.

Background

The land referred to above is part of a "Block of Land" designated as an Area of Development Restraint [ADR] No. H094 consisting in total about 13.99 hectares. In the Inspector's Report (thought to be 1989) he recommended that this land, which was site No. 12, be withdrawn from Green Belt Designation and reserved for an ADR. The Inspector observed at paragraph 173 of his Report that the selection of this area meant that Hurcott Lane could act as a permanent "stop-line" to further development since it forms the boundary of the confirmed Green Belt at this point. It was also observed that the agricultural value of the land is not high.

Representations

Proposed modifications to the Policies to accommodate the proposals are set out in section 3 below and the justification for such is set out at section 6 below.

3. This representation relates to the DPD in regard to "Site Allocations and Policies"
To which part of the DPD does this representation relate?

<p>Paragraph: - "Sequential Approach to New Development" to be modified to include part of ADR Site H094 to be paragraph 3 and the existing paragraphs 3 & 4 to become 4 & 5</p> <p>-----</p> <p>To Include: 130 Affordable New Homes per Annum</p> <p>-----</p> <p>Housing: The percentage level of Affordable Housing on part of the H094 ADR Site is set at a minimum of 40% and a maximum of 50% - and 2/3 bed Low Cost Homes (from 75 sq. m. up to 120 sq. m. to be set at minimum of 10% and a maximum of 15%. A maximum of 65% combining both should be supported.</p> <p>-----</p> <p>Density of New Housing Development: Insert after bullet point Kidderminster. "The ADR site of 3.58 hectares should meet densities of no less than 50 dwellings per hectare."</p> <p>-----</p>		<p>Policy DS01</p> <p>-----</p> <p>DS05</p> <p>-----</p> <p>CP04</p> <p>-----</p> <p>CP05</p>		<p>Other e.g. Map, table, figure, key diagram</p>	<p>Site H094 in part; as an "Area of Development Restraint" ADR - As Shown edged red on the accompanying OS Plan Marked H094 (in Part).</p>
---	--	---	--	---	---

4. Do you consider the DPD is :

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

Please refer to guidance notes for explanation of terms
If you have entered No to 4(3), please continue to Q5. In all other circumstances, please go to Q6.

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

(1) Positively prepared

YES

(2) Justified

(3) Effective

YES

(4) Consistent with national policy

YES

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

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

The National Planning Policy Framework (NPPF) that came into force on 27 March 2012 has now eliminated all the previous Planning Policy Statements and any remaining Planning Policy Guidance Notes.

The NPPF At: -

Paragraph 7: confirms that sustainable development includes performing a social role by supporting strong, vibrant & healthy communities, by providing the supply of housing required to meet the needs of present & future generations....

Paragraph 11: reference is made to -

The Planning & Compulsory Purchase Act 2004 that is still in force and Section 38(6) states: - "If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise."

Paragraph 14: confirms that at the heart of the NPPF the golden thread running through the plan-making & decision making is the presumption in favour of sustainable development and LPAs should positively seek opportunities to meet the development needs of their area.

Paragraph 15: This confirms that Policies in Local Plans should follow the approach in favour of sustainable development so that development which is sustainable can be approved without delay.

Paragraph 47: This confirms that LPAs should ensure that: -

- Their Local Plan meets the full objectively assessed needs for market & affordable housing in the housing market area including identifying key sites that are critical to the delivery of the housing strategy over the plan period
- Identify a supply of specific deliverable sites (as defined in the footnote 11) in that such sites are available now, offer a suitable location and in particular that the development of the site is viable
- This applies to identifying a supply of specific developable sites from 6-10 years & where possible for the year 11-15

Paragraph 50: This confirms delivering a wide choice of homes: -

The NPPF should be used & considered at all times by Local Planning Authorities in their decision making process. It is submitted that the contents of the NPPF are all material considerations that should be taken into account in preparing the Development Plan in the form of the Local Development Framework in regard to the Site Allocations & Policies.

The Site Allocations and associated Policies are unsound for 3 reasons as set out below.

Is the DPD positively prepared?

1. It is submitted that the Site Allocations & Policies reflecting such are not positively prepared. The Local Planning Authority as Wyre Forest District Council submits that, subject to the landowner releasing such, that there is sufficient land to accommodate 4000 houses between 2012 & 2026. This fails to take into account the annual need of sites to provide 260 Affordable Homes ¹(AH) over the same period. CP04 confirms the likely delivery of 60 AH per annum. It is calculated therefore that there is a deficiency of 2800 AH over the Plan Period from 2012 to 2026.
2. Therefore the development plan documents are not in accordance with paragraph 47 of the NPPF in that the supply of AH is in the negative and accordingly the Plan is flawed.

Is the DPD effective?

1. It is submitted that taking into account the above information the Local Plan is wholly ineffective. It fails in that no proper account has been taken of the continuing ongoing need for AH and Low Cost Affordable Homes which simply has been sidelined because of the need to provide the Normal Homes requirement of 4000. While much sympathy is given to the fact developers need to reduce the amount of AH in permissions already allowed, and that it appears to be uneconomic to build on these Sites that have permission containing say 40 % AH, this situation simply adds to the ongoing deficiency. The reduction by the LPA in the past year or two to reduce the level of AH to 30% or even 20% may well aid the developer, and the reasons for that are understood; but it exposes the LPA to further problems in that the DPD is not in accordance with paragraph 47 of the NPPF
2. Simply because the AH deficiency is compounded each year by the reduction of the percentage of AH on Sites of 10/6 or more dwellings or 0.5 hectares in size, the lack of AH is not being addressed and deteriorates.
3. These figures conclusively demonstrate that the Local Plan is ineffective because it is not delivering the required AH in the 5 year period (nor from 2012 to 2026).

¹ Reliance is placed upon document: Wyre Forest District Core Strategy DPD Matter 9 Affordable Housing Policy CP04 as attached. The figures at paragraph 1.2 confirm a total shortfall of 260 subsidised affordable housing. In contrast CP04 suggests at 7.10 in the Reasoned Justification a figure of 175 affordable homes; but that only 30 % of the need is likely to be delivered. The LPA is respectfully requested to explain the difference for clarification at the EIP.

Is the DPD in accordance with National Policy?

1. Section 6 of the NPPF refers to "Delivering a wide choice of quality homes" & at paragraph 47 it confirms that LPAs should identify and update annually a supply of specific deliverable sites... etc. to provide 5 years worth of housing against their housing requirements etc....At paragraph 52 the NPPF confirms that the supply of new homes can sometimes be best achieved through planning for larger scale development such as new settlements or existing villages and towns that follow the principles of Garden Cities.
2. The WFDC as the LPA has regrettably failed to identify sufficient land to accommodate at least 100 AH annually for the next 5 years and so the Local Plan is wholly flawed and unsound for the reasons set out above.

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

The Planning Portal dated 06 September 2012 confirms that the Government is committed to:

- Removing restrictions on house builders to help unlock 75,000 homes currently stalled due to sites being commercially unviable. Developers who can prove that council's affordable housing requirements make the project unviable will see them removed.
- New legislation for Government guarantees of up to £40bn worth of major infrastructure projects and up to £10bn of new homes. The Infrastructure (Financial Assistance) Bill will include guaranteeing the debt of Housing Associations and private sector developers.
- Up to 15,000 affordable homes and 5,000 empty homes brought back into use using new capital funding of £300m and the infrastructure guarantee
- An additional 5,000 homes built for rent at market rates in line with proposals outlined in Sir Adrian Montague's report to Government on boosting the private rented sector

The LPA is respectfully requested to take all the above submissions into account and urgently modify the Local Plan to now incorporate the 3.58 hectares of land presently designated as an ADR and shown edged red on the accompanying OS Map, in order to provide sufficient land to accommodate at least some of the serious need for AH and Low Cost Housing.

It is recognised that the 10 hectares or thereabouts of land behind our clients' land is not included in this representation though such a representation may well have been submitted by the adjoining landowner. It is also recognised that the whole is of one block as designated by Site H094. Should the LPA now consider that taking into account the serious shortage of land available for Low Cost Homes & AH & that it is then deemed essential to incorporate all of the land designated as an ADR; we are instructed that the landowners of this land are willing to discuss the options of access for ingress & egress, with the owners of the land to the rear, through their land, in order to accommodate sufficient development in the future to satisfy the need and demand as has been demonstrated in this document.

We refer to the paragraph 47 of the NPPF and footnote 11. We are instructed by the landowners that this Site is available now. It offers a suitable location for such and that if now incorporated into the plan, we can confirm that all efforts will be made by the owners to make the necessary planning application in order that the required housing in the proportions of up to 50% for AH and up to 15% Low Cost Homes can have every reasonable prospect of being delivered within 5 years. It would appear that such a proposition would be assisted by government and financed by the Government's Infrastructure (Financial Assistance) Bill 2012-2013 that is now going through Parliament, as promoted by the Chancellor of the Exchequer in order to restart the economy.

It is submitted that by allowing this land into the plan will benefit the area of Kidderminster and importantly the whole district of WFDC; in that it will allow Developers who have Sites with planning permission including perhaps 40% AH to perhaps apply for reduction of such to make the Sites economic to build. This would be relying upon the argument that there is a provision of AH and Low Cost Homes being accommodated by land owners who are prepared to allow a higher percentage than normal of such, while understanding & accepting that the return per acre may be less than was expected some 5/6 years ago.

In regard to the proposed inclusion of up to 50% AH we rely upon an Appeal Decision allowed by Mr PJ Asquith MA(Hons) MA MRTPI in 2001 [Ref. APP/M0655/A/99/1023973] where at the Inquiry reference was made that the LPA covering Lymm in Lancashire/Cheshire simply had failed to deliver sufficient AH in the years before. The proposal was in outline for 200 houses of which 50% were to be AH. This decision was challenged by the LPA and it was subsequently allowed by the Court of Appeal in 2002 Case No. C/2002/0673 (Neutral Citation No. [2002] EWCA Civ. 1762). The lack of provision of AH was a sufficiently important "material consideration" to allow the Appeal to succeed. It is submitted that the figures provided above are more than sufficient to persuade the LPA that this land should now be included in the LP.

The required proposed modifications to the relevant Policies are set out above at Section 3 in order to bring this land forward into the Local Plan to assist in accommodating the severe shortage of Low Cost & Affordable Homes in the whole area of WFDC.

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

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

YES

Yes, We wish to participate at the oral examination

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

Because of the importance of the promotion of this land to now be allocated for development for the reasons set out above; and in the likely event that the Inspector may require possible clarification.

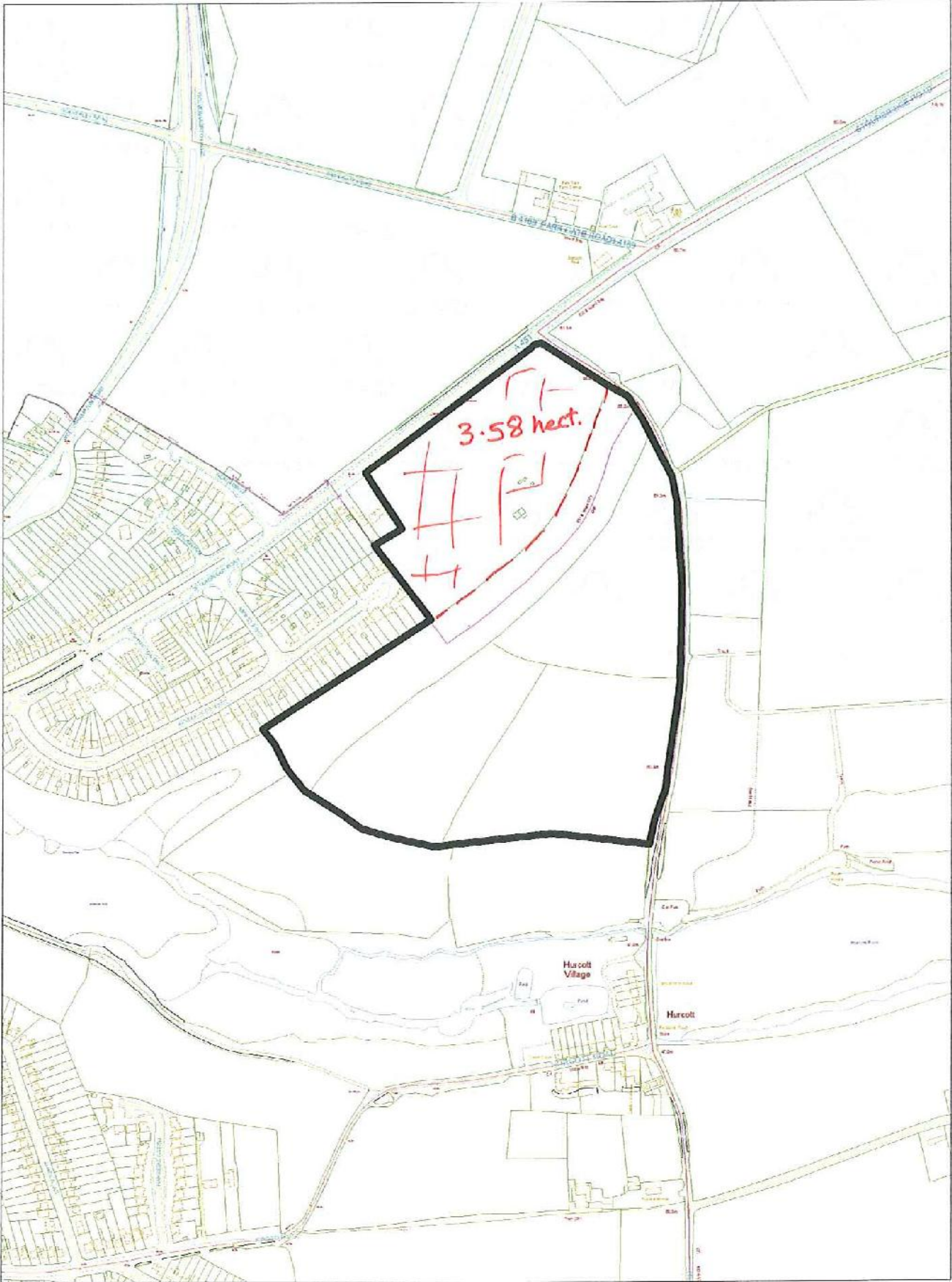
Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Susan M Fellows MD LRPA LTD.

Date:

08 Sep. 2012



 **Wyre Forest**
District Council

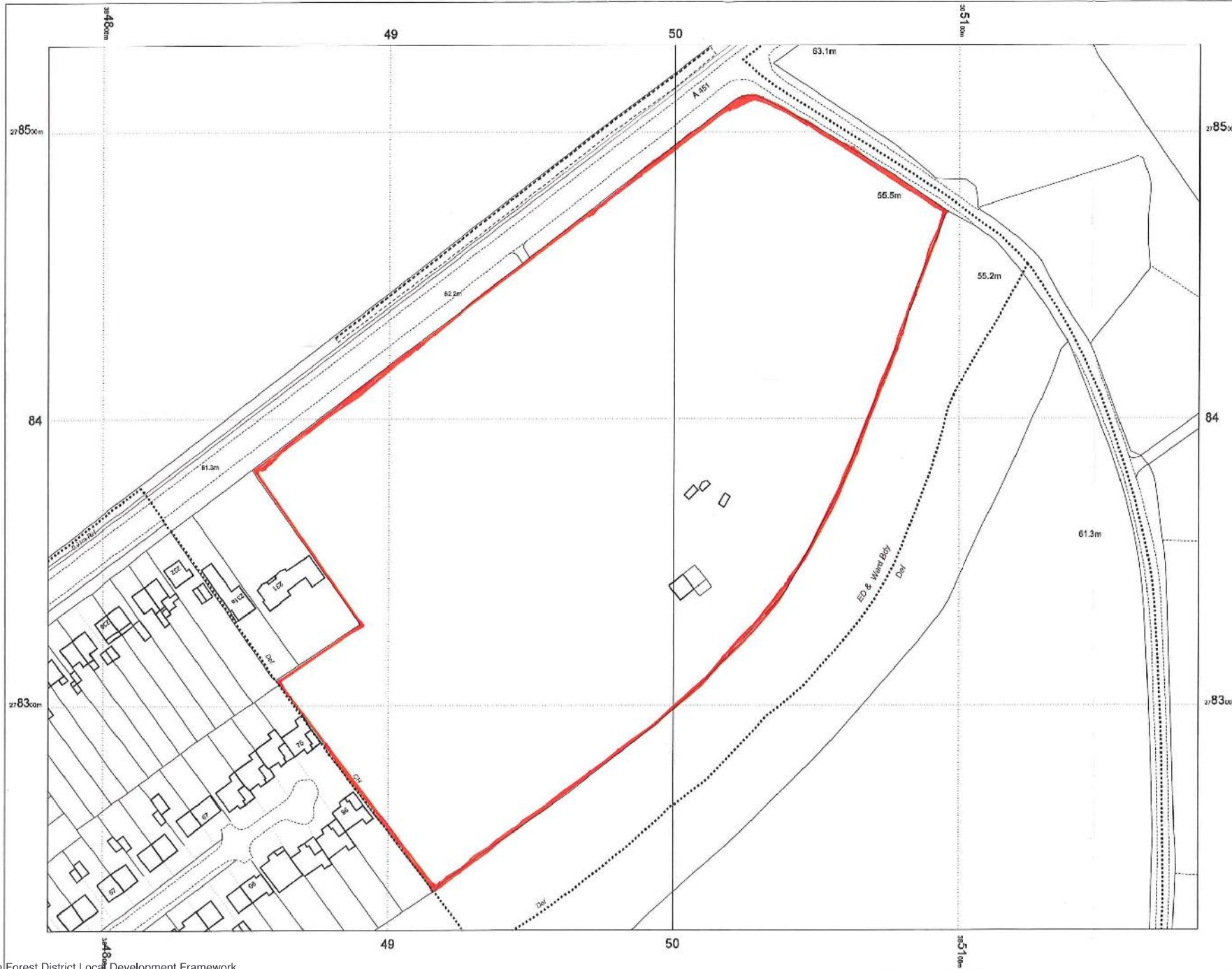
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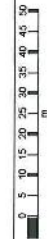


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O.S. MASTERMAP - 1:1250 SCALE



LAND AT STOURBRIDGE ROAD
HURCOTT
KIDDERMINSTER



OS Mastermap
05 September 2012, ID:
CM-00174487
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Wyre Forest District Core Strategy DPD

Matter 9

Affordable Housing

Policy CP04

Question 1

What evidence underpins the policy? (Needs Assessment and Overall Viability Study)?

- 1.1 Policy CP04 is underpinned by a number of key sources of evidence. Firstly, in terms of need assessment it is informed by the South Housing Market Area Strategic Housing Market Assessment (SHMA) and the Parish Housing Needs Surveys. Pages 78-79 of the SHMA Report, 2007 (EB31), sets out the key findings relating to affordable housing need for the Wyre Forest District. This established that a large proportion of new affordable housing should be made available for sale at 50% of the lower quartile, in addition to ensuring that a substantial proportion of new supply is for social rent unless and until it is possible to deliver significant numbers of new dwellings at 50% of lower quartile.

- 1.2 The SHMA Monitoring Report (2008/09) (ED60) was published in April 2010 following the submission of the Core Strategy. This provides an update in relation to the District's affordable housing requirements. In summary it shows that the need for social rented housing is greater than the current supply and that there is an annual shortfall of 46 dwellings per annum, but adding in those who can afford to buy only up to 50% lower quartile, gives a total shortfall of subsidised affordable housing of 260 per annum. The level of need for housing at not more than 75% of lower quartile cost equates to 89% of the total new open market housing proposed post 2011. Evidence from the last 5 years suggests that social re-lets are likely to decrease, meaning that extra pressure will be placed on increasing the supply of all forms of affordable housing, particularly social rented, as needs that cannot be met at levels just above social rented add to this pressure.

- 1.3 Rural Housing Needs Surveys have been undertaken by a number of Parishes within the District. Those that have been completed so far include the Parishes of Upper Arley, Rock, Chaddesley Corbett, Wolverley, Cookley, Stone and more recently Blakedown. These have established the exact level of need for affordable homes within some of the District's more rural communities where house prices are higher. Typically these relate to lower levels of need amongst younger families and in particular highlight a need for intermediate/shared ownership housing in many of the rural areas to enable younger people to get on the housing ladder.

- 1.4 The District Council appointed GVA Grimley in July 2009 to undertake a Viability Assessment of 23 potential housing sites to be allocated through the emerging Local Development Framework (LDF), the findings of which are set out in the Viability Assessment of SHLAA Sites (November 2009) (EB17) and subsequent Viability Assessment of SHLAA Sites Addendum (March 2010) (EB18). These documents underpin Policy CP04 and provide the Council with a robust and credible evidence base in terms of viability.
- 1.5 The Viability Assessment examined the impact of emerging planning policy on the viability of potential residential development sites throughout the District. The assessment had regard to affordable housing and other planning obligations/infrastructure requirements. For example, education, public open space and highways, together with other potential site constraints such as contamination.
- 1.6 The Viability Assessment is also underpinned by GVA Grimley's research relating to the Local Residential Property Market Review (October 2009) (ED61) to ensure that viability assessment assumptions are robust. The review examined market considerations as set out at paragraph 2.11 of the Viability Assessment of SHLAA sites and at sections 3-6 of the Local Residential Property Market Review. The review utilises new build property sales prices within the District as its basis, subsequently updated by the Halifax Index, to provide indexed average selling prices.
- 1.7 The Viability Assessment of SHLAA sites (November 2009) tested an affordable housing proportion of 40%. Where viability was identified as a concern by the Council, the affordable housing target was also tested at 20%. These sites were predominantly located within central Kidderminster.
- 1.8 The Viability Assessment of SHLAA sites Addendum (March 2010) tested an affordable housing proportion of 30%. This followed on from the Planning Inspectorate (PINs) Frontloading Meeting held in December 2009 at which viability issues were discussed in detail (ED53) The findings of the Viability Assessment informed the Council's reasoning for the affordable housing target required within Policy CP04.

Question 2

Are the 30% target and unit thresholds justified, effective and consistent with national policy and the RSS?

- 2.1 The 30% affordable housing target on sites of ten or more dwellings within Kidderminster and Stourport-on-Severn and on sites of 6 or more dwellings within Bewdley and the rural areas is both justified and effective. The 30% target was tested in a Viability Assessment of Strategic Housing Land Availability Assessment (SHLAA) Sites: Addendum (March 2010) (EB18) in accordance with the requirements of PPS3: Housing (NP2), subsequent to the PINs frontloading meeting held on 14th December 2009.
- 2.2 The scope of the viability assessment was to examine a sample of 23 sites across the District at a strategic level. This strategic approach is justified, given the information available relating to the sample sites tested. The approach also enables strategic conclusions regarding the viability of affordable housing proportions at the District level to be drawn. Whilst there is little best practice guidance on undertaking viability assessments, GVA Grimley's approach is broadly consistent with the approach taken to assess viability elsewhere.
- 2.3 The viability study adopts a range of typologies, as necessary, to inform the viability assessment. The site typologies developed relate to factors such as remediation and flooding, where cost assumptions have been utilised.
- 2.4 Although the viability study concluded that the majority of sites were viable at 40% affordable housing provision, the Council has reduced the affordable housing requirement to 30% to improve the viability of residential development throughout the District, on the basis that this may assist the attractiveness of potential development.
- 2.5 PPS 3: Housing (paragraph 29) (NP2) sets out the national indicative minimum site threshold at 15 dwellings. However, it does allow Local Planning Authorities to set lower minimum thresholds where viable and practicable. The site size thresholds have been developed through response to evidence set out in the South Housing Market Area Strategic Housing Market Assessment (SHMA) (EB31). The thresholds have been reduced from the 2004 Adopted Local Plan (ED27) which included a blanket threshold for developments of 15 units or above. Evidence within the SHMA (paragraph 11.3.2) found that the present level of housing supply within the South

Housing Market Area is heavily constrained by the large proportion of new housing supply that is on small sites below the threshold at which current policies can be applied. Therefore Policy CP04 within the Core Strategy includes a reduced site size threshold of 10 dwellings within the urban areas of Kidderminster and Stourport-on-Severn.

- 2.6 Due to the more acute affordability issues within Bewdley and the District's rural settlements coupled with the generally smaller residential developments that come forward in these areas, the site size threshold at which 30% affordable housing should be provided, has been reduced to 6 dwellings.
- 2.7 PPS 3 requires Local Planning Authorities to set an overall target for the amount of affordable housing to be provided which reflects an assessment of the likely economic viability of land for housing within the area. The West Midlands Regional Spatial Strategy Phase 2 Panel Report (Sept 2009) (EB02) recommended that the regional affordable housing target should be 35% of the net housing increase within the West Midlands. In accordance with PPS 3, the Council has had full regard to economic viability assessment in developing the affordable housing target for the District. Therefore the Core Strategy advocates a 30% target provision for new developments in line with the findings of the viability assessment.

Question 3

How will changing housing needs be rolled forward to inform Implementation through time?

- 3.1 The Strategic Housing Market Assessment (SHMA) is the key assessment for housing needs within the South Housing Market Area. This report was produced in 2007 and is based on data for 2005/06 (EB31). An annual update on this report is produced by Worcestershire County Council for a rolling 4 year programme. 3 of these monitoring reports have now been published. The most recent SHMA Monitoring Report (2008/09) (ED60) was published in April 2010.
- 3.2 A new SHMA for Worcestershire only will be produced to cover the next 5 year period from 2011-16. This is to be commissioned shortly and has a target completion date of 1st October 2011 and is to be based on 2010/11 data.

- 3.3 Policy CP05 of the Core Strategy places an emphasis on the need for new developments to take account of the District's housing needs as set out within the SHMA.
- 3.4 Changing housing needs in relation to the District's rural parishes are to a large extent covered below in the Council's response to Question 7. In brief, the SHMA provides the evidence and approach to identifying changing housing needs within the rural settlements in the future and sets out how this approach can be more proactively progressed and implemented.

Question 4

Are the policy's ongoing control measures appropriate and likely to be effective?

- 4.1 Policy CP04 includes a number of control measures in order that it is effectively delivered into the future. Firstly, Section 106 Agreements will continue to be used to ensure that where affordable housing is provided, it will remain as affordable in perpetuity. S106 Agreements will also continue to be the mechanism by which the tenure split in relation to social rented and intermediate housing on sites is controlled.
- 4.2 To ensure that sites continue to come forward to supply affordable housing throughout the plan period, the Site Allocations and Policies DPD will allocate some sites for 100% provision of affordable housing. In addition, the site size threshold at which the provision of affordable housing will be required has been lowered to capture smaller windfall sites that may come forward (Please refer to the Council's response in relation to Question 2 above).
- 4.3 The standardised viability model that the Council will commission as part of the site allocations process will assist with the delivery of affordable housing in changing economic circumstances. However, this will also provide the flexibility to enable the Council to seek higher levels of affordable housing on sites where the residual land value is higher when the local market is more buoyant.
- 4.4 Finally, the Strategy's Monitoring and Implementation Framework will help to assess the overall effectiveness of the policy and includes three indicators to monitor the trends in the provision of affordable housing.

Question 5

Has the viability of the overall policy been adequately considered?

- 5.1 The Policy has been developed with full regard to the Viability Assessment of Strategic Housing Land Availability Assessment (SHLAA) Sites (November 2009) (EB17/18). It was also discussed at some length during the Planning Inspectorate's Frontloading meeting held on 14/12/2009 (ED53). This meeting established that the emerging policy took full account of viability considerations and the work undertaken by GVA Grimley.
- 5.2 The Council is aware that viability is a subjective concept, which can rest upon site specific issues, the aspirations, circumstance or operational requirements of the key stakeholders involved. These issues are particularly difficult to quantify at a site specific level without further detailed investigations, as set out at paragraph 2.2 of the Viability Assessment of SHLAA Sites (Nov 2009). As a result, the Council has adopted a flexible approach to its affordable housing policy to account for the uncertain nature of these costs.
- 5.3 The policy seeks to enhance viability by adopting an affordable housing proportion lower than the target identified as potentially viable in the 2009 Viability Assessment. In addition, Policy CP04 states that the Council "will generally seek" to secure an affordable housing provision of 30%, allowing flexibility for individual circumstances and site specific viability arguments to be taken into account.
- 5.4 Furthermore, the Viability Assessment and subsequent addendum (March 2010) take into account issues such as contamination, remediation, flooding and S106 contributions, as they may apply to the sample sites and where costs can be estimated, to ensure the study's robustness. The Council will also undertake further viability assessment work to inform the Site Allocations and Policies and the Kidderminster Central Area Action Plan (KCAAP) Development Plan Documents (DPDs) to support the formulation of these plans.
- 5.5 The Submission Core Strategy Policy CP04 also sets out the Council's intention to produce a standardised viability model as part of the Site Allocations and Policies and KCAAP DPDs. This will guide potential applicants to undertaking site specific viability assessments, where viability is of concern. The model will incorporate best practice guidance, currently being formulated on behalf of the Royal Institution of Chartered

Surveyors (RICS). The model will then be used to assess those individual economic circumstances relating to specific sites. It was agreed with both the Planning Inspectorate (PINs) and Government Office West Midlands (GOWM), that this level of detail would not be appropriate within the overarching Core Strategy. However, the policy wording does demonstrate the measures that will be put in place to ensure flexibility.

Question 6

Is deliverability including individual development project viability adequately addressed?

- 6.1 The Viability Assessment of Strategic Housing Land Availability Assessment (SHLAA) Sites (November 2009) and Viability Addendum (March 2010) (EB17/18) were undertaken at a strategic level. The purpose of this work was to assess a sample of SHLAA sites and draw conclusions regarding the development viability of typical sites across the District. The identification of an appropriate sample had regard to the fact that the Core Strategy is predominately based upon the delivery of previously developed land opportunities, but also site size. The approach to selecting the sample sites adequately reflects the sites that would be brought forward for residential development in the Core Strategy.
- 6.2 The sample sites tested highlighted a number of issues that affected site viability, including development density, housing mix, the implications of flood risk upon build costs and the costs associated with demolition and remediation. The approach taken by the consultants factored these issues into the assessment through utilising the typology based assumptions (set out in paragraphs 2.28 – 2.33 and 2.57 of the November 2009 report), and applying these to the sites assessed as appropriate. Conclusions were then drawn regarding the likely viability of SHLAA sites at various levels of affordable housing provision, given the typologies adopted.
- 6.3 It is clearly set out at paragraphs 2.2, 2.21 and 4.6 of the Viability Assessment and its subsequent Addendum that the assessment does not attempt to test certain site specific issues. It is considered that this approach is justified for the following reasons:
1. A number of issues set out at paragraph 2.21 of the Assessment will apply differently to the sample sites, and also, sites coming forward for residential

development throughout the District. For this reason, cost assumptions in relation to some of these issues are inappropriate without further investigation on a site by site basis, which is outside the scope of the strategic assessment of viability.

2. Land owners' aspirations are likely to vary; some may be willing to receive lower uplift in land values for development when compared to others. Similarly, some land owners may incur significant relocation costs that they will seek to factor into any decision to release their land for development.

6.4 For these reasons, the Council has developed an affordable housing policy which has sufficient flexibility to enable developers/landowners to seek to reduce affordable housing contributions. This will be applied in those circumstances where it can be demonstrated that the site specific costs relating to development will undermine the viability of residential development at the required level of 30% affordable housing provision.

Question 7

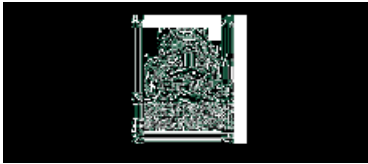
Is the rural policy element soundly based, consistent with the main policy and likely to be effective in delivery?

7.1 The rural affordable housing element of the policy is considered to be soundly based on national policy set out in paragraph 30 of PPS3 (NP2). Furthermore pages 89-91 of the South Housing Market Area Strategic Housing Market Assessment (SHMA) (EB31) set the context for rural housing need across Worcestershire. Crucially, the results from parish housing needs surveys undertaken across the County have demonstrated that in every parish surveyed there was an indication of unmet local housing need and a clear majority support for an affordable housing scheme. The proportion of respondents indicating housing need was never less than 10%.

7.2 Policy CP04's delivery in relation to rural affordable housing is partially dependent upon the effective assessment of local housing need at the parish level. The SHMA does raise concerns over the past assessment of housing need and identifies that there is clearly scope for reviewing the way that rural housing needs are assessed. Currently within the District, Parish Housing Needs Assessments have been completed for Upper Arley, Rock, Chaddesley Corbett, Wolverley, Cookley, Stone

and Blakedown. All surveys identified the need for the provision of more affordable housing within the settlements, in particular for shared ownership opportunities.

- 7.3 The SHMA recommends that in the future there will be scope for the exact nature of affordable housing developments in a rural parish to be determined by a local survey. However, this would be against the background of an agreed investment programme and an identified site, rather than in reverse order as at present. The evidence suggests that this could be a more efficient delivery outcome. It is considered that Policy CP04 reflects this proactive approach and will provide far more flexibility in identifying sites for the sole provision of affordable housing through the Site Allocations process.



Comment

Agent	Miss Sarah Perryman (677967)
Email Address	sperryman@nlppanning.com
Company / Organisation	Nathaniel Lichfield & Partners
Address	14 Regents Wharf All Saints Street London N1 9RL
Consultee	(677975)
Company / Organisation	Brook Green Estates Ltd
Address	C/O Lombard Group Properties Ltd The Old Library Stourport on Severn DY13 8YJ
Event Name	Site Allocations and Policies Publication
Comment by	Brook Green Estates Ltd ()
Comment ID	SALPP121
Response Date	14/09/12 15:26
Consultation Point	Policy SAL.GPB3 Protecting and Enhancing Local Retail Services (View)
Status	Submitted
Submission Type	Web
Version	0.1

To which part of the DPD does this representation relate? (Please state paragraph number, policy number, map, table or figure number). Policy SAL.GPB3

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

Do you consider the DPD is:

Sound No

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

Positively prepared Yes

Justified	Yes
Effective	Yes
Consistent with national policy	No

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

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.

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

The threshold for new retail floorspace should be increased from 250 sq m to 280 sq m net so that it is consistent with the 1994 Sunday Trading Act's definition of a small shop. Policy SAL.GPB3 should therefore be amended as follows:

*"...Support will be given for new retail development in neighbourhood or village centres comprising the conversion or extension of existing facilities, provided that the floorspace proposed does not exceed **280 sqm net** .*

*Outside of the neighbourhood or village designations, support will also be given for the development of new retail (A1) uses where they do not exceed **280sqm net** and where:*

- 1 *it can be located on previously developed land.*
- 2 *it would not cause adverse impact to the local amenity."*

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

If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary. Please note that the inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in the oral part of the examination.

To ensure the Core Strategy is positively prepared and effective.



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

Ref:

(For official use only)

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

BY 5.30pm on Friday 14th September 2012

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

Part A

1. Personal Details*		2. Agent's Details (if applicable)	
<i>*If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.</i>			
Title	Dr		
First Name	Peter		
Last Name	King		
Job Title (where relevant)	Chairman, Bromsgrove and Wyre Forest group		
Organisation (where relevant)	Campaign to Protect Rural England		
Address Line 1	49, Stourbridge Road		
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Line 3	Stourbridge, W. Midlands		
Post Code	DY9 0QS		
Telephone Number	01562-720368		
E-mail Address (where relevant)	peterkingiron@blueyonder.co.uk		

Part B – Please use a separate sheet for each representation

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

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

Name or Organisation :

3. To which DPD does this representation relate? Site Allocations and Policies / *(delete as necessary)*
To which part of the DPD does this representation relate?

Paragraph		Policy	B1	Other e.g. Map, table, figure, key diagram	
-----------	--	--------	----	--	--

4. Do you consider the DPD is :

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

Please refer to guidance notes for explanation of terms

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

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

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

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

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

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 that he can appropriately incorporate into it.

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

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

Substantial redrafting is required to allow retail “edge-of-centre” development, but concentrated at the end nearest Load Street.

Wording should be added to allow adjacent land to be incorporated into the site, if desired.

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

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

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

 YES

Yes, I wish to participate at the oral examination

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

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

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

Signature:

Date:



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

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

Part A

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

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

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

Part B – Please use a separate sheet for each representation

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

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Name or Organisation :

3. To which DPD does this representation relate? **Site Allocations and Policies** / (delete as necessary)

To which part of the DPD does this representation relate?

Paragraph		Policy	B2	Other e.g. Map, table, figure, key diagram	
-----------	--	--------	----	--	--

4. Do you consider the DPD is :

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

Please refer to guidance notes for explanation of terms

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

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

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

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

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

- (a) Lax Lane is primarily a residential area, the introduction of new business uses, as opposed to the continuation of existing ones, is inappropriate.
- (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.

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

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

See 6

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

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

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

 YES

Yes, I wish to participate at the oral examination

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

Signature:

Date:



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Part B – Please use a separate sheet for each representation

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Name or Organisation :

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

To which part of the DPD does this representation relate?

Paragraph 4.11		Policy	DPL1	Other e.g. Map, table, figure, key diagram
----------------	--	--------	------	--

4. Do you consider the DPD is :

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

Please refer to guidance notes for explanation of terms

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

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

- (1) Positively prepared
- (2) Justified
- (3) Effective
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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.

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

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

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

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

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

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 YES

Yes, I wish to participate at the oral examination

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Part B – Please use a separate sheet for each representation

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Name or Organisation :

3. To which DPD does this representation relate? **Site Allocations and Policies**
To which part of the DPD does this representation relate?

Paragraph 4.21		Policy	DPL2	Other e.g. Map, table, figure, key diagram
-------------------	--	--------	------	--

4. Do you consider the DPD is :

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

Please refer to guidance notes for explanation of terms

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

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

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

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

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

The 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, 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?

- Requests for larger houses are likely to be balanced by requests for smaller ones, leading to no net need.
- Some tenants of privately rented accommodation (in satisfactory condition) keep their names on the housing list, because so called “affordable” housing is cheaper and (in practice) provides greater security of tenure. However rehousing such people in social housing again provides no net need, since the house given up is likely to be available to let someone else.

- Those who are happy living in a mobile home will often keep their names on the housing list, in case the mobile home park where they live loses its licence or some disaster happens to them.

Case studies: In Bromsgrove District several applications alleging need based on waiting list data have successfully been opposed by local residents on the grounds that the alleged need does not exist. In the polarised atmosphere of an opposed planning application, it is difficult for a housing-needs survey to be objectively conducted. The result in several cases that I have been involved in has been that some need existed, but on a much smaller scale than the applicant a Registered Social Landlord had alleged in reliance on waiting list data:

- Stoke Prior: The scheme (on Green Belt) was promoted by a developer with the support of a housing association, based solely on waiting list data. A housing needs survey was then conducted and showed little need. The application was refused, as was one for a smaller scheme. This refusal was upheld on appeal
- Alvechurch: The scheme again on Green Belt was on land that we would have identified for the next ADR there. A housing needs survey was eventually conducted, but by then, a builder was seeking planning consent to develop the site of a redundant school and offering an element of affordable housing in its scheme. The housing needs survey showed that there was a need, but not sufficient for both schemes. The former school site was allowed to go ahead and the Green Belt site rejected. The waiting list data had shown large numbers of applicants who had expressed a wish to live there, but few had any significant local connection with the village (as opposed to the district as a whole).
- Clent: the scheme was promoted by the Parish Council and opposed by a residents group. Holy Cross village (where the site was) is washed over by Green Belt, but half the houses in the parish are in West Hagley (which is not Green Belt). The housing needs survey showed rather limited need, but was conducted in relation to the whole parish, rather than the half of the population located in the Green Belt. The outcome was that the residents group opposed the incumbent parish council at the next elections and succeeded in replacing all parish councillors, except one whose re-election they had recommended.

We hear that an affordable housing scheme suffered a similar fate; again with the result that virtually the whole council was replaced at the next election.

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

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

1. Delete the final sentence. Substitute: Where no housing needs survey exists, the applicant should seek to have one prepared.
2. Delete "Parish Needs Survey" and substitute "Local Needs Survey"

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

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

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

YES

Yes, I wish to participate at the oral examination

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

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Signature:

Date:



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Part A – Personal Details

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

Part A

1. Personal Details*

2. Agent's Details (if applicable)

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

Title

Dr

First Name

Peter

Last Name

King

Job Title
(where relevant)

Chairman, Bromsgrove and
Wyre Forest group

Organisation
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Campaign to Protect Rural
England

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49, Stourbridge Road

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Telephone Number

01562-720368

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peterkingiron@blueyonder.co.uk

Part B – Please use a separate sheet for each representation

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Name or Organisation :

3. To which DPD does this representation relate? **Site Allocations and Policies /**
To which part of the DPD does this representation relate?

Paragraph 4.44		Policy	DPL6	Other e.g. Map, table, figure, key diagram
----------------	--	--------	------	--

4. Do you consider the DPD is :

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

Please refer to guidance notes for explanation of terms

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

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

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

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

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

Further justification is required as to why a shared entrance is needed. A typical "granny flat" is intended to provide the dependent with a measure of independence, while allowing supervision by the principal owner. There may well be a ground floor flat added to a two-storey house, where a first floor link is impossible. A requirement for internal communication on all floors of the dependent accommodation would certainly be justified. The mischief to be avoided is that when the dependent dies or leaves, the flat is let as a separate dwelling, as the justification states, but this should be achievable with less slightly restrictive wording.

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

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

The 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

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

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

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

 YES

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First Name

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Job Title
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Name or Organisation :

3. To which DPD does this representation relate? **Site Allocations and Policies** / (delete as necessary)

To which part of the DPD does this representation relate?

Paragraph 4.74		Policy DPL11		Other e.g. Map, table, figure, key diagram	
----------------	--	-----------------	--	--	--

4. Do you consider the DPD is :

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

Please refer to guidance notes for explanation of terms

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

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

- (1) Positively prepared
- (2) Justified
- (3) Effective
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6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

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

The general policy of the law is that documents should be clear and unambiguous. 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. (iii) might be an alternative to (i) and (ii); it could be that (i) must apply with either of (ii) or (iii). This needs to be resolved.

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

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

We would suggest that the paragraphs should renumbered as (a) (i), (a) (ii), and (b).

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

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

Yes, I wish to participate at the oral examination

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Last Name

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Job Title
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Name or Organisation :

3. To which DPD does this representation relate? **Site Allocations and Policies** / (delete as necessary)

To which part of the DPD does this representation relate?

Paragraph 4.80		Policy	DPL12	Other e.g. Map, table, figure, key diagram
----------------	--	--------	-------	--

4. Do you consider the DPD is :

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

Please refer to guidance notes for explanation of terms

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

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

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

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

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

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

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

We would suggest that the paragraphs should renumbered as (a) (i) - (iii), (b) and (c).

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

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BY 5.30pm on Friday 14th September 2012

This form has two parts –

Part A – Personal Details

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

Part A

1. Personal Details*

2. Agent's Details (if applicable)

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

Title

Dr

First Name

Peter

Last Name

King

Job Title
(where relevant)

Chairman, Bromsgrove and
Wyre Forest group

Organisation
(where relevant)

Campaign to Protect Rural
England

Address Line 1

49, Stourbridge Road

Line 2

Hagley

Line 3

Stourbridge, W. Midlands

Post Code

DY9 0QS

Telephone Number

01562-720368

E-mail Address
(where relevant)

peterkingiron@blueyonder.co.uk

Part B – Please use a separate sheet for each representation

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

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Name or Organisation :

3. To which DPD does this representation relate? **Site Allocations and Policies** (*delete as necessary*)
To which part of the DPD does this representation relate?

Paragraph	Policy	EA1 (also EA2)	Other e.g. Map, table, figure, key diagram
-----------	--------	----------------------	--

4. Do you consider the DPD is :

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

Please refer to guidance notes for explanation of terms

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

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

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

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

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

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 preferable if a supermarket is needed. This follows from the sequential approach in GBP2, which should be cross-referenced.

Even though they may be in separate ownerships, sites EA1 and EA2 adjoin each other. A single policy covering both would be better.

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

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

See 6

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

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

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

 YES

Yes, I wish to participate at the oral examination

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

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Name or Organisation :

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

To which part of the DPD does this representation relate?

Paragraph		Policy	EA4	Other e.g. Map, table, figure, key diagram	
-----------	--	--------	-----	--	--

4. Do you consider the DPD is :

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

Please refer to guidance notes for explanation of terms

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

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

Car Sales and Service is an important activity. The retention of the area as such should be a priority, and alternative uses only be sought if its continuation is not viable.

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

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

The policy should be subject to a precondition that the existing car sales and service use is no longer viable

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

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

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Name or Organisation :

3. To which DPD does this representation relate? **Site Allocations and Policies** / (delete as necessary)

To which part of the DPD does this representation relate?

Paragraph		Policy	EA5	Other e.g. Map, table, figure, key diagram	
-----------	--	--------	-----	--	--

4. Do you consider the DPD is :

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

Please refer to guidance notes for explanation of terms

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

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

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

The very jagged boundary with the gardens of houses in Baldwin Road is unsatisfactory. There should be wording to allow boundary adjustments between area EA5 and these gardens to ensure good use of land.

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

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

Wording should be added to the effect that the boundary is not intended to be precise and adjustments between it and the gardens of houses in Baldwin Road can be permitted.

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

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

 YES

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Name or Organisation :

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

To which part of the DPD does this representation relate?

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

4. Do you consider the DPD is :

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

Please refer to guidance notes for explanation of terms

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

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

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

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

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

- (a) The definitions in 5.24 fall down on the attempt to formulate common rules covering all three towns, when they are very different.
- The rules (as formulated) may well be appropriate to Kidderminster, but the subject is dealt with at length in KCAAP and does not need to appear in SALP at all, save as a bland statement that the subject is dealt with in KCAAP. This could be done by amending 5.19 to exclude Kidderminster and placing 5.27 immediately after it. The attempt to cover the subject for Kidderminster in both documents causes unnecessary duplication, making the whole confusing, which must in turn mean that it is not justified.
 - Accordingly it is suggested that the policy should be limited to Stourport and Bewdley, even at risk of having to repeat in KCAAP wording that appears in SALP. Each has a well-defined retail centre, but both are at risk of decline, rather than there being pressure for retail expansion. In these two towns, a site beyond 100 metres from the edge of the town centre ought to be classified as “out of centre”.
- (b) Policy GPB2 itself:
- Primary frontages have traditionally required a high proportion of A1 uses. The test as to when there are too few A1 uses is too weak. On the other hand, certain health-related activities (and other uses in note

8) have traditionally been conducted from offices (or office-like) premises in town centres. The clustering of these with A1-A5 uses tends to enhance the viability of a town centre. These can be treated in much the same way as A2-A5 within the Primary Shopping Area.

- Edge-of-centre development that is very close to the boundary of the centre and well linked to it (for example by a passageway from the main street) may be appropriate
- Other edge-of-centre and especially out-of-centre retail development should be strongly discouraged, as it is liable to detract from the viability of the town centre. The sequential approach ought to control this.
- If the suggestion that GBP2 is limited to the other two towns is adopted, a further condition may be needed, for the applicant to show why out-of-centre development cannot be placed in Kidderminster.

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

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

1. Policy GPB2 should be limited to Bewdley and Stourport, save for a brief statement that the policy on Kidderminster is as set out in KCAAP. See detailed suggestions above
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.
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.
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.

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

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

 YES

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Name or Organisation :

3. To which DPD does this representation relate? **Site Allocations and Policies** / (delete as necessary)

To which part of the DPD does this representation relate?

Paragraph	Policy	KSS1	Other e.g. Map, table, figure, key diagram

4. Do you consider the DPD is :

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

Please refer to guidance notes for explanation of terms

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

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

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

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

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

- (a) The policy should be cross-referenced to DPL11 to 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.

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

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

1. Compliance with policy SAL.DP11 should be explicitly required, in the wording of the policy (except in relation to the Chester Road South site)
2. Wording should be added in relation to the Baskerville Road site allowing the incorporation of garden land adjoining the site.

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

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

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

 YES

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Job Title (where relevant)	Chairman, Bromsgrove and Wyre Forest group		
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To which part of the DPD does this representation relate?

Paragraph		Policy	PDS1 – Lea Castle	Other e.g. Map, table, figure, key diagram	
-----------	--	--------	-------------------------	--	--

4. Do you consider the DPD is :

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

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

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 effectiveness of the screening.

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

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

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Stourbridge, W. Midlands

Post Code

DY9 0QS

Telephone Number

01562-720368

E-mail Address
(where relevant)

peterkingiron@blueyonder.co.uk

Part B – Please use a separate sheet for each representation

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

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Name or Organisation :

3. To which DPD does this representation relate? **Site Allocations and Policies** / (delete as necessary)

To which part of the DPD does this representation relate?

Paragraph		Policy	PDS2	Other e.g. Map, table, figure, key diagram	
-----------	--	--------	------	--	--

4. Do you consider the DPD is :

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

Please refer to guidance notes for explanation of terms

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

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

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

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

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

We are concerned at the sinuous boundary to the site. This may be a matter of wording as to how the red line should be interpreted. The boundary should be fairly tightly drawn around the existing buildings, leaving the car park outside it. However the possibility should exist of allowing add-on new facilities adjacent to but beyond the boundary drawn on the map, if this is adequately justified.

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

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

1. 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.
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.

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

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

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

 YES

Yes, I wish to participate at the oral examination

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

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Signature:

Date:



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BY 5.30pm on Friday 14th September 2012

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Part A – Personal Details

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

Part A

1. Personal Details*

2. Agent's Details (if applicable)

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

Title

Dr

First Name

Peter

Last Name

King

Job Title
(where relevant)

Chairman, Bromsgrove and
Wyre Forest group

Organisation
(where relevant)

Campaign to Protect Rural
England

Address Line 1

49, Stourbridge Road

Line 2

Hagley

Line 3

Stourbridge, W. Midlands

Post Code

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Telephone Number

01562-720368

E-mail Address
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Part B – Please use a separate sheet for each representation

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Name or Organisation :

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

To which part of the DPD does this representation relate?

Paragraph	Policy	RS2	Other e.g. Map, table, figure, key diagram
-----------	--------	-----	--

4. Do you consider the DPD is :

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

Please refer to guidance notes for explanation of terms

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

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

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

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

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

Policy RS2 Unsound: not effective
The site boundary is sinuous.
rationalisation of the boundary.

Wording should be added to allow the

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

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

Wording should be added to allow the rationalisation of the boundary.

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

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

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

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Part A

1. Personal Details*

2. Agent's Details (if applicable)

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

Part B – Please use a separate sheet for each representation

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Name or Organisation :

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

To which part of the DPD does this representation relate?

Paragraph	9.18	Policy	SK1	Other e.g. Map, table, figure, key diagram
-----------	------	--------	-----	--

4. Do you consider the DPD is :

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

Please refer to guidance notes for explanation of terms

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

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

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

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

The 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 this area and Wilden Covert from the boundary on the plan on p.108. 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.

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

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

Redraw boundary as described in 6.

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

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

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

 YES

Yes, I wish to participate at the oral examination

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Part A

1. Personal Details*

2. Agent's Details (if applicable)

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

Part B – Please use a separate sheet for each representation

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Name or Organisation :

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

To which part of the DPD does this representation relate?

Paragraph		Policy	SK2	Other e.g. Map, table, figure, key diagram	
-----------	--	--------	-----	--	--

4. Do you consider the DPD is :

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

Please refer to guidance notes for explanation of terms

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

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

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

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

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

- (a) Paragraph vii at the top of page 110 should include connectivity across the river Stour into Wilden Marshes. These are currently virtually landlocked, but there ought to be an opportunity for providing public access to (say) a board walk through the marshes without there being a significant impact on their wildlife value.
- (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.
- (c) We would comment that 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 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.
- (d) There appears to be an underpass under Severn Valley Railway. The layout in sketched in phase 2 of the recent planning application did not appear positively enough to incorporate this into the street networks. An extra paragraph should be added to require this.

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

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

- a. Amended wording as in 6.
- b. The plan on page 111 should be labelled as an example of how the policy might be implemented.
- c. Wording should be incorporated to allow boundary adjustments at the southeast corner of the site to bring adjacent land within it.
- d. An additional paragraph xi encouraging the development to have a positive connectivity with the underpass under the Severn Valley Railway.

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

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

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

 YES

Yes, I wish to participate at the oral examination

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

Signature:

Date:



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Part A

1. Personal Details*

2. Agent's Details (if applicable)

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

Title

Dr

First Name

Peter

Last Name

King

Job Title
(where relevant)

Chairman, Bromsgrove and
Wyre Forest group

Organisation
(where relevant)

Campaign to Protect Rural
England

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49, Stourbridge Road

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Stourbridge, W. Midlands

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DY9 0QS

Telephone Number

01562-720368

E-mail Address
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peterkingiron@blueyonder.co.uk

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Name or Organisation :

3. To which DPD does this representation relate? **Site Allocations and Policies /**
To which part of the DPD does this representation relate?

Paragraph		Policy	SK4	Other e.g. Map, table, figure, key diagram	
-----------	--	--------	-----	--	--

4. Do you consider the DPD is :

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

Please refer to guidance notes for explanation of terms

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

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

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

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

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

The policy is too deterministic for a policy intended to last 20 years. If the suggested development does not take place, the site should be available for other employment uses.

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

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

The policy should provide a fall-back psotion allowing other employment uses

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

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

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

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Signature:

[

Date:



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1. Personal Details*

2. Agent's Details (if applicable)

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Last Name	King		
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Name or Organisation :

3. To which DPD does this representation relate? **Site Allocations and Policies** / (delete as necessary)

To which part of the DPD does this representation relate?

Paragraph		Policy	STC4	Other e.g. Map, table, figure, key diagram	
-----------	--	--------	------	--	--

4. Do you consider the DPD is :

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

Please refer to guidance notes for explanation of terms

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

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

Any retail uses should be concentrated as far as possible at the eastern end of the site and be well-integrated with the Albion Street 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.

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

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

The policy should require retail involving part only of the site to be at the east end and to be well connected to the town centre

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

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

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

 YES

Yes, I wish to participate at the oral examination

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First Name

Peter

Last Name

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Job Title
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Name or Organisation :

3. To which DPD does this representation relate? **Site Allocations and Policies /**

To which part of the DPD does this representation relate?

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

4. Do you consider the DPD is :

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

Please refer to guidance notes for explanation of terms

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

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

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- (3) Effective
- (4) Consistent with national policy

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

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

- (a) The relationship between the two part 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.
- (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.
- (c) A cross-reference to Policy UP11 is desirable.

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

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

See 6

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

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

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

 YES

Yes, I wish to participate at the oral examination

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

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Signature:

Date:



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

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BY 5.30pm on Friday 14th September 2012

This form has two parts –

Part A – Personal Details

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

Part A

1. Personal Details*

2. Agent's Details (if applicable)

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

Title

Dr

First Name

Peter

Last Name

King

Job Title
(where relevant)

Chairman, Bromsgrove and
Wyre Forest group

Organisation
(where relevant)

Campaign to Protect Rural
England

Address Line 1

49, Stourbridge Road

Line 2

Hagley

Line 3

Stourbridge, W. Midlands

Post Code

DY9 0QS

Telephone Number

01562-720368

E-mail Address
(where relevant)

peterkingiron@blueyonder.co.uk

Part B – Please use a separate sheet for each representation

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

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

Name or Organisation :

3. To which DPD does this representation relate? **Site Allocations and Policies** / (delete as necessary)

To which part of the DPD does this representation relate?

Paragraph	Policy	UP3	Other e.g. Map, table, figure, key diagram

4. Do you consider the DPD is :

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

Please refer to guidance notes for explanation of terms

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

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

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

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

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

- (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. I have seen a picture of a development somewhere in the Black Country that was clearly designed to turn its back on the “dirty cut” – something that canals have long ceased to be.
- (c) The diversion of a footpath (or other right of way) 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.

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

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

See 6

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peterkingiron@blueyonder.co.uk

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Name or Organisation :

3. To which DPD does this representation relate? **Site Allocations and Policies** / (delete as necessary)

To which part of the DPD does this representation relate?

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

4. Do you consider the DPD is :

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

Please refer to guidance notes for explanation of terms

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

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

- (1) Positively prepared
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6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

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

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).

It is possibly that this obligation is covered by planning policy elsewhere, but we do not know where

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

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

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First Name

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Name or Organisation :

3. To which DPD does this representation relate? **Site Allocations and Policies** / (delete as necessary)

To which part of the DPD does this representation relate?

Paragraph		Policy	UP5	Other e.g. Map, table, figure, key diagram	
-----------	--	--------	-----	--	--

4. Do you consider the DPD is :

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

Please refer to guidance notes for explanation of terms

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

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

- (1) Positively prepared
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- (4) Consistent with national policy

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

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

Developments near designated sites should seek to enhance them, where possible; and to facilitate access to them, where appropriate.

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

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

Some additional wording is needed.

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

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

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Title

Dr

First Name

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Last Name

King

Job Title
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Campaign to Protect Rural
England

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DY9 0QS

Telephone Number

01562-720368

E-mail Address
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peterkingiron@blueyonder.co.uk

Part B – Please use a separate sheet for each representation

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Name or Organisation :

3. To which DPD does this representation relate? **Site Allocations and Policies** / (delete as necessary)

To which part of the DPD does this representation relate?

Paragraph	Policy	UP6	Other e.g. Map, table, figure, key diagram

4. Do you consider the DPD is :

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

Please refer to guidance notes for explanation of terms

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

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

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

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

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

- (a) The idea of protection for undesignated historic gardens looks like a minefield. It is suggested that provision should be made for a local listing of these, to be incorporated into HER.
- (b) To the list at the top of page 86 the following further paragraphs need to be added to ensure the preservation of the integrity of historic sites:
- (v) Alterations should where possible be reversible. This is most important for the most important assets.
- (vi) The retention of historic artefacts, such as surviving mill machinery.

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

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

To the list at the top of page 86 the following further paragraphs need to be added:

- (v) Alterations should where possible be reversible. This is most important for the most important assets.
- (vi) The retention of historic artefacts, such as surviving mill machinery.

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 Record

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

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

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

YES

Yes, I wish to participate at the oral examination

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Signature:

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Date:



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2. Agent's Details (if applicable)

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Title

Dr

First Name

Peter

Last Name

King

Job Title
(where relevant)

Chairman, Bromsgrove and
Wyre Forest group

Organisation
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Name or Organisation :

3. To which DPD does this representation relate? **Site Allocations and Policies** / (*delete as necessary*)

To which part of the DPD does this representation relate?

Paragraph	Policy	UP9	Other e.g. Map, table, figure, key diagram

4. Do you consider the DPD is :

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

Please refer to guidance notes for explanation of terms

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

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

- (1) Positively prepared
- (2) Justified
- (3) Effective
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6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

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

Clause (v) should make reference to long term maintenance, for example lights in public places should be adopted by the relevant lighting authority.

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

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

See 6

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1. Personal Details*	2. Agent's Details (if applicable)
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Title	Dr		
First Name	Peter		
Last Name	King		
Job Title (where relevant)	Chairman, Bromsgrove and Wyre Forest group		
Organisation (where relevant)	Campaign to Protect Rural England		
Address Line 1	49, Stourbridge Road		
Line 2	Hagley		
Line 3	Stourbridge, W. Midlands		
Post Code	DY9 0QS		
Telephone Number	01562-720368		
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Name or Organisation :

3. To which DPD does this representation relate? **Site Allocations and Policies** / (delete as necessary)

To which part of the DPD does this representation relate?

Paragraph		Policy	UP12	Other e.g. Map, table, figure, key diagram	
-----------	--	--------	------	--	--

4. Do you consider the DPD is :

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

Please refer to guidance notes for explanation of terms

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

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

- (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.
- (b) The reference to “Permanent Construction” appears to encourage the addition of a brick skin, contrary to paragraph 7.103.

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

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Last Name	King		
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Telephone Number	01562-720368		
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Name or Organisation :

3. To which DPD does this representation relate? **Site Allocations and Policies** / (delete as necessary)

To which part of the DPD does this representation relate?

Paragraph		Policy	UP13	Other e.g. Map, table, figure, key diagram	
-----------	--	--------	------	--	--

4. Do you consider the DPD is :

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

Please refer to guidance notes for explanation of terms

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

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

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

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

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

Policy Unsound: not positive enough

- (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.”
- (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.

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

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

See 6

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

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

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

 YES

Yes, I wish to participate at the oral examination

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

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

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

Signature:

Date:



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

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

BY 5.30pm on Friday 14th September 2012

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

Part A

1. Personal Details*

2. Agent's Details (if applicable)

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

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

Part B – Please use a separate sheet for each representation

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

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Name or Organisation :

3. To which DPD does this representation relate? **Site Allocations and Policies** / (delete as necessary)

To which part of the DPD does this representation relate?

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

4. Do you consider the DPD is :

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

Please refer to guidance notes for explanation of terms

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

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

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

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

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

The policy should be cross-referenced to DPL11 to make it clear that that policy also applies. Otherwise the Plan will be ambiguous as this will not be clear.

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

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

Compliance with policy SAL.DP11 should be explicitly required, in the wording of the policy

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

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

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

 YES

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Title

Dr

First Name

Peter

Last Name

King

Job Title
(where relevant)

Chairman, Bromsgrove and
Wyre Forest group

Organisation
(where relevant)

Campaign to Protect Rural
England

Address Line 1

49, Stourbridge Road

Line 2

Hagley

Line 3

Stourbridge, W. Midlands

Post Code

DY9 0QS

Telephone Number

01562-720368

E-mail Address
(where relevant)

peterkingiron@blueyonder.co.uk

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

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Name or Organisation :

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

To which part of the DPD does this representation relate?

Paragraph	Policy	WS1	Other e.g. Map, table, figure, key diagram

4. Do you consider the DPD is :

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

Please refer to guidance notes for explanation of terms

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

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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.

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

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

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 there should be a policy to that effect.

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

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

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 YES

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Job Title
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Chairman, Bromsgrove and
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Name or Organisation :

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

To which part of the DPD does this representation relate?

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

4. Do you consider the DPD is :

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

Please refer to guidance notes for explanation of terms

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

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

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

The same objection relates to both Appendix B of SALP and Appendix B of KCAAP
 Will the adoption of WFCS and both documents result in all policies in the 2004 Local Plan and WCSP being replaced with the possible exception of the Mineral and Waste provisions (where the County is the Planning Authority)? If so, they should say so. If not, SALP should contain a schedule of policies which will survive.

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

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

See 6

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

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Signature:

Date:

14.9.12

Elaine Wilcox

From: Katherine Burnett [Katherine.Burnett@canalrivertrust.org.uk]
Sent: 14 September 2012 15:04
To: Wyre Forest Planning Policy
Subject: Site Allocations and Policies Publication

Dear Sir/Madam

Re: Site Allocations and Policies Publication

Thank you for alerting our organisation to the above consultation. Although we are registered with your online consultation portal, unfortunately we are currently experiencing difficulties in accessing the internet therefore I have been unable to respond online.

Therefore our comments are as follows:-

Policy SAL.UP2 Providing a Green Infrastructure Network

Under ii Staffordshire and Worcestershire Canal of policy SAL.UP2 Providing a Green Infrastructure Network, additional wording has been added to state *Development should seek to enhance the biodiversity and water quality of the canal corridor whilst recognising the multi-functional nature of the corridor.*

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

Policy SAL.SK1 South Kidderminster Enterprise Park

Canal & River Trust support the requirement for developments 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.*

Canal & River Trust consider water should not be treated as just a setting or backdrop for development but as a space and leisure and commercial resource in its own right. The 'added value' of the water space needs to be fully explored.

Canal & River Trust consider potential contamination of the canal corridor, waterway and ground water from wind blow, seepage or spillage at sites should be avoided.

Policy SAL.EA5 Baldwin Road

Representation 1:-

Canal & River Trust wish to comment on SAL.EA5 in the context of the tests of soundness set out in the new National Planning Policy Framework. Specifically, our comments relate to the effectiveness/deliverability of the proposal as an owner of part of the site.

We welcome the proposal in the policy for a masterplan to be required for the whole site 'prior to any development being considered'. However, it is considered that part 'ii.' of the policy requires further deliberation in terms of ensuring that the policy is deliverable. Under part 'ii.' as currently worded, the requirement is stated as being to 'retain, enhance and make accessible the public open space that lies within the site boundary.' This wording raises two matters. Firstly, it is unclear whether the requirement is to retain in part or entirety the open space. Secondly, the space that currently exists affords no public access and is currently designated as 'urban open space'.

It should be recognised that any proposal to enhance and make accessible the space will increase associated maintenance requirements, which could in itself act as a disincentive to achieving part 'ii.' of the policy by placing financial burdens on the owner of the space beyond those that currently exist and this also needs to be set in a context in which other areas of the site allocation are in different ownerships. This could be addressed through an approach which allows for the reconfiguration of the space and the release of part of it for development. This would create value on part of the land, which would assist in delivering an enhanced space and access for the benefit of

local residents. It would also enable matters such as natural surveillance and linkages through the site to be more satisfactorily addressed in a context in which the space as currently configured occupies one side of the site and together with the canal suffers poor natural surveillance. Such an approach would support the following requirements of the adopted Core Strategy under Policy CP15 (Regenerating Waterways):

- Developments and initiatives that contribute positively to the creation of a quality canal-side environment, particularly in the urban areas, will be supported.
- All new development in areas adjacent to the canal must have a positive relationship to it, providing a strong, active frontage onto the waterside. Developments must contribute towards creating an attractive waterside environment that provides natural surveillance to the area and promotes a high level of activity throughout the day.

It is unclear whether the policy as currently worded allows for the reconfiguration and release of part of the space. Nevertheless, it is our understanding that representations were made by others to the development plan document at the options stage which emphasised the benefits of a holistic approach to the site, and which led to the draft site allocation. The merits of a quality over quantity approach to open space on the site were set out in those representations in a context of an existing large supply of open space in Stourport-on-Seven, as evidenced in the Council's open space audit, and in the context of achieving a usable area of open space in association with residential development on the site. It is considered that such a principle is important with respect to the delivery of part 'ii.' of the policy and as part of the rationale for a holistic approach to the site.

The following two amendments would address the above matters and, in our view, make the policy more deliverable:

Amend part 'ii.' of the policy to read:

Enhance and make accessible the open space that lies within the site boundary.

Add the following clarification to the reasoned justification after the first sentence of paragraph 13.19 as follows (additional text bold and underlined).

14.30 Some of the key considerations for this site are to improve the links to the adjacent canal and to ensure that the open space that lies within the boundary of the site is enhanced and improved and so that access can be gained to it. **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.** This site provides real opportunities to provide links to these assets and make them a focus for development. The site also offers the potential to improve green infrastructure links within this area, linking into the Canal and the associated habitats and wildlife that exist.

Policy SAL.EA5 Baldwin Road

Representation 2:-

Canal & River Trust have previously expressed our support for the provision of access to the canal, however, consideration should also be given to the cost of providing this and the on-going cost and liability to ensure any access proposals which come forward as part of the development at Baldwin Road can be delivered.

I hope these comments are of assistance but do not hesitate to contact me should you have any queries

Yours sincerely

Katherine Burnett BSc (Hons) AMRTPI
Area Planner West Midlands

T 01827 252067 M 07824 356538

E katherine.burnett@canalrivertrust.org.uk

Strategic Planning Team Midlands

Canal & River Trust, Peels Wharf, Lichfield Street, Fazeley, Tamworth, Staffordshire, B78 3QZ

Please visit our website www.canalrivertrust.org.uk to find out more about the Canal & River Trust and download our 'Shaping our Future document' on the **About Us** page.

The Canal & River Trust is a new charity entrusted with the care of 2,000 miles of waterways in England and Wales. Get involved, join us - Visit / Donate / Volunteer at www.canalrivertrust.org.uk

Canal & River Trust is a charitable company limited by guarantee registered in England & Wales with company number 7807276 and charity number 1146792. Registered office address First Floor North, Station House, 500 Elder Gate, Milton Keynes MK9 1BB.

Elusen newydd yw Glandŵr Cymru sy'n gofalu am 2,000 o filltiroedd o ddyfrffyrdd yng Nghymru a Lloegr. Cymerwch ran, ymunwch â ni - Ewch i Rhoddion a Gwirfoddoli yn www.glandwrcymru.org.uk

Mae Glandŵr Cymru yn gwmni cyfyngedig drwy warant a gofrestrwyd yng Nghymru a Lloegr gyda rhif cwmni 7807276 a rhif elusen gofrestredig 1146792. Swyddfa gofrestredig: First Floor North, Station House, 500 Elder Gate, Milton Keynes MK9 1BB.

Tracy Carpenter
c/o 8 Orchard Close
Stourport-on-Severn
Worcestershire

27th August 2012

To Maria Dunn

With regard to your consultation for the provision of sites for Gypsies, Travellers and Showpeople. I would like to re-propose my land at Blackstone – Bewdley Road, Stourport.

Bewdley, to my knowledge has *no* provision whatsoever of sites for Gypsies and Travellers and so when a suitable site is identified, such as the one I am proposing, which does not encroach on to neighbouring properties nor does it even impact on any neighbouring views as it is screened, it begs the question - why? Is Bewdley discriminating against these communities?

If this land was being proposed as a gated community for non-travellers, over 55s, I genuinely doubt there would have been the public opposition that was evident at the consultation you held last year.

The access to the land is good, otherwise you would not have sited a public picnic area next door and also the council permits mobile tradespeople to sell their wares from the service road.

I propose this land could be passed exclusively for the over 55s in the Gypsy and Travelling community. I am not aware that this age group in this community is catered for anywhere in the *county*, as it is for non-travellers. This could be for 8 -12 plots, each one on its own ¼ acre plot with gardens maintained by a resident site manager, in stark contrast to the eyesores hidden away down Sandy Lane, Stourport. This land could be a beautifully manicured, gated development with gardens laid predominantly to lawn, gravel driveways, with feature fruit trees and flower beds, rather than the concrete jungles of Sandy Lane.

This is an opportunity for the council to produce something to be proud of for the first time for Gypsies and Travellers. I have approached a member of the travelling community who is very excited about my proposal and has expressed a very strong interest in being the resident site manager. He and his wife said "It would be amazing, it would be something for our community to be proud of at last".

I would be interested in your views on this proposal, and look forward to a reply from you in due course.

Yours faithfully





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Part A

1. Personal Details*

2. Agent's Details (if applicable)

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

Title	Mr		
First Name	Roger		
Last Name	Gurney		
Job Title (where relevant)	Clerk to Churchill and Blakedown Parish Council		
Organisation (where relevant)	Churchill and Blakedown Parish Council		
Address Line 1	56 Malvern Road		
Line 2	Powick		
Line 3	Worcester		
Post Code	WR2 4RT		
Telephone Number	01905 830756		
E-mail Address (where relevant)	rogerdgurney@btinternet.com		

Part B – Please use a separate sheet for each representation

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Name or Organisation : Churchill and Blakedown Parish Council

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

To which part of the DPD does this representation relate?

Paragraph	17.1	Policy	SAL.RS1	Other e.g. Map, table, figure, key diagram	
-----------	------	--------	---------	--	--

4. Do you consider the DPD is :

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

Please refer to guidance notes for explanation of terms

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

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

- (1) Positively prepared
- (2) Justified
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6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

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

Policy SAL.RS1 does not fully address the local housing need in Blakedown and it is too restrictive.

The site is the only deliverable site in the Parish and must address the Local Needs Housing in a wider sense than just “affordable” housing consistent with the Core Strategy vision (see separate representation on defining Local Needs Housing). The Parish Council is alert to this need and has commissioned a new Housing Needs Survey to determine the true local need.

The current policy SAL.RS1 does not fully address the local needs and is inconsistent with the adopted Wyre Forest Core Strategy (policy DS01) and the NPPF (paragraph 159). At a recent planning appeal at Castle Ash, Birmingham Road, Blakedown the Inspector dismissed the appeal partly on the grounds that the proposed development did not meet local housing needs (APP/R1845/A/11/2143452).

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

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

The Parish Council suggests that Policy SAL.RS1 is wrongly grounded since the site will not be forward until after the Local Plan has been reviewed and Green Belt (Rural Exception Site) policies will no longer apply.

Sub paragraph (i) of the policy should be amended to delete the word “affordable” and delete the reference to waiting lists (this was added between the preferred options and the publication versions of the DPD and is not robustly justified).

Sub paragraph (ii) should be amended by deleting “an element of enabling market housing” and replacing with “appropriate local housing needs”.

The Parish Council seeks a Statement of Common Ground with the Local Planning Authority on this matter.

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

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

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

Yes, I wish to participate at the oral examination

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


The Parish Council seeks a Statement of Common Ground with the Local Planning Authority on this matter.

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

Signature:

Date:

5th September
2012

 Wyre Forest District Council	Wyre Forest District Local Development Framework – Site Allocations and Policies and Kidderminster Central Area Action Plan Development Plan Documents (DPDs) Publication Stage Representation Form	Ref: (For official use only)
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Part A

1. Personal Details*	2. Agent's Details (if applicable)		
<i>*If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.</i>			
Title	Mr		
First Name	Roger		
Last Name	Gurney		
Job Title (where relevant)	Clerk to Churchill and Blakedown PC		
Organisation (where relevant)	Churchill and Blakedown Parish Council		
Address Line 1	56 Malvern Road		
Line 2	Powick		
Line 3	Worcester		
Post Code	WR2 4RT		
Telephone Number	01905 830756		
E-mail Address (where relevant)	rogerdgurney@btinternet.com		

Part B – Please use a separate sheet for each representation

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

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

Name or Organisation :Churchill and Blakedown Parish Council

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

To which part of the DPD does this representation relate?

Paragraph	Jargon Guide (Definitions or Glossary)	Policy	Definition of Local Needs Housing	Other e.g. Map, table, figure, key diagram
-----------	--	--------	-----------------------------------	--

4. Do you consider the DPD is :

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

Please refer to guidance notes for explanation of terms

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

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

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

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

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

The DPD seeks to introduce a definition of Local Needs Housing which does not exist in the NPPF. By defining it as “Affordable Housing” only it is inconsistent with the Adopted Wyre Forest Core Strategy which refers to Housing for Local Needs.

The NPPF defines Affordable Housing but does not define Housing for Local Needs (Local Needs Housing). It does in Paragraph 159, however, require LPAs to address needs for all types of housing, including downsizing for older people and does not restrict this duty to Affordable Housing. (“Older people” is defined in the NPPF Glossary).

However, the Adopted Wyre Forest Core Strategy specifies Housing for Local Needs as the only type of housing acceptable in villages named in the Settlement Hierarchy (Policy DS01) and does not define this further. Plain English, therefore, applies.

The DPD definition is, therefore, too restrictive and inappropriate. A separate definition of Local Needs Housing (or Housing for Local Needs) is required in the DPD, so that it is not in conflict with the Core Strategy and duties under the NPPF.

Local Needs Housing (or Housing for Local Needs) addresses the need for all types of housing consistent with paragraph 159 of the NPPF, for which there is a local need as follows:

“meets household and population projections, taking account of migration and demographic change”

“including affordable housing and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes)”

“caters for housing demand and the scale of housing supply necessary to meet this demand”

(The term “Older people” is defined in the NPPF as “People over retirement agewhose housing needs can encompass accessible, adaptable general needs housing for those looking to downsize from family housing).

The DPD is inconsistent with the Core Strategy and the NPPF, rendering the Core Strategy impossible to deliver. The Parish Council seeks a different definition of Local Needs Housing and a Statement of Common Ground with the LPA on the matter.

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

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

The Parish Council suggests the following change of definition:

Delete Local Needs Housing - See Affordable Housing

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.

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

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

Yes, I wish to participate at the oral examination

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

To ensure that the views of the Parish Council are fully explained and discussed.

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

Signature:

Date:

5th September
2012

	Wyre Forest District Local Development Framework – Site Allocations and Policies and Kidderminster Central Area Action Plan Development Plan Documents (DPDs) Publication Stage Representation Form	Ref: (For official use only)
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Please return to: Planning Policy Manager, Economic Prosperity and Place Directorate, Duke House, Clensmore Street, Kidderminster, Worcestershire, DY10 2JX; or by e-mailing this form to Planning.Policy@wyreforestdc.gov.uk

BY 5.30pm on Friday 14th September 2012

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

Part A

1. Personal Details*		2. Agent's Details (if applicable)
<i>*If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.</i>		
Title	Mr	Mr
First Name	Edward	Anthony
Last Name	Coomber	Champion
Job Title (where relevant)		Partner
Organisation (where relevant)		Halls (Worcester) LLP
Address Line 1		4 Foregate Street
Line 2		
Line 3		Worcester
Post Code		WR1 1DB
Telephone Number		01905 720106
E-mail Address (where relevant)		Anthony.champion@hallsworcester.com

Part B – Please use a separate sheet for each representation

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

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

Name or Organisation :

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

To which part of the DPD does this representation relate?

Paragraph	14	Policy	SAL.WS	Other e.g. Map, table, figure, key diagram
-----------	----	--------	--------	--

4. Do you consider the DPD is :

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

Please refer to guidance notes for explanation of terms

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

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

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

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

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

The DPD fails to identify an adequate land supply for Stourport on Severn. Again available land to the west of the town albeit encroaching into green belt has been disregarded whereas it lies above the flood plain, is directly accessible to the main road system and public transport.

Release of a site in this location would firstly provide valuable additional housing growth for Stourport to support and sustain its existing town centre facilities and to offer a well defined site with good road access and transport facilities (including public transport) whose release would still preserve the valuable green belt corridor between Stourport on Severn and Bewdley.

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

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

As outlined in Item 6, the site off Bewdley Road, Stourport on Severn as edged red on the attached plan should be included as a future allocation for the plan period to 2026.

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

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

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

Yes, I wish to participate at the oral examination

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

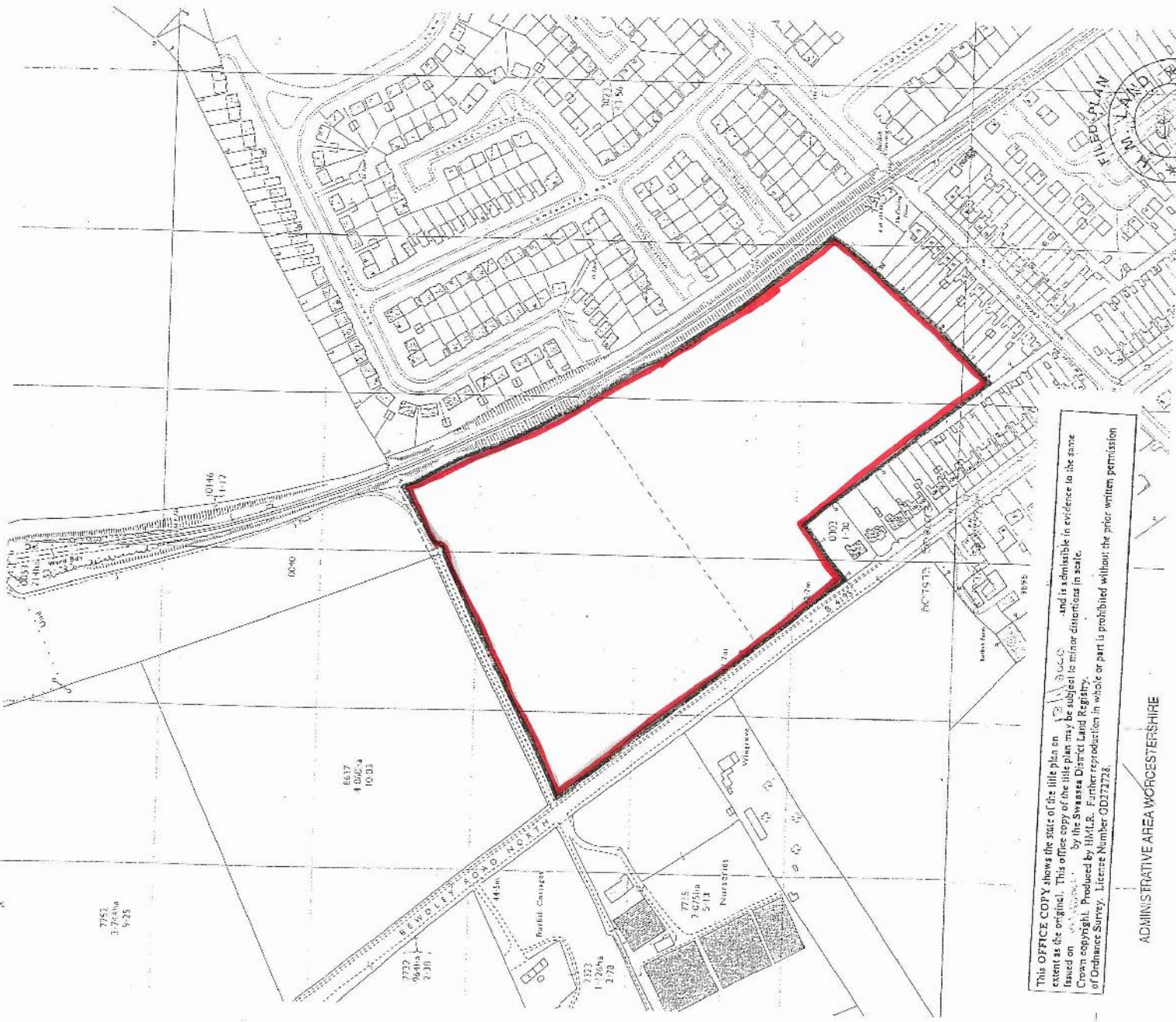
N/A

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

Signature:

Date:

25 July 2012

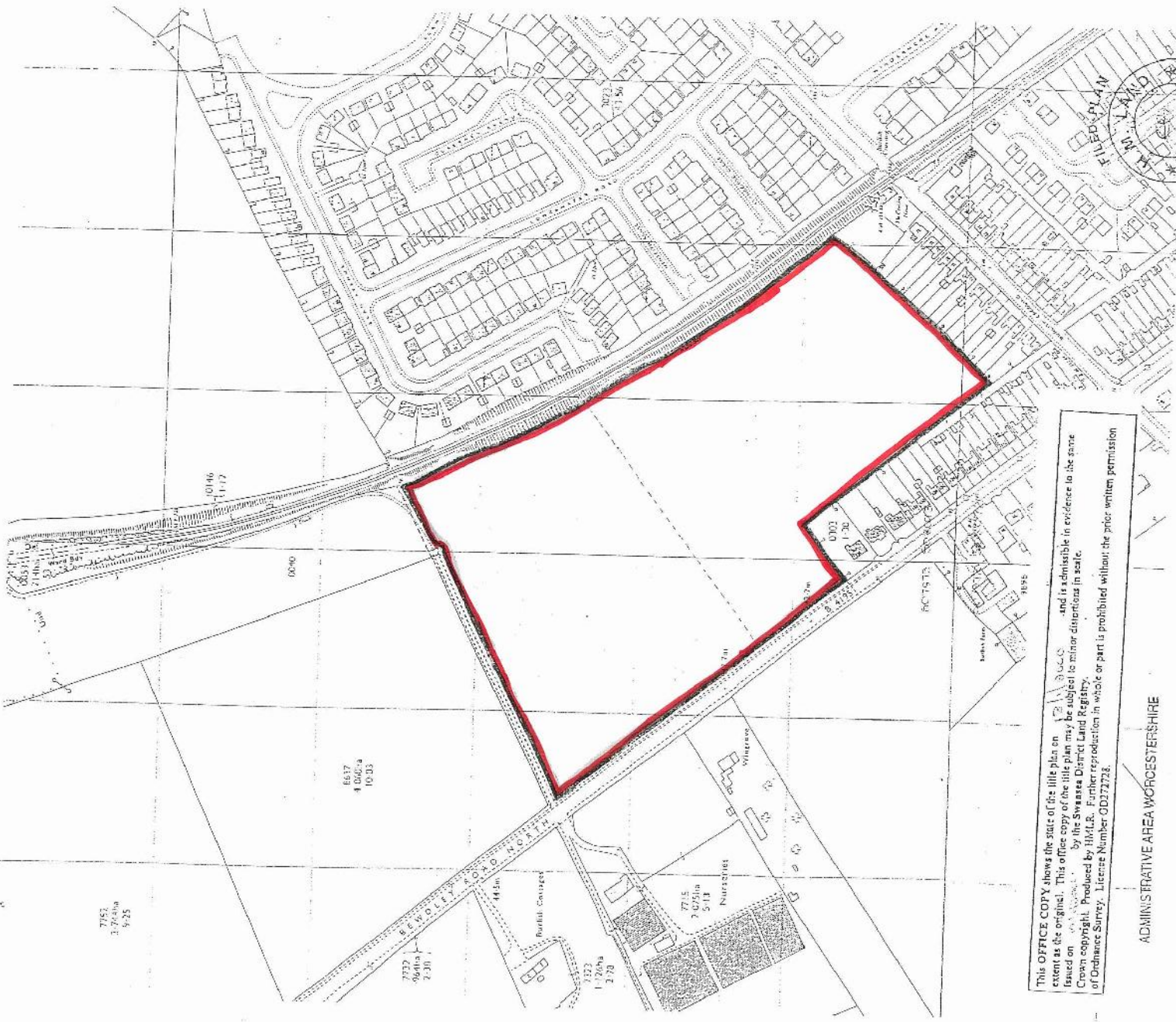


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ADMINISTRATIVE AREA WORCESTERSHIRE

H.M. LAND REGISTRY		TITLE NUMBER	
ORDNANCE SURVEY		HW116003	
PLAN REFERENCE	SO 7973 SO 8073	Scale	1 / 2500
COUNTY	HEREFORD AND WORCESTER	DISTRICT	WYRE FOREST
© Crown Copyright			

land at STOWPORT ON SEVERN

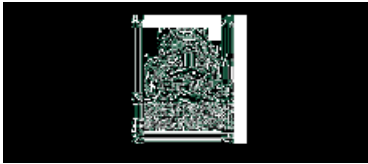


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ADMINISTRATIVE AREA WORCESTERSHIRE

H.M. LAND REGISTRY		TITLE NUMBER	
ORDNANCE SURVEY		HW116003	
PLAN REFERENCE		Scale	
SO 7973 SO 8073	SO 7972 SO 8072		1 / 2500
COUNTY HEREFORD AND WORCESTER	DISTRICT	WYRE FOREST	
© Crown Copyright			

land at Stouffort-on-Severn



Comment

Consultee	Mr David Gibbons (498129)
Email Address	Core11@btinternet.com
Company / Organisation	core11
Address	305 Tennyson Way Offmore Farm Kidderminster DY10 3XA
Event Name	Site Allocations and Policies Publication
Comment by	core11 (Mr David Gibbons)
Comment ID	SALPP2
Response Date	27/07/12 06:46
Consultation Point	1.1 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.1

To which part of the DPD does this representation relate? (Please state paragraph number, policy number, map, table or figure number). 1.1

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

Do you consider the DPD is:

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

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

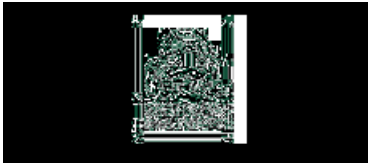
The Kidderminster LDF is not a statutory document but is adopted from the statutory document- CORE STRATEGY (2006-2026)

All planning " Site Allocation" proposals within the LDF for the district will therefor be in compliance with the LDF and the CORE STRATEGY 2006-2026 making planning proposals legally sound.

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

Clarification as to why the Site Allocations and Policies are compliant with legislation could be stated at 1-1.

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



Comment

Consultee	Mr David Gibbons (498129)
Email Address	Core11@btinternet.com
Company / Organisation	core11
Address	305 Tennyson Way Offmore Farm Kidderminster DY10 3XA
Event Name	Site Allocations and Policies Publication
Comment by	core11 (Mr David Gibbons)
Comment ID	SALPP3
Response Date	27/07/12 07:01
Consultation Point	1.2 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.1

To which part of the DPD does this representation relate? (Please state paragraph number, policy number, map, table or figure number). 1.2

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

Do you consider the DPD is:

Compliant with the Duty to Cooperate	Yes
Legally Compliant	Yes
Sound	No

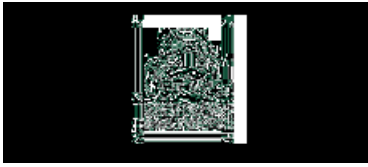
Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

compliant

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified above where this relates to soundness. You will need

to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The Core Strategy (2006-2026), should be identified as the prime legal document as adopted by WFDC



Comment

Consultee	Mr David Gibbons (498129)
Email Address	Core11@btinternet.com
Company / Organisation	core11
Address	305 Tennyson Way Offmore Farm Kidderminster DY10 3XA
Event Name	Site Allocations and Policies Publication
Comment by	core11 (Mr David Gibbons)
Comment ID	SALPP5
Response Date	29/07/12 09:47
Consultation Point	1.5 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.1

To which part of the DPD does this representation relate? (Please state paragraph number, policy number, map, table or figure number). 1.5

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

Do you consider the DPD is:

Compliant with the Duty to Cooperate Yes

Legally Compliant Yes

Sound No

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

Consistent with national policy Yes

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

The Site Allocations DPD makes reference to consultation involving key infrastructure providers.

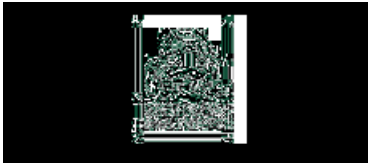
Did that consultation identify the concept that one of the prime aspects of new and existing infrastructure planning will require walking and cycling paths, to be part of the design fabric of any planning applications. Thus conforming to the Core Strategy.

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

The Core Strategy 2006-2026 is the prime legal document and statutory instrument. The new NPPF is not a legal document nor is this DPD.

By referring to this early in this DPD, future points that conformity to the CS is being addressed in a particular paragraph, any reference to the Core Strategy will inform the reader that the statutory parameters are required, and are noted.

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



Comment

Consultee	Mr David Gibbons (498129)
Email Address	Core11@btinternet.com
Company / Organisation	core11
Address	305 Tennyson Way Offmore Farm Kidderminster DY10 3XA
Event Name	Site Allocations and Policies Publication
Comment by	core11 (Mr David Gibbons)
Comment ID	SALPP6
Response Date	29/07/12 10:01
Consultation Point	1.12 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.1

To which part of the DPD does this representation relate? (Please state paragraph number, policy number, map, table or figure number). 1.12

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

Do you consider the DPD is:

Compliant with the Duty to Cooperate Yes

Legally Compliant Yes

Sound No

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

Positively prepared Yes

Justified Yes

Effective No

Consistent with national policy Yes

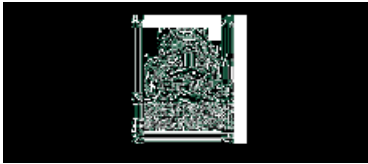
Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

The legality of all the documents is not made clear

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

I refer to my comments at paragraph 1.5

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



Comment

Consultee	Mr David Gibbons (498129)
Email Address	Core11@btinternet.com
Company / Organisation	core11
Address	305 Tennyson Way Offmore Farm Kidderminster DY10 3XA
Event Name	Site Allocations and Policies Publication
Comment by	core11 (Mr David Gibbons)
Comment ID	SALPP7
Response Date	29/07/12 10:19
Consultation Point	2.3 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.1

To which part of the DPD does this representation relate? (Please state paragraph number, policy number, map, table or figure number). 2.3

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

Do you consider the DPD is:

Compliant with the Duty to Cooperate	No
Legally Compliant	No
Sound	No

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

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

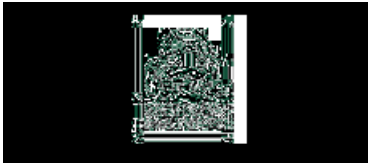
Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

This paragraph does not identify the amount of land or areas needed for infrastructure and open space related to the various elements of development noted at 2.4

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

Please refer to my comments already stated, regarding overall space requirements for future planning applications to include open space and infrastructure.

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



Comment

Consultee	Mr David Gibbons (498129)
Email Address	Core11@btinternet.com
Company / Organisation	core11
Address	305 Tennyson Way Offmore Farm Kidderminster DY10 3XA
Event Name	Site Allocations and Policies Publication
Comment by	core11 (Mr David Gibbons)
Comment ID	SALPP8
Response Date	29/07/12 10:44
Consultation Point	2.19 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.1

To which part of the DPD does this representation relate? (Please state paragraph number, policy number, map, table or figure number). 2.19

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

Do you consider the DPD is:

Compliant with the Duty to Cooperate No

Legally Compliant No

Sound No

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

Positively prepared No

Justified No

Effective No

Consistent with national policy No

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

There are no references to the vast shortage of recreational open space in the district.

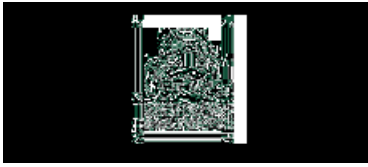
All the points regarding, wellbeing : a good place to do buisness : a desirable place to live. a better environment. All this is achieved through infrastructure and open space, yet the amount of space allocated for it appears to be none existant.

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

The Green Infrastructure and the Core Strategy as a whole repeatedly state the requirements . but as usual this most important of element of our place we live in, is taking a back seat

Injection of information in" detail" as to site proposals for infrastructure and open space and for improvement of the existing areas in these catogories must be promoted in thes DPDs.

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



Comment

Consultee	Mr David Gibbons (498129)
Email Address	Core11@btinternet.com
Company / Organisation	core11
Address	305 Tennyson Way Offmore Farm Kidderminster DY10 3XA
Event Name	Site Allocations and Policies Publication
Comment by	core11 (Mr David Gibbons)
Comment ID	SALPP9
Response Date	29/07/12 16:41
Consultation Point	2.9 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.1

To which part of the DPD does this representation relate? (Please state paragraph number, policy number, map, table or figure number). 2.9

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

Do you consider the DPD is:

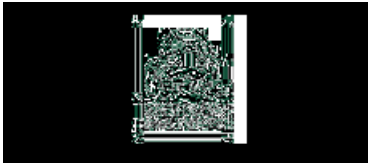
Compliant with the Duty to Cooperate	Yes
Legally Compliant	Yes
Sound	Yes

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

Core 11 recognises and welcomes the specific inclusion of development strategy item 9 (sustainable modes of transport)

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

no change



Comment

Consultee	Mr David Gibbons (498129)
Email Address	Core11@btinternet.com
Company / Organisation	core11
Address	305 Tennyson Way Offmore Farm Kidderminster DY10 3XA
Event Name	Site Allocations and Policies Publication
Comment by	core11 (Mr David Gibbons)
Comment ID	SALPP10
Response Date	29/07/12 17:01
Consultation Point	2.10 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.1

To which part of the DPD does this representation relate? (Please state paragraph number, policy number, map, table or figure number). 2.10

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

Do you consider the DPD is:

Compliant with the Duty to Cooperate Yes

Legally Compliant Yes

Sound No

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

Positively prepared Yes

Justified Yes

Effective Yes

Consistent with national policy No

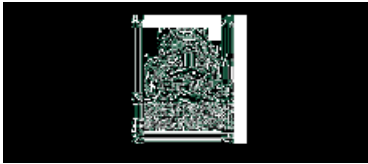
Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

The Core Strategy as adopted, identifies within the Green infrastructure Study, that open space is also a prime objective of any development strategy.

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

The site allocations DPD would best be served if open space and infrastructure was given individual identity, and included at 2.9

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



Comment

Consultee	Mr David Gibbons (498129)
Email Address	Core11@btinternet.com
Company / Organisation	core11
Address	305 Tennyson Way Offmore Farm Kidderminster DY10 3XA
Event Name	Site Allocations and Policies Publication
Comment by	core11 (Mr David Gibbons)
Comment ID	SALPP11
Response Date	29/07/12 17:33
Consultation Point	2.13 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.1

To which part of the DPD does this representation relate? (Please state paragraph number, policy number, map, table or figure number). 2.13

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

Do you consider the DPD is:

Compliant with the Duty to Cooperate Yes

Legally Compliant Yes

Sound Yes

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

Positively prepared Yes

Justified Yes

Effective Yes

Consistent with national policy No

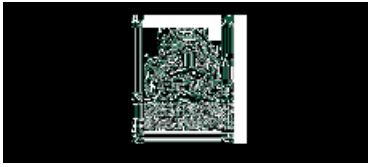
Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Land allocations for some developments prior to 2006 where insecure, will these be noted in current quantum. With the aim of avoiding any repetition of shortfall in land amounts for development.

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

Clarification as to "total" land needed for development projects.

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



Comment

Consultee	Mr David Gibbons (498129)
Email Address	Core11@btinternet.com
Company / Organisation	core11
Address	305 Tennyson Way Offmore Farm Kidderminster DY10 3XA
Event Name	Site Allocations and Policies Publication
Comment by	core11 (Mr David Gibbons)
Comment ID	SALPP12
Response Date	29/07/12 17:43
Consultation Point	2.15 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.1

To which part of the DPD does this representation relate? (Please state paragraph number, policy number, map, table or figure number). 2.15

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

Do you consider the DPD is:

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

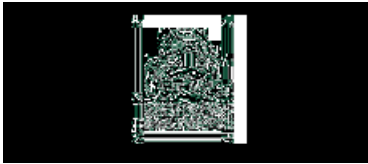
Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

The amount of land for commercial development may be correct. Has the vision of open space for employment sites been taken into account.

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

Information regarding Open Space could be shown, as it is a parameter for commercial planning applications.

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



Comment

Consultee	Mr David Gibbons (498129)
Email Address	Core11@btinternet.com
Company / Organisation	core11
Address	305 Tennyson Way Offmore Farm Kidderminster DY10 3XA
Event Name	Site Allocations and Policies Publication
Comment by	core11 (Mr David Gibbons)
Comment ID	SALPP13
Response Date	29/07/12 17:51
Consultation Point	3.1 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.2

To which part of the DPD does this representation relate? (Please state paragraph number, policy number, map, table or figure number). 3.1

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

Do you consider the DPD is:

Compliant with the Duty to Cooperate Yes

Legally Compliant Yes

Sound Yes

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

Consistent with national policy Yes

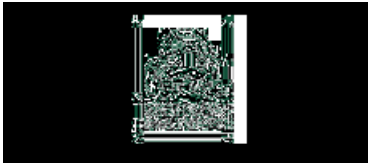
Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

The NPPF does not supersede any statutory documents already in place. Care must be taken to ensure planning applications meet these constraints.

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

comment only

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



Comment

Consultee	Mr David Gibbons (498129)
Email Address	Core11@btinternet.com
Company / Organisation	core11
Address	305 Tennyson Way Offmore Farm Kidderminster DY10 3XA
Event Name	Site Allocations and Policies Publication
Comment by	core11 (Mr David Gibbons)
Comment ID	SALPP14
Response Date	30/07/12 08:32
Consultation Point	4.12 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.1

To which part of the DPD does this representation relate? (Please state paragraph number, policy number, map, table or figure number). 4.12

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

Do you consider the DPD is:

Compliant with the Duty to Cooperate Yes

Legally Compliant Yes

Sound Yes

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

Positively prepared No

Justified No

Effective No

Consistent with national policy No

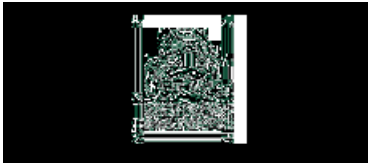
Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

For comment

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

core11 recognises that all relevant LDF policies are noted but would advise that the Core Strategy 2006-2016 is added as the statutory instrument.

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



Comment

Consultee	Mr David Gibbons (498129)
Email Address	Core11@btinternet.com
Company / Organisation	core11
Address	305 Tennyson Way Offmore Farm Kidderminster DY10 3XA
Event Name	Site Allocations and Policies Publication
Comment by	core11 (Mr David Gibbons)
Comment ID	SALPP15
Response Date	30/07/12 08:47
Consultation Point	4.32 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.1

To which part of the DPD does this representation relate? (Please state paragraph number, policy number, map, table or figure number). 4.32

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

Do you consider the DPD is:

Compliant with the Duty to Cooperate Yes

Legally Compliant Yes

Sound No

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

Positively prepared No

Justified No

Effective No

Consistent with national policy Yes

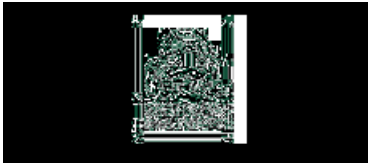
Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Clarification regarding that open space is a statutory requirement inclusion, in a developers submission that cost constraints are affecting a site. Planning fabric must be adjusted to include open space

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

update 4.32 to include statutory constraints

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



Comment

Consultee	Mr David Gibbons (498129)
Email Address	Core11@btinternet.com
Company / Organisation	core11
Address	305 Tennyson Way Offmore Farm Kidderminster DY10 3XA
Event Name	Site Allocations and Policies Publication
Comment by	core11 (Mr David Gibbons)
Comment ID	SALPP16
Response Date	30/07/12 09:03
Consultation Point	4.33 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.1

To which part of the DPD does this representation relate? (Please state paragraph number, policy number, map, table or figure number). 4.33

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

Do you consider the DPD is:

Compliant with the Duty to Cooperate Yes

Legally Compliant Yes

Sound No

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

Positively prepared No

Justified No

Effective No

Consistent with national policy Yes

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

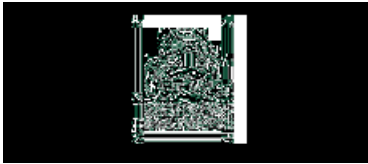
Any software packages or tools used by developers and vetted by the council must identify that the software gives guidance on infrastructure and open space as a legal priority.

The idea that a payment can leapfrog this design element is now defunct.

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

Include :- any software used in any appraisal must have infrastructure and open space capability inbuilt .

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



Comment

Consultee	Mr David Gibbons (498129)
Email Address	Core11@btinternet.com
Company / Organisation	core11
Address	305 Tennyson Way Offmore Farm Kidderminster DY10 3XA
Event Name	Site Allocations and Policies Publication
Comment by	core11 (Mr David Gibbons)
Comment ID	SALPP17
Response Date	30/07/12 11:08
Consultation Point	Policy SAL.CC1 Sustainable Transport Infrastructure (View)
Status	Submitted
Submission Type	Web
Version	0.1

To which part of the DPD does this representation relate? (Please state paragraph number, policy number, map, table or figure number). 6.3

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

Do you consider the DPD is:

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

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

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

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

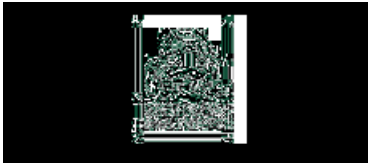
POLICY IS SOUND

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

This (SAL.CC1) policy should be stated by its" title" for reference in many more policies in this DPD.

Its importance is understated so far.

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



Comment

Consultee	Mr David Gibbons (498129)
Email Address	Core11@btinternet.com
Company / Organisation	core11
Address	305 Tennyson Way Offmore Farm Kidderminster DY10 3XA
Event Name	Site Allocations and Policies Publication
Comment by	core11 (Mr David Gibbons)
Comment ID	SALPP18
Response Date	30/07/12 11:27
Consultation Point	6.8 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.1

To which part of the DPD does this representation relate? (Please state paragraph number, policy number, map, table or figure number). 6.8

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

Do you consider the DPD is:

Compliant with the Duty to Cooperate Yes

Legally Compliant Yes

Sound Yes

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

Justified Yes

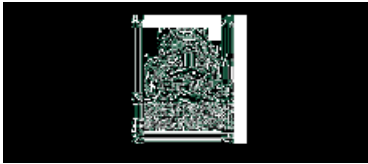
Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Cycling and walking networks can be combined provided design takes the objectives into account

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

Make reference to the possibility of combining cycling routes with walking and pedestrian routes. This design detail would also make other items such as childrens prams; disabled wheel chairs and others able to use the routes.

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



Comment

Consultee	Mr David Gibbons (498129)
Email Address	Core11@btinternet.com
Company / Organisation	core11
Address	305 Tennyson Way Offmore Farm Kidderminster DY10 3XA
Event Name	Site Allocations and Policies Publication
Comment by	core11 (Mr David Gibbons)
Comment ID	SALPP20
Response Date	12/08/12 20:43
Consultation Point	6.10 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.1

To which part of the DPD does this representation relate? (Please state paragraph number, policy number, map, table or figure number). 6.10

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

Do you consider the DPD is:

Compliant with the Duty to Cooperate Yes

Legally Compliant Yes

Sound Yes

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

Positively prepared No

Justified No

Effective Yes

Consistent with national policy No

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

The DPD is legally sound. However there may be infirmaty when the unavoidable cross cutting policies are encountered. The developer would have to check each aspect of his application with regard to transpot items. Consulting a "Transport" document which identifies the constraints and parameters that are in place for transport throughout thee DPD. Creating a tool for transport applications.

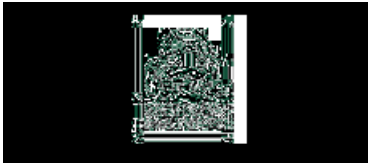
Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified above where this relates to soundness. You will need to say why this change will make the DPD legally comliant or sound. It will be helpful if you are able to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

The DPD gives a optimistic view with regard to all modes of transport.

By the nature of different modes of transport, a cross cutting with infrastructure occurs

Could a stand alone parameter and a constraint document be developed, that would bring together all the strategy policies regarding the variouse modes of transport, this would state the required conformaty, and put them in one place, instead of having to detail the directives every time a transport policy is visited in the DPD

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



Comment

Consultee	Mr David Gibbons (498129)
Email Address	Core11@btinternet.com
Company / Organisation	core11
Address	305 Tennyson Way Offmore Farm Kidderminster DY10 3XA
Event Name	Site Allocations and Policies Publication
Comment by	core11 (Mr David Gibbons)
Comment ID	SALPP21
Response Date	13/08/12 07:29
Consultation Point	6.42 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.1

To which part of the DPD does this representation relate? (Please state paragraph number, policy number, map, table or figure number). 6.42

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

Do you consider the DPD is:

Compliant with the Duty to Cooperate Yes

Legally Compliant Yes

Sound No

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

Positively prepared No

Justified No

Effective Yes

Consistent with national policy No

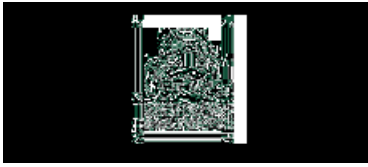
Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

6.42 is legally compliant.

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

The soundness of 6.42 could be firmed up , if reference to existing water management shortfalls, are noted as having a possible influence on new development SUDS schemes. Improvement of some existing drainage may be necessary along with any new proposals.

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



Comment

Consultee	Mr David Gibbons (498129)
Email Address	Core11@btinternet.com
Company / Organisation	core11
Address	305 Tennyson Way Offmore Farm Kidderminster DY10 3XA
Event Name	Site Allocations and Policies Publication
Comment by	core11 (Mr David Gibbons)
Comment ID	SALPP22
Response Date	13/08/12 07:47
Consultation Point	Policy SAL.CC7 Water Management (View)
Status	Submitted
Submission Type	Web
Version	0.1

To which part of the DPD does this representation relate? (Please state paragraph number, policy number, map, table or figure number). SAL.CC7

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

Do you consider the DPD is:

Compliant with the Duty to Cooperate Yes

Legally Compliant Yes

Sound No

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

Positively prepared No

Justified No

Effective Yes

Consistent with national policy No

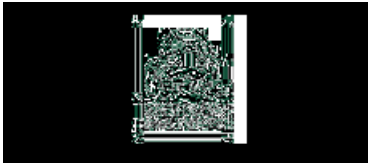
Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Core11 support Policy SAL. CC7 and note, it makes reference to CP02 . This states new developments should incorporate SUDS.

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

Policy SAL.CC7 could point out that SUDS included in new developments may be influenced by other local or adjoining, draining systems, that may be inadequate, and will need improvement.

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



Comment

Consultee	Mr David Gibbons (498129)
Email Address	Core11@btinternet.com
Company / Organisation	core11
Address	305 Tennyson Way Offmore Farm Kidderminster DY10 3XA
Event Name	Site Allocations and Policies Publication
Comment by	core11 (Mr David Gibbons)
Comment ID	SALPP23
Response Date	13/08/12 11:44
Consultation Point	9.25 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.1

To which part of the DPD does this representation relate? (Please state paragraph number, policy number, map, table or figure number). 9.25

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

Do you consider the DPD is:

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

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

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

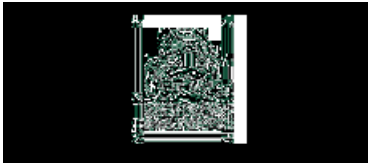
Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

This Policy 9 is to be commended for content and vision.

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

We comment, and applaud the DPD. This policy 9 should be promoted in importance.

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



Comment

Consultee	Mr David Gibbons (498129)
Email Address	Core11@btinternet.com
Company / Organisation	core11
Address	305 Tennyson Way Offmore Farm Kidderminster DY10 3XA
Event Name	Site Allocations and Policies Publication
Comment by	core11 (Mr David Gibbons)
Comment ID	SALPP28
Response Date	19/08/12 10:31
Consultation Point	Policy SAL.SK2 Former British Sugar Site (View)
Status	Submitted
Submission Type	Web
Version	0.1

To which part of the DPD does this representation relate? (Please state paragraph number, policy number, map, table or figure number). SAL.SK2

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

Do you consider the DPD is:

Compliant with the Duty to Cooperate Yes

Legally Compliant Yes

Sound Yes

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

Positively prepared Yes

Justified Yes

Effective Yes

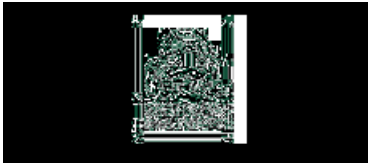
Consistent with national policy Yes

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

Core11 notes this policy as compliant. Its vision encompasses all the best development objectives of the LDF Core Strategy 2006-2026 including the Green Infrastructure Study 2010.

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

No changes.



Comment

Consultee	Mr David Gibbons (498129)
Email Address	Core11@btinternet.com
Company / Organisation	core11
Address	305 Tennyson Way Offmore Farm Kidderminster DY10 3XA
Event Name	Site Allocations and Policies Publication
Comment by	core11 (Mr David Gibbons)
Comment ID	SALPP29
Response Date	20/08/12 08:19
Consultation Point	7.7 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.1

To which part of the DPD does this representation relate? (Please state paragraph number, policy number, map, table or figure number). 7.7

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

Do you consider the DPD is:

Compliant with the Duty to Cooperate Yes

Legally Compliant No

Sound No

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

Positively prepared Yes

Justified Yes

Effective Yes

Consistent with national policy Yes

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

Core11 notes and welcomes the general appreciation of green infrastructure policies throughout the DPD. Para 7.7 gives reference to the proposals map, the map identifies the various areas and typologies, including the inclusion of a Open Space area at Offmore Farm now referred to as Borrington Park. The map also identifies, the boundaries of Dunclent Allotements and land immediately adjoining the Dunclent Brook on Offmore Estate. It includes the recreation area as adjoining the brook, and at the point where private property meets the brook. These boundary points as shown may be inaccurate. Ownership of land adjoining wetlands or waterways incurs responsibility (Riparian Rights), and access with safety responsibility. These areas are probably natural open space, and wetlands.

Refer to WFDC Land Drainage ordinary Watercourses.

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

Legality of the DPD is insecure if the boundary points are inaccurate.

Also the title or identity of the different types of land needs to be determined and stated on the map, if necessary.

Borrington Park is shown as a playing field. It is a recreation and amenity Open Space. Should this prove to be the case then, All areas need Correct identity titles putting on the Proposals Map and the boundaries amended and redrawn, if necessary. Core11 refers to the areas identified in our response at 7.7 only.

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



ENGLISH HERITAGE

WEST MIDLANDS

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

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

14 September 2012

Dear Ms Mayman

re: **PRE-SUBMISSION PUBLICATION – SITE ALLOCATIONS AND POLICIES
DEVELOPMENT PLAN DOCUMENT**

Thank you for your letter of 20 July and the invitation to comment on the pre-submission Site Allocations and Policies Development Plan Document (DPD).

The Duty to Cooperate

The Historic Buildings and Monuments Commission (English Heritage) is a “prescribed body” by virtue of Part 2 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and is therefore required to co-operate in relation to planning of sustainable development with local planning authorities and other prescribed bodies by Section 33A of Part 2 of the Planning and Compulsory Act (as inserted by Section 110 of the Localism Act 2011).

The activities on which the prescribed bodies are required to co-operate include the preparation of development plan and other local development documents so far as relating to a strategic matter i.e. sustainable development or use of land that has or would have a significant impact on at least two planning areas.

English Heritage confines its involvement in planning issues to matters that involve or otherwise affect the historic environment. English Heritage’s duty to co-operate is therefore appropriate in respect of strategic matters that would involve or otherwise affect a heritage asset.

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



English Heritage considers that the Site Allocation and Policies Development Plan Document complies with the Duty to Cooperate.

English Heritage was consulted on and has responded to each of the previous consultation stages in addition to attending strategic update meetings with the Council's planning and conservation officers.

In response to this ongoing duty English Heritage would wish to be informed of any further changes to the Development Plan Document as part of the examination process. We would also be happy to continue to work with the Council in addressing our representations.

Representations

Our representations on the document are as follows:

Support: 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: 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: 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.

Unsound: Policy SAL.UP6 Safeguarding the Historic Environment

English Heritage welcomes in principle the inclusion of this policy and the added detail in provides in conjunction with Policy CP11 Quality Design and Local Distinctiveness as set out in the adopted Core Strategy. These policies together with the commitment to prepare a Supplementary Planning Document on the Historic Environment serve overall to provide a positive strategy for the conservation and enjoyment of the District's historic environment.

There are, however, aspects of the policy and reasoned justification which are inconsistent with national guidance on the historic environment as set out in the NPPF and require further clarification. Our key concerns relate to the following areas:

- i) the appropriate coverage of heritage assets of archaeological significance as part of the policy;
- ii) the consistency and clarity of the policy content dealing with harm to heritage assets (a-c) and the reasoned justification particularly 7.58;
- iii) the consideration of enhancing the setting of conservation areas (e.g. NPPF 137);
- iv) consistency of terminology, especially in relation to significance;

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- v) the clarity of the information requirements for heritage statements as currently described in the reasoned justification and whether this type of information might be better located in an appendix to the plan;
- vi) the compatibility of the reference to enabling development (7.57) and English Heritage's guidance on Enabling Development and the extant PPS5 Practice Guide.

We believe that the above points can be addressed by amendments to the text and we would be happy to continue to work with the Council to resolve our representation.

Support: Policy SAL.UP7 Quality Design and Local Distinctiveness

English Heritage welcomes the prominence and emphasis the policy gives to securing high quality design.

To further improve the clarity of the policy and its consistency with national guidance as set out in the National Planning Policy Framework (Requiring Good Design), we recommend the following minor amendments:

- Criterion (i): Amend the last part of the sentence to '...transport infrastructure and landmarks, *and draw on the contribution of the historic environment to local character and distinctiveness.*'
- Criterion (iii): Expand the sentence to include '.... common building line, *historic street pattern, and skyline.*'
- Criterion (xi): Include a reference to 'materials' e.g. '.. traditional design *and materials...*'.

Support: Policy SAL.UP10

English Heritage welcomes the specific inclusion in the policy of criteria relating to heritage assets.

To improve consistency with national guidance we recommend a minor amendment to point (i) as follows: '*Conserve the significance of a building, monument, site, place, area or landscape, including its setting.*'

Policy SAL.UP11 Re-Use and Adaptation of Rural Buildings

English Heritage welcomes the clear reference in the reasoned justification to the West Midlands Farmsteads and Landscapes Project as part of the evidence base for the plan and its implementation. We consider, however, that the policy requires modification to fully reflect and positively take forward the findings of the Project and its application in helping to inform proposals which achieve sustainable development for the District's historic farmsteads.

We recommend the following changes:

- 1) Under the first section 'Re-use and Adaptation of Rural Buildings' introduce a new first point along the lines of; '*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.*' This is in order to establish the key principle that farmsteads should be considered as a whole rather than a focus on individual buildings.

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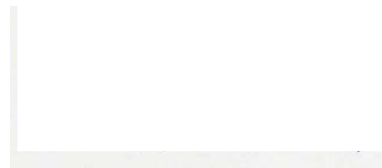


- 2) Amend the existing point (i) to allow for a more informed approach to whether some element of new build might offer a more appropriate and sustainable option than the conversion of a sensitive historic building. For example – ‘... or the addition of a large-scale element of new build.’
- 3) Include in point (ii) a reference to significance e.g. ‘...fabric, character, significance or setting...’;
- 4) Under the section Residential Development, expand the first paragraph to also address considerations relating to sustainability or historical significance e.g. ‘.. or for reasons of sustainability or historical significance an alternative use would be preferable, ...’. This is in order to take account of situations where residential reuse may be the most viable and appropriate use consistent with the significance of the heritage asset.
- 5) Amend 7.94 to also refer to the importance of ensuring that their significance and landscape setting is not harmed.
- 6) Amend the first sentence in 7.97 to also refer to the significance of a building;
- 7) Amend the opening sentence of 7.98 to be more positive and reflective of the influence of well informed and good quality design e.g. ‘Residential conversions can be detrimental.’.
- 8) Update the reasoned justification at 7.10 to reflect the latest work Worcestershire County Council is undertaking on further refining the evidence base and accompanying planning tools of the West Midlands Project.

Policy SAL.B1 Load Street Redevelopment Area

This is a highly sensitive site due to its location within the conservation area as well as its wider townscape setting, this including views across the site from the wider area such as from the riverside. In recognition of this we recommend that point (vi) in the policy also refers to this e.g. ‘... respect their heritage setting in a positive manner including views across the area.’

Yours sincerely



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

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available*



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

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

Dear Miss Mayman

Pre-Submission Publication of Wyre Forest District Site Allocations and Policies Development Plan Document (DPD)

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

Several of the key evidence documents, listed in paragraph 1.9 as informing the DPD, are currently not available for viewing. These are the Sequential Testing (Flooding) document and Infrastructure Delivery Plan. The absence of these two documents has made it difficult to comment on the soundness of the plan.

We would be happy to meet with your Council to discuss our representations and we would welcome the opportunity to review the Sequential Testing (Flooding) document and Infrastructure Delivery Plan.

Yours sincerely

Mrs Rachel Whiteman
Senior Planning Officer

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Direct e-mail rachel.whiteman@environment-agency.gov.uk

Environment Agency
Hafren House Welshpool Road, Shelton, Shrewsbury, SY3 8BB.
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End



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

Ref:

(For official use only)

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

BY 5.30pm on Friday 14th September 2012

This form has two parts –

Part A – Personal Details

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

Part A

1. Personal Details*

2. Agent's Details (if applicable)

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

Title

Mrs

First Name

Rachel

Last Name

Whiteman

Job Title
(where relevant)

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Organisation
(where relevant)

Environment Agency

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Telephone Number

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E-mail Address
(where relevant)

rachel.whiteman@environment-agency.gov.uk

Part B – Please use a separate sheet for each representation

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

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

Name or Organisation : Environment Agency

3. To which DPD does this representation relate? Site Allocations and Policies
To which part of the DPD does this representation relate?

Paragraph		Policy	SAL.UP12	Other e.g. Map, table, figure, key diagram	
-----------	--	--------	----------	--	--

4. Do you consider the DPD is :

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

Please refer to guidance notes for explanation of terms

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

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

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

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

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

Policy SAL.UP12 'Chalets'

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, as noted in Table 2 of the National Planning Policy Framework Flood Risk Technical Guidance. We would recommend a reference to safe development is added to the policy as follows:

For sites that are located within the floodplain, consideration should be given to relocating the caravan(s) to an area of lower flood risk **and it must be demonstrated that the development can be made safe for the lifetime of the development.**

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

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

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

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

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

Yes, I wish to participate at the oral examination

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

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

Signature:

Rachel Whiteman

Date:

14/9/2012



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Part A

1. Personal Details*

2. Agent's Details (if applicable)

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

Title

Mrs

First Name

Rachel

Last Name

Whiteman

Job Title
(where relevant)

Senior Planning Officer

Organisation
(where relevant)

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SY3 8BB

Telephone Number

01743 283 505

E-mail Address
(where relevant)

rachel.whiteman@environment-agency.gov.uk

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Name or Organisation : Environment Agency

3. To which DPD does this representation relate? Site Allocations and Policies
To which part of the DPD does this representation relate?

Paragraph		Policy	SAL.UP11	Other e.g. Map, table, figure, key diagram	
-----------	--	--------	----------	--	--

4. Do you consider the DPD is :

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

Please refer to guidance notes for explanation of terms

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

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SAL.UP11 'Re-use and Adaptation of Rural Buildings

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.

vi. That appropriate drainage and flood risk mitigation, **including safe development requirements, are available for the lifetime of the development.**

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

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

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Signature:

Rachel Whiteman

Date:

14/9/2012



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Title

Mrs

First Name

Rachel

Last Name

Whiteman

Job Title
(where relevant)

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Telephone Number

01743 283 505

E-mail Address
(where relevant)

rachel.whiteman@environment-agency.gov.uk

Part B – Please use a separate sheet for each representation

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

Name or Organisation : Environment Agency

3. To which DPD does this representation relate? Site Allocations and Policies
To which part of the DPD does this representation relate?

Paragraph		Policy	SAL.UP3	Other e.g. Map, table, figure, key diagram	
-----------	--	--------	---------	--	--

4. Do you consider the DPD is :

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

Please refer to guidance notes for explanation of terms

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

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

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

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

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

Policy SAL.UP3 'Providing a Green Infrastructure Network'

We support the inclusion of this policy within the Site Allocation and Policies DPD, particularly part 1(i) on the delivery and enhancement of the River Severn and River Stour Corridors.

It should be noted that, whilst these corridors are important, similar corridors are also essential (though on a smaller scale) 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.

The first paragraph refers to proposals enhancing and retaining open space/green infrastructure. A reference to **blue infrastructure** in this section for all water bodies, including the tributary corridors, in the District, would address this in working towards the Objectives of the Water Framework Directive.

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

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

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Signature:

Rachel Whiteman

Date:

14/9/2012



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Last Name

Whiteman

Job Title
(where relevant)

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Part B – Please use a separate sheet for each representation

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

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

Name or Organisation : Environment Agency

3. To which DPD does this representation relate? Site Allocations and Policies
To which part of the DPD does this representation relate?

Paragraph		Policy	SAL.RS2	Other e.g. Map, table, figure, key diagram	
-----------	--	--------	---------	--	--

4. Do you consider the DPD is :

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

Please refer to guidance notes for explanation of terms

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

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

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

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

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

Policy SAL.RS2 'Land at Clows Top'

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.

Policy SAL.RS2, point iii., states that development must ensure that appropriate drainage measures are provided. However, there should be a reasonable degree of certainty through the local plan that the required infrastructure is deliverable in a timely fashion. Paragraph 177 of the National Planning Policy Framework states that it is 'important to ensure that there is a reasonable prospect that planned infrastructure is deliverable in a timely fashion. To facilitate this, it is important that local planning authorities understand district-wide development costs at the time Local Plans are drawn up.'

Paragraph 5.70 of the adopted Core Strategy states that 'the availability of the necessary infrastructure and the potential need to provide additional capacity in some of the locations will be key factors in determining the timing of the release of sites...Further work on high level costings and an infrastructure

implementation plan will be carried out to inform the Site Allocations and Policies and Kidderminster Central Area Action Plan DPDs. This will ensure that the information is up-to-date.' In terms of environmental infrastructure, the Environment Agency and utility company are listed as key stakeholders and delivery bodies (paragraph B.2 (B Infrastructure Schedules) of the adopted Core Strategy defines environmental infrastructure for the purpose of the plan).

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 (listed in paragraph 1.19 as a key background study/report) is not available for review and we understand that this document is still being undertaken by the Council to inform the evidence base.

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.

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

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

The Infrastructure Delivery Plan 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.

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 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). 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.

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

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

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

Yes, I wish to participate at the oral examination

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

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

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

Signature:

Rachel Whiteman

Date:

14/9/2012



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

Ref:

(For official use only)

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

BY 5.30pm on Friday 14th September 2012

This form has two parts –

Part A – Personal Details

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

Part A

1. Personal Details*

2. Agent's Details (if applicable)

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

Title

Mrs

First Name

Rachel

Last Name

Whiteman

Job Title
(where relevant)

Senior Planning Officer

Organisation
(where relevant)

Environment Agency

Address Line 1

Hafren House

Line 2

Welshpool Road

Line 3

Shrewsbury

Post Code

SY3 8BB

Telephone Number

01743 283 505

E-mail Address
(where relevant)

rachel.whiteman@environment-agency.gov.uk

Part B – Please use a separate sheet for each representation

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

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

Name or Organisation : Environment Agency

3. To which DPD does this representation relate? Site Allocations and Policies
To which part of the DPD does this representation relate?

Paragraph	Policy	Other e.g. Map, table, figure, key diagram
	SAL.SK2 SAL.KSS1 SAL.STC1 SAL.STC2 SAL.STC3 SAL.STC4 SAL.EA1 SAL.EA2 SAL.EA3 SAL.EA4 SAL.EA5 SAL.WS1 SAL.B1 SAL.B2	

4. Do you consider the DPD is :

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

Please refer to guidance notes for explanation of terms

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

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

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

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

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

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 and the policies it has been included in. Whilst it is likely that a desk study report will be required for the majority of sites, a number of sites (policies listed above) are identified as having a shown previously contaminated use and a high potential for contaminated land issues. For consistency we would prefer the following wording to be used for the identified policies.

Preferred wording:

- ensure they incorporate appropriate remediation, building and drainage design in order to deal with any land contamination.

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

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

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

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

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

Yes, I wish to participate at the oral examination

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

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

Signature:

Rachel Whiteman

Date:

14/9/2012



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Title

Mrs

First Name

Rachel

Last Name

Whiteman

Job Title
(where relevant)

Senior Planning Officer

Organisation
(where relevant)

Environment Agency

Address Line 1

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Line 2

Welshpool Road

Line 3

Shrewsbury

Post Code

SY3 8BB

Telephone Number

01743 283 505

E-mail Address
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rachel.whiteman@environment-agency.gov.uk

Part B – Please use a separate sheet for each representation

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Name or Organisation : Environment Agency

3. To which DPD does this representation relate? Site Allocations and Policies
To which part of the DPD does this representation relate?

Paragraph	1.9	Policy		Other e.g. Map, table, figure, key diagram	
-----------	-----	--------	--	--	--

4. Do you consider the DPD is :

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

Please refer to guidance notes for explanation of terms

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

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

- (1) Positively prepared
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- (3) Effective
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6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

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

Paragraph 1.9 'Sustainability Appraisal and Evidence Base'

Paragraph 1.9 refers to background studies and technical reports that have been produced to inform the decisions made regarding sites in the DPD. All of the studies are stated as available to view on the Council's website and the main studies produced to inform the site selection process are listed.

Two of the documents listed are not available for review and we understand that they are still being undertaken by the Council to inform the evidence base.

There appears to be no clear cross reference with the evidence base as the Sequential Testing (Flooding) document and Infrastructure Delivery Plan are still being completed. It is difficult to comment on the soundness of the plan as we have not seen the contents of these two key evidence base documents.

Paragraph 177 of the National Planning Policy Framework states that it is 'important to ensure that there is a reasonable prospect that planned infrastructure is deliverable in a timely fashion. To facilitate this, it is important that local planning authorities understand district-wide development costs at the time

Local Plans are drawn up.'

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

As the Sequential Testing (Flooding) and Infrastructure Delivery Plan are still being completed it is unclear whether the plan is the most appropriate strategy, when considered against reasonable alternatives, and whether the plan is deliverable over its period i.e. flood risk, environmental infrastructure requirements etc.

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

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

The Infrastructure Delivery Plan and Sequential Testing (Flooding) reports should be finalised and published so that they can be viewed and commented on. It should be clear how the plans have been used to inform and support the policy, site allocations (Sequential Approach) and deliverability of the plan, providing transparency and a clear link to the evidence base.

Flood Risk:

The flood risk sequential approach must be fully utilised in selecting sites for development and the appropriate type of development in considering flood risk vulnerability. In particular, watercourses not modelled as part of the Level 2 SFRA relate to a site at Lax Lane and South Kidderminster (adjacent the Hoo Brook), shown as Flood Zone 3. How have these sites been considered? The Sequential Testing (Flooding) report should be completed to support the allocation of sites within the DPD. Upon receipt of this document we would be able to comment further and update our position.

Environmental Infrastructure:

The Infrastructure Delivery Plan should address and update the environmental infrastructure constraints identified in the Wyre Forest District Water Cycle Strategy (WCS) Final Report, March 2010. When comparing the DPD with the WCS, a number of the more rural sites are 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.

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

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

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

Yes, I wish to participate at the oral examination

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

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

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

Signature:

Rachel Whiteman

Date:

14/9/2012



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Part A

1. Personal Details*

2. Agent's Details (if applicable)

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

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

Part B – Please use a separate sheet for each representation

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Name or Organisation : Environment Agency

3. To which DPD does this representation relate? Site Allocations and Policies
To which part of the DPD does this representation relate?

Paragraph	4.8	Policy		Other e.g. Map, table, figure, key diagram	Table (Residential Land Allocations)
-----------	-----	--------	--	--	---

4. Do you consider the DPD is :

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

Please refer to guidance notes for explanation of terms

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

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

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

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

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

Paragraph 4.8 - Table on 'Residential Land Allocations'

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.

Paragraph 1.9 of the Development Plan Document (DPD) refers to background studies and technical reports that have been produced to inform the decisions made regarding sites in the DPD. All of the studies are stated as available to view on the Council's website and the main studies produced to inform the site selection process are listed.

Two of the documents listed are not available for review and we understand that they are still being undertaken by the Council to inform the evidence base.

There appears to be no clear cross reference with the evidence base as the Sequential Testing (Flooding) document and Infrastructure Delivery Plan are still being completed. It is difficult to comment on the soundness of the plan as we have not seen the contents of these two key evidence base documents.

Paragraph 177 of the National Planning Policy Framework states that it is 'important to ensure that there is a reasonable prospect that planned infrastructure is deliverable in a timely fashion. To facilitate this, it is important that local planning authorities understand district-wide development costs at the time Local Plans are drawn up.'

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

As the Sequential Testing (Flooding) and Infrastructure Delivery Plan are still being completed it is unclear whether the plan is the most appropriate strategy, when considered against reasonable alternatives, and whether the plan is deliverable over its period i.e. flood risk, environmental infrastructure requirements etc.

As an example, we note that the rural sites at Blakedown Nurseries and The Terrance, Clows Top have been identified in the plan for an early phasing of 2011-16. However, both of these sites had sewerage and/or sewage treatment constraints identified in the WCS. Clows Top was found to require major infrastructure, which could lead to significant time and cost implications. It is currently unclear how this has been assessed as part of the DPD, to support the phasing and delivery of sites.

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

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

The Infrastructure Delivery Plan and Sequential Testing (Flooding) reports should be finalised and published so that they can be viewed and commented on. It should be clear how the plans have been used to inform and support the policy, site allocations (Sequential Approach) and deliverability of the plan, providing transparency and a clear link to the evidence base.

Flood Risk:

The flood risk sequential approach must be fully utilised in selecting sites for development and the appropriate type of development in considering flood risk vulnerability. The Sequential Testing (Flooding) report should be completed to support the allocation of sites within the DPD. Upon receipt of this document we would be able to comment further and update our position.

Environmental Infrastructure:

The Infrastructure Delivery Plan should address and update the environmental infrastructure constraints identified in the Wyre Forest District Water Cycle Strategy (WCS) Final Report, March 2010. When comparing the DPD with the WCS, a number of the more rural sites are 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.

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

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

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

Yes, I wish to participate at the oral examination

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

- To clarify the issues.

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

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

Signature:

Rachel Whiteman

Date:

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Part A

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2. Agent's Details (if applicable)

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Title

Mrs

First Name

Rachel

Last Name

Whiteman

Job Title
(where relevant)

Senior Planning Officer

Organisation
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Environment Agency

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Name or Organisation : Environment Agency

3. To which DPD does this representation relate? Site Allocations and Policies
To which part of the DPD does this representation relate?

Paragraph	6.30	Policy		Other e.g. Map, table, figure, key diagram	
-----------	------	--------	--	--	--

4. Do you consider the DPD is :

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

Please refer to guidance notes for explanation of terms

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

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

- (1) Positively prepared
- (2) Justified
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If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Paragraph 6.30 (Delivering Sustainable Development Standards)

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.

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

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

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Name or Organisation : Environment Agency

3. To which DPD does this representation relate? Site Allocations and Policies
To which part of the DPD does this representation relate?

Paragraph	Policy	Other e.g. Map, table, figure, key diagram
6.52		
6.53		
6.54		

4. Do you consider the DPD is :

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

Please refer to guidance notes for explanation of terms

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

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

- (1) Positively prepared
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If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

We support the inclusion of text on 'Water Quality' with paragraphs 6.52 – 6.54.

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 using Water Framework Directive classification. This classification system incorporates both chemical and ecological elements.

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.

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. Suggested text is provided within box 7 below.

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

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

We would recommend that paragraph 6.52 is updated to refer to the current classification system. The following data is provided to assist this update:

Only two of the water bodies within the district are currently reported at good ecological status, the remaining water bodies are less than good ecological status. In addition, the River Stour is also failing chemical status. Of the physico-chemical elements, only phosphate is less than good status throughout the district.

WFD Surface Water Classification (as reported in the River Basin Management Plan)

WB ID	Category	WB Name	Current Overall Status	Chemical Status
	Ecological Status			
B109054044180	River Moderate	Hadley Bk - source to conf R Salwarpe	Moderate	
B109054044210	River	Dick Bk - source to conf R Severn	Good	Good
B109054044450	River Moderate	Gladder Bk - source to conf R Severn	Moderate	
B109054044460	River Moderate	Hartlebury Bk - source to conf R Severn	Moderate	
B109054044530	River	Hoo Bk - source to conf R Stour	Moderate	
B109054044560	River	Dowles Bk - source to conf R Severn	Poor	Poor
B109054044570	River Moderate	Blakedown Bk - source to conf R Stour	Moderate	
B109054044610	River	Drakelow Bk - source to conf R Stour	Good	Good
B109054044710	River Poor	R Stour (Worcs) - conf Smestow Bk to conf R Severn		Poor
B109054049144	River Moderate	R Severn - conf R Worfe to conf R Stour	Moderate	
B109054049145	River Moderate	R Severn - conf R Worfe to conf R Stour	Moderate	
B70910505	Canal Moderate	Staffordshire & Worcester Canal, Stourbridge Canal to River Severn		

Further detail can be found in the Severn River Basin Management Plan on our website:
www.environment-agency.gov.uk/research/planning/33106.aspx

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.

In relation to groundwater, we would recommend the following text:

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.

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

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

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

Yes, I wish to participate at the oral examination

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

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

Signature:

Rachel Whiteman

Date:

14/9/2012



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

Part A

1. Personal Details*

2. Agent's Details (if applicable)

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

Title

Mrs

First Name

Rachel

Last Name

Whiteman

Job Title
(where relevant)

Senior Planning Officer

Organisation
(where relevant)

Environment Agency

Address Line 1

Hafren House

Line 2

Welshpool Road

Line 3

Shrewsbury

Post Code

SY3 8BB

Telephone Number

01743 283 505

E-mail Address
(where relevant)

rachel.whiteman@environment-agency.gov.uk

Part B – Please use a separate sheet for each representation

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

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

Name or Organisation : Environment Agency

3. To which DPD does this representation relate? Site Allocations and Policies
To which part of the DPD does this representation relate?

Paragraph		Policy	SAL.CC7	Other e.g. Map, table, figure, key diagram	
-----------	--	--------	---------	--	--

4. Do you consider the DPD is :

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

Please refer to guidance notes for explanation of terms

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

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

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

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

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

Policy SAL.CC7 'Water Management

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.

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 (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 (our representations for paragraph 6.52-6.54 explain the District context to support this). Suggested wording is provided in box 7 below.

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

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

The Water Quality section of Policy SAL.CC7 could be improved by the inclusion of the following text. This is to ensure that development causes no negative impact upon the waterbodies in the District, but also seeks improvement and enhancement, in line with the requirements of the EU Water Framework Directive.

Recommended wording:

Development proposals will be permitted which:

- do not lead to deterioration of EU Water Framework Directive water body status,
- 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.
- 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.

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

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

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

Yes, I wish to participate at the oral examination

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

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Signature:

Rachel Whiteman

Date:

14/9/2012



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

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BY 5.30pm on Friday 14th September 2012

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Part A

1. Personal Details*	2. Agent's Details (if applicable)
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**If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

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

Part B – Please use a separate sheet for each representation

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Name or Organisation : Environment Agency

3. To which DPD does this representation relate? Site Allocations and Policies
To which part of the DPD does this representation relate?

Paragraph		Policy	SAL.DPL2	Other e.g. Map, table, figure, key diagram	
-----------	--	--------	----------	--	--

4. Do you consider the DPD is :

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

Please refer to guidance notes for explanation of terms

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

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

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

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

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

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:

Appropriate arrangements for sewerage treatment must be submitted as part of the application in addition to satisfactory drainage measures, in protecting the water environment.

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

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

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

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Signature:

Rachel Whiteman

Date:

14/9/2012



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2. Agent's Details (if applicable)

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Title

Mrs

First Name

Rachel

Last Name

Whiteman

Job Title
(where relevant)

Senior Planning Officer

Organisation
(where relevant)

Environment Agency

Address Line 1

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E-mail Address
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rachel.whiteman@environment-agency.gov.uk

Part B – Please use a separate sheet for each representation

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

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

Name or Organisation : Environment Agency

3. To which DPD does this representation relate? Site Allocations and Policies
To which part of the DPD does this representation relate?

Paragraph		Policy	SAL.DPL8	Other e.g. Map, table, figure, key diagram	
-----------	--	--------	----------	--	--

4. Do you consider the DPD is :

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

Please refer to guidance notes for explanation of terms

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

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

Policy SAL.DPL8 'Land Allocations'

Policy SAL.DPL8 details sites allocated for gypsy and traveller use. We have previously raised the following comments on your Council's Gypsy and Travellers consultation on potential sites and draft policies. 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:

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.

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 '*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*'. In addition, paragraph 11 of Policy B (Planning for traveller sites) of Planning Policy for Traveller Sites states that 'Local planning authorities

should ensure that traveller sites are sustainable economically, socially and environmentally. Local planning authorities should, therefore, ensure that their policies:

g) do not locate sites in areas at high risk of flooding, including functional floodplains, given the particular vulnerability of caravans...’.

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), **we raised concerns that it had not been demonstrated that the development could be made safe for occupiers in this location.** 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.

We are likely to provide similar comments on any future planning application for the above sites, in considering flood risk and safe development requirements.

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

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

Your Council should be satisfied that the chosen sites are sustainable, in line with Planning Policy for Traveller Sites.

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

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

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

Yes, I wish to participate at the oral examination

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

- To clarify the issues.

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

Signature:

Rachel Whiteman

Date:

14/9/2012



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First Name	Rachel		
Last Name	Whiteman		
Job Title (where relevant)	Senior Planning Officer		
Organisation (where relevant)	Environment Agency		
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Name or Organisation : Environment Agency

3. To which DPD does this representation relate? Site Allocations and Policies
To which part of the DPD does this representation relate?

Paragraph		Policy	SAL.DPL9	Other e.g. Map, table, figure, key diagram	
-----------	--	--------	----------	--	--

4. Do you consider the DPD is :

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

Please refer to guidance notes for explanation of terms

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

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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.

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

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

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Signature:

Rachel Whiteman

Date:

14/9/2012



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Title

Mrs

First Name

Rachel

Last Name

Whiteman

Job Title
(where relevant)

Senior Planning Officer

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Name or Organisation : Environment Agency

3. To which DPD does this representation relate? Site Allocations and Policies
To which part of the DPD does this representation relate?

Paragraph		Policy	SAL.DPL9	Other e.g. Map, table, figure, key diagram	
-----------	--	--------	----------	--	--

4. Do you consider the DPD is :

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

Please refer to guidance notes for explanation of terms

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Policy SAL.DPL10 'Sites for Gypsy and Traveller Use'

We support the inclusion of point iii. under part 2 'Design 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.

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:

1. Sites for Gypsy and Traveller Use

ix. In accordance with Adopted Core Strategy policy CP06, the site does not fall within areas at higher risk of flooding.

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

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

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Signature:

Rachel Whiteman

Date:

14/9/2012



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Name or Organisation : Environment Agency

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To which part of the DPD does this representation relate?

Paragraph		Policy	SAL.RS1	Other e.g. Map, table, figure, key diagram	
-----------	--	--------	---------	--	--

4. Do you consider the DPD is :

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

Please refer to guidance notes for explanation of terms

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Policy SAL.RS1 'Blakedown Nurseries'

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.

Paragraph 177 of the National Planning Policy Framework states that it is 'important to ensure that there is a reasonable prospect that planned infrastructure is deliverable in a timely fashion. To facilitate this, it is important that local planning authorities understand district-wide development costs at the time Local Plans are drawn up.'

Paragraph 5.70 of the adopted Core Strategy states that 'the availability of the necessary infrastructure and the potential need to provide additional capacity in some of the locations will be key factors in determining the timing of the release of sites...Further work on high level costings and an infrastructure implementation plan will be carried out to inform the Site Allocations and Policies and Kidderminster Central Area Action Plan DPDs. This will ensure that the information is up-to-date.' In terms of

environmental infrastructure, the Environment Agency and utility company are listed as key stakeholders and delivery bodies (paragraph B.2 (B Infrastructure Schedules) of the adopted Core Strategy defines environmental infrastructure for the purpose of the plan).

It is unclear how this has been assessed as the Infrastructure Delivery Plan (listed in paragraph 1.19 as a key background study/report) is not available for review and we understand that this document is still being undertaken by the Council to inform the evidence base.

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.

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

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

The Infrastructure Delivery Plan 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.

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.

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

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

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

Yes, I wish to participate at the oral examination

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

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

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

Signature:

Rachel Whiteman

Date:

14/9/2012

Our Ref: P865/SH/clw
Date: 8 August 2012

Grosvenor House
75-76 Francis Road
Edgbaston
Birmingham B16 8SP

Planning Policy Manager
Economic Prosperity Placement Directorate
Duke House
Clensmore Street
Kidderminster
Worcestershire
DY10 2JX

T 0121 455 9455 F 0121 455 6595
E info@harrislamb.com



Dear Sir/Madam

**Site Allocation and Policies DPD
Reilloc Chain Site – SAL.SK3**

Thank you for providing Harris Lamb Planning Consultancy (HLPC) with the opportunity to participate in the preparation of the Wyre Forest Site Allocations and Policies DPD. HLPC are instructed to submit representations to this document by Reilloc Chain Limited in respect of the site in their ownership to the west of Stourpourt Road, Kidderminster. This site forms part of allocation SAL.SK3 – Oasis Arts and Crafts and Reilloc Chain site. Whilst allocation of the site for residential development is supported we are of the opinion that the Site Allocation and Policies DPD needs to be amended prior to its submission in order for it to be considered sound.

Attached to this letter are completed versions of the Publication Stage Representation Forms setting out our concerns and suggested changes. We trust you will find these representations useful. If you have any queries, or would like to discuss this matter further, please do not hesitate to contact me.


Yours sincerely

PH

Simon Hawley BA (Hons) MA MRTPI
Associate
simon.hawley@harrislamb.com
DIRECT DIAL: 0121 213 6015

Encs

Copy: Nick Jethwa – Gemini Property

	Wyre Forest District Local Development Framework – Site Allocations and Policies and Kidderminster Central Area Action Plan Development Plan Documents (DPDs) Publication Stage Representation Form	Ref: (For official use only)
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Please return to: Planning Policy Manager, Economic Prosperity and Place Directorate, Duke House, Clensmore Street, Kidderminster, Worcestershire, DY10 2JX; or by e-mailing this form to Planning.Policy@wyreforestdc.gov.uk

BY 5.30pm on Friday 14th September 2012

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

Part A

1. Personal Details*		2. Agent's Details (if applicable)
<i>*If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.</i>		
Title	Mr	Mr
First Name	Nick	Simon
Last Name	Jethwa	Hawley
Job Title (where relevant)		Associate Director
Organisation (where relevant)	Gemini Properties	Harris Lamb Limited
Address Line 1		75 – 76 Francis Road
Line 2		Edgbaston
Line 3		Birmingham
Post Code		B16 8SP
Telephone Number		0121 455 9455
E-mail Address (where relevant)		simon.hawley@harrislamb.com

Part B – Please use a separate sheet for each representation

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

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

Name or Organisation :

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

To which part of the DPD does this representation relate?

Paragraph	4.8	Policy		Other e.g. Map, table, figure, key diagram	Table. Residential Land Allocations.
-----------	-----	--------	--	--	--------------------------------------

4. Do you consider the DPD is :

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

Please refer to guidance notes for explanation of terms

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

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

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

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

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

The allocation of the Oasis Arts and Crafts and Reilloc Chain site in the Residential Land Allocations table is supported. However, the suggested phasing is inappropriate. The Reilloc Chain site is now largely vacant. It is, therefore, likely to be available for development relatively soon. The phasing of the release of the site should, therefore, be amended in reference to it being deliverable within the 2011 – 2016 timeframe.

The phasing reference in the Residential Land Allocations table should not be a barrier to the delivery of this site.

As referred to in our response to Policy SAL.SK3 – Oasis Arts and Crafts and Reilloc Chain site, it is unnecessary for both sites to come forward simultaneously. They are in separate ownerships and providing an appropriate design solution can be found the Reilloc Chain site should be able to come forward for residential development before the Oasis Arts and Crafts site.

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

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

The Residential Land Allocations table should be amended so that the indicative timetable for the release of the Oasis Arts and Crafts and Reilloc Chain site is 2011 to 2021.

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

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

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

Yes, I wish to participate at the oral examination

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

It is necessary to attend the examination in order to explain the history of the Reilloc Chain site and confirm its deliverability to the Inspector. The site provides the opportunity to deliver housing earlier in the plan period helping the Council to maintain a five year housing land supply. It is, therefore, important that the Site Allocations DPD properly reflects its availability and the timing for its release.

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

Signature:

Date:



Wyre Forest
District Council

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

Ref:

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Part A

1. Personal Details*

2. Agent's Details (if applicable)

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

Title

Mr

Mr

First Name

Nick

Simon

Last Name

Jethwa

Hawley

Job Title
(where relevant)

Associate Director

Organisation
(where relevant)

Gemini Properties

Harris Lamb Limited

Address Line 1

75 – 76 Francis Road

Line 2

Edgbaston

Line 3

Birmingham

Post Code

B16 8SP

Telephone Number

0121 455 9455

E-mail Address
(where relevant)

simon.hawley@harrislamb.com

Part B – Please use a separate sheet for each representation

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Name or Organisation :

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

To which part of the DPD does this representation relate?

Paragraph	2.12	Policy		Other e.g. Map, table, figure, key diagram	
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4. Do you consider the DPD is :

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

Please refer to guidance notes for explanation of terms

If you have entered **No** to 4(3), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is **unsound** because it is **not**:

- (1) Positively prepared
- (2) Justified
- (3) Effective
- (4) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Paragraph 2.12 makes reference to the delivery of 4,000 dwellings between 2006 and 2026 in Wyre Forest. This requirement is based upon the level of housing provision set out in the adopted Core Strategy. Whilst it is appreciated that the Land Allocations DPD should be prepared in conformity with the Core Strategy more recent evidence suggests that the housing target set by the Core Strategy should be considered out-of-date.

The 4,000 dwelling requirement is based upon the level of development identified as being appropriate for Wyre Forest by the RSS Phase 2 Review Panel Report. This requirement was in turn based upon the 2006 Household Projections. Since the publication of the RSS a series of household projections and population projection updates have been produced that suggest the RSS Phase 2 Review housing target is insufficient to meet the housing requirements for Wyre Forest.

The NPPF requires local authorities to have a clear understanding of housing needs in their area. They are required to prepare a Strategic Housing Market Assessment (SHMA) to assess the full housing need. The SHMA is a key document in informing the strategic housing target.

Following publication of the Wyre Forest Core Strategy a Worcestershire SHMA has been produced by GVA (February 2012). The SHMA suggests that Wyre Forest should be delivering an annual average of between 170 and 370 dwellings per annum between 2011 and 2030. The upper figures are clearly in excess of 200 d.p.a. requirements by the Core Strategy.

It should also be noted that the SHMA is likely to have underestimated the housing requirement given it is based on the 2008 population projections. The more recently published 2010 population projections suggest a higher level of housing growth in Wyre Forest than the 2008 projections is needed. The 2010 projections suggest that Wyre Forest population will increase from 99,000 in 2010 to 105,000 in 2030. This is an increase of 6,000 people. This compares to a 2008 population projection that suggest that Wyre Forest population will increase from 98,700 in 2010 to 105,300 in 2030. An increase of 6,600. Given that the 4,000 dwellings referred to in paragraph 2.12 is likely to be insufficient to meet the Council's housing requirement it is suggested that the paragraph is amended to make reference to a 4,000 dwelling requirement being a minimum. This will then ensure that the Site Allocation And Policy DPD is in conformity with the adopted Core Strategy. It will also allow for additional residential sites to be delivered to meet the identified local housing need.

(Continue on a separate sheet /expand box if necessary)

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Paragraph 2.12 should be reworded to make reference to the 4,000 dwelling target being a minimum. Reference should be made to the Site Allocation and Policies DPD based upon the requirements of the current Core Strategy. If the Core Strategy is reviewed and the housing target increased, further sites would need to come forward for development to meet strategic housing target.

(Continue on a separate sheet /expand box if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination


9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

We wish to reserve the right to attend the examination. The delivery of housing to meet strategic housing target is a complex issue that is best debated in front of the Inspector.

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Date:

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First Name	Nick	Simon	
Last Name	Jethwa	Hawley	
Job Title (where relevant)		Associate Director	
Organisation (where relevant)	Gemini Properties	Harris Lamb Limited	
Address Line 1		75 – 76 Francis Road	
Line 2		Edgbaston	
Line 3		Birmingham	
Post Code		B16 8SP	
Telephone Number		0121 455 9455	
E-mail Address (where relevant)		simon.hawley@harrislamb.com	

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Name or Organisation :

3. To which DPD does this representation relate? Site Allocations and Policies / Kidderminster Central Area Action Plan (*delete as necessary*)

To which part of the DPD does this representation relate?

Paragraph	Policy	SAL.PFSD1	Other e.g. Map, table, figure, key diagram

4. Do you consider the DPD is :

4.(1) Compliant with the Duty to Cooperate	Yes	√	No	
4.(2) Legally compliant	Yes	√	No	
4.(3) Sound	Yes	√	No	

Please refer to guidance notes for explanation of terms

If you have entered **No** to 4(3), please continue to Q5. In all other circumstances, please go to Q6.

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If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Policy SAL.PFSD1 is supported. It accords with the requirements of the NPPF. The Council's commitment to supporting appropriate development is welcomed.

(Continue on a separate sheet /expand box if necessary)

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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Last Name	Jethwa	Last Name	Hawley
Job Title (where relevant)		Job Title (where relevant)	Associate Director
Organisation (where relevant)	Gemini Properties	Organisation (where relevant)	Harris Lamb Limited
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Name or Organisation :

3. To which DPD does this representation relate? Site Allocations and Policies / Kidderminster Central Area Action Plan (*delete as necessary*)
To which part of the DPD does this representation relate?

Paragraph		Policy	SAL.SK3	Other e.g. Map, table, figure, key diagram	
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4. Do you consider the DPD is :

4.(1) Compliant with the Duty to Cooperate	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(3) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>

Please refer to guidance notes for explanation of terms

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If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

The policy's supporting text advises that the delivery of the Oasis Arts and Crafts and Reilloc Chain site will be phased between 2006 and 2021. This is inappropriate. The Reilloc Chain section of the allocation is currently in the process of being vacated. It will, therefore be available for redevelopment in the near future. It is inappropriate to seek to delay the release of this site until 2016. The site can make a valuable contribution towards the five year housing land supply requirement at the beginning of the plan period. It should, therefore, come forward for development at a relatively early stage of the plan period.

Point (iii), of the policy requires the development to front on to both the Stourport Road and Goldthorn Road. This requirement is too restrictive at this stage. Meetings have been held with Development Control Officers at Wyre Forest District Council regarding the redevelopment of the Reilloc Chain site. The current indicative layout does not suggest a frontage on to Goldthorn Road is appropriate. No concern has been expressed with this approach to date.

On the opposite side of Goldthorn Road to the site are a number of allotments, residential properties - not all of which front onto Goldthorn Road, and the entrance to Goldthorn Place. There is not a natural

building line or pattern on the opposite side of Goldthorn Road that the development should respect. Given the location, mix of uses and the relationship of the site to the surrounding area reference to the development of the site fronting on to the Stourpourt Road and Goldthorn Road is inappropriate particularly given that masterplanning work is not available to support (iii) of the policy.

Reference is made to a comprehensive approach to a development of the site. Whilst this reference is supported it should not prevent the development of the Reilloc Chain site coming forward before the Oasis Arts and Crafts site. The Reilloc Chain site is soon to become vacant. As a sustainable brownfield site within the urban area it is appropriate for it to come forward for residential development in the short term given that the principle of the residential development of the site has been accepted. The policy's supporting text should, therefore, confirm that the two sites can be developed independently of one another provided that an appropriate design solution is in place.

(Continue on a separate sheet /expand box if necessary)

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The indicative phasing period should be changed to 2011 – 2021.

Part (iii) should be removed from the policy's text.

Supporting paragraph 9.37 should be amended to confirm that the two sites can be developed independently of one another provided that a design solution is in place to ensure a full comprehensive approach.

(Continue on a separate sheet /expand box if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

The Oasis Arts and Crafts and Reilloc Chain site will make a significant contribution to the adopted Strategic Housing Target. Policy SAL.SK3 should be worded in the way to facilitate the release of the sites independently of one another as it is likely that the Reilloc Chain site will come forward for development first. It is necessary to attend the examination to explain to the Inspector how the two sites can be developed independently of one another whilst maintaining a comprehensive approach to the wider site.

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Date:

Ref: FL10141
14th September 2012

Planning Policy Manager
Economic Prosperity and Place Directorate
Wyre Forest District Council
Duke House
Kidderminster Town Hall
Vicar Street
Kidderminster
DY10 1DB

Dear Sirs,

Site Allocations and Policies Public Participation – Unit 2, Greenacres Lane

1. We act on behalf of the landowner of Unit 2, Greenacres Lane and have been instructed to submit representations to the above Publication Draft of the Council's Site Allocations and Policies DPD. The principle purpose of this representation is to 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 Publication Draft Policy SAL.B2. The proposed additional allocation is required to ensure the DPD is sound in terms of being effective and consistent with national policy.

Allocation of Unit 2, Greenacres Lane, Bewdley

2. This representation follows dialogue with the Council's Planning Officers over the most appropriate way, in the context of the Council's preferred strategic approach, to facilitate residential development at Unit 2, Greenacres Lane site. These discussions highlighted that it is the Council's strategic policy approach for smaller housing sites in Bewdley to be brought forward on the formal allocations set out in Publication Draft Policy SAL.B2. It was also identified that the Unit 2, Greenacres Lane has significant potential to bring forward a sustainable residential development and in view of the preferred strategic approach to housing the Council would duly consider the site's inclusion as a formal allocation within Policy SAL.B2. This representation therefore provides the necessary information in order for the proposed change to Policy SAL.B2 to be made at the point the DPD is submitted for Examination in Public.
3. For the avoidance of doubt the site put forward for residential use allocation in Policy SAL.B2 is Unit 2, Greenacres Lane, Bewdley shown outlined red on the accompanying location plan (**Appendix 1**).

Site Description and Surrounding Area

4. The site is 0.04 hectares and comprises a derelict former light industrial unit. The site is previously developed land in the defined residential area of Bewdley and therefore residential development is acceptable in principle.
5. The site is relatively flat with existing landscaped embankments to the northern and eastern boundaries. It benefits from views which include the river Severn and Severn Valley railway which provide an attractive setting for prospective residential use of the site. There is good access to the site from a shared courtyard off Greenacres Lane.
6. The surrounding area is mainly residential with a number of houses in close proximity to the proposed allocation (which serves to reduce the commercial attractiveness of the site). The allocation of this site for residential purposes would therefore facilitate a use that is more compatible with its residential surrounds than its current lawful status and also lead to the permanent removal of the redundant, dilapidated former commercial building to be replaced by a new building (designed to a standard that would meet with the Council's design policies) that will serve to improve the overall character of the area.
7. Moreover, the site is no longer considered suitable for a continuation of commercial activities due to general lack of demand for light industrial and other similar commercial activities in Bewdley. The continuation of commercial use is further constrained by the building's severely dilapidated state which would require significant investment to bring up to commercial market standard (see **Appendix 2** attached to this representation for a letter from a commercial agent on the commercial viability of the existing premises). As such, without any commercial demand for the site such extensive refurbishments will not be possible. A residential use of this redundant brownfield site is therefore proposed as it will have sufficient market value to be able to absorb the cost of re-development as well as delivering a viable and sustainable development that will meet a local need and being a more compatible use with the surrounding residential land uses.

Type and quantum of development to be allocated

8. Weighing all the aforementioned factors together it is clear that the site is more suited to residential redevelopment and therefore a wholly Residential (C3) use is proposed. The surrounding residential character is mainly detached or semi-detached dwellings, a feature of the area that this allocation would need to reflect in stipulating an indicative capacity. In response to this it is our view that the allocation should include the following details:
 - **Site name:** Unit 2, Greenacres Lane, Bewdley
 - **Site Area:** 0.04
 - **Proposed use:** Residential (C3)
 - **Indicative Phasing Period:** 2011 to 2016
 - **Indicative Capacity:** 1 detached housing unit

Constraints

9. The only planning constraint that would need to be addressed is that the site is in an area liable to flood. The majority of the site (including where residential development would be located) falls within Flood Zone 2 although a small section of the access from Greenacres Lane falls within Flood Zone 3. Therefore, the allocation would need to highlight the flooding situation and ensure that a suitable means of escape can be achieved when brought forward through the Development Management process.
10. To assist the Council on this matter there is a current planning application being considered on the site which includes a comprehensive Flood Risk Assessment and a Sequential Test. This FRA and Sequential Test (included as **Appendix 3** to this representation as background

information) concludes that all flood issues can be overcome (including the provision of suitable means of escape) and for the purposes of this strategic allocation process demonstrates that there are no material flood issues that would prevent the proposed development on this site being a deliverable allocation over the plan period. It is also materially relevant to note that the site has a clear fall back in regard to flooding issues in that the existing unit could be converted to residential use without any requirement for the flood sequential and exception tests to be met.

11. In view of this it is recommended that the policy or supporting text makes reference to the need for a scheme being brought forward on the site to accord with any advice provided by the Environment Agency. It is noted that such an approach has been considered as acceptable for the Bewdley, Lax Lane allocation within SAL.B2, which actually falls wholly within Flood Zone 3 (Unit 2, Greenacres Lane site primarily falls within Flood Zone 2).

Reasoned Justification for Inclusion of site in Policy SAL.B2

12. The National Planning Policy Framework Core Planning Principles include a preference for allocations on land with lower environmental value and the promotion of effective use of land by re-using previously developed land. The site has no conservation or environmental value and is previously developed land in an existing residential area and therefore in accordance with the NPPF Core Planning Principles.
13. The District's strategic planning policy approach to the location of housing development in the District set out in adopted Core Strategy Policy DS01 – Development Locations states that:

“New development will be concentrated on brownfield sites within the urban areas of Kidderminster and Stourport-on-Severn. Limited opportunities for development to meet local needs will be identified on brownfield sites in Bewdley and within the rural settlements.”
14. This site is redundant previously developed land and therefore would accord with the Council's strategic approach to the location of development in the District.
15. The site is also deliverable over the plan period as our client is seeking to bring forward its redevelopment as soon as is practicable and upon allocation can form part of the Council's identified housing land supply required by the NPPF. Further, 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. This would also accord with the Council's strategic housing policies that consistently generally seek to bring forward housing in Bewdley and rural areas that meets local needs, which the allocation of this site in this case would achieve.
16. In view of the Council's strategy to bring forward housing in Bewdley mainly on allocated sites to meet local needs rather than on exception sites, it is therefore 'sound' planning for this site to be formally allocated in Policy SAL.B2 in order to ensure that it can be brought forward in accordance with the Council's strategic housing delivery approach for Bewdley.
17. In terms of the type of residential housing that would need to be allocated on the site, it is also worth considering the national context to housing delivery in that the Government has placed high priority on the new homes market as a driver for growth and has taken some steps to help local government and industry meet housing demand. Among these is the publication of the 2012 National Planning Policy Framework, which calls for balance between sustainable development which benefits the local community, and realistic returns for land owners and developers such that development is commercially viable.
18. In view of this it will need to be recognised in the allocation of this site that there will not be any need for any affordable housing as the size of the site means that it cannot support more

than one dwelling unit. In this regard this representation is supported at **Appendix 4** by a robust and comprehensive viability analysis for Unit 2 Greenacres Lane, which conclusively shows that there is no prospect of this one dwelling unit site being able to be brought forward as affordable housing; the submitted evidence confirms that it is only a market dwelling that can produce sufficient value to absorb the extensive costs involved in developing the site.

19. The supporting viability assessment therefore evidences that it would not be reasonable, justified or effective to seek to deliver a 100% affordable scheme on this site due to the existing use value when set against the cost of developing the site (although as previously stated the allocation would still represent meeting a local need as the site owner will bring it forward to meet their own individual need for a home in Bewdley). To ensure that the allocation can retain the flexibility for it to come forward it is necessary for the policy wording to simply refer to 'Residential (C3)' with a requirement for any proposal coming forward that includes market units to be subject to a viability assessment in accordance with Policy SAL.DPL3 at the planning application stage.

Contextual Changes Required to facilitate this amendment

20. In addition to amending Policy SAL.B2 to formally allocate the Former Light Industrial Units, Greenacres site for residential development, Paragraph 4.8 will need to be updated to include due reference to the additional site.

Other Matters

21. Whilst the primary purpose of this representation is to request the Former Light Industrial Units, Greenacres site is allocated within Policy SAL.B2, we would also like to put forward a separate amendment to the document and address a potential inconsistency between the adopted Core Strategy and the Publication Draft of the Site Allocations and Policies DPD.
22. To provide the context, Policy CP04 set out the Council's overarching approach for the provision of affordable housing as being "30% on sites of ten or more dwellings within Kidderminster and Stourport on Severn and 30% on sites of 6 or more dwellings within Bewdley and the rural areas". This 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.
23. However, Publication Draft Policy SAL.DPL2 as worded will ensure that all housing (and therefore regardless of whether schemes are under the Policy CP04 threshold) coming forward outside of the allocations must be 100% affordable units; we feel this conflicts with and goes beyond the Core Strategy approach to affordable housing set out in Policy CP04. The policy would therefore benefit from some slight re-wording just to ensure consistency with the Core Strategy and so not to unwittingly preclude other types of housing that could well be perfectly acceptable in planning terms from being considered where sustainable opportunities arise.
24. To address this inconsistency between the two tiers of policy and ensure the DPD is sound in terms of being positively prepared, justified, effective and consistent with national policy we suggest the following minor amendment (additional wording in red text) is made to Policy SAL.DPL2 as follows:

Draft Policy SAL.DPL2 - Rural Housing

Within Bewdley and the rural areas of the District, new housing development will only be permitted in the following circumstances:

1. Exception Sites

Planning permission may be granted for schemes of 100% affordable housing which

are designed to meet identified local housing needs on small sites within or adjoining Bewdley and the villages subject to the following criteria:

- i. The development must remain as affordable housing in perpetuity.*
- ii. The number, size, type, mix and tenure of dwellings must match the extent of identified local need.*
- iii. The site must be well-related to the existing built-up area of the settlement in which it is located.*
- iv. The scale of the scheme should be appropriate to the size and character of the settlement and must not damage the character of the settlement or the landscape.*
- v. The site should provide access to local services and facilities by sustainable modes of transport.*

Schemes for 1 to 5 units proposing less than 100% affordable housing provision on exceptions sites will be permitted where it is demonstrated that they will not harm the strategic approach to housing delivery in the District set out in the Core Strategy. In accordance with Core Strategy Policy CP04, schemes of 6 or more units not proposing 100% affordable housing will need to be accompanied by a robust viability assessment, as set out in Policy SAL.DPL3 - Financial Viability, to justify enabling development.

25. We trust we have supplied sufficient information to enable you to include Unit 2, Greenacres Lane within the Bewdley smaller sites Policy SAL.B2. If you require anything further or have any queries please do not hesitate to contact me on the details provided.

Yours faithfully,

Ryan Fuller
FullerLong Planning Consultants
Tel: 01932 428 410
Mob: 07788 270 027
e-mail – ryan@fullerlong.com

cc: Paul Round (Wyre Forest District Council)
Rebecca Mayman (Wyre Forest District Council)
Julian Phillips (Councillor for Bewdley)
Stacey Matthews
Matthew Harding



Wyre Forest District Local Development Framework – Site Allocations and Policies and Kidderminster Central Area Action Plan Development Plan Documents (DPDs) Publication Stage Representation Form

Ref:

(For official use only)

Please return to: Planning Policy Manager, Economic Prosperity and Place Directorate, Duke House, Clensmore Street, Kidderminster, Worcestershire, DY10 2JX; or by e-mailing this form to Planning.Policy@wyreforestdc.gov.uk

BY 5.30pm on Friday 14th September 2012

This form has two parts –
Part A – Personal Details
Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make and remember to specify which document it relates to. Please specify which DPD you are commenting on.

Part A

1. Personal Details*	2. Agent's Details (if applicable)
----------------------	------------------------------------

**If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

Title	Mr/Ms	Mr
First Name	Matthew/Stacey	Ryan
Last Name	Harding/Matthews	Fuller
Job Title (where relevant)		Managing Partner
Organisation (where relevant)		Fullerlong Planning Consultants
Address Line 1		41 Thames Street
Line 2		Weybridge
Line 3		Surrey
Post Code		KT13 8JG
Telephone Number		01932 428 410
E-mail Address (where relevant)		Ryan@fullerlong.com

Part B – Please use a separate sheet for each representation

Your representation should cover all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

After this stage, further submission will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Name or Organisation : Fullerlong Planning Consultants

3. To which DPD does this representation relate? **Site Allocations and Policies**
To which part of the DPD does this representation relate? **Rural Housing**

Paragraph	Policy	Policy SAL.DPL2	Other e.g. Map, table, figure, key diagram
4. Do you consider the DPD is :			
4.(1) Compliant with the Duty to Cooperate	Yes	<input checked="" type="checkbox"/>	No <input type="checkbox"/>
4.(2) Legally compliant	Yes	<input checked="" type="checkbox"/>	No <input type="checkbox"/>
4.(3) Sound	Yes	<input type="checkbox"/>	No <input checked="" type="checkbox"/>

Please refer to guidance notes for explanation of terms

If you have entered **No** to 4(3), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is **unsound** because it is not:

- (1) Positively prepared
- (2) Justified
- (3) Effective
- (4) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

We would also like to put forward a separate amendment to the document and address a potential inconsistency between the adopted Core Strategy and the Publication Draft of the Site Allocations and Policies DPD.

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unwittingly preclude other types of housing that could well be perfectly acceptable in planning terms from being considered where sustainable opportunities arise. Without this change the DPD is not sound as it has not been positively prepared, justified, effective or consistent with national policy.

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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(Continue on a separate sheet /expand box if necessary)

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No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

The change required is fundamental to the DPD's soundness and therefore necessary for it to be duly examined in public.

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Ryan Fuller

Date:

14-9-12



Wyre Forest District Local Development Framework – Site Allocations and Policies and Kidderminster Central Area Action Plan Development Plan Documents (DPDs) Publication Stage Representation Form

Ref:

(For official use only)

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Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make and remember to specify which document it relates to. Please specify which DPD you are commenting on.

Part A

1. Personal Details*		2. Agent's Details (if applicable)	
<i>*If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.</i>			
Title	Mr/Ms		Mr
First Name	Matthew/Stacey		Ryan
Last Name	Harding/Matthews		Fuller
Job Title (where relevant)			Managing Partner
Organisation (where relevant)			Fullerlong Planning Consultants
Address Line 1			41 Thames Street
Line 2			Weybridge
Line 3			Surrey
Post Code			KT13 8JG
Telephone Number			01932 428 410
E-mail Address (where relevant)			Ryan@fullerlong.com

Part B – Please use a separate sheet for each representation

Your representation should cover all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

After this stage, further submission will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Name or Organisation : Fullerlong Planning Consultants

3. To which DPD does this representation relate? **Site Allocations and Policies**
To which part of the DPD does this representation relate? **Bewdley Smaller Sites**

Paragraph	Policy	Policy SAL.B2	Other e.g. Map, table, figure, key diagram
4. Do you consider the DPD is :			
4.(1) Compliant with the Duty to Cooperate	Yes	<input checked="" type="checkbox"/>	No <input type="checkbox"/>
4.(2) Legally compliant	Yes	<input checked="" type="checkbox"/>	No <input type="checkbox"/>
4.(3) Sound	Yes	<input type="checkbox"/>	No <input checked="" type="checkbox"/>

Please refer to guidance notes for explanation of terms

If you have entered **No** to 4(3), please continue to Q5. In all other circumstances, please go to Q6.

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- (1) Positively prepared
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- (3) Effective
- (4) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

1. We act on behalf of the landowner of Unit 2, Greenacres Lane and have been instructed to submit representations to the above Publication Draft of the Council's Site Allocations and Policies DPD. The principle purpose of this representation is to 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 Publication Draft Policy SAL.B2. The proposed additional allocation is required to ensure the DPD is effective and consistent with national policy.

Allocation of Unit 2, Greenacres Lane, Bewdley

2. This representation follows dialogue with the Council's Planning Officers over the most appropriate way, in the context of the Council's preferred strategic approach, to facilitate residential development at Unit 2, Greenacres Lane site. These discussions highlighted that it is the Council's strategic policy approach for smaller housing sites in Bewdley to be brought forward on the formal allocations set out in Publication Draft Policy SAL.B2. It was also identified that the Unit 2, Greenacres Lane has significant potential to bring forward a sustainable residential development and in view of the preferred strategic approach to housing the Council would duly consider the site's inclusion as a formal allocation within Policy SAL.B2. This representation therefore provides the necessary information in order for the proposed change to Policy SAL.B2 to be made at the point the DPD is

submitted for Examination in Public.

3. For the avoidance of doubt the site put forward for residential use allocation in Policy SAL.B2 is Unit 2, Greenacres Lane, Bewdley shown outlined red on the accompanying location plan (**Appendix 1**).

Site Description and Surrounding Area

4. The site is 0.04 hectares and comprises a derelict former light industrial unit. The site is previously developed land in the defined residential area of Bewdley and therefore residential development is acceptable in principle.
5. The site is relatively flat with existing landscaped embankments to the northern and eastern boundaries. It benefits from views which include the river Severn and Severn Valley railway which provide an attractive setting for prospective residential use of the site. There is good access to the site from a shared courtyard off Greenacres Lane.
6. The surrounding area is mainly residential with a number of houses in close proximity to the proposed allocation (which serves to reduce the commercial attractiveness of the site). The allocation of this site for residential purposes would therefore facilitate a use that is more compatible with its residential surrounds than its current lawful status and also lead to the permanent removal of the redundant, dilapidated former commercial building to be replaced by a new building (designed to a standard that would meet with the Council's design policies) that will serve to improve the overall character of the area.
7. Moreover, the site is no longer considered suitable for a continuation of commercial activities due to general lack of demand for light industrial and other similar commercial activities in Bewdley. The continuation of commercial use is further constrained by the building's severely dilapidated state which would require significant investment to bring up to commercial market standard (see **Appendix 2** attached to this representation for a letter from a commercial agent on the commercial viability of the existing premises). As such, without any commercial demand for the site such extensive refurbishments will not be possible. A residential use of this redundant brownfield site is therefore proposed as it will have sufficient market value to be able to absorb the cost of re-development as well as delivering a viable and sustainable development that will meet a local need and being a more compatible use with the surrounding residential land uses.

Type and quantum of development to be allocated

3. Weighing all the aforementioned factors together it is clear that the site is more suited to residential redevelopment and therefore a wholly Residential (C3) use is proposed. The surrounding residential character is mainly detached or semi-detached dwellings, a feature of the area that this allocation would need to reflect in stipulating an indicative capacity. In response to this it is our view that the allocation should include the following details:
- **Site name:** Unit 2, Greenacres Lane, Bewdley
 - **Site Area:** 0.04
 - **Proposed use:** Residential (C3)
 - **Indicative Phasing Period:** 2011 to 2016
 - **Indicative Capacity:** 1 detached housing unit

Constraints

9. The only planning constraint that would need to be addressed is that the site is in an area liable to flood. The majority of the site (including where residential development would be located) falls within Flood Zone 2 although a small section of the access from Greenacres Lane falls within Flood Zone 3. Therefore, the allocation would need to highlight the flooding situation and ensure that a suitable means of escape can be achieved when brought forward through the Development Management process.
10. To assist the Council on this matter there is a current planning application being considered on the site which includes a comprehensive Flood Risk Assessment and a Sequential Test. This FRA and

Sequential Test (included as **Appendix 3** to this representation as background information) concludes that all flood issues can be overcome (including the provision of suitable means of escape) and for the purposes of this strategic allocation process demonstrates that there are no material flood issues that would prevent the proposed development on this site being a deliverable allocation over the plan period. It is also materially relevant to note that the site has a clear fall back in regard to flooding issues in that the existing unit could be converted to residential use without any requirement for the flood sequential and exception tests to be met.

11. In view of this it is recommended that the policy or supporting text makes reference to the need for a scheme being brought forward on the site to accord with any advice provided by the Environment Agency. It is noted that such an approach has been considered as acceptable for the Bewdley, Lax Lane allocation within SAL.B2, which actually falls wholly within Flood Zone 3 (Unit 2, Greenacres Lane site primarily falls within Flood Zone 2).

Reasoned Justification for Inclusion of site in Policy SAL.B2

12. The National Planning Policy Framework Core Planning Principles include a preference for allocations on land with lower environmental value and the promotion of effective use of land by re-using previously developed land. The site has no conservation or environmental value and is previously developed land in an existing residential area and therefore in accordance with the NPPF Core Planning Principles.
13. The District's strategic planning policy approach to the location of housing development in the District set out in adopted Core Strategy Policy DS01 – Development Locations states that:

“New development will be concentrated on brownfield sites within the urban areas of Kidderminster and Stourport-on-Severn. Limited opportunities for development to meet local needs will be identified on brownfield sites in Bewdley and within the rural settlements.”
14. This site is redundant previously developed land and therefore would accord with the Council's strategic approach to the location of development in the District.
15. The site is also deliverable over the plan period as our client is seeking to bring forward its redevelopment as soon as is practicable and upon allocation can form part of the Council's identified housing land supply required by the NPPF. Further, 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. This would also accord with the Council's strategic housing policies that consistently generally seek to bring forward housing in Bewdley and rural areas that meets local needs, which the allocation of this site in this case would achieve.
16. In view of the Council's strategy to bring forward housing in Bewdley mainly on allocated sites to meet local needs rather than on exception sites, it is therefore 'sound' planning for this site to be formally allocated in Policy SAL.B2 in order to ensure that it can be brought forward in accordance with the Council's strategic housing delivery approach for Bewdley.
17. In terms of the type of residential housing that would need to be allocated on the site, it is also worth considering the national context to housing delivery in that the Government has placed high priority on the new homes market as a driver for growth and has taken some steps to help local government and industry meet housing demand. Among these is the publication of the 2012 National Planning Policy Framework, which calls for balance between sustainable development which benefits the local community, and realistic returns for land owners and developers such that development is commercially viable.
18. In view of this it will need to be recognised in the allocation of this site that there will not be any need for any affordable housing as the size of the site means that it cannot support more than one dwelling unit. In this regard this representation is supported at **Appendix 4** by a robust and comprehensive viability analysis for Unit 2 Greenacres Lane, which conclusively shows that there is no prospect of this one dwelling unit site being able to be brought forward as affordable housing; the submitted evidence confirms that it is only a market dwelling that can produce sufficient value to

absorb the extensive costs involved in developing the site.

19. The supporting viability assessment therefore evidences that it would not be reasonable, justified or effective to seek to deliver a 100% affordable scheme on this site due to the existing use value when set against the cost of developing the site (although as previously stated the allocation would still represent meeting a local need as the site owner will bring it forward to meet their own individual need for a home in Bewdley). To ensure that the allocation can retain the flexibility for it to come forward it is necessary for the policy wording to simply refer to 'Residential (C3)' with a requirement for any proposal coming forward that includes market units to be subject to a viability assessment in accordance with Policy SAL.DPL3 at the planning application stage.

Contextual Changes Required to facilitate this amendment

20. In addition to amending Policy SAL.B2 to formally allocate the Former Light Industrial Units, Greenacres site for residential development, Paragraph 4.8 will need to be updated to include due reference to the additional site.

(Continue on a separate sheet /expand box if necessary)

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Add the Unit 2, Greenacres Lane site to Policy SAL.B2 as an allocation for residential (C3).

(Continue on a separate sheet /expand box if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

The change required is fundamental to the DPD's soundness and therefore necessary for it to be duly examined in public.

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Ryan Fuller

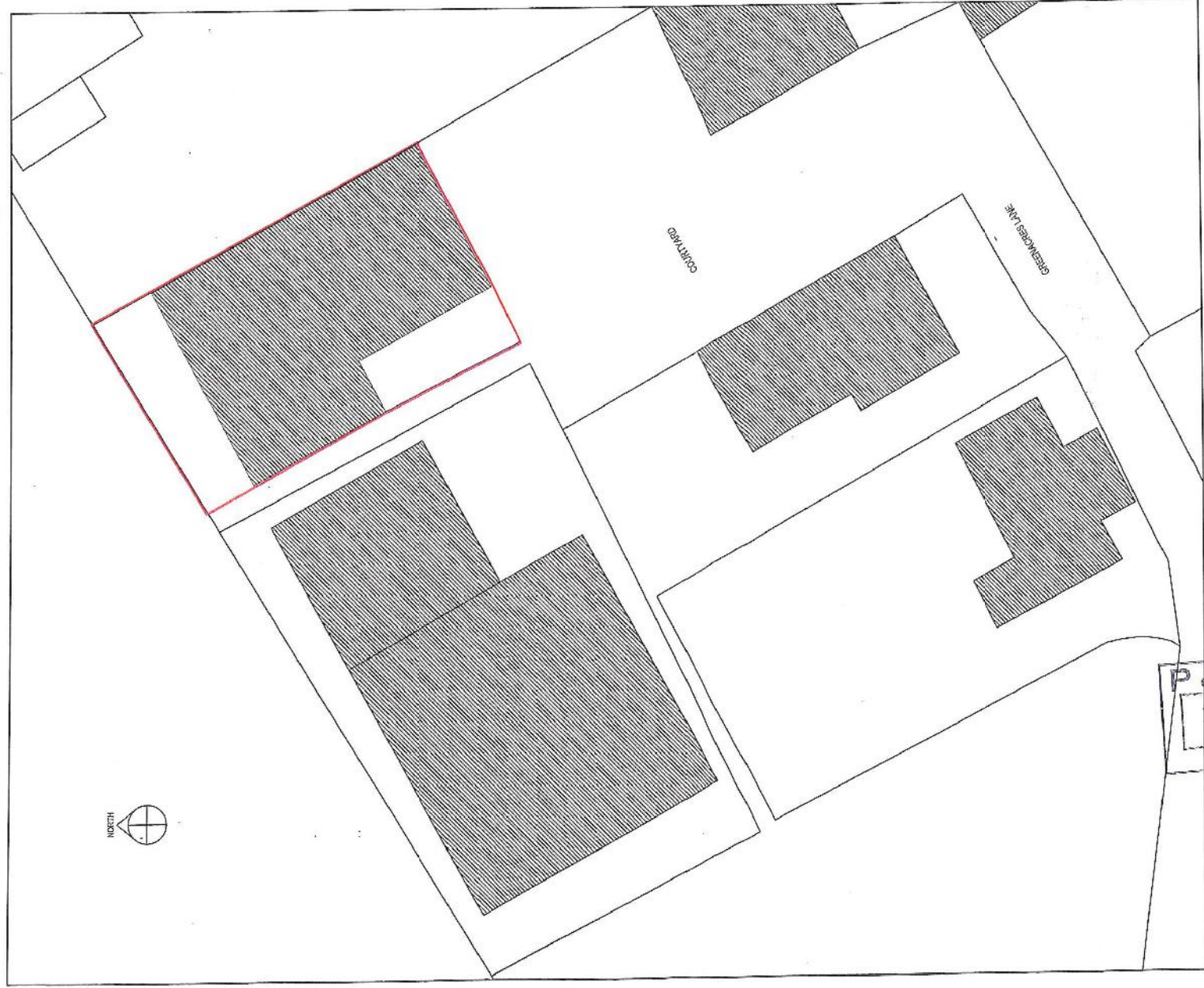
Date:

14-9-12

2012/0321

Notes

- 1. All sizes to be checked on site by the contractor prior to preparation of shop drawings or fabrication of parts
- 2. This drawing should not be scaled. Any discrepancies to be brought to the immediate attention of the architect.



Rev.	Description	By	Date
Scale	1:200 @ A3		
Drawing No.	SK_P_01		Rev.B
Date	APRIL 2012		
Drawn By	JO		Issued For

Client MR MATT HARDING + MS STACEY MATTHEWS
 Project PLOT 2
 GREENACRES LANE, BEWDLEY
 Title SITE PLAN AS EXISTING
 Project No.



OPFER LOGAN ARCHITECTS

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Email : info@olarcitects.com

3 Queens Crescent, Glasgow, G4 9BW Telephone : (0141) 332 9900 Fax : (0141) 342 2289

Unit 2 Greenacres Lane, Bewdley, DY12 2RE

Feasibility Study

INTRODUCTION

This report has been commissioned to establish the economic viability of affordable housing at the above plot by Fullerlong planning consultants on 10th September 2012. This will be achieved by comparing the expected value of affordable housing which can be expected with the anticipated costs as well as the site conditions.

VALUE OF AFFORDABLE HOUSING

Affordable housing sales are based on the average wage, the national average wage is £25,000.00 so the average value of an affordable housing unit is £75,000.00. House prices in the area are on average;

One bedroom	£115,000.00	Zoopla
Two bedroom	£160,000.00	Zoopla
Three bedroom	£245,000.00	Zoopla
Four bedroom	£275,000.00	Zoopla
Five bedroom	£375,000.00	Zoopla

COST

The plot as it stands has a value of £100,000.00 (as confirmed by Esurvs valuation report attached), The build cost have been calculated on the attached cost analysis as £162,393.00. The total cost of the development has been calculated to be £262,393.00. A developer would normally expect a 20% return on an investment of this nature. So the sale value would need to include a mark up £52,478.60 of to achieve this return.

SITE CONDITIONS

The site is approximately 200m², however 32m² of this cannot be built on as it is designated as amenity space in the title deeds. This means the area that can be built on is only 168m² and is an 'L' shape. Given the local planning requirements for amenity space the footprint of the building is restricted to a maximum 90m².

CONCLUSIONS

For the project to be economically viable the final value must exceed £314,871.60. In which case a developer would need to build a house single house with four bedrooms or more.

The option would be to build three one bedroom or two two bedroom houses however given the restrictions on floor space, access, parking and amenity space this will not be possible.

The street scene on Greenacres Lane is of large properties 3 bedroom or more, all of individual design.

Houses of a value of £314,871.60 are not affordable under the National Framework of Planning Policy..

2012/0321

Consulting Civil, Structural & Geo-Environmental Engineers

Flood Risk Assessment

Site Address:

Plot 2 Greenacres Lane,
Bewdley

Paul Waite Associates Ltd
Summit House
Riparian Way
The Crossing
Cross Hills
BD20 7BW

info@pwaite.co.uk
www.pwaite.co.uk

Project Ref: 12059/I/01
May 2012



Flood Risk Assessment

Paul Waite Associates have been appointed by Mr Matthew Harding & Ms Stacey Matthews, to undertake a Flood Risk Assessment in support of a planning application for a change of use from light industrial/commercial to residential development at Plot 2, off Greenacres Lane at Bewdley in Worcestershire.

Clients Details

M Harding & S Matthews
Plot 2
Greenacres Lane
Bewdley
Worcestershire
DY12 2RE

Documents Revision Status

<i>ISSUE:</i>	<i>DATE</i>	<i>COMMENTS</i>
-	May 25, 2012	FINAL

Contents

Executive Summary	1
1.0 Introduction	3
2.0 Approach to the Flood Risk Assessment	4
2.1 Approach	4
2.2 Application of the Sequential and Exceptions Test	4
3.0 Site Details	6
3.1 Location	6
3.2 Former/Current Use	7
3.3 Proposals	8
3.4 Boundaries	8
3.5 Topography	8
3.6 Existing Drainage	9
3.7 History of Flooding	10
3.7.1 British Hydrological Society – Hydrological Events	10
3.7.2 Internet Search for Historical Flooding	10
3.7.3 Wyre Forest Valley SFRA	11
3.7.4 Environment Agency Historic Flood Data	11
3.7.5 Anecdotal Reports	11
4.0 Flooding Mechanisms	12
4.1 Fluvial: River Severn	12
4.1.1 General	12
4.1.2 Modelled Flood Levels	13
4.1.3 Overtopping (1 in 100 year Event)	14
4.1.4 Impact of Climate Change	14
4.1.5 Overtopping (Extreme 1 in 1000 year Event)	14
4.1.6 Requirements for Safe Access and Egress	15
4.1.7 Conclusion	18

4.2	Groundwater	18
4.3	Overland Flow	19
5.0	Material Consideration In Respect of PPS25	20
5.1	Climate Change	20
5.2	Environment Agency Flood Map	20
5.3	Finished Floor Levels	21
5.4	Emergency Access and Egress during Times of Flood	21
5.5	Flood Warning	23
5.6	Flood Resistance/Resilience Measures	24
5.7	Flood Protection Equipment	25
6.0	Conclusions and Recommendations	27

Tables

Table 1	Flood Risk Vulnerability and Flood Zone Compatibility
Table 2	Sources of Flooding
Table 3	Environment Agency Model Data for Node Reference 14207
Table 4	Guidance on Debris Factors for Different Flood Depths, Velocities and Dominant Land Uses (Table 3.1 FD2321/TR1)
Table 5	Velocity, Depth and Flood Hazard Matrix
Table 6	Flood Hazard Rating for Safe Access/Egress Route (Greenacres Lane)
Table 7	Typical Flood Proofing Measures

Figures

Figure 1	Location Plan – Plot 2, Greenacres Lane, Bewdley
Figure 2	Existing Building at Plot 2 Viewed from Greenacres Lane
Figure 3	Aerial Photograph of the Existing Site Viewed North
Figure 4	Greenacres Lane Viewed West from the Development Access
Figure 5	River Severn Viewed Upstream from Location Adjacent to Application Site
Figure 6	Environment Agency Flood Map
Figure 7	Start of Proposed Flood Evacuation Route (Viewed West)

- Figure 8 End of Proposed Flood Evacuation Route (Viewed from Greenacres Lane)
- Figure 9 Environment Agency Flood Warning Coverage Map
- Figure 10 Domestic Flood Resistant Measures

Appendices

- Appendix A Environment Agency Standing Advice
- Appendix B Existing Site Layout: Topographical Survey
- Appendix C Proposed Development Plans
- Appendix D Environment Agency Flood Data
- Appendix E Wyre Forest SFRA Data
- Appendix F 1 in 100 Year Flood Envelope Plan
- Appendix G Soilscape Map
- Appendix H Additional Photographs

Executive Summary

Paul Waite Associates have been appointed to undertake a Flood Risk Assessment in accordance with the requirements of the National Planning Policy Framework, to support of a planning application for a proposed change in use from light industrial/commercial to residential accommodation at Plot 2, Greenacres Lane in Bewdley, Worcestershire.

The gross development area covers 0.02Ha; and the footprint of the existing building is shown to lie within Flood Zone 2 of the Environment Agency Flood Map.

The access from the property at Greenacres Lane is at a slightly lower elevation, and is shown to lie within Flood Zone 3.

The primary flood risk to the site is identified from the River Severn; which is situated approximately 30 metres to the east of the property.

Following significant flood history, flood defences have recently been installed within Bewdley to protect the town from inundation by the river. However the application site is located at the northern fringe of the town, and is therefore unprotected by the new flood defence system.

The ground floor level within the existing building ranges from 23.01mAOD up to 23.17mAOD. The level of the road at the site access is 22.34mAOD.

Using modelled flood level data provided by the Environment Agency, it is determined that the footprint of the property is elevated above the 1 in 100 year flood level, estimated as 22.71mAOD.

The 1 in 100 year plus climate change flood level has not been provided, and therefore the 1 in 150 year modelled flood level for the River Severn has been utilised to assess the impact of an increase in flood level on the development. The 1 in 150 year flood level is estimated at 22.85mAOD; and the footprint of the development is elevated above the predicted water level.

To evaluate the extreme 1 in 1000 year event within the River Severn; an increase in flood level of 1 metre was added to the 1 in 100 year modelled water level i.e. 23.71mAOD. This showed that under extreme flood conditions within the River Severn, it is likely that the building will become inundated.

Undertaking an assessment of flood depths at the site access onto Greenacres Lane; indicates that the flood depth during the 1 in 100 year event is 0.37 metres; increasing to 0.51 metres with the application of climate change (1 in 150 year flood level).

In accordance with the requirements set out within the National Planning Policy Framework, it is essential to ensure that the route into and out of the application site will not present a danger to people during a flood event within the River Severn.

Using methodologies set out within Defra documents FD2320/TR2 and FD2321/TR1, it is determined that during the 1 in 100 year event, the access onto Greenacres Lane is considered to represent a significant hazard. This classification increases to extreme hazard with the application of future climate change.

With this in mind, an alternative route away from the property has been devised which provides a safe pedestrian escape route, during flood conditions.

The route directs the Client and others to the rear of adjacent properties, and back onto Greenacres Lane at a higher level.

To supplement the provision of an escape route, it is highly recommended that the Client registers to receive flood warnings via the Environment Agency's Flood warning's Direct Service; and devises a suitable flood evacuation plan to move away from the property to a safe area within Flood Zone 1 if advised to do so.

For new residential development it is usual practice to design the ground floor level to a minimum of 600mm above the 1 in 100 year plus climate change flood level i.e. 23.45mAOD. However, owing to development constraints associated with refurbishment works within an existing structure, this is likely to be unfeasible, largely due to the reduction in headroom at ground and first floor levels.

It is therefore recommended that the ground floor level is set at 23.15mAOD; which provides the necessary 150mm elevation above ground level as required for the damp proof course/membrane.

This will provide a 0.44 metre freeboard above the predicted 1 in 100 year flood level within the River Severn adjacent to the property.

For added protection against inundation, it is recommended that flood resistance and resilience measures are considered for incorporation into the refurbishment works up to a level of 23.45mAOD i.e. 300mm above the proposed finished ground floor level.

Application of the mitigation measures outlined within this report will ensure that there is a low residual flood risk at the proposed development.

1.0 Introduction

Paul Waite Associates have been appointed to undertake a Flood Risk Assessment in support of a planning application for change of use of a former light industrial/commercial building to provide residential accommodation at Plot 2, Greenacres Lane in Bewdley, Worcestershire.

The proposed development has a gross area approximating 0.02 Hectares and is shown to be situated within Flood Zones 2 and 3 of the Environment Agency Flood Map.

Flood Zone 2 is defined as land assessed as having between a 1 in 100 and 1 in 1000 annual probability of river flooding (1% – 0.1%) or between a 1 in 200 and 1 in 1000 annual probability of sea flooding (0.5% – 0.1%) in any year.

Flood Zone 3 is defined as being land assessed as having a 1 in 100 or greater annual probability of river flooding (>1%) or a 1 in 200 or greater annual probability of flooding from the sea (>0.5%) in any year.

The primary source of flood risk to the proposed development site has been identified as fluvial flooding from the River Severn, however other sources of flooding have been considered within this assessment.

It is usual for the Agency to raise an objection to development applications within the floodplain or Zone 2 or 3 of the flood map until the question of flood risk has been properly evaluated. The Agency will also object to developments where the total site area is in excess of 1 hectare until suitable consideration has been given to surface water runoff.

2.0 Approach to the Flood Risk Assessment

2.1 Approach

A topographical survey of the existing site was undertaken by Interlock Surveys in May 2012, and is related to OS National Grid from ST08 by GPS for both coordinates and levels. Therefore the resulting site levels have been used within this report.

The requirements for flood risk assessments are generally set out in the 'Technical Guidance to the National Planning Policy Framework', published in March 2012; and in more detail from the Environment Agency's 'Standing Advice on Flood Risk' available from <http://www.environment-agency.gov.uk/reasearch/planning/82584.aspx>.

A copy of the relevant Standing Advice in regard to this development is provided within Appendix A of this report.

2.2 Application of the Sequential and Exceptions Test

The risk based sequential test should be applied at all stages of planning. Its aim is to steer new development to areas at the lowest probability of flooding, within Zone 1. The Flood Zones are the starting point for the sequential approach.

The development is shown to be situated within Flood Zones 2 and 3 of the Environment Agency Flood Map, with the footprint of the existing building being wholly within Flood Zone 2 and hence comprises land having between a 1 in 100 and 1 in 1000 annual probability of river flooding (1% – 0.1%) or between a 1 in 200 and 1 in 1000 annual probability of sea flooding (0.5% – 0.1%) in any year.

Proposals for the site incorporate refurbishment of an existing light industrial/commercial building to provide residential accommodation and as such Table 2 of the Technical Guidance to the National Planning Policy Framework (March 2012) indicates that the development is classified as 'more vulnerable'.

Table 1: Flood Risk Vulnerability and Flood Zone 'Compatibility'

Flood Risk Vulnerability Classification		Essential Infrastructure	Water compatible	Highly Vulnerable	More Vulnerable	Less Vulnerable
Flood Zone	Zone 1	✓	✓	✓	✓	✓
	Zone 2	✓	✓	Exception Test required	✓	✓
	Zone 3a	Exception Test required	✓	×	Exception Test required	✓
	Zone 3b	Exception Test required	✓	×	×	×

- ✓ Development is appropriate
- * Development should not be permitted

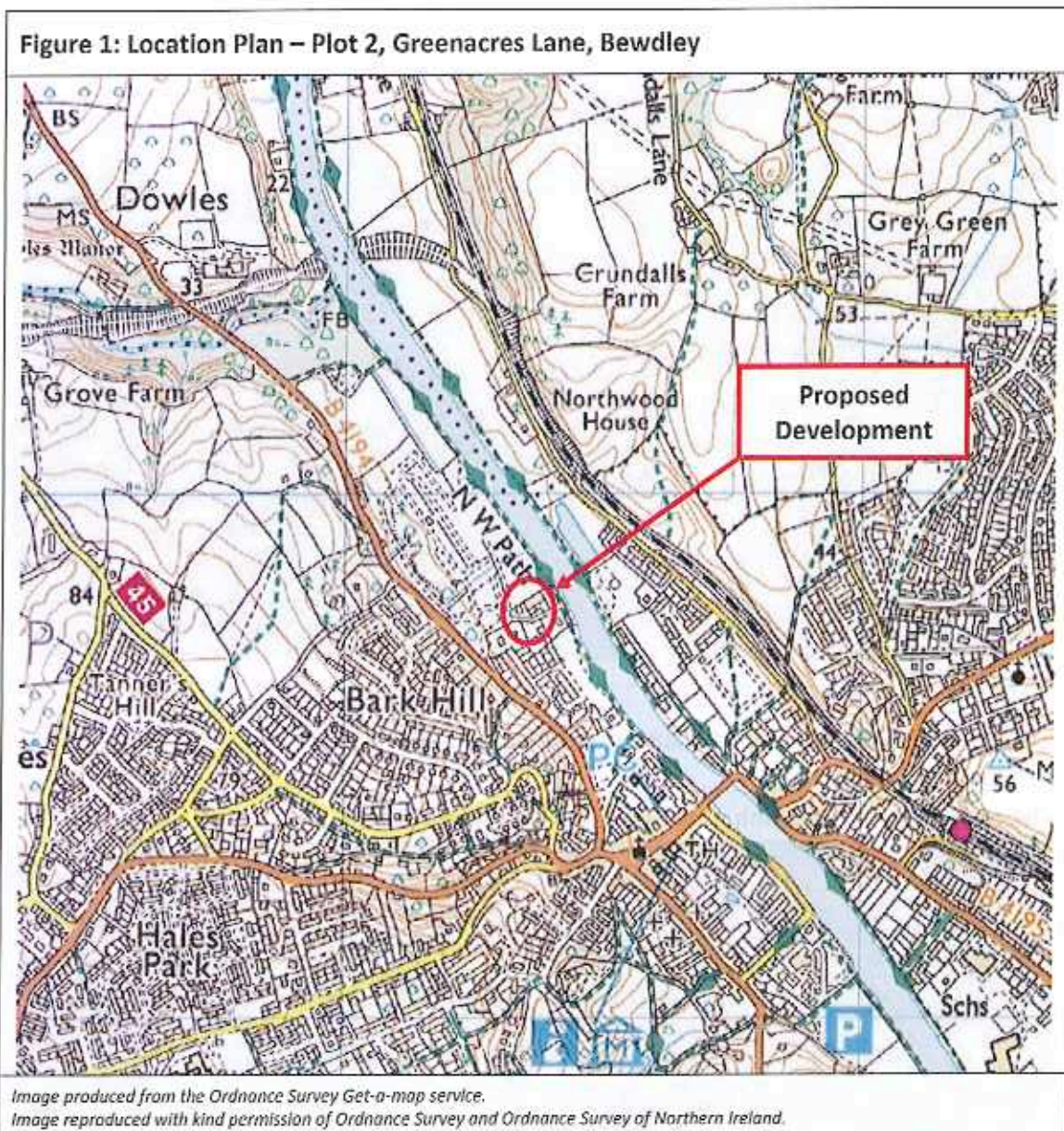
In accordance with the vulnerability table above, the development is deemed to be appropriate for the site.

3.0 Site Details

3.1 Location

The site is centred on ordnance survey grid reference SO 783 758.

An Ordnance Survey plan, indicating the location of the property is presented below.



3.2 Former/Current Use

From historical Ordnance Survey Maps for Bewdley it has been established that the application site is located within a former light industrial/commercial site; which was originally part of the Bewdley Gas Works site.

The existing workshop building is no longer in use as a commercial property, and is currently vacant.

Figure 2: Existing Building at Plot 2 Viewed from Greenacres Lane



Image: PWA Associates

A topographical Survey of the existing site is provided within Appendix B of this report.

Figure 3: Aerial Photograph of the Existing Site Viewed North



Image courtesy of www.bing.com/maps

3.3 Proposals

Proposals for development at the site comprise refurbishment of the existing building to provide a single residential unit; with open plan living accommodation at ground floor; and sleeping accommodation at first floor levels.

A small section of the building will be demolished to provide a small garden area.

The latest development layout plan has been provided within Appendix C of this report.

3.4 Boundaries

The application site is situated within the northern fringe of Bewdley; at a distance approximating 500 metres from the centre of the town.

The northern boundary of the site is formed by Local Authority managed parkland known as the Gasworks Meadow.

Greenacres Lane is situated along the south boundary of the site; with existing residential development situated immediately to the east and west of Plot 2.

Further residential development is situated along the south side of Greenacres Lane.

Riverside Caravan Park is accessed from Greenacres Lane and is situated approximately 70 metres to the west side of the application site.

The primary source of flood risk to the development is identified from the River Severn. The west bank of the watercourse is located at 30 metres to the east of the site.

The B4194 forms primary route from the village of Astley Cross to the south of Stourport, via Bewdley and the village of Buttonoak to Kinlet. Within the vicinity of the development, the B4194 is known as Dowles Road, and enables vehicular access to the site via Greenacres Lane.

3.5 Topography

The topographical survey of the existing site indicates a high point of 23.57m AOD situated to the rear of the existing building, along the north boundary; and a low point of 23.04m AOD at the yard area located within the south west part of the site.

The ground floor level within the existing building ranges from 23.01m AOD up to 23.17m AOD.

The courtyard area to the south of the application site generally slopes in a southwards direction with levels ranging from 22.34m AOD at the entrance onto Greenacres Lane up to 23.18m AOD along the east wall.

Figure 4: Greenacres Lane Viewed West from the Development Access



Image: PWA Associates

3.6 Existing Drainage

Observations made during a site visit undertaken by Paul Waite Associates in May 2012, confirm that surface water from the existing site is directed via a positive system i.e. rainwater pipes, to the local drainage network.

Following development, the footprint of the existing building will be slightly reduced in order to make provision for a small garden area, along the west side of the building. This will have the effect of reducing surface water runoff rates and volumes leaving the site; therefore making a betterment on the existing situation.

Furthermore, it is proposed that the existing drainage system serving the site will be retained.

3.7 History of Flooding

3.7.1 British Hydrological Society – Hydrological Events

A search on the British Hydrological Society Chronology of British Hydrological Events website (<http://www.dundee.ac.uk/geography/cbhe>) did not provide any details regarding flooding incidents within the immediate vicinity of the application site, however, a number of reports were recorded within the Bewdley area, the most notable of which include the following:

- 29th November 1620 – Severe flooding caused drowning of 68No people at Homstone’s Loade near Bewdley.
- February 1795 – The flooding at Shrewsbury destroyed the quays and a local timber yard; flood water reached a depth of 3ft within the Swan, White Hart and Meadow Inns along the Severn Gorge. 2No houses at Coalport were washed away, and most of the bridges crossing the River Severn were badly damaged, including Bewdley Bridge, a five arched bridge, which was replaced by Telford’s stone bridge.
- November 1852 – Most severe flood at Bewdley since 1795. Water level within the River Severn, which had overflowed its banks, rose quickly, submerging over half of Load Street by four to five feet. Access and egress from the houses near the bridge was obtained through the upper story windows by means of planks.
- January 1899 – Riverside houses at Bewdley were flooded to a depth approximating 1 metre.

3.7.2 Internet Search for Historical Flooding

Undertaking an internet based search for flooding indicated the following notes and specific records of flooding within the Bewdley area:

- The largest flood on the Severn at Bewdley occurred on 21st March 1947 with 533 cumecs (cubic metres per second; HiFlows UK dataset). The second largest occurred on 10th March 1946 with a discharge of 510 cumecs. The first and second ranked floods therefore occurred on consecutive years.
- The 2nd November 2000 flood (ranked third at Bewdley since 1923) was larger than the 14th December 2000 flood on the middle river (ranked seventh at Bewdley since 1923).
- The gauged record indicates that significant ‘flood years’ occurred at Bewdley in 1951 and 1954 with 13 and 11 flood peaks over 210 cumecs (cubic metres per second) respectively. This is for the period 1923-2003.
- Floods of over 210 cumecs have occurred at Bewdley in all seasons. The most frequent flood season is winter (57.8%) and the least frequent flood season is summer (3.2%).

- Evidence suggests that the February 1795 flood exceeded the November 1770 flood at Bewdley. It is known the 1795 flood was the larger flood on the upper River Severn at Welsh Bridge, Shrewsbury.

3.7.3 Wyre Forest Valley SFRA

The Level 1 SFRA was produced by Royal Haskoning and published in January 2008.

The report details numerous incidents of flooding within the Bewdley area; however there are no specific instances of flooding detailed within the document affecting development at Greenacres Lane.

An extract from the SFRA document detailing historic flooding within the area, is presented for reference within Appendix E of this report.

3.7.4 Environment Agency Historic Flood Data

Information obtained from the Environment Agency indicates that the property at Plot 2, Greenacres Lane is located within the areas which were affected by flooding during the historic flood events of December 1960 and October 1998.

A copy of the historic flood map is provided for reference within Appendix D of this report.

3.7.5 Anecdotal Reports

Anecdotal reports of historic flooding within the vicinity of the application development indicate that during the last flooding incident at Bewdley, in 2011, flood water did not extend as far as the access into the application site.

4.0 Flooding Mechanisms

Table 2: Sources of Flooding

Source/Pathway	Significant?	Comment/Reason
Fluvial	Yes	River Severn
Tidal/Coastal	No	
Canal	No	
Pluvial (urban drainage)	No	Smaller building footprint; increased green space i.e. inclusion of a garden area
Groundwater	No	
Overland flow	Yes	Due to topography of the area – there is potential for flooding via this mechanism
Blockage	No	
Infrastructure failure	No	
Rainfall Ponding	No	

4.1 Fluvial: River Severn

4.1.1 General

The River Severn is the longest river in the UK, approximating 354 kilometres.

The watercourse rises at an altitude of 610 metres on Plynlimon, Ceredigion near Llanidloes in Powys (mid Wales); and flows through Shropshire, Worcestershire and Gloucestershire, with the county towns of Shrewsbury, Worcester, and Gloucester along its banks.

With an average discharge of 107m³/s at Apperley in Gloucestershire, the River Severn is the greatest river in terms of water flow in England and Wales.

The river is usually considered to become the Severn Estuary after the Second Severn Crossing between Severn Beach in South Gloucestershire, and Sudbrook in Monmouthshire; discharging into the Bristol Channel which in turn discharges into the Celtic Sea and the wider Atlantic Ocean.

The Severn's drainage basin area is 11,420 square kilometres, excluding the River Wye and Bristol Avon which also flow into the Severn Estuary; and the river's major tributaries include the Vyrnwy, Teme, Warwickshire Avon and Stour.

The watercourse is largely open channel within the vicinity of the application site; and the Environment Agency have confirmed that there are no formal flood defences along this section of the River Severn. As such, consideration will need to be given regarding overtopping of the natural river bank.

4.1.2 Modelled Flood Levels

The Environment Agency have provided details of flood levels and flows for a range of probabilities at a number of locations along the River Severn. The details have been extracted from the Abermule to Worcester hydraulic model of the river undertaken in 2004 using ISIS 1D modelling software.

A review of the data indicates that Node Reference 14207 provides the most appropriate data, due to its location in proximity with the proposed development.

Table 3: Environment Agency Model Data for Node Reference 14207

Return Period	Flow (m ³ /s)	Level (mAOD)
1 in 5 year	494.61	21.60
1 in 10 year	542.57	21.86
1 in 25 year	614.91	22.23
1 in 50 year	665.63	22.48
1 in 100 year	716.31	22.71
1 in 150 year	749.53	22.85

Figure 5: River Severn Viewed Upstream from Location Adjacent to Application Site



Image: PWA Associates

4.1.3 Overtopping (1 in 100 year Event)

The modelled flood level provided for Node 14207 during the 1 in 100 year event is 22.71mAOD.

Details obtained from the topographical survey of the site indicate that the lowest external point within the boundary of the application site is 23.04mAOD; and the internal ground floor level within the building ranges from 23.01mAOD up to 23.17mAOD.

As such, the building is elevated 0.3 – 0.46 metres above the predicted flood level during this event.

The road level within Greenacres Lane at the site access is measured as 22.34mAOD. Therefore during flood conditions, the access is likely to be inundated to a depth approximating 0.37 metres.

A plan illustrating the flood envelope for the 1 in 100 year event is provided within Appendix F.

4.1.4 Impact of Climate Change

The modelled information provided by the Environment Agency does not make an allowance for climate change.

Therefore in order to investigate the impact of increased flood water levels at the development, which are likely to occur in the future as a result of climate change, the modelled data for the 1 in 150 year event has been utilised i.e. 22.85mAOD.

Undertaking a comparison to known levels throughout the site indicates that the lowest external level within the site boundary is 0.19 metres above the modelled flood level; and similarly the internal ground floor of the existing building is elevated 0.15 – 0.32 metres above the predicted flood water level.

During such a scenario, the depth of inundation at the site access is likely to be increased to 0.51 metres.

4.1.5 Overtopping (Extreme 1 in 1000 year Event)

Again details pertaining to flood levels during the 1 in 1000 year event have not been provided by the Environment Agency.

Therefore to assess the impact of extreme events at the location of the application site, an increase in flood level of 1 metre has been applied to the 1 in 100 year modelled data.

The extreme 1 in 1000 year flood level is therefore taken to be 23.71mAOD, and experience suggests that this provides a conservative estimate.

Comparing levels taken from the topographical survey of the site indicates that the building would become inundated to a depth of 0.7 metres during a flood event of this magnitude.

4.1.6 Requirements for Safe Access and Egress

In accordance with the requirements set out within the National Planning Policy Framework, it is essential to ensure that the route into and out of the application site will not present a danger to people during a flood event within the River Severn.

From Section 13.3 of document FD2320/TR2 'R&D Outputs: FRA Guidance for New Development: Phase 2', the requirements for safe access and exit from development situated in flood risk areas are as follows, in decreasing order of preference:

- Safe dry route for people and vehicles
- Safe dry route for people
- If a dry route for people is not possible, a route for people where the flood hazard (in terms of depth and velocity of flooding) is low and should not cause a risk to people.
- If a dry route for vehicles is not possible, a route for vehicles where the flood hazard (in terms of depth and velocity of flooding) is low to permit access for emergency vehicles. However the public should not drive vehicles in floodwater.

Where a dry route is not possible and a route with low flood hazard is identified, the route should not have any service covers that could be removed, or other underwater hazards. It is often difficult to see underwater hazards even in shallow water, particularly at night or if the water is silty.

In addition, the route should be clearly marked, for example using painted posts.

Vehicles should not be used when:

- The presence of water stops the engine functioning;
- The vehicle floats; or
- The vehicle becomes difficult to control.

Cars will stop and/or float in water as shallow as 0.5m, whilst some emergency vehicles may survive in water of 1m. A fire engine remains controllable in depths of 0.5m up to a flow velocity of 5 m/sec, due to high-level air intakes/exhausts.

The data and information required in assessing safe access and exit depends on the complexity of the approach undertaken, as follows:

Simple Approach

- Flood levels for suitable annual probabilities (advisable to look at the 1% and 0.1% annual probabilities for fluvial flooding or the 0.5% and 0.1% for tidal/coastal flooding).
- Minimum ground levels along access and exit routes.

Intermediate Approach

- Flood depths and velocities for suitable annual probabilities across the development site and surrounding the development site, determined from hydraulic modelling.
- Simple lookup table relating depth and velocity to danger to people

Detailed Approach

- Flood depths and velocities across the development site and surrounding the development site, determined from hydraulic modelling.
- An appropriate means for determining the hazard factor for the site should be determined from the Flood Risks to People report.

Due to the scope of development proposed, an intermediate approach to assessing the safety of the emergency escape route has been adopted.

Intermediate Approach: Methodology

Danger to people is assessed using flood hazard, which can be expressed as a combination of flood depth and velocity.

Hydraulic modelling or the use of results from an existing assessment is needed to predict flood depth and velocity.

The Flood Risks to People project has developed the following equation to relate the flood hazard to flood depth and velocity:

$$\text{Flood Hazard Rating} = ((v + 0.5) \times D) + DF$$

Where:

v = velocity (m/s)

D = depth (m)

DF = debris factor

The following table extracted from FD2321/TR1 provides guidance with regard to the appropriate debris factors to be applied.

Table 4: Guidance on Debris Factors for Different Flood Depths, Velocities and Dominant Land Uses (Table 3.1 FD2321/TR1)

Depths	Pasture/Arable	Woodland	Urban
0 to 0.25m	0	0	0
0.25 to 0.75m	0	0.5	1
>0.75m and/or V>2	0.5	1	1

It may be argued that the area surrounding the escape route is not wholly urban in nature; as it is on the northern fringe of Bewdley and is flanked to the north by Gasworks Meadow; and riverside parkland to the south.

As such, a value for DF of 0 has been applied to the area along the escape route with a depth of inundation less than 0.25m; 0.75 has been applied to areas where the depth of flooding is less than 0.75m; and a value of 1.0 applied to areas with a depth of flooding in excess of 0.75m.

Using the guidance provided by FD2320/TR2, the following velocities are sufficient for such calculations:

- 0.5 m/s for lowland flat floodplains
- 2.0 m/s for steeper catchments

Based on this, the hazard rating equation has been applied to various combinations of flood depth and velocity to produce a matrix of hazard ratings.

Applying thresholds to these hazard ratings defines the danger to people at various depths and velocities as shown in the following table, extracted from FD2320/TR2.

Table 5: Velocity, Depth and Flood Hazard Matrix

Velocity (m/s)	Depth (m)									
	DF = 0			DF = 0.75		DF = 1.0				
	0.1	0.2	0.25	0.5	0.75	1.00	1.25	1.50	1.75	2.00
0.00	0.05	0.10	0.13	1.00	1.13	1.50	1.63	1.75	1.88	2.00
0.50	0.10	0.20	0.25	1.25	1.50	2.00	2.25	2.50	2.75	3.00
1.00	0.15	0.30	0.38	1.50	1.88	2.50	2.88	3.25	3.63	4.00
1.50	0.20	0.40	0.50	1.75	2.25	3.00	3.50	4.00	4.50	5.00
2.00	0.25	0.50	0.63	2.00	2.63	3.50	4.13	4.75	5.38	6.00
2.50	0.30	0.60	0.75	2.25	3.00	4.00	4.75	5.50	6.25	7.00

	<0.75	Low flood hazard (caution is required)
Class 1	0.75 – 1.25	Moderate hazard - Danger for some (children, the elderly & infirm)
Class 2	1.25 – 2.00	Significant hazard - Danger for most (the general public)
Class 3	>2.00	Extreme hazard - Danger for all (includes the emergency services)

Flood Hazard Rating Calculations

Modelled flood levels have been provided by the Environment Agency for a range of probabilities; and are provided within Table 3.

Within the calculation table illustrated below:

- Point 1 represents the lowest level of the site access onto Greenacres Lane and
- Point 2 represents the lowest level of the proposed flood escape route as illustrated on the proposed plans for the development within Appendix C.

Table 6: Flood Hazard Rating for Safe Access/Egress Route (Greenacres Lane)

DF=0 (Flood Depth 0-0.25m); DF=0.75 (Flood Depth 0.25-0.75m); DF=1.0 (Flood Depth >0.75m)

Point Ref.	Level (m)	1 in 25 year		1 in 50 year		1 in 100 year		1 in 150 year	
		Flood Depth (m) A	Flood Hazard Rating A	Flood Depth (m) B	Flood Hazard Rating B	Flood Depth (m) C	Flood Hazard Rating C	Flood Depth (m) D	Flood Hazard Rating D
1	22.34	-0.11	0	0.14	0.35	0.37	1.88	2.03	1.21
2	22.81	-0.58	0	-0.33	0	-0.1	0	0.04	0.1

In summary the resulting calculations indicate that the access on to Greenacres Lane possesses a a Hazard Rating of 1.88 during the 1 in 100 year event, increasing to 1.21 with the application of climate change; and therefore in general presents a significant hazard to the site's occupiers leaving the site at the peak of the flood event.

With this in mind, an alternative route away from the property has been devised which provides a safe pedestrian escape route, during flood conditions.

4.1.7 Conclusion

It is concluded that the River Severn presents a flood risk to the application site at Plot 2, Greenacres Lane in Bewdley.

Furthermore, the development is confirmed to be situated within Flood Zone 2; and dry access and egress from the site can be obtained during the 1 in 100 year plus climate change (1 in 150 year) event.

Dry access and egress during the extreme 1 in 1000 year event however may not be achievable.

4.2 Groundwater

An extract from the Wyre Forest Level 1 SFRA states:

'The Environment Agency confirmed that they are not aware of any specific incidences of groundwater flooding within the District. However, it should be noted that areas such as the Riddings Brook catchment and the low lying areas of Wolverley are known to be very "marshy" due to the high levels of the water table, which could potentially exacerbate surface flooding problems.'

A review of historical borehole logs from the British Geological Survey website, within the Bewdley area indicated no groundwater seepage at depths greater than 3 metres below ground level.

Furthermore details regarding the underlying geology of the Bewdley area have been reviewed from www.landis.org.uk or 'Soilscape', which indicates that the site lies on freely draining floodplain soil.

In conclusion this mechanism is deemed to present a low flood risk to the proposed development.

4.3 Overland Flow

The proposed development is situated within the relatively steep sided catchment associated with the River Severn at this location along its route.

Information obtained from local Ordnance Survey maps for the Bewdley area indicates that Dowles Road exhibits an elevation approximating 40mAOD; and is therefore 15 metres above the general level within the application site.

In the event of heavy rainfall, runoff may be directed downhill along Greenacres Lane, towards the River Severn. It is noted that should this occur the proposed residential dwelling is set back away from the road and is elevated 0.67 metres above the site access level.

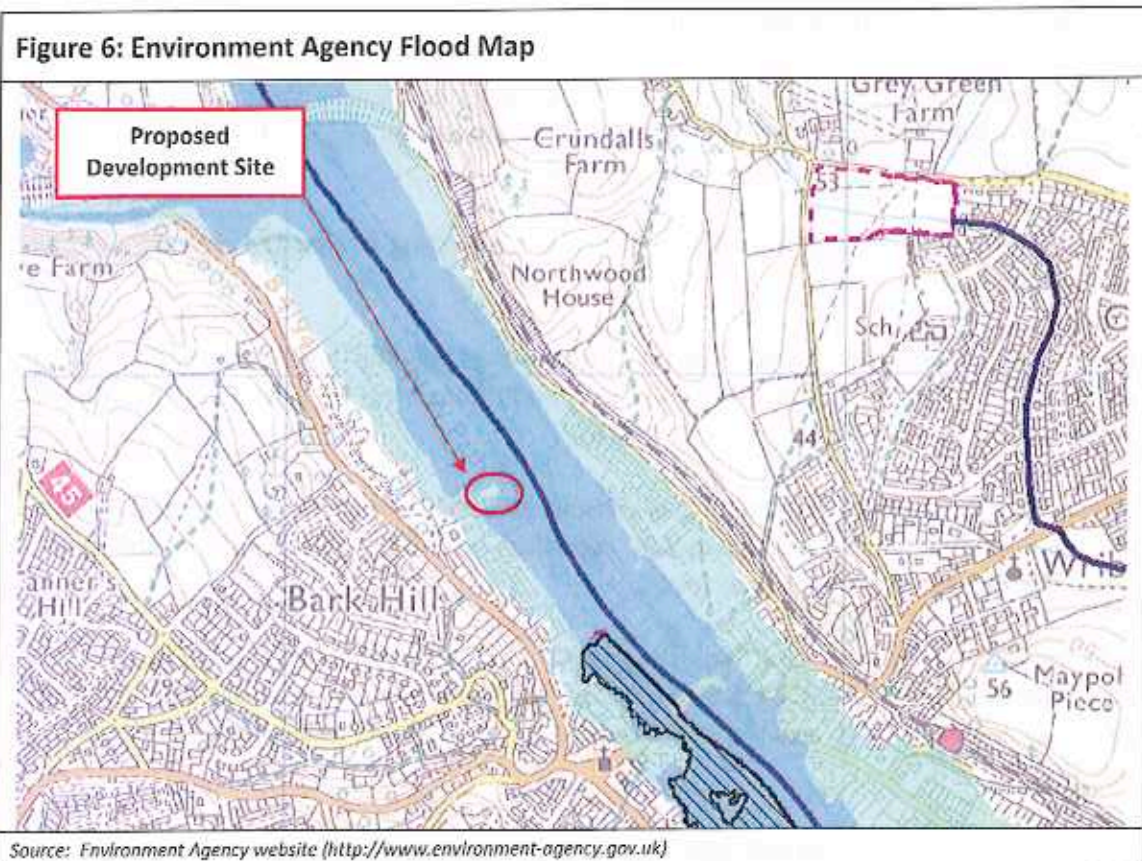
As such it is considered that there is a low flood at the proposed dwelling from overland flow.

5.0 Material Consideration In Respect of PPS25






5.1 Climate Change

Annex A of PPS25 suggests that winters will become wetter over the whole of the UK, by as much as 20% by the year 2050. In making an assessment of the impact of climatic change, flooding from rivers and land will give a peak flow allowance of up to 20% increase in rainfall for a given return period by 2050 and 30% by 2110. These considerations will provide an appropriate precautionary assessment for climatic change impact on flood flows and rainfall intensities.

5.2 Environment Agency Flood Map



Key

-  Flooding from rivers or sea without defences (Flood Zone 3)
-  Extent of extreme flood (Flood Zone 2)
-  Flood defences
-  Areas benefiting from flood defences
-  Main rivers

The Environment Agency flood Zone map indicates that the site lies predominantly within Flood Zone 2, being the Zone comprising land having between a 1 in 100 and 1 in 1000 annual probability of river flooding (1% – 0.1%) or between a 1 in 200 and 1 in 1000 annual probability of sea flooding (0.5% – 0.1%) in any year.

5.3 Finished Floor Levels

The proposed residential dwelling is located within Flood Zone 2, of the Environment Agency Flood Map; and is elevated approximately 0.3 – 0.46 metres above the modelled 1 in 100 year flood level.

Furthermore the ground floor level of the building is 0.15 – 0.32 metres above the 1 in 150 year flood level; which has been used within the assessment to represent the increase in flood levels associated with future climate change.

It is usual with new residential development to recommend finished ground floor levels at a minimum of 600mm above the 1 in 100 year plus climate change (1 in 150 year) level; hence 23.45mAOD.

However proposals involve the change of use of an existing building to provide residential accommodation.

The current floor level ranges within the existing building between 23.01mAOD and 23.17mAOD. This would mean uplifting the ground floor level by 0.28 – 0.44 metres; with and a step up into the building of 0.44 metres.

This uplift in levels within the building is considered to be impractical both in terms of access into the building and the subsequent reduction in head heights within the building structure; at ground and first floor levels.

It is therefore recommended that the ground floor level within the building is set at a minimum level of 23.15mAOD; which provides the required 150mm above external ground levels for installation of a damp proof course or membrane; and a minimum of 300mm freeboard.

5.4 Emergency Access and Egress during Times of Flood

During flood conditions it has been determined that the access onto Greenacres Lane is likely to be inundated.

As such, a flood escape route has been devised as part of the development proposals, which provides a dry route along the rear of adjacent properties; and back onto Greenacres Lane during the 1 in 100 year plus climate change (1 in 150 year) event.

This flood escape route will also provide a benefit for neighbouring properties, which may also be affected by flooding from the River Severn.

A plan illustrating the proposed escape route is provided within Appendix C.



Figure 7: Start of Proposed Flood Evacuation Route (Viewed West)

(Image: PWA Associates May 2012)

Figure 8: End of Proposed Flood Evacuation Route (Viewed from Greenacres Lane)

(Image: PWA Associates May 2012)



5.5 Flood Warning

It is concluded that the site lies within Flood Zone 2; and therefore it is considered that there is a medium risk of flooding.

The site is covered by the Environment Agency's Flood Warning's Direct Service.

This is a free service which enables the Environment Agency to send a direct message when flooding is expected and may affect the property. Flood warnings are designed to provide residents the time to prepare for flooding. Flood warnings can be sent by telephone, mobile, email, SMS text message or fax.

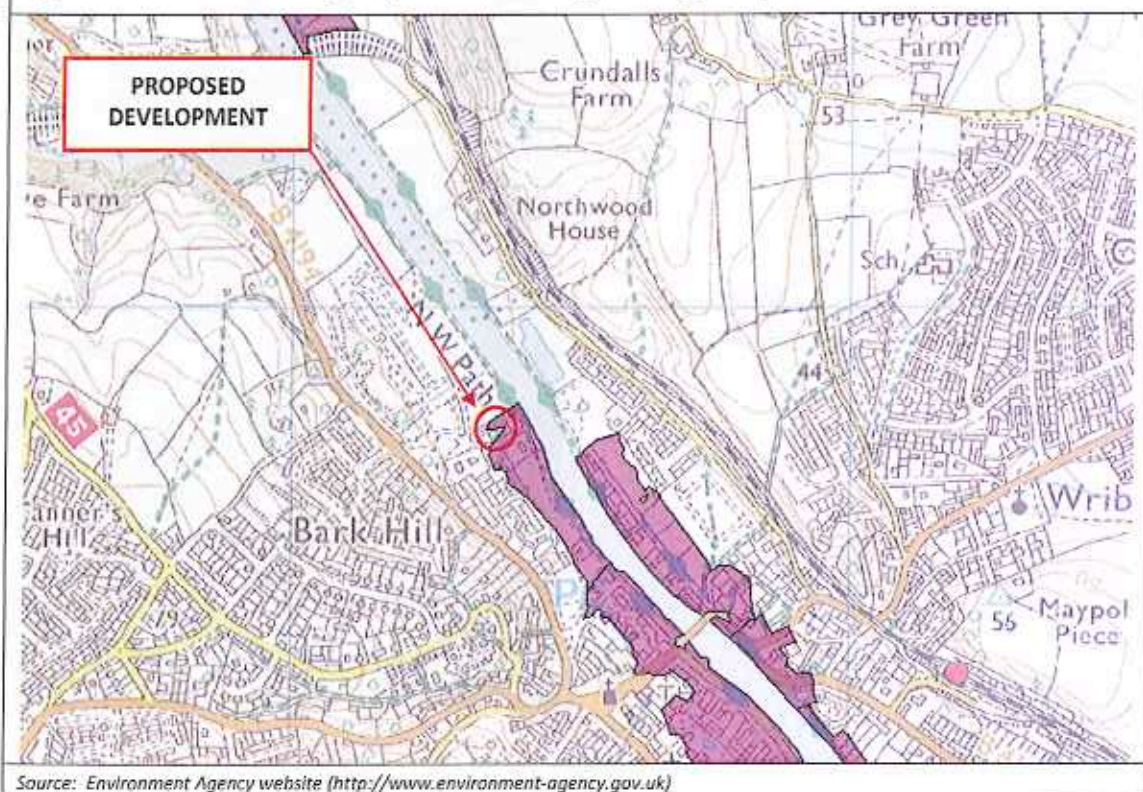
The Environment Agency also provides the **Floodline 0845 988 1188** service, where occupants can listen to recorded flood warning information for the area or speak to an operator for advice 24 hours a day.

Should a flood event reach the level where the development is at risk of inundation, then the Environment Agency will issue a Severe Flood Warning.

More information regarding this service is available from website:

<http://www.environment-agency.gov.uk/homeandleisure/floods/38289.aspx>

Figure 9: Environment Agency Flood Warning Coverage Map



5.6 Flood Resistance/Resilience Measures

In areas of medium to high flood risk, it is usual to recommend the implementation of flood proofing within the proposed building design to reduce the residual damages if an extreme flood was to occur.

Owing to constraints with regard to remodelling an existing building, it is considered impractical to elevate ground levels within the footprint to a level 600mm above the 1 in 100 year plus climate change flood level (1 in 150 year event) i.e. 23.45m AOD; to provide sufficient freeboard.

Therefore it is recommended that the finished ground floor level within the building is set at a minimum level of 23.15m AOD.

Therefore to provide the minimum required level of protection in accordance with general Environment Agency requirements it is recommended that flood resistance/resilience techniques are considered for incorporation into the design for refurbishment.

Flood resistance/resilience measures should therefore be designed to a minimum level of 23.45m AOD.

Flood proofing is a technique by which buildings are designed to withstand the effects of flooding. There are two main categories of flood proofing, which are dry proofing and wet proofing.

Dry proofing methods are designed to keep water out of the building, and wet proofing methods are designed to improve the ability of the property to withstand the effects of flooding once the water has entered the building.

Where wet proofing is required it is important that a flood warning and evacuation plan should be prepared and practised regularly, so that the occupants and any contents of the building can be moved to areas above the 1 in 100 year plus climate change flood level if required. In addition fixtures and fittings should be built to withstand immersion in water or designed to be easily replaced.

The differential pressures across load bearing walls and the flotation effect that will occur during flood events should be taken into account when considering dry proofing techniques. For most existing properties this means that dry flood proofing should only be considered if the expected flood depth is under 0.9m.

The table overleaf summarises the recommendations for flood proofing measures which can be incorporated within the design. Such measures are put forward in accordance with 'Development and Flood Risk Guidance for the Construction Industry' CIRIA C624, London 2004.

Table 7: Typical Flood Proofing Measures

Feature	Considerations To Improve Flood Proofing
External Walls	Careful consideration of materials: use low permeability materials to limit water penetration if dry proofing required. Avoid using timber frame and cavity walls. Consider applying a water resistant coating. Provide fitting for flood boards or other temporary barriers across openings in the walls.
Internal Walls	Avoid use of gypsum plaster and plasterboards; use more flood resistant linings (e.g. hydraulic lime, ceramic tiles). Avoid use of stud partition walls.
Floors	Avoid use of chipboard floors. Use concrete floors with integrated and continuous damp proof membrane and damp proof course. Solid concrete floors are preferable; if a suspended floor is to be used, provide facility for drainage of sub-floor void. Use solid insulation materials.
Fitting, Fixtures and Services	If possible, locate all fittings, fixtures and services above design floor level. Avoid chipboard and MDF. Consider use of removable plastic fittings. Use solid doors treated with waterproof coatings. Avoid using double-glazed window units that may fill with flood water. Use solid wood staircases. Avoid fitted carpets. Locate electrical, gas and telephone equipment and systems above flood level. Fit anti-flooding devices to drainage systems.

It would be preferable to avoid external doors as this would remove a potential point of flood inflows. However since free access and egress into the new building will be required, flood resistant doors and/or the use of flood resistant stop logs or flood boards should be considered.

5.7 Flood Protection Equipment

Keeping water out of the refurbished building, or limiting the ingress of floodwater is recommended when considering flood protection measures. Excluding water will help to reduce damage to the internal fabric of the buildings and their contents. Such measures are referred to as dry-proofing and include:

- Temporary flood barriers.
- Measures to reduce seepage through walls and floors.
- The installation of non-return valves on sewers.

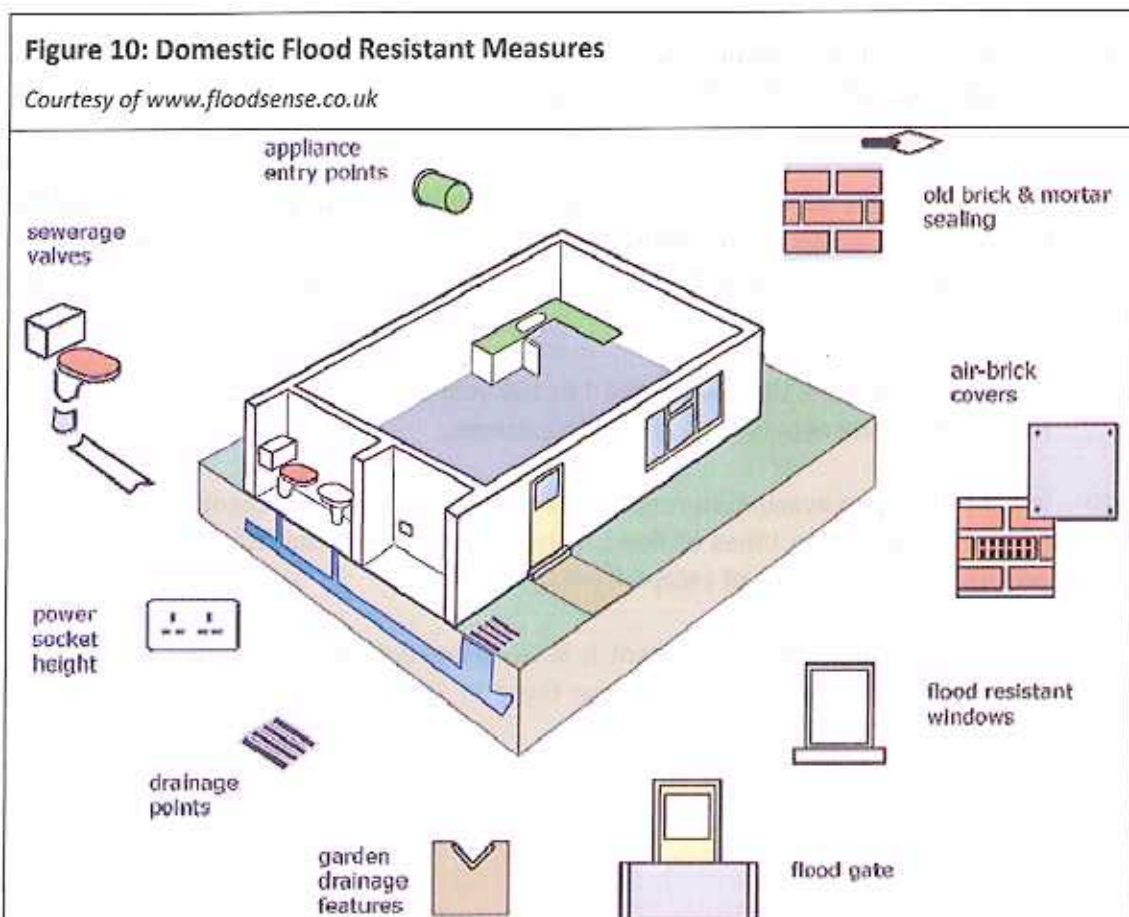
Movable flood barriers can be very effective in preventing or reducing the volume of floodwater entering through doors and other external openings in walls, such as windows and airbricks, as long as a good quality product is installed in accordance with the manufacturer's instructions.

Although barriers may not totally prevent the ingress of water into a building, they can provide valuable time in which to move people, vehicles, expensive possessions and other essential items to higher levels before floodwater rises inside the building.

In order to compensate for the unfeasibility for elevating floor levels within the existing building, it is recommended that the installation of flood protection up to a level of 23.45mAOD is considered.

Flood barriers on wall openings can also reduce the amount of contaminated silt and debris entering a property. Water that seeps through the ground or walls is likely to be filtered to some extent and therefore is usually cleaner than floodwater entering larger openings such as gaps around doors and airbricks.

There are many suppliers and various types of flood doors and barriers which may be utilised at the application site; and a sketch illustrating some typical domestic flood resistant measures are illustrated within Figure 10 below.



6.0 Conclusions and Recommendations

- 6.1 The proposed development covers a gross development area of 0.02 Hectares, and is located at Plot 2, Greenacres Lane in Bewdley, Worcestershire.
- 6.2 The development involves a change of use from light industrial/commercial to residential use.
- 6.3 The footprint of the existing building is located primarily within Flood Zone 2; although following completion of the assessment it is highlighted that the site access onto Greenacres Lane is located within Flood Zone 3.
- 6.4 The primary source of flooding at the development is identified from the River Severn; which is located approximately 30 metres to the east of the application site.
- 6.5 The predicted 1 in 100 year flood level for the River Severn in line with the development is 22.71mAOD.
- 6.6 Modelled flood levels incorporating an increase for climate change has not been provided. Therefore for the purposes of the assessment, the modelled 1 in 150 year flood level in line with the site has been utilised i.e. 22.85mAOD.
- 6.7 Ground floor levels within the existing building range from 23.01mAOD up to 23.17mAOD, and are therefore elevated above the predicted 1 in 100 year and 1 in 150 year flood levels.
- 6.8 The level of the site access onto Greenacres Lane is at a level of 22.34mAOD. Undertaking a comparison against the modelled flood levels provided for the River Severn indicates that it is likely to become inundated during these design flood events.
- 6.9 Calculations indicate that during the 1 in 100 year and 1 in 150 year events, the flood hazard at the site access is significant to extreme.
- 6.10 In light of this, an evacuation route is proposed, to enable the Client to escape away from the property in times of flood. Calculations suggest that this alternative route provides low risk means of escape from the site.
- 6.11 With new residential development it is usual to recommend internal ground floor level at a minimum of 600mm above the 1 in 100 year plus climate change flood level (1 in 150 year event).

- 6.12 Due to constraints within the existing building it is considered impractical to raise the ground floor level within the building to the required 23.45m AOD. Therefore it is recommended that the ground floor level is set to a minimum of 23.15m AOD i.e. 150mm above external ground levels to provide the required level for the damp proof course/membrane.
- 6.13 Furthermore it is recommended that flood resistance/resilience techniques are considered for inclusion within the design for refurbishment, to a level of 23.45m AOD.
- 6.14 Due to the proximity of the site to the River Severn; along with its location within Flood Zone 2, it is highly recommended that the Client registers to receive flood warnings from the Environment Agency's Flood Warning's Direct service and devises a flood evacuation plan to relocate away from the flooding is required.
- 6.15 An assessment of secondary flood mechanisms indicates that groundwater and overland flows present a low flood risk to the proposed development.

APPENDIX A

Environment Agency Standing Advice

More Vulnerable development up to 1ha in size (excludes non-residential extension with a footprint of less than 250sq. metres or a domestic extension) in Flood Zone 2

Applications for planning permission should be accompanied by a completed form. An electronic version can be submitted by 'printing' it to a PDF writer.

The guidance on this sheet concerning Flood Risk Assessment requirements should also be applied to applications for Change Of Use within this category. Note - the Sequential Test does not apply to Change of Use applications. This advice is not applicable to development proposals for landfill/waste facilities & holiday/short-let caravans in this Flood Zone.

Sequential Test requirements

The Sequential Test is applied by the Local Planning Authority (LPA) to planning applications within this category. Details of the sequential test are set out in paragraph 101 of the NPPF.

FRA requirements

Planning applications must be accompanied by a Flood Risk Assessment (FRA). We recommend the FRA meets the requirements set out in the table below. All flood management measures will need to be supported by plans and drawings that form part of the FRA. The requirement for a FRA is set out in the NPPF in paragraphs 103 and 104 and footnote 20.

We recommend that Table 1.0 is completed by the applicant as part of the FRA submission. The standing advice help pages¹ provide guidance to help the applicant through this process. Plans may need to be amended and/or application withdrawn if the detail provided in the table does not meet the requirements as set out.

The following sections are to be completed by the applicant and checked by the LPA:

Site address & development description:	Plot 2 Greenacres Lane Bewdley DY12 2RE Change of Use: Light Industrial/Commercial to Residential Use
Print Name:	Donna Metcalf for Paul Waite Associates
Signature:	
Date:	25/05/12

Continued...

¹The help pages are available to see on the Environment Agency website www.environment-agency.gov.uk on the flood risk standing advice pages.

Table 1.0

More vulnerable development up to 1ha in size (excludes Non-residential extension with a footprint of less than 250 sq. metres or a domestic extension) in Flood Zone 2 (Does not apply to sites used for holiday or short-let caravans and camping, or landfill and waste management sites. For these proposals please refer to FRA Guidance note 3).

Flood risk to building/occupants. Information to be provided by the applicant as part of the Flood Risk Assessment	Applicant to provide level information in the boxes below	Criteria to be used by LPA in assessing the Flood Risk Assessment
Flood level for the 1 in 100 annual probability river flood (1%); or 1 in 200 annual probability sea flood (0.5%) in any year (including an allowance for climate change) in relation to Ordnance Datum ² , (Newlyn)	22.71mAOD	<p>In order to deliver safe development, we strongly advise the following -</p> <p>Ground floor levels to be set at a minimum of whichever is the higher of:</p> <ul style="list-style-type: none"> • 300mm above the general ground level of the site OR • 600mm above the 1 in 100 annual probability river flood (1%); or 1 in 200 annual probability sea flood (0.5%) in any year (including an allowance for climate change). • Basement rooms to have unimpeded access internally to an upper level. <p>LPA's role: Ensure that the level information has been provided and the standards set out above have been met.</p>
Average ground level of the site in relation to Ordnance Datum (Newlyn)	22.04mAOD	
Finished floor level of lowest habitable room in relation to Ordnance Datum (Newlyn)	22.01mAOD	
1 in 1000 annual probability (0.1%) in any year flood level including an allowance for climate change where this information is available.	<p>22.71mAOD (1 in 100 year)</p> <p>22.85mAOD (1 in 150 year)</p> <p>1 in 1000 year not provided - used 23.71mAOD for assessment purposes.</p>	<p>In order to deliver safe development, we strongly advise the following -</p> <p>For single storey buildings or ground floor subdivisions with no access to higher floors, users of the development have access to a refuge set above the 1 in 1000 annual probability (0.1%) in any year flood level including an allowance for climate change.</p> <p>LPA's role: Ensure that the provision of a safe refuge for single storey buildings complies with the above information. To achieve these standards floor levels should be raised. Note: For buildings with more than one storey in this category upper floors can be considered safe refuge</p>

Continued...

² Ordnance Datum or the abbreviation 'OD' is the mean level of the sea at Newlyn in Cornwall from which heights above sea level are taken. The contour lines on Ordnance Survey maps measure heights above OD for example, though these are not accurate enough for a flood risk assessment.

Table 1.0 (Continued)

Applicant is to provide confirmation that the requirements below have been met	Applicant to indicate compliance in the box below. Enter 'yes' or 'no'	LPA should satisfy themselves with regard to the comments below.
<p>Management of surface water Applicant is to indicate that surface water will be managed in accordance with the following standards:</p> <ul style="list-style-type: none"> • Specific requirements for managing surface water set out in an adopted Strategic Flood Risk Assessment and/or Surface Water Management Plan produced by the Local Planning Authority. • Surface water run-off will be controlled to ensure no flooding of property and no increase in surface water run-off from the site to a watercourse or receiving water body compared to the existing pre-application run-off rate in a 1 in 100 year storm event (1% chance in any one year) plus an appropriate allowance for climate change (Flood risk Practice Guide paragraphs 5.51 and 5.54) • Meets the requirements of Approved Document Part H of Building Regulations 2000. 	<p>Reduced footprint due to provision of a small domestic garden.</p> <p>N/A</p>	<p>LPA's role: Look for assurance from the applicant that surface water will be managed in accordance with the requirements opposite. Seek assurance if not already provided. Cross check the planning application with the Local Plan. Consultation with the local authority Building Control department is recommended. Paragraph 103 of NPPF states that LPAs should in determining planning applications give priority to the use of SuDS.</p> <p>Note: Strategic options for surface water management should be used wherever available. Options such as this would be identified as part of the SFRA for inclusion within in the Local Plan. Building regulation requirements alone are not appropriate for areas with critical drainage problems.</p>
<p>Flood resilience and resistance Applicant is to indicate that flood resilience/ resistance and emergency escape measures/ procedures have been incorporated where possible. This applies to any part of the building (e.g. basements), that are situated below the 1 in 100 annual probability river flood (1%); or 1 in 200 annual probability sea flood (0.5%) level in any year (including an allowance for climate change).</p>	<p>Yes</p>	<p>LPA's role: Look for assurance from the applicant that resilience/resistance and evacuation procedures have been addressed in accordance with the requirements opposite. Seek assurance if not already provided. Cross check the planning application with the Local Plan. Consultation with the local authority Building Control (flood resilience/ resistance) and Emergency Planning (evacuation) department is recommended.</p>
<p>Other sources of flooding (not rivers or the sea) Applicant is to indicate that the SFRA has been referred to and that the recommendations regarding other sources of flooding have been incorporated into the application.</p> <p>If no SFRA is available and flood risk from other sources is present, guidance should be sought from the organisations listed in the help pages under the heading 'other sources of flooding'.</p>	<p>Yes</p>	<p>LPA's role: Look for assurance from the applicant that the SFRA has been referred to (where available) and that mitigation for flooding from other sources has been provided where necessary.</p>

Note on flood level information: Flood Level information should be obtained by the applicant first from the SFRA, or if not available, from the Environment Agency. Where the applicant is unable to obtain the information from either of these sources the LPA should consult the Environment Agency for an individual consultation response.

End of comment

APPENDIX B

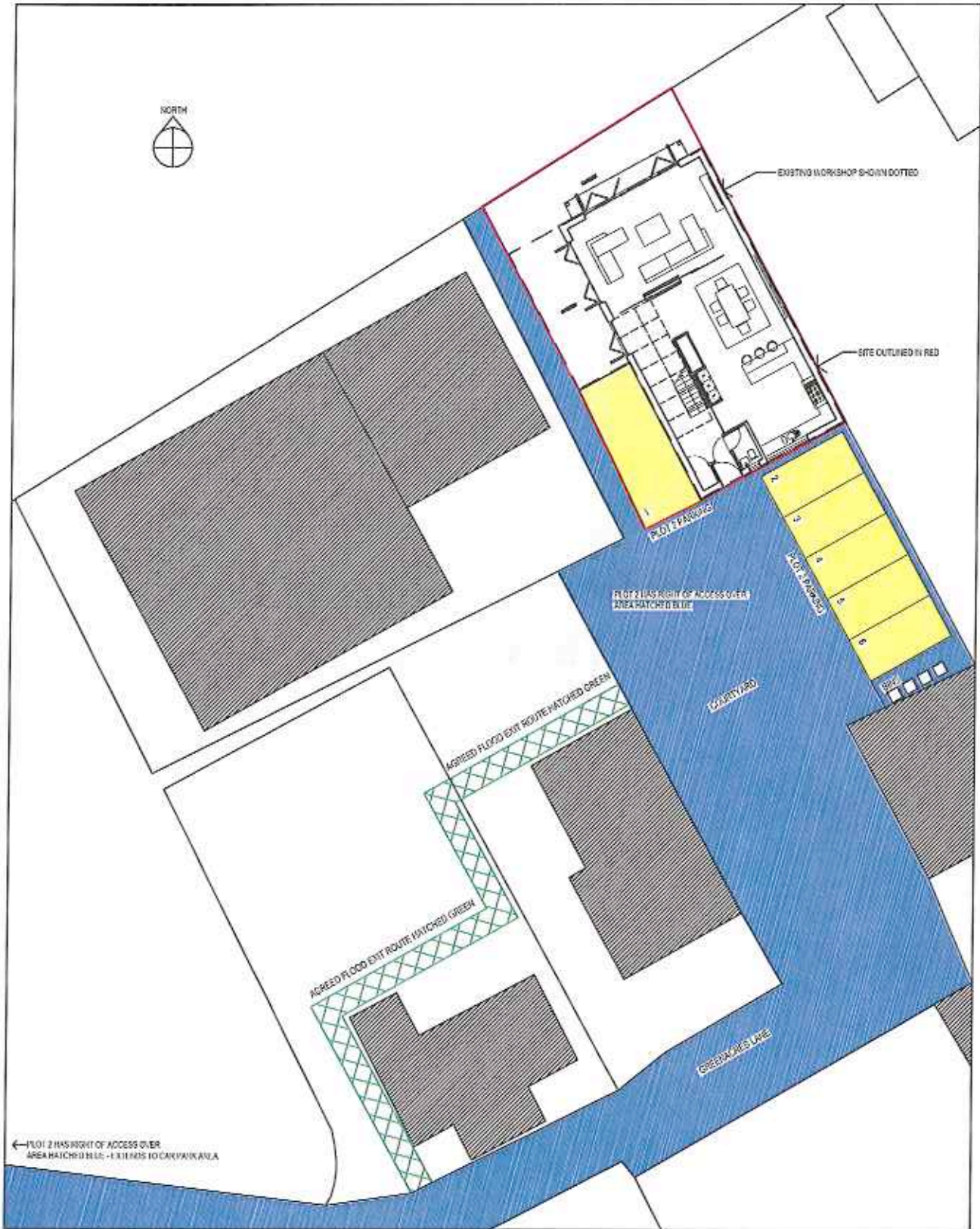
Existing Site Layout: Topographical Survey

APPENDIX C

Proposed Development Plans

Notes

1. All sizes to be checked on site by the contractor prior to preparation of shop drawings or fabrication of parts.
2. This drawing should not be scaled. Any discrepancies to be brought to the immediate attention of the architect.



Client MR MATT HARDING + MS STACEY MATTHEWS
 Project PLOT 2
 GREENACRES LANE, BEWDLEY
 Title SITE PLAN AS PROPOSED
 Project No.

Rev.	Description	By	Date
Scale	1:200 @ A3		
Drawing No.	SK_P_02	Rev.	B
Date	APRIL 2012		
Drawn By	JO	Issued For	
Copyright of design and drawing reserved.			

APPENDIX D

Environment Agency Flood Data

Donna Metcalf

From: MidsWest, [Midswest@environment-agency.gov.uk]
Sent: 17 May 2012 15:30
To: info@floodriskconsult.com
Subject: ERW/1781: Product-4 FRA River Severn - for Plot 2, Greenacres Lane, Bewdley DY12 2RE
Attachments: ERW1781-FRA Map.pdf; ERW1781-Extents 1.pdf; ERW1781-Extents 2.pdf; ERW1781-Flood Event Outline.pdf; Standard Notice 2011.doc.pdf; FRA Advisory text.pdf; Guidance for Developers Note.doc

17 May 2012

Dear Donna Metcalf

Provision of Product-4 FRA River Severn - for Plot 2 Greenacres Lane, Bewdley, DY12 2RE.

Thank you for your request of 1 May 2012 to use Environment Agency data, Product 4, in the development of the Flood Risk Assessment (FRA) for the above-named site. The information is attached.

If you have requested this information to help inform a development proposal, then you should note the detail in the attached advisory text on the use of Environment Agency Information for Flood Risk Assessments / Flood Consequence Assessments.

This information is provided subject to the enclosed Standard Notice, which you should read.

Please see attached Detailed FRA Map.

A flood plain is an area of land over which river or sea water flows or is stored in times of flood, or would flow but for the presence of flood defences where they exist. This is a precautionary approach in case flood defences are overtopped or breached.

We use historical flood records, river flow data and computer models to estimate specific flood events; on rivers, this will normally be the greater of the 1 in 100 year return period or the highest known water level. In the coastal areas the 1 in 200 year flood or the highest known flood will be used, whichever is the greater. Information from these models is also used to show the need for flood alleviation measures in certain areas and to advise on development within the floodplain. The flood zones refer to the land at risk of flooding and does not refer to single properties. It is possible for a property to be built at a level above the floodplain but still fall within the risk area.

The Flood Map does not reflect future predicted changes in climate. Nor does it provide information on flood depth, speed or volume of flow. Flooding can also occur from other sources such as groundwater or sewers, which are the responsibilities of other organisations.

According to our published flood map which provides a general estimate of the likelihood of flooding across England & Wales, the site is shown to be within Flood Zone 3 (1% chance of flooding in any given year) from the River Severn not taking into account the presence of flood defences. This means that the site/ area lies within the 1 in 100 year flood zone. Please note that the flood plain does not provide an indicator of flood risk at an individual property level.

The Bank Top ePlanning Tool

Local Authorities have the responsibility to consult the Environment Agency on any new development falling within 20 metres of the top of the bank of a Main River. The Bank Top Tool

allows the Local Planning Authority to determine if new development falls within these areas and triggers the consultation.

Modelled Levels

Please see details of modelled levels in the table below

Please see attached Modelled Extent Maps.

Node Reference	Level (mAOD)					
	1 in 150 Year Chance	1 in 100 Year Chance	1 in 50 Year Chance	1 in 25 Year Chance	1 in 10 Year Chance	1 in 5 Year Chance
14246	22.98	22.83	22.60	22.36	21.99	21.73
14245	23.00	22.86	22.63	22.39	22.03	21.77
14239	22.98	22.84	22.61	22.37	22.02	21.77
14228	22.98	22.84	22.62	22.38	22.02	21.77
14218	22.96	22.82	22.59	22.35	21.99	21.74
14207	22.85	22.71	22.48	22.23	21.86	21.60
14196	22.86	22.72	22.50	22.26	21.90	21.65
14186	22.79	22.65	22.42	22.19	21.84	21.59
14173	22.74	22.60	22.37	22.13	21.78	21.54

Node Reference Point	Flow m ³ /s					
	1 in 150 Year Chance	1 in 100 Year Chance	1 in 50 Year Chance	1 in 25 Year Chance	1 in 10 Year Chance	1 in 5 Year Chance
14246	749.54	716.32	665.64	614.92	542.57	494.62
14245	749.53	716.32	665.64	614.92	542.57	494.62
14239	749.53	716.32	665.64	614.92	542.57	494.62
14228	749.53	716.32	665.64	614.92	542.57	494.62
14218	749.53	716.31	665.63	614.91	542.57	494.62
14207	749.53	716.31	665.63	614.91	542.57	494.61
14196	749.52	716.31	665.63	614.90	542.57	494.61
14186	749.52	716.31	665.62	614.90	542.56	494.61
14173	749.52	716.30	665.62	614.90	542.56	494.61

Source: Abermule to Worcester model produced in 2004 using ISIS 1D.

mAOD definition

The term 'mAOD (N)' means 'metres above Ordnance Datum (at Newlyn, Cornwall)'. Ordnance Datum is the National standard datum of the Ordnance Survey from which all levels, relative to sea level, are quoted and has been used in Great Britain since 1936.

Historical Flooding

Our records of Historic Flooding show the extents of known flooding from rivers, the sea, and groundwater. Examination of our records of Historic Flooding shows that the area that the above site is within, was flooded in 1960 and 1998. Please note that these records show flooding to the land and do not necessarily indicate that properties within the historic flood extents were flooded internally. It is also possible that the pattern of flooding in this area has changed and that this area would now flood under different circumstances. You may also wish to contact your local authority or internal drainage board, to see if they have other relevant local flood information.

Additional Flooding Information

You may however wish to obtain further information regarding localised historic flooding from drains, culverts, surface-water flooding and small watercourses, which are not modelled by us. This may be available from the relevant Local Authority.

Flood Defences

There are no Environment Agency maintained flood defences in the Greenacers Lane area of Bewdley and no information is available for the standard of protection offered by other flood defences or natural channels to this area.

The River Severn in this area receives only channel maintenance and blockages are removed as required.

Future Planning Advice:

This letter provides information on River Flooding only. It does not constitute a Flood Risk Assessment (FRA) or state that the site is not at risk from flooding. There are different forms of potential flooding that we do not hold records of.

The attached 'Guidance for Developers' note is to assist you with advice on when a FRA will be required, what it may need to consider, and who might prepare them. It also includes links to internet sources of information. If informal Planning advice on a draft FRA or development proposals is required please contact our **Planning Team** by e-mailing westareaplanning@environment-agency.gov.uk with your information.

Future advice on the potential drainage issues:

If your proposal would involve works in any river or within 8 metres of the top of a main river bank or within the floodplain of a main river then permission may also be required from us before you start work. For advice on this and any drainage issues please contact our **Development and Flood Risk Team** on telephone: 01743 283522 or by emailing dfr.midswest@environment-agency.gov.uk

This response contains answers to the specific questions contained in your correspondence. I hope this information meets your needs. If you need to discuss anything further please contact us at the address below.

Yours sincerely

Rachel Hamer
External Relations Officer

For further information please contact External Relations on 01743 283410
Direct e-mail:- midswest@environment-agency.gov.uk

Enc.
Detailed FRA Map
Standard Notice
Guidance for Developers
Advisory Text

From: Donna Metcalf [mailto:info@floodriskconsult.com]
Sent: 01 May 2012 09:50

To: Enquiries, Unit

Subject: Plot 2, Greenacres Lane, Bewdley DY12 2RE

Please provide a reference number to enable the order of Product 4 data to inform an FRA at the above address.

A location plan of the site is attached for information purposes, with co-ordinates provided below:

X: 378386

Y: 275798

Should you require further information, please do not hesitate to contact me.

Kind regards,

Donna Metcalf

The Flood Risk Consultancy

6 Ash Street

Crosshills

Keighley

BD20 8TR

Office: 01535 632822

Mobile: 07928 519871

Email: info@floodriskconsult.com

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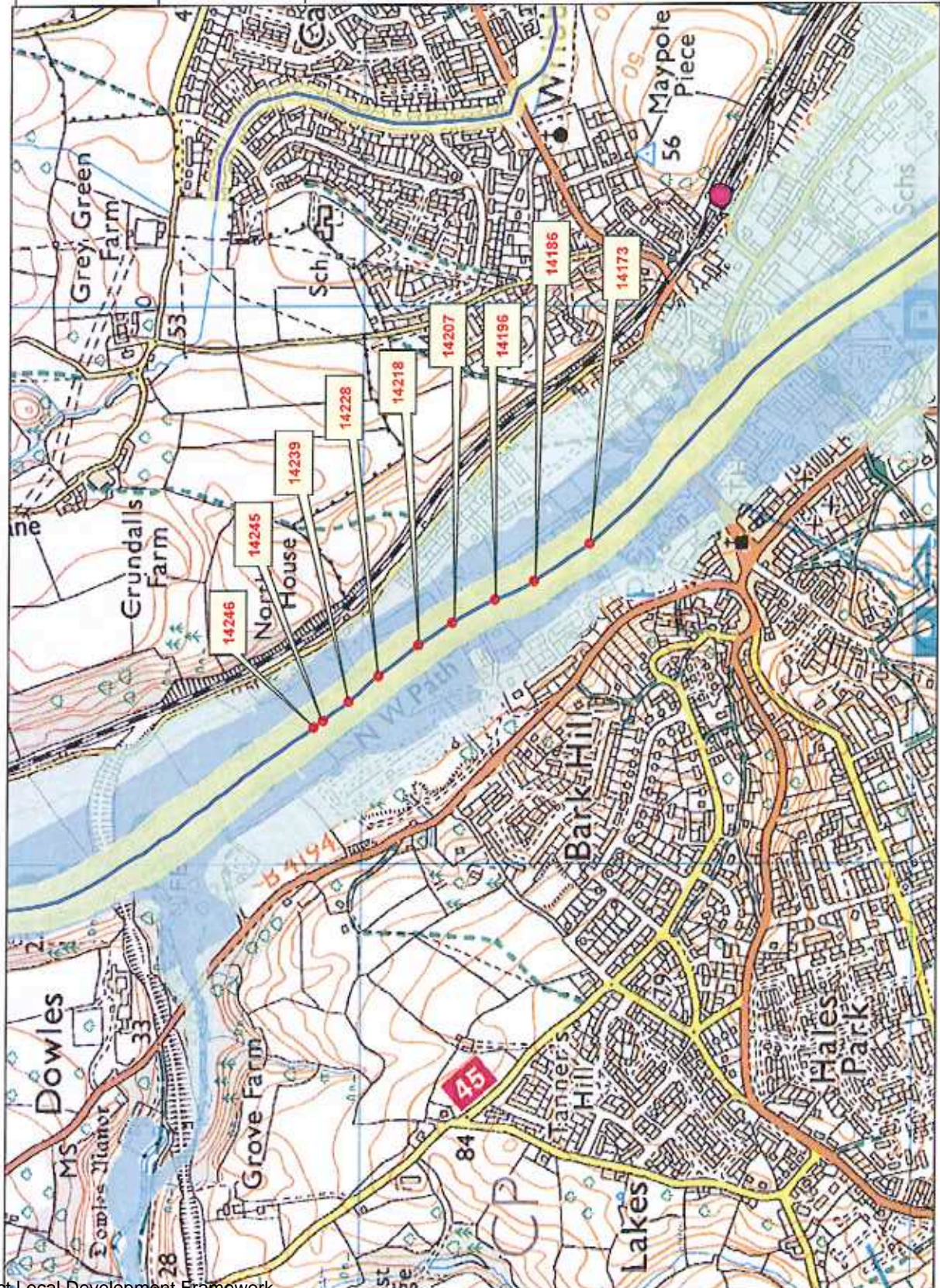
Detailed FRA Map centred on Greenacres Lane, Bewdley - created 16 May 2012 [ERW1781]



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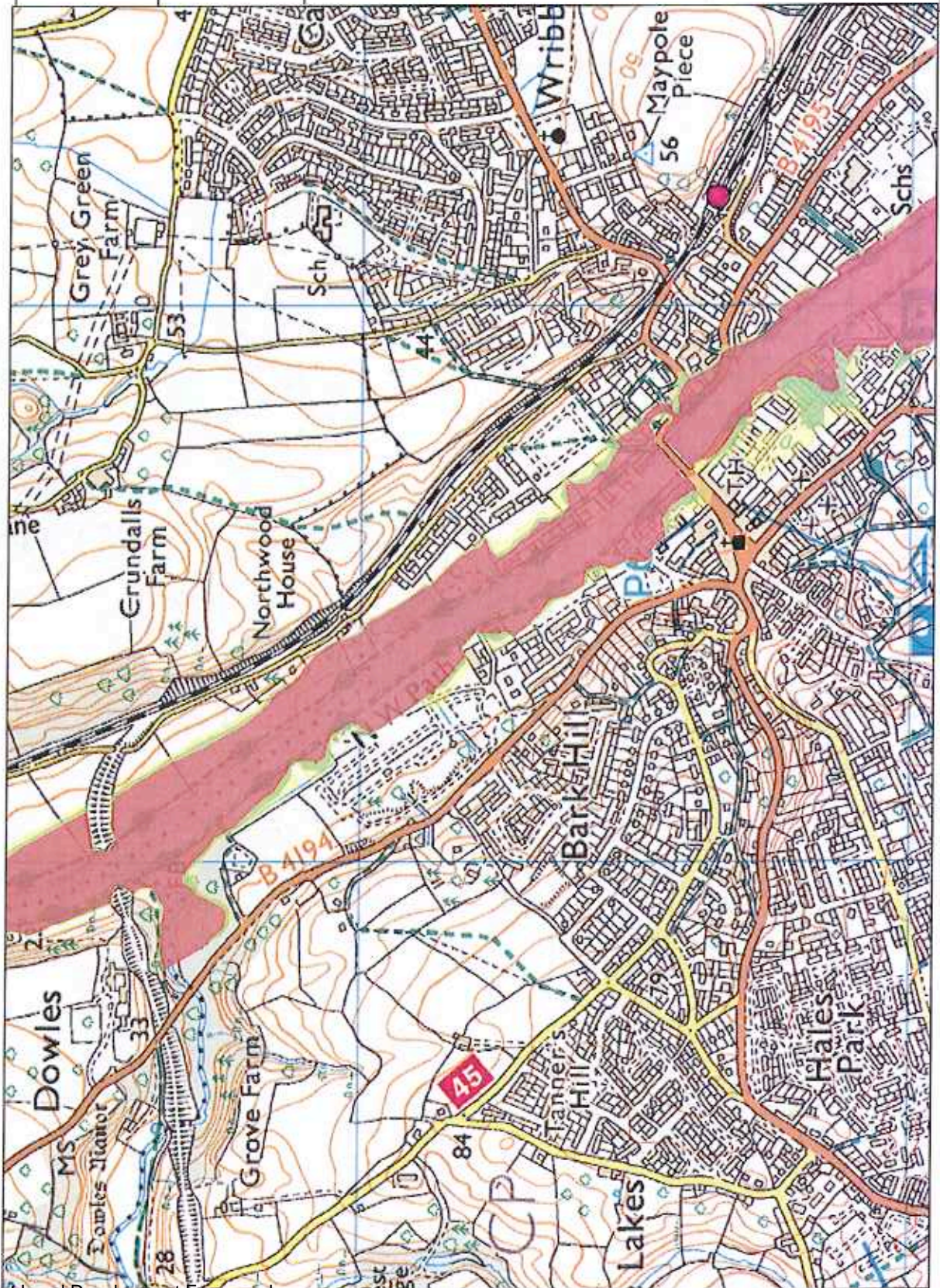
Legend

- Node Reference Point
- main rivers
- Bank top e-planning tool
- 1% (1 in 100 year) floodplain (fz3)
- 0.1% (1 in 1000 year) floodplain (fz2)



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Modelled Extent Outline Map centred on Greenacres Lane, Bewdley - created 16 May 2012 [ERW1781]



1: 10,000

Legend

- 1 in 5 Year Outline
- 1 in 10 Year Outline
- 1 in 25 Year Outline

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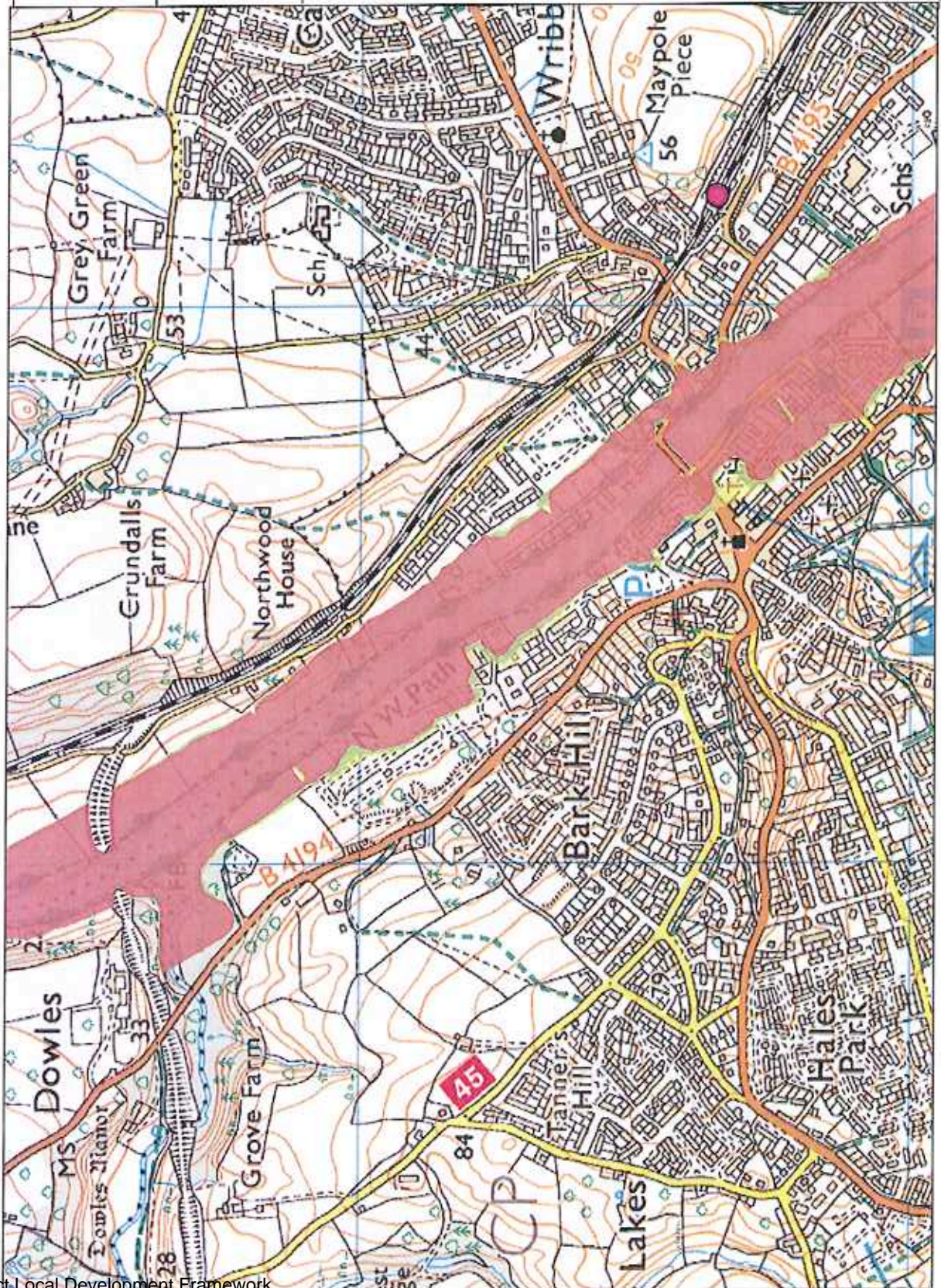
Modelled Extent Outline Map centred on Greenacres Lane, Bewdley - created 16 May 2012 [ERW1781]



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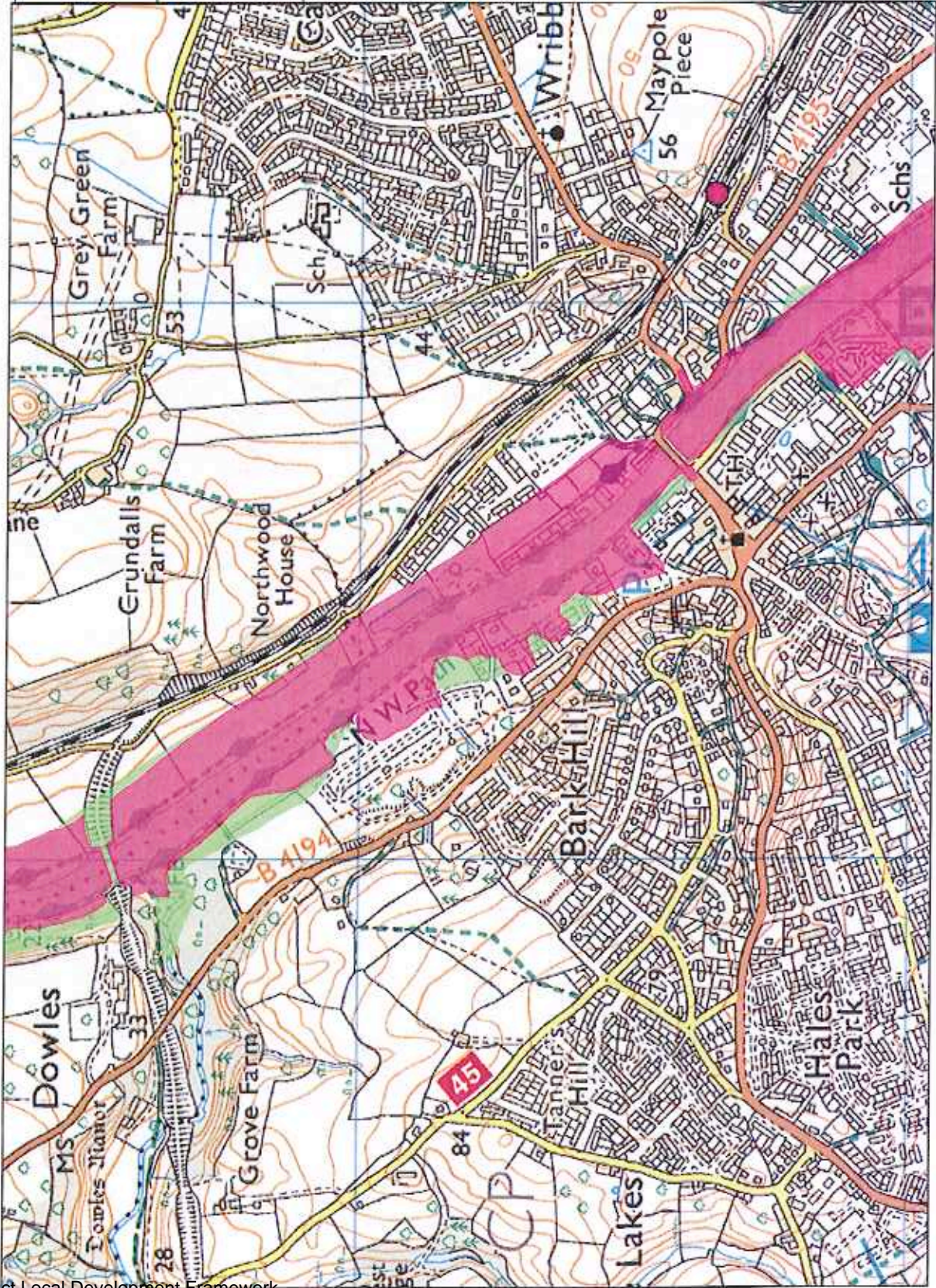
Legend

- 1 in 50 Year Outline
- 1 in 100 Year Outline
- 1 in 150 Year Outline



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Flood Event Outline Map centred on Greenacres Lane, Bewdley - created 16 May 2012 [ERW1781]



1: 10,000

Legend

- Flood Event December 1960
- Flood Event October 1998

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Contact Us: National Customer Contact Centre, PO Box 544, Rotherham, S60 1BY. Tel: 03708 506 506 (Mon-Fri 8-6). Email: enquiries@environment-agency.gov.uk

APPENDIX E

Wyre Forest SFRA Data

Table B2 - Historic Flooding Records from watercourses within Bewdley

ID	Location ¹	Watercourse and Cause ²	Dates	Source	Comments
B1	Bowdloy (Unspecified)	River Severn Cause i	5 th March 1576	EA CFMP Final Report June 2005, Appendix E; EA Fluvial Severn Flood Risk Management Strategy Final Report Oct 2006 Appendix B1	"Great Flood"
B2	Bowdloy Fair	River Sovorn Cause i	29 th November 1620	EA CFMP Final Report June 2005, Appendix E	68 drowned "Great flood on Sovorn" – limited specific details
B3	Orchard Lane to the rear of St Annos House and Lax Lane	Tributary of River Severn Cause i	1923	Flooding Survey, Wyre Forest District Council, March 1997	Orchard Land is poor quality and Lax Lane flooding short lived and passable
B4	Bewdley (throughout)	River Severn Cause i	Severe: 1946, 1947, 1960, 1965 Less Severe: 1990, 1993, 1995	Flooding Survey, Wyre Forest District Council, March 1997 EA CFMP Final Report June 2005, Appendix E EA Upper Severn Area Gaugeboard Data 02/10/2007	Duration up to 24hrs for a 1 in 3 year event Duration up to a week in 1 in 100 year event when depth may be 3m 1995/6 NRA protection scheme proposal rejected by residents for environmental and economic reasons. Up to 175 residential, commercial and tourist properties at risk from 1 in 100yr. Also caravan park [SO 783 758] 1947 5.82m above gaugeboard datum (highest ever known)
B5	Bewdley (throughout)	River Severn 4.99m	30 th October 1998	EA CFMP Final Report June 2005	Largest event in the Severn Uplands region in the preceding 30 years

		Cause i			
B6	Bewdley (throughout)	River Severn Cause i	Oct/Nov 2000	EA CFMP Final Report June 2005	
B7	Sabrina Drive, Bewdley	River Severn (right bank) Cause i	9 th November 2000	EA Fluvial Severn Flood Risk Management Strategy Final Report Oct 2006	3 properties flooded
B8	Riverside North, Bewdley	River Severn (left bank) Cause i	9 th November 2000	EA Fluvial Severn Flood Risk Management Strategy Final Report Oct 2006	4 properties flooded
B9	Stourport Road, Bewdley	River Severn (left bank) [5.16m total] Cause i	9 th November 2000	EA Fluvial Severn Flood Risk Management Strategy Final Report Oct 2006 EA Upper Severn Gaugeboard Data	6 properties flooded
B10	Savernside North, Bewdley	River Severn (right bank) [5.16m total] Cause i	9 th November 2000 February 2002 (RP 5-10yrs) New Year 2003 (minor event)	EA Fluvial Severn Flood Risk Management Strategy Final Report Oct 2006; EA CFMP Final Report June 2005 EA Bewdley Flood Alleviation Scheme EA Upper Severn Gaugeboard Data	40 properties flooded in 2000; Demountable defences erected in 2002 and prevented flooding; Demountable defences erected in 2003 although flood waters not reach them Section of stone quay wall collapsed
B11	Severnside	River	9 th November 2000	EA Fluvial	69 properties flooded

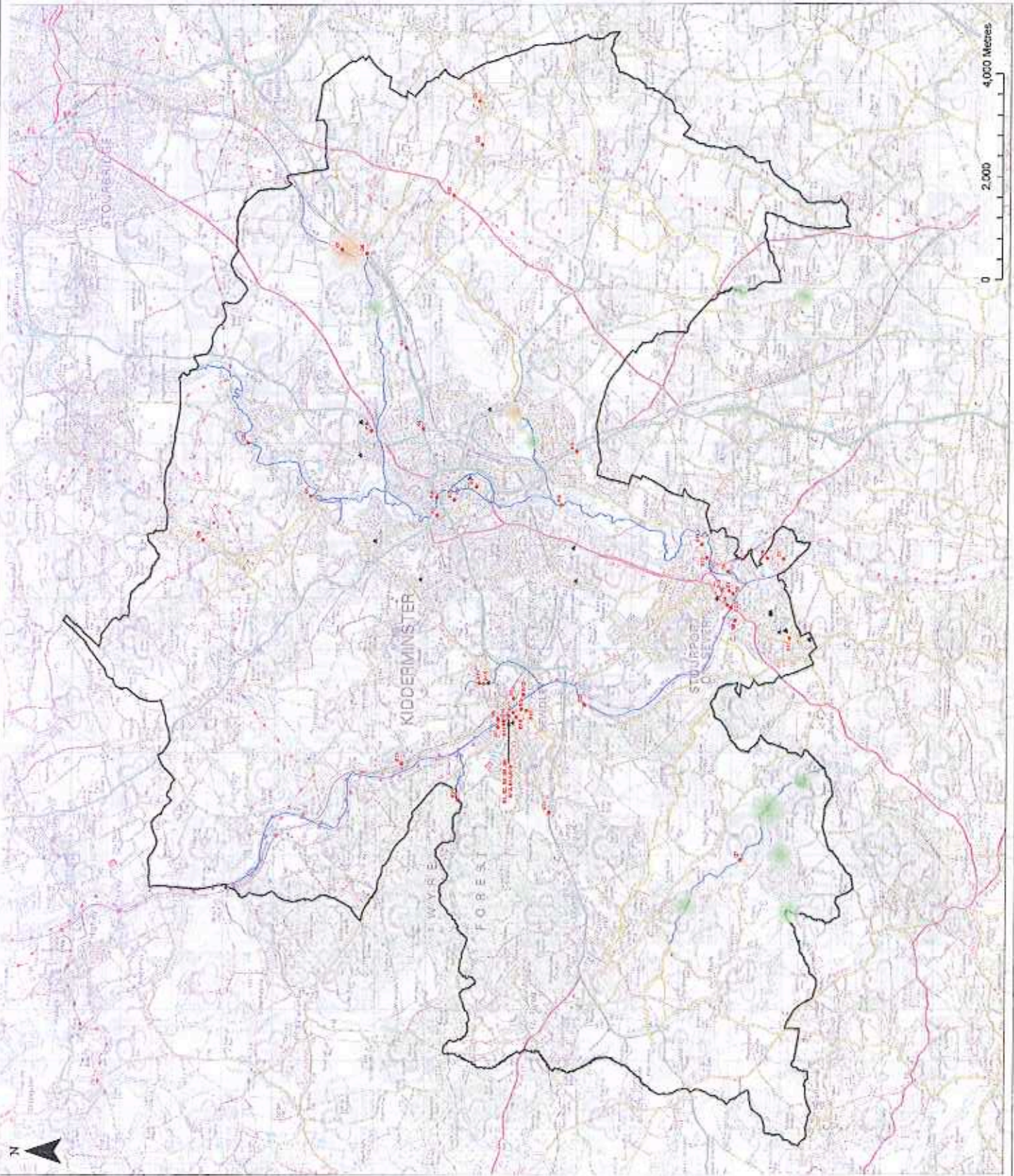
	South	Severn (right bank) [5.16m total] Cause I		Severn Flood Risk Management Strategy Final Report Oct 2006 EA Upper Severn Gaugeboard Data	
B12	Acacia Avenue	River Severn (left bank) [5.16 total] Cause I	9 th November 2000	EA Fluvial Severn Flood Risk Management Strategy Final Report Oct 2006 EA Upper Severn Gaugeboard Data	1 property flooded
B13	Bewdley (Unspecified)	River Severn [5.31m] Cause I	13 th December 2000	EA Fluvial Severn Flood Risk Management Strategy Final Report Oct 2006	
B14	Bewdley (Unspecified)	River Severn 4.9m Cause I	7 th February 2004	EA CFMP Final Report June 2005, EA Fluvial Severn Flood Risk Management Strategy Final Report Oct 2006	Lower magnitude than Oct/Nov 2000; 160 properties and 53 chalets (Bewdley and Shrewsbury areas); Demountable defences erected and prevented property flooding (40)
B15	High Street, Lax Lane and Severnside South	Snuffmill Brook Overtopping of blocked culvert causing 4 ft fast flowing water Cause I,III	19 th -21 st June 2007	Flooding Survey, Wyre Forest District Council, March 1997	8 Properties and 3/4 gardens. 8 families and 2 high risk elderly persons relocated

B16	Wribbenhall - Queensway	Sewage and storm water overflow Cause iv	19 th -21 st June 2007	Flooding Survey, Wyre Forest District Council, March 1997	54 properties affected, 3 evacuated
B17	Savernside North and Dog Lane	Flash flooding and sewer failure Cause iv	19 th -21 st June 2007	Flooding Survey, Wyre Forest District Council, March 1997; Flooding Summary for RFDC	Sand bags issued by EA and County Council Highways
B18	Bewdley (Unspecified)	River Severn Cause I Led to landslip on Northwood Lane	20 th -25 th July 2007	Wyre Forest District Council Cabinet Meeting Interim Report 30 th August 2007	Defences erected but did not get wet 5 properties evacuated due to landslip
B19	Wribbenhall	Riddings Brook Cause I, III	19 th -20 th June 2007	Flooding Summary for RFDC Anecdotal evidence	70 properties flooded
B20	Dowles	Dowles Brook Cause I	19 th -20 th June 2007 20 th -25 th July 2007	WFDC Drainage Engineer	Flooding exacerbated due to a series of blockages caused by trees and debris
B21	Part of Long Bank	Flash flooding and sewer failure Cause I and Cause III	19 th -21 st June	Flooding Survey, Wyre Forest District Council, March 1997	Sand bags issued by EA and County Council Highways
B22	B4194 Near Ribblesford	River Severn	Regularly Most Severe: 1946, 1947, 1960, 1965 Less Severe: 1990, 1993, 1995	Flooding Survey, Wyre Forest District Council, March 1997	Road situated beside river in floodplain
B23	Trimpley	River Severn Cause i	Historically	Flooding Survey, Wyre Forest District Council, March 1997	38 holiday chalets liable to flood (lowest chalet frequency 1 in 5 years) No proposed works

Notes

3. The above is not an exhaustive list of flooding records.
4. Causes of flooding
 - i. Overflow of watercourses and existing flood defences including water retention facilities such as flood storage reservoirs / washlands and storm water balancing ponds;
 - ii. Breaching of flood defences (including flood storage areas)

- iii. Mechanical, structural or operational failure (including due to blockages) or hydraulic structures, pumps etc;
- iv. Localised surface water flooding (including sewer flooding and overland flooding);
- v. Functional Floodplains or Washlands; and
- vi. Groundwater flooding.



Key:

- Historic Flooding Events
- Severn Trent Historic Sewer Flooding**
- Ordinary Watercourses
- Main Rivers
- Minor Misalignments
- Major Misalignments
- ▭ Wyre Forest Boundary

Notes:
*1. The locations of sewer leaks are generalized and represent an approximate area. The precise location of the leak should not be extrapolated as a specific location or sewer block.

This map is for information only. It is not intended to be used as a legal document. It is the responsibility of the user to ensure that the information is up to date and accurate. The information is provided as a guide only and should not be relied upon for any specific purpose. © 2008 Royal Haskoning

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Title:
Locations of All Forms of Historic Flooding

Project:
Wyre Forest District Council SFRA

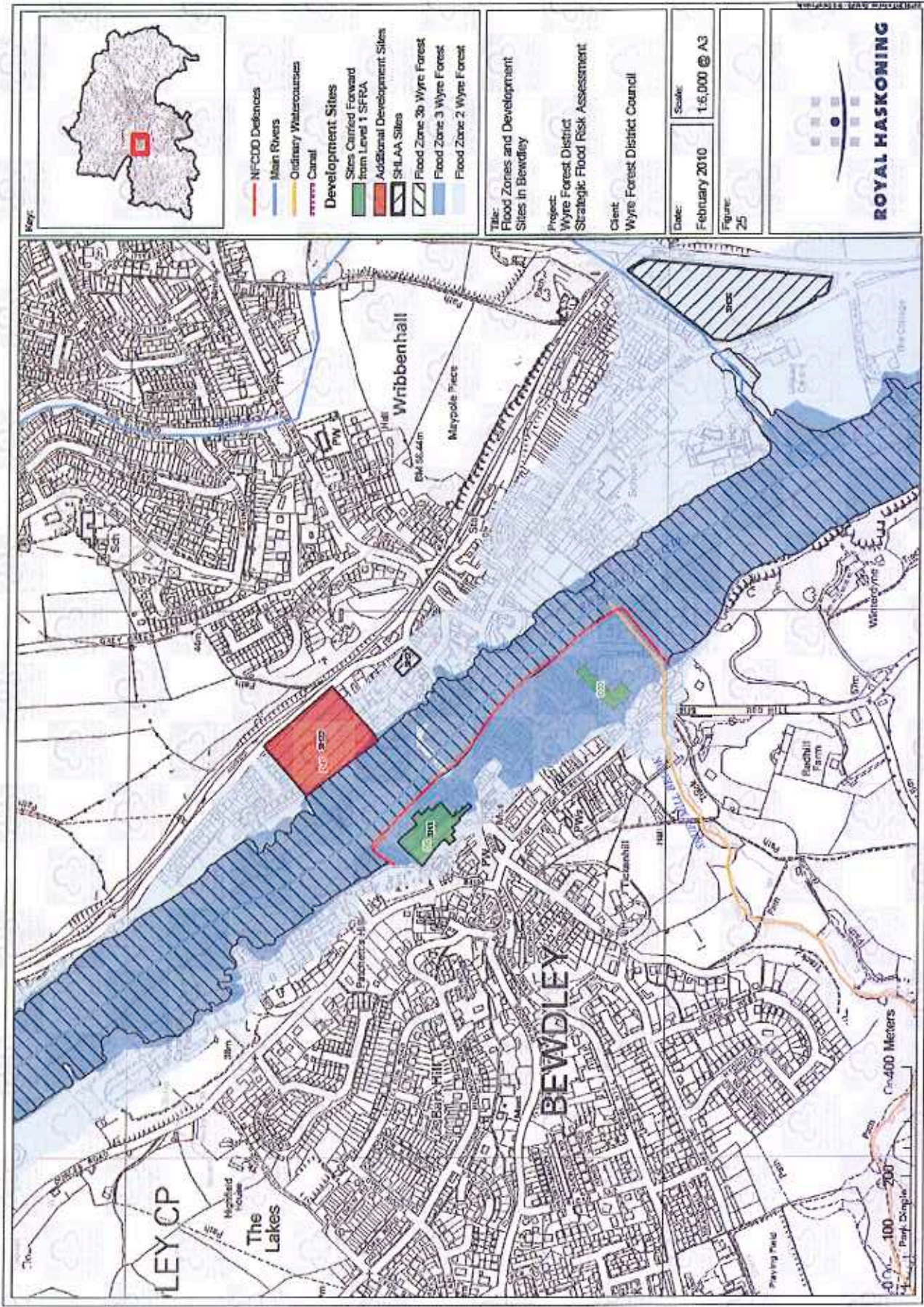
Client:
Wyre Forest District Council

Date:
January 2008

Scale:
1:35,000

Figure:
3



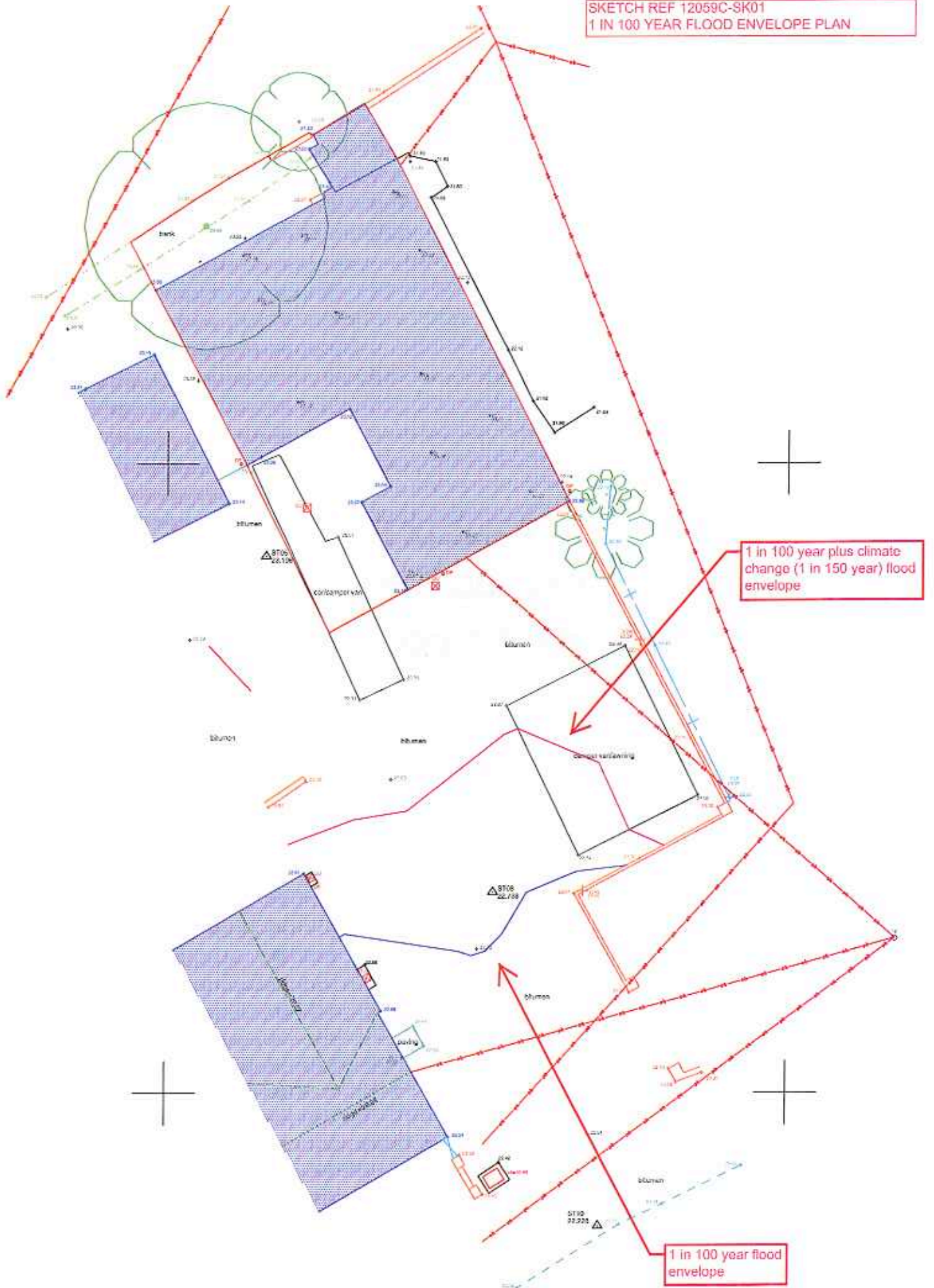


APPENDIX F

1 in 100 Year

Flood Envelope Plan

SKETCH REF 12059C-SK01
1 IN 100 YEAR FLOOD ENVELOPE PLAN

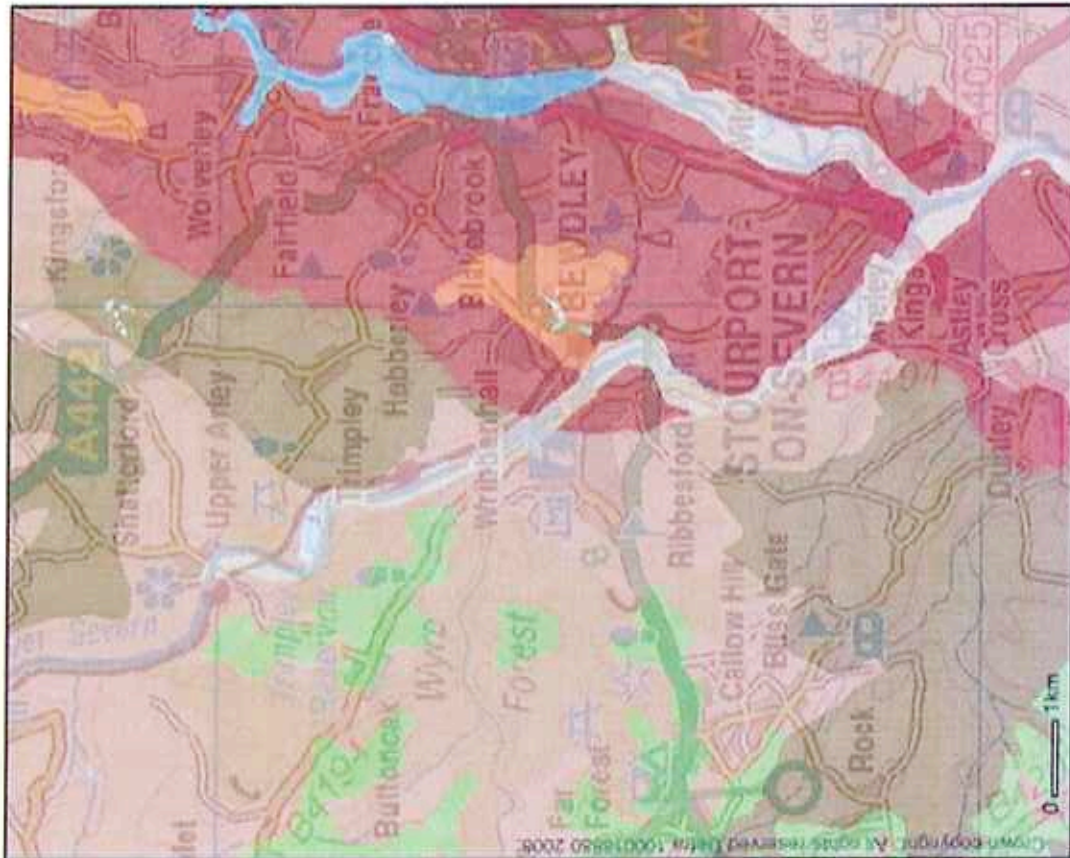


1 in 100 year plus climate change (1 in 150 year) flood envelope

1 in 100 year flood envelope

APPENDIX G

Soilscape Map



© National Soil Resources Institute, Cranfield University, 2008. The information and map contained within this report may not be used for commercial purposes.

Soilscapes is a 1:250,000 scale, simplified soils dataset covering England and Wales. It was created from the more detailed National Soil Map (NATMAPvector) with the purpose of effectively communicating a general understanding of the variations which occur between soil types, and how soils effect the environment.

SELECTED SOILSCAPE:

- Freely draining floodplain soils

HABITATS:

Grassland; wet carr woodlands in old river meanders

LANDCOVER:

Grassland some arable

DRAINAGE:

Freely draining



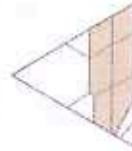
FERTILITY:

Moderate to high



TEXTURE:

Loamy



COVERAGE:

England: 0.6%

Wales: 1.8%

E&W: 0.7%

GENERAL ENQUIRIES

www.silsoe.cranfield.ac.uk/nsri

phone: +44 (0)1234 75 2978

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SOILS DATA LEASE

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APPENDIX H

Additional Photographs



Photograph 1: View eastwards towards the River Severn from the rear of Plot 2.



Photograph 2: View westwards along the rear wall of Plot 2.



Photograph 3: Plot 2 existing frontage



Photograph 4: Access onto Greenacres Lane



Photograph 5: View to rear of Plot 2 from riverbank, illustrating elevated ground floor

Consulting Civil, Structural & Geo-Environmental Engineers

Sequential Test Report

**Site Address:
Plot 2
Greenacres Lane
Bewdley**

Paul Waite Associates Ltd
Summit House
Riparian Way
The Crossing
Cross Hills
BD20 7BW

info@pwaite.co.uk
www.pwaite.co.uk

**Report Ref: 12059/I/02A
September 2012**



Flood Risk Assessment

Paul Waite Associates have been appointed by Mr Matthew Harding & Ms Stacey Matthews, to undertake a Sequential/Exceptions Test in support of a planning application for a change of use from light industrial/commercial to residential development at Plot 2, off Greenacres Lane at Bewdley in Worcestershire.

Clients Details

M Harding & S Matthews
Plot 2
Greenacres Lane
Bewdley
Worcestershire
DY12 2RE

Documents Revision Status

<i>ISSUE:</i>	<i>DATE</i>	<i>COMMENTS</i>
-	September 05, 2012	FINAL
A	September 06, 2012	FINAL – minor amendments

Contents

Executive Summary	1
1.0 Introduction	3
1.1 Terms of Reference	3
1.2 Approach to the Assessment	3
2.0 Flood Risk Vulnerability at the Site	5
2.1 Site Details	5
2.2 Flood Zone Allocation	6
3.0 National Planning Policy Framework (NPPF)	8
4.0 The Sequential Test	9
4.1 The Sequential Test Process: A Summary	9
4.2 Strategic Application & Development Vulnerability	9
4.3 Defining the Evidence Base	10
4.3.1 Geographical Area	10
4.3.2 Source of Reasonably Available Sites	10
4.3.3 State the Method Used For Comparing Flood Risk between Sites	10
4.4 Applying the Sequential Test	11
4.4.1 Proposed Development Criteria for Comparison	11
4.4.2 Strategic Housing Land Availability Assessment (SHLAA – August 2012)	11
4.4.3 Residential Land Availability Report (April 2012)	11
4.4.4 Sequential Test	12
5.0 Conclusion	14

Tables

Table 1	Flood Risk Vulnerability and Flood Zone Compatibility
Table 2	Summary of Criteria Used for Comparison Purposes

Figures

Figure 1 Location Plan – Plot 2, Greenacres Lane, Bewdley

Figure 2 Environment Agency Flood Map

Appendices

Appendix A Environment Agency Standing Advice: Sequential Test

Appendix B Section 3 SHLAA (Update 2012)

Appendix C Residential Land Availability Report (2012)

Appendix D Details of Alternative Sites

Executive Summary

A total of 50No alternative sites were identified from Wyre Forest District Council's SHLAA (2012 Update); with an additional 172No sites from the Residential Land Availability Report (2012).

Section 3.1 of the SHLAA 2012 identifies 44No potentially alternative sites; with an additional 7No sites put forward for consideration. It is noted however that site reference R161 is listed twice. This provides a total of 50No potentially alternative sites.

Of the alternative sites identified from the SHLAA within the Wyre Forest District 8No of the 50No sites are located within Flood Zones 2 or 3; and as such cannot be considered sequentially preferable in terms of flood risk when compared to the application site. This leaves 42No potentially alternative sites which need to be investigated further.

Table 4b of the Residential Land Availability Report indicates a total of 172No potentially alternative sites, which will become available or be completed within the next 5 years. It is noted that of these sites 169No have existing planning permission; with 69No identified as 'Under Construction' at 01/01/12; and therefore only 3No sites from this list need to be sequentially tested.

Of these 3No remaining sites identified from the Residential Land Availability Report (April 2012), 1No site is repeated from SHLAA report. In addition, 1No site is situated partially within Flood Zone 3 and has therefore been discounted, as it is not considered to be sequentially preferable in terms of flood risk; leaving a single site to be investigated further.

This leaves a total of 43No sites to be investigated further.

Of the alternative sites remaining, 21No have gained planning permission and the development has been completed; is currently under construction; or works are due to commence on site within the near future.

Furthermore, 9No sites have been identified to be unavailable for redevelopment in the short term; 1No site is currently undergoing a planning application appeal and is therefore not considered to be available; and 6No sites are considered to have existing developer interest.

This leaves a total of 6No 'reasonably available' sites.

The nature of the proposed development includes construction of a single residential unit, covering a total area of 0.02 Hectares.

Of the remaining 6No sites, all are considered to cover a considerably larger area than the proposed development.

Whilst this reason alone is not sufficient to rule the sites out from the list of alternative sites; it is noted that planning comments regarding all of the sites listed below have indicated that due to known site constraints there is a preference to develop each of the site using a holistic approach. As such, dividing the sites to accommodate a small single residential unit is considered to be unsuitable.

The 5No remaining sites are as follows:

- K041 Rifle Range Shops, Kidderminster – allocated for mixed development to include retail provision and affordable housing.
- K134 Musketeer Public House, Kidderminster – site adjoins the Rifle Range Shops and is under the same ownership. Site is allocated for mixed use development to include retail provision and affordable housing.
- K146 Cheshire’s Site, Kidderminster – Industrial site is currently for sale, and covers approximately 0.34 Hectares. It is considered through the KCAAP, that it is preferable to approach development at the site holistically.
- R161 The Terrace, Clows Top – outline planning consent for residential development (affordable housing) was granted in 2003; however site not brought forward due to expensive drainage issues.
- K211 Sladen School Site, Kidderminster – Large site and Worcestershire County Council has advised that they would prefer to keep the land within single ownership; therefore division of the development area to accommodate a single residential development is considered to be unfeasible. Furthermore local opposition to a large residential development at the site has been noted.
- D52 (1866) – evidence suggests that the site has the capacity to accommodate 20No residential dwellings. The site falls under the category within the Residential Land Availability Report as a site for ‘conversion’; it is presumed to provide apartment units. As such the approach to redevelopment would need to be undertaken using a holistic approach; and is therefore unsuitable to accommodate the application site.

None of the alternative sites obtained from the SHLAA or Residential Land Availability Report are considered to be sequentially preferable in terms of flood risk; availability or suitability.

As such it is concluded that the application site passes the Sequential Test.

1.0 Introduction

1.1 Terms of Reference

This report has been commissioned to support a planning application for change of use of a former light industrial/commercial building to provide residential accommodation at Plot 2, Greenacres Lane in Bewdley, Worcestershire.

Proposals for the redevelopment works involve the construction of a single dwelling, at a location approximately 30 metres to the west of the River Severn.

In accordance with requirements set out by the Environment Agency, it is proposed that the internal ground floor level of the new dwelling will be set at a minimum of 23.31mAOD; with a flood resistance/resilience measures incorporated into the building up to a level of 23.61mAOD.

During flood conditions within the River Severn it was determined that the access from the development onto Greenacres Lane may become inundated. To overcome this issue, a flood escape route has been incorporated into the development proposals, which provides a low hazard route along the rear of adjacent properties, emerging back onto Greenacres Lane at a higher elevation.

In addition, it is recommended that the site owners/occupiers sign up to receive flood warnings from the Environment Agency; and develop and practice a flood evacuation plan.

1.2 Approach to the Assessment

It is usual for the Environment Agency to raise an objection to development applications that are within Flood Zones 2 and 3 or those sites which are in excess of 1 hectare, until the question of flood risk has been properly evaluated.

Due the location of the proposed development within the floodplain, the site will need to undergo Sequential Testing as defined by the National Planning Policy Framework (March 2012) published by the Department for Communities and Local Government, in order to demonstrate that there are no reasonably available sites in the area with a lower probability of flooding that would be more appropriate to the type of development and land use proposed.

The aim of this report will be to consider the issues relating to the Sequential Test.

Evidence of proper application of the Flood Risk Sequential Test is required within the planning application for the proposed development from the Local Planning Authority.

The following document describes the requirements and methodology adopted for this report:

- Environment Agency Standing Advice: Demonstrating the Flood Risk Sequential Test for Planning Applications (Version 3.1 April 2012).

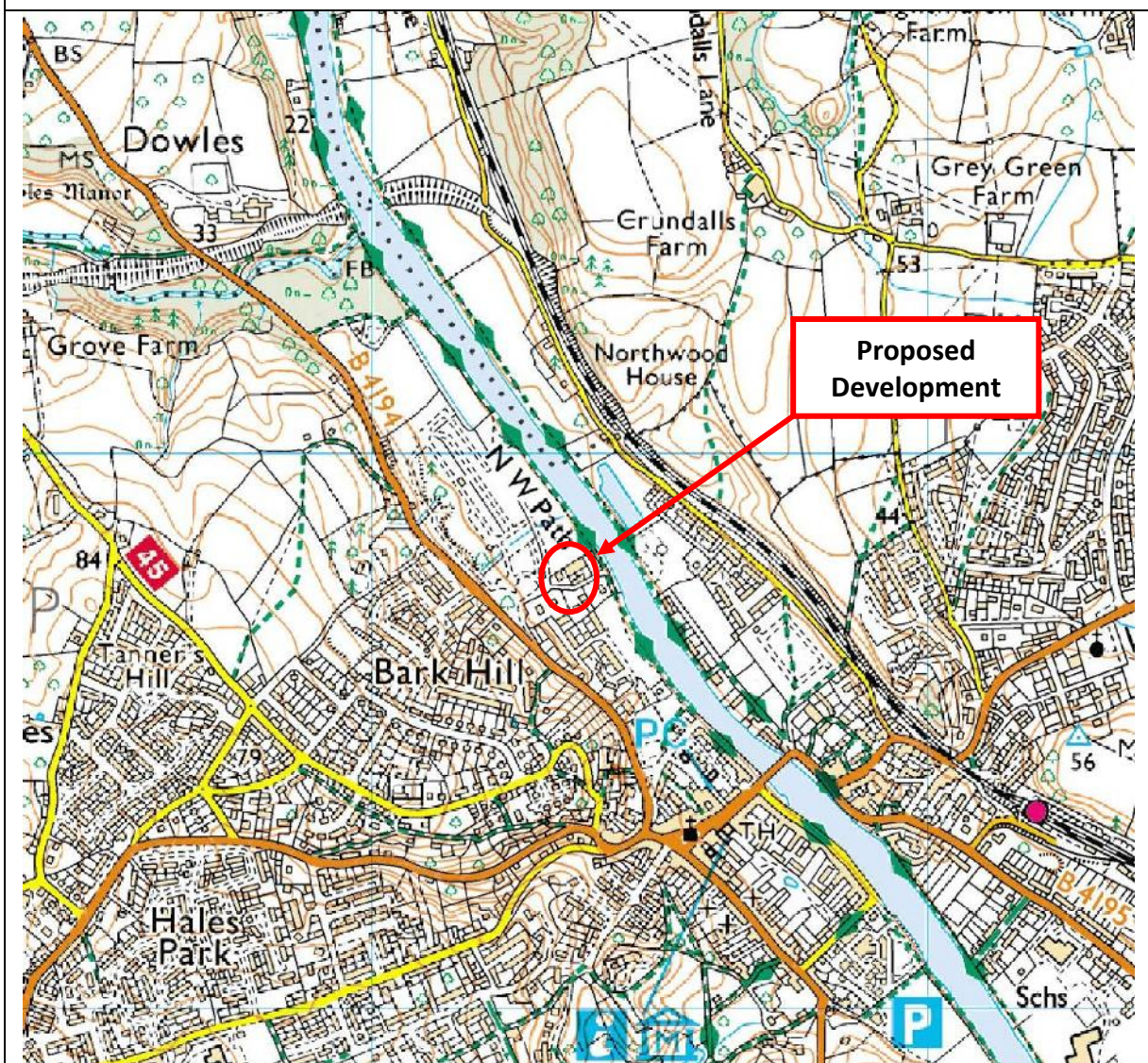
2.0 Flood Risk Vulnerability at the Site

2.1 Site Details

The site is centred on ordnance survey grid reference SE 012 454.

An Ordnance Survey plan, indicating the location of the property is presented below.

Figure 1: Location Plan – Plot 2, Greenacres Lane, Bewdley



*Image produced from the Ordnance Survey Get-a-map service.
Image reproduced with kind permission of Ordnance Survey and Ordnance Survey of Northern Ireland.*

2.2 Flood Zone Allocation

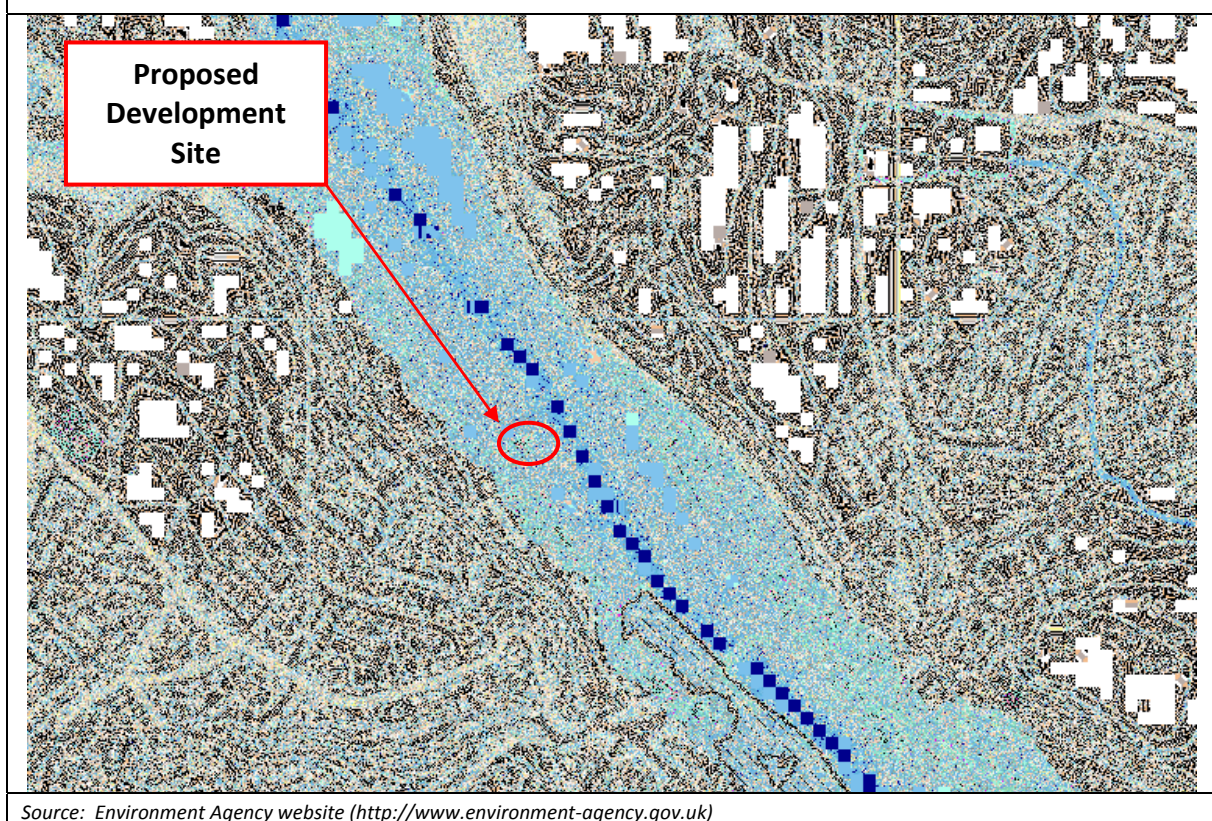
The development site is shown to lie within Zones 2 and 3 of the Environment Agency Flood Map.

Flood Zone 2 is defined as land assessed as having between a 1 in 100 and 1 in 1000 annual probability of river flooding (1% – 0.1%) or between a 1 in 200 and 1 in 1000 annual probability of sea flooding (0.5% – 0.1%) in any year.

Flood Zone 3 is defined as being land assessed as having a 1 in 100 or greater annual probability of river flooding (>1%) or a 1 in 200 or greater annual probability of flooding from the sea (>0.5%) in any year.

Utilising historic and modelled flood data for the River Severn provided by the Environment Agency, a site specific flood risk assessment has been undertaken which concluded that whilst the watercourse presents a flood risk to the site, the footprint of the proposed dwelling is actually situated wholly within Flood Zone 2.

Figure 2: Environment Agency Flood Map



As defined by the National Planning Policy Framework and the Wyre Forest Valley SFRA, within each Flood Zone new development should be directed first to sites at the lowest probability of flooding, and the flood vulnerability of the intended use matched to the flood risk of the site, e.g. higher vulnerability uses located on parts of the site at lowest probability of flooding.

Police, ambulance and fire stations; command centres, telecommunications and installations are required to be operational during flooding.

In addition, emergency dispersal points, installations requiring hazardous substances consent, basement dwellings, caravans, mobile homes and park homes intended for permanent residential use are considered to be highly vulnerable to flooding.

The site has been previously developed and is located within an area containing other residential development.

The proposed development is deemed to be “more vulnerable” as defined within Table 2 of the Technical Guidance document for the National Planning Policy Framework.

Table 1: Flood Risk Vulnerability and Flood Zone ‘Compatibility’

Flood Risk Vulnerability Classification		Essential Infrastructure	Water compatible	Highly Vulnerable	More Vulnerable	Less Vulnerable
Flood Zone	Zone 1	✓	✓	✓	✓	✓
	Zone 2	✓	✓	Exception Test required	✓	✓
	Zone 3a	Exception Test required	✓	✗	Exception Test required	✓
	Zone 3b	Exception Test required	✓	✗	✗	✗

- ✓ Development is appropriate
- ✗ Development should not be permitted

 Conclusion of the Site Specific Flood Risk Assessment

In accordance with Table 1 above, in terms of flood risk vulnerability, the proposed development is deemed appropriate for the site; and does not need to pass the Exceptions Test.

3.0 National Planning Policy Framework (NPPF)

The aims of the NPPF and Strategic Flood Risk Assessment (SFRA) are to ensure that flood risk is taken into account at all stages in the planning process to avoid inappropriate development in areas at risk of flooding, and to direct development away from areas with the highest risk.

Where new development is exceptionally necessary in such areas, policy aims to make it safe without increasing flood risk elsewhere and where possible, reducing flood risk overall.

A sequential risk based approach to determining the suitability of land for development in flood risk areas is central to the NPPF and Wyre Forest District Council's SFRA, and should be applied at all levels of the planning process.

In areas at risk of river or sea flooding, preference should be given to locating new development in Flood Zone 1. If there are no reasonably available sites in Flood Zone 1, the flood vulnerability of the proposed development can be taken into account in locating development in Flood Zone 2 and then Flood Zone 3. Within each flood zone, new development should be directed to sites at the lowest probability of flooding from all sources.

As highlighted previously the outcome of the site specific FRA places the subject site within Flood Zone 2, meaning that it is located wholly within an area having between a 1 in 100 and 1 in 1000 annual probability of river flooding (1% – 0.1%) or between a 1 in 200 and 1 in 1000 annual probability of sea flooding (0.5% – 0.1%) in any year.

Buildings used for residential purposes, which would include the proposed development forming this application, fall under the 'More Vulnerable' classification in terms of flood risk vulnerability and in order to be deemed appropriate within Flood Zone 2 is subject to passing the Sequential Test.

4.0 The Sequential Test

4.1 The Sequential Test Process: A Summary

Environment Agency Standing Advice document 'Demonstrating the Flood Risk Sequential Test for Planning Applications (version 3.1 April 2012) highlights the stages which need to be undertaken to apply the Sequential Test.

Stage 1: Strategic Application & Development Vulnerability

- Has the Sequential Test already been carried out for this development at a Local Plan Level?
- Is the flood risk vulnerability classification of the proposal appropriate to the Flood Zone in which the site is located, according to Tables 1 and 3 of the Technical Guidance to the NPPF?

Stage 2: Defining the Evidence Base

- State the geographical area over which the test is to be applied.
- If greater or less than the district boundary justify why the geographical area for applying the test has been chosen.
- Identify the source of reasonable available sites.
- State the method used for comparing flood risk between sites.

Stage 3: Applying the Sequential Test

- State the name and location of the reasonably available site options being compared to the application site.
- Indicate whether flood risk on the reasonably available options is higher or lower than the application site.
- State whether the reasonably available options being considered are within the Local Plan.
- State the approximate capacity of each reasonably available site being considered.

Stage 4: Conclusion

Are there any reasonably available sites in areas with a lower probability of flooding that would be appropriate to the type of development or land use proposed?

4.2 Strategic Application & Development Vulnerability

A Sequential Test has not been carried out for the application site at Local Plan level.

The site is located within Flood Zone 2 (medium probability). In accordance with Table 1 of the NPPF appropriate uses at the site include:

‘Essential infrastructure and the water-compatible, less vulnerable and more vulnerable uses, as set out in table 2, are appropriate in this zone. The highly vulnerable uses are only appropriate in this zone if the Exception Test is passed.’

Table 2 of the NPPF defines ‘More Vulnerable’ development as:

- Hospitals.
- Residential institutions such as residential care homes, children’s homes, social services homes, prisons and hostels.
- Buildings used for dwelling houses, student halls of residence, drinking establishments, nightclubs and hotels.
- Non-residential uses for health services, nurseries and educational establishments.
- Landfill and sites used for waste management facilities for hazardous waste.
- Sites used for holiday or short-let caravans and camping, *subject to a specific warning and evacuation plan.*

The proposed development incorporates redevelopment at a former industrial site to provide a single residential dwelling. The flood risk vulnerability classification of the development is therefore confirmed as ‘More Vulnerable’; and consequently deemed appropriate within Flood Zone 2.

4.3 Defining the Evidence Base

4.3.1 Geographical Area

Through liaison with Wyre Forest District Council, it was determined that the application site must be sequentially tested against all potentially available sites throughout the whole district.

4.3.2 Source of Reasonably Available Sites

- Wyre Forest District Council’s document ‘Strategic Housing Land Availability Assessment (2012 Update).
- Wyre Forest District Council’s document ‘Residential Land Availability’ (1st April 2012).

4.3.3 State the Method Used For Comparing Flood Risk between Sites

The following sources have been utilised to identify and compare flood risk at each site:

- Wyre Forest District Strategic Flood Risk Assessment Level 1 (2008)
- Wyre Forest District Strategic Flood Risk Assessment Level 2 (2010)
- Environment Agency Flood Maps

4.4 Applying the Sequential Test

4.4.1 Proposed Development Criteria for Comparison

Table 2: Summary of Criteria Used for Comparison Purposes

Site Name	Location	Flood Zone	Size (Hectares)	Previously Developed	Proposed Development Type
Plot 2 Greenacres Lane	Bewdley	2	0.02	Yes	Single Residential Dwelling

The NPPF defines ‘windfall’ sites as:

‘Sites which have not been specifically identified as available in the Local Plan process. They normally comprise previously-developed sites that have unexpectedly become available.’

4.4.2 Strategic Housing Land Availability Assessment (SHLAA – August 2012)

Section 3.1 of the SHLAA 2012 Update, presents a table setting out the position on SHLAA sites which were deemed suitable for housing. The table provides a total of 44No potentially alternative sites.

Furthermore Section 4 of the report highlights an additional 7No sites which have been put forward for consideration. It is noted however that site reference R161 is listed twice. This provides a total of 50No potentially alternative sites.

4.4.3 Residential Land Availability Report (April 2012)

Table 4b of the Residential Land Availability Report indicates a total of 172No potentially alternative sites, which will become available or be completed within the next 5 years.

It is noted that of these sites 169No have existing planning permission; with 69No identified as ‘Under Construction’ at 01/01/12.

Of the 3No remaining sites identified from this information source, it is noted that 1No site is repeated from the SHLAA report and 1No site is situated partially within Flood Zone 3.

These sites have therefore been discounted; leaving a single site which needs to be investigated as part of the Sequential Test.

4.4.4 Sequential Test

Flood Risk

In total 51No potentially alternative sites have been identified.

Of these 8No sites are located within Flood Zones 2 or 3; and as such cannot be considered sequentially preferable in terms of flood risk when compared to the application site.

This leaves a total of 43No sites to be investigated further.

Availability

Of the remaining sites, 21No have gained planning permission and the development has been completed; is currently under construction; or works are due to commence on site within the near future.

This reduces the list to 22No potentially alternative sites.

Furthermore, 9No sites have been identified to be unavailable for redevelopment in the short term; 1No site is currently undergoing a planning application appeal and is therefore not considered to be available; and 6No sites are considered to have existing developer interest.

This leaves a total of 6No 'reasonably available' sites.

Suitability

The nature of the proposed development includes construction of a single residential unit, covering a total area of 0.02 Hectares.

Of the remaining 6No sites, all are considered to cover a considerably larger area than the proposed development.

Whilst this reason alone is not sufficient to rule the sites out from the list of alternative sites; it is noted that planning comments regarding all of the sites listed below have indicated that due to known site constraints there is a preference to develop each of the site using a holistic approach. As such, dividing the sites to accommodate a small single residential unit is considered to be unsuitable.

- **K041 Rifle Range Shops, Kidderminster** – allocated for mixed development to include retail provision and affordable housing.
- **K134 Musketeer Public House, Kidderminster** – site adjoins the Rifle Range Shops and is under the same ownership. Site is allocated for mixed use development to include retail provision and affordable housing.

- **K146 Cheshire’s Site, Kidderminster** – Industrial site is currently for sale, and covers approximately 0.34 Hectares. It is considered through the KCAAP, that it is preferable to approach development at the site holistically.
- **R161 The Terrace, Clows Top** – outline planning consent for residential development (affordable housing) was granted in 2003; however site not brought forward due to expensive drainage issues.
- **K211 Sladen School Site, Kidderminster** – Large site and Worcestershire County Council has advised that they would prefer to keep the land within single ownership; therefore division of the development area to accommodate a single residential development is considered to be unfeasible. Furthermore local opposition to a large residential development at the site has been noted.
- **D52 (1866) Rock Works, Park Lane, Kidderminster** – evidence suggests that the site has the capacity to accommodate 20 No residential dwellings. The site falls under the category within the Residential Land Availability Report as a site for ‘conversion’; it is presumed to provide apartment units. As such the approach to redevelopment would need to be undertaken using a holistic approach; and is therefore unsuitable to accommodate the application site.

Conclusion

None of the alternative sites obtained from the SHLAA or Residential Land Availability Report are considered to be sequentially preferable in terms of flood risk; availability or suitability.

As such it is concluded that the application site passes the Sequential Test.

5.0 Conclusion

The redevelopment of Plot 2, Greenacres Lane in Bewdley to provide a single residential dwelling is considered to make a valuable contribution to the housing provision within the Wyre Forest District.

Details of potentially alternative sites have been obtained from the Strategic Housing Land Availability Assessment (2012) and the Residential Land Availability Report (2012), providing a total of 223No sites.

Testing the sites against flood risk and availability, 6No sites remained within the list of potentially alternative sites.

Investigating existing site constraints for each of these sites indicated that none are considered to be suitable to accommodate the proposed development planned for the application site.

As such the application site is deemed to have passed the Sequential Test.

Furthermore, it is considered that the development could be appropriately designed to mitigate flood risk, and the current building proposals concur with this approach (see the PWA Flood Risk Assessment Report Document Ref. 10259/I/01 Revision A).

APPENDIX A

Environment Agency

Standing Advice:

Sequential Test

Demonstrating the flood risk Sequential Test for Planning Applications

We recommend that the approach below is used by local planning authorities to apply the Sequential Test to planning applications located in Flood Zones 2 or 3. The approach provides an open demonstration of the Sequential Test being applied in line with NPPF and flood risk Practice Guide. Close working between local planning authority development control and forward planning departments will be required to implement the Sequential Test effectively.

Paragraph 101 of the NPPF states that "the aim of the Sequential Test is to steer development to areas with the lowest probability of flooding. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding."

Note: the Sequential Test does not apply to Change of Use applications unless it is for change of use of land to a caravan, camping or chalet site, or to a mobile home site or park home site.

Stage 1 - strategic application & development vulnerability

The Sequential Test can be considered adequately demonstrated if **both** of the following criteria are met:

- The Sequential Test has already been carried out for the site (for the same development type) at the strategic level (Local Plan); **and**
- The development vulnerability is appropriate to the Flood Zone (see table 3 of technical guidance to the NPPF).

1.1 Has the Sequential Test already been carried out for this development at Local Plan level? If yes, reference should be provided for the site allocation and Local Plan document in question.

1.2 Is the flood risk vulnerability classification of the proposal appropriate to the Flood Zone in which the site is located according to tables 1 and 3 of technical guidance to the NPPF? The vulnerability of the development should be clearly stated.

Finish here if the answer is Yes to BOTH questions 1.1 and 1.2

Only complete stages 2 and 3 if the answer to EITHER questions 1.1 or 1.2 is 'No'

Stage 2 - defining the evidence base

2.1 State the geographical area over which the test is to be applied.

2.2 If greater or less than the district boundary justify why the geographical area for applying the test has been chosen.

Identify the geographical area of search over which the test is to be applied - this will usually be over the whole of the Local Planning Authority (LPA) area but may be reduced where justified by the functional requirements of the development (e.g. catchment area for a school or doctors surgery) or relevant objectives in the Local Plan. For example, if a local need such as affordable housing or town centre renewal has been identified as part of the Sustainability Appraisal process that has reached 'submission' stage, this might mean that the geographical area of search is restricted to a specific regeneration area. Equally, in some circumstances it may be appropriate to expand the search area beyond the LPA boundary for uses that have a sub-regional, regional or national market. For example, the location of an oil refinery serving the whole country should be determined on a countrywide basis.

2.3 Identify the source of reasonable available sites, either:

- background / evidence base documents (state which), or if not available
- other sites known to the LPA that meet the functional requirements of the application.

Identify the source of 'reasonably available' alternative sites - these sites will usually be drawn from the evidence base / background documents that have been produced to inform the emerging Local Plan.

In the absence of background documents, 'reasonably available' sites would include any sites that are known to the LPA and that meet the functional requirements of the application in question, and where necessary, meet the Local Plan Policy criterion for windfall development (see box below).

Windfall sites

Windfall sites are those which have not been specifically identified as available in the Local Plan process. They comprise previously-developed sites that have unexpectedly become available.

We recommend that the acceptability of windfall applications in flood risk areas should be considered at the strategic level through a policy setting out broad locations and quantities of windfall development that would be acceptable or not in Sequential Test terms.

In the absence of a flood risk windfall policy, it may be possible (where the data is sufficiently robust) for the LPA to apply the Sequential Test taking into account historic windfall rates and their distribution across the district relative to Flood Zones. Where historic and future trends evidence indicate that housing need in the district through windfall can be met largely/entirely by development outside high flood risk areas, this may provide grounds for factoring this into the consideration of 'reasonably available' alternative sites at the planning application stage.

2.4 State the method used for comparing flood risk between sites, either:

- Environment Agency Flood Map, or
- an up to date Strategic Flood Risk Assessment held by the Local Planning Authority, or
- site specific Flood Risk Assessments where they are suitable for this purpose, or
- another map or sources of flooding information not listed (state which).

Identify the means of comparing flood risk between each site - as a starting point this will be the Environment Agency Map showing the Flood Zones. If comparing sites within the same Flood Zone it is necessary to use a Strategic Flood Risk Assessment showing a variation in risk throughout the Flood Zone or site specific Flood Risk Assessments where these are available and suitable for the purpose.

Stage 3 - applying the Sequential Test

Compare the reasonably available sites identified under stage 2 with the application site. Sites should be compared in relation to flood risk; Local Plan status; capacity; and constraints to delivery including availability, policy restrictions, physical problems or limitations, potential impacts of the development, and future environmental conditions that would be experienced by the inhabitants of the development.

3.1 State the name and location of the reasonably available site options being compared to the application site.

3.2 Indicate whether flood risk on the reasonable available options is higher or lower than the application site. State the Flood Zone or SFRA classification for each site.

3.3 State whether the reasonably available options being considered are allocated within the Local Plan. Confirm the status of the Plan.

3.4 State the approximate capacity of each reasonably available site being considered. This should be based on:

- the density policy within the Local Plan, and
- past performance in this respect.

3.5 Detail any constraints to the delivery of identified reasonably available options; for example, availability within a given a time period or lack of appropriate infrastructure. This part of the test should include recommendations on how these constraints could be overcome and when.

Sequential Test conclusion

Are there any reasonably available sites in areas with a lower probability of flooding, that would be appropriate to the type of development or land use proposed?

Next steps (see over)

Exception Test - Where necessary, the Exception Test should now be applied in the circumstances set out by tables 1 and 3 of the technical guidance to the NPPF.

Applying the sequential approach at site level

In addition to the formal Sequential Test, the NPPF sets out the requirement for developers to apply the sequential approach (see paragraph 103, first bullet point) to locating development within the site.

As part of their discussions with planning applicants, LPAs should ask the following questions:

- Can risk be avoided through substituting less vulnerable uses or by amending the site lay-out?
- Has the applicant demonstrated that less vulnerable uses for the site have been considered?
- Can density be varied to reduce the number or vulnerability of units located in higher risk parts of the site?

APPENDIX B

Section 3 SHLAA

(Update 2012)

3 Update on SHLAA sites

3.1 The following table sets out the position as of 1st April 2010 on the SHLAA sites which were deemed to be suitable for housing. Eight of the sites have been completed. The economic downturn has led to some schemes being revised during the course of construction with developers favouring houses over flats. A number of schemes are currently mothballed with developers in administration. Several permissions have come up for renewal so implementation is now likely to slip.

Update on SHLAA Sites

Site ref	Location	Position at 01/04/12
B001	Load Street car park	Scheme unlikely to be brought forward in same format.
S005	Tan Lane School	School relocated to site of former Lickhill Middle School in January 2012. Site to be allocated for mixed uses in Site Allocations and Policies DPD.
S006	TP Toys	Much of site now vacant. Site to be allocated for mixed uses in Site Allocations and Policies DPD.
S008	Vale Road Garage	Sheltered housing scheme for 45 retirement flats due to complete summer 2012.
K011	Former Telephone Exchange	No extant permission but still developer interest. Site to be allocated in Site Allocations and Policies DPD.
S012	Martley Road	Site completed.
K015	78 Mill Street	Site currently vacant. Revised scheme for 13 dwellings on rear of site approved June 2010.
S017	Baldwin Road	Planning permission has now lapsed on this Adopted Local Plan allocated site. Forms part of wider site to be allocated in Site Allocations and Policies DPD.
B018	Blackstone Barns	Conversion works due to complete summer 2012.
S020	Carpets of Worth	Application for mixed use development to include 159 dwellings - delegated authority to approve April 2012.
K024	Sutton Reservoir	Renewal of outline approved September 2009 for 5 years. May be brought forward sooner.
K028	Hérons Nursing Home	24-bed dementia unit now complete so site site is no longer available.
B034	Bewdley Primary School	Scheme for 46 affordable units completed end of 2011.
R036	The Manor House Wolverley	Site completed
K041	Rifle Range shops	Site to be allocated for redevelopment in Site Allocations and Policies DPD.
K042	Hurcott Road maisonettes	Remaining maisonette blocks now demolished. Approval for 97 dwellings October 2011. On site Spring 2012.
K050	Chester Road Bowling Club	Appeal for 26 affordable dwellings allowed August 2011. Unlikely to proceed.
K054	Georgian carpets	Bellway Homes scheme approved for 223 dwellings December 2011. On site January 2012 with 2 showhomes complete by end of March.
K061	Harriers Trading Estate	Permission for 28 dwellings granted April 2009 - permission due to lapse.
R066	Butts Lane Depot	New owner looking to put in renewal application summer 2012.

Site ref	Location	Position at 01/04/12
K074	Blakebrook School and County Buildings	School expected to relocate to new complex in September 2014. Site to be allocated for mixed uses in Site Allocations and Policies DPD.
S078	Tesco & Bedland Stores, Lombard Street	Tesco redevelopment on Carpets of Worth site has detailed permission and highway works are underway prior to construction of store. Site to be allocated for mixed uses in Site Allocations and Policies DPD.
S085	Manor PH	Site cleared. Planning approval for 14 dwellings (June 2010) or care home (April 2012).
K087	108/109 Bewdley Hill	Site sold early 2012. Reserved matters application expected shortly.
S088	Midland Industrial Plastics	Site to be allocated in Site Allocations and Policies DPD.
K089	King Charles I School	Following withdrawal of BSF funding, site is likely to remain in educational use.
K090	Sutton Arms PH	Site cleared early 2010. Reserved matters application for 14 dwellings approved November 2010.
R095	Blakedown Nurseries	Planning application for 42 dwellings received early 2012.
R104	Land off Sebright Road, Fairfield	Planning now approved for 10 affordable houses - to start April 2012.
S106	Rear of 33 Baldwin Road	Site completed.
R115	Oxbine, Callow Hill	Revised scheme dismissed at appeal as not in conformity with Core Strategy. Up for sale.
K134	Muskateer PH	Site to be allocated in Site Allocations and Policies DPD.
K138	Land off Puxton Drive	71 dwellings under construction - due to complete end 2012.
R143	Garage site, The Green, Chaddesley Corbett	Permission granted for 4 affordable units December 2011.
K146	Cheshires, Coventry Street	Much of building now empty. Site to be allocated in Kidderminster Central Area Action Plan DPD.
K156	Zanzibars, Castle Road	Site completed end March 2012.
K157	Franchise Street	Revised scheme for 74 units approved. Site completed March 2011.
S159	Lichfield Basin	Site completed end March 2012.
R161	The Terrace, Clows Top	Site to be allocated in Site Allocations and Policies DPD together with adjoining site.
S208	Wilden Primary School	School continues to operate from this site with no immediate plans to relocate and release site.
K209	Sion Hill Middle School	Small area of site back in use as educational offices. Scheme to convert main school buildings to education training and conference centre not implemented.
K210	Former British Sugar Site	Outline planning application for phase 1 scheme for mix of uses including 250 dwellings received Spring 2012.
K211	Sladen School site	No detailed scheme drawn up for cleared site. Site to be allocated in Kidderminster Central Area Action Plan DPD.
K214	Brinton's Offices, Exchange Street	Offices vacated and up for sale. Site to be allocated in Kidderminster Central Area Action Plan DPD

4 New Sites put Forward for Consideration

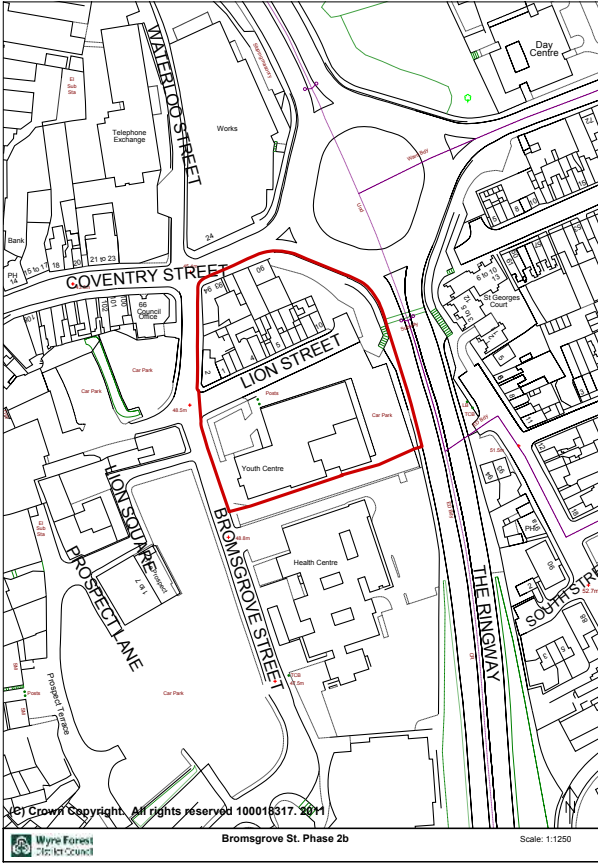
4.1 There have been no sites put forward by landowners for consideration since the last update other than to suggest that the haulage yard at Clows Top which adjoins site R161 be included as part of a larger site. The Site Allocations and Policies and the Kidderminster Central Area Action Plan Development Plan Document publication drafts contain a small number of sites which have not previously been assessed for their housing potential. The majority of these are proposed for allocation as mixed use sites with an element of housing.

4.2 In Kidderminster town centre there is the potential to bring further residential uses into Lion Street and Lion Square (see policies KCA.EG6/7 in the Kidderminster Central Area Action Plan) as part of a wider regeneration agenda. In Stourport-on-Severn, it is proposed to allocate the area around the Swan Hotel and Working Men's Club for a mix of uses including residential above ground floor level and there is developer interest in redeveloping the former Lucy Baldwin Hospital site for housing. In Bewdley, it is proposed to allocate two small sites in Lax Lane and the High Street to include residential uses. At Clows Top, it is proposed to enlarge site R161 in order to include the adjoining haulage yard.

4.3 Site assessment sheets for these sites can be found at Appendix A.

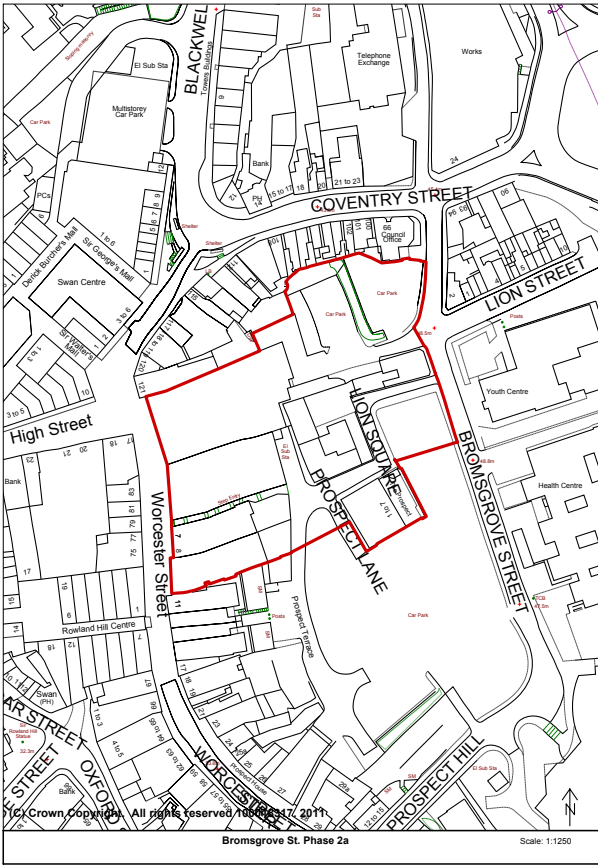
A Site Assessment Sheets

SITE REF: K300 LION STREET



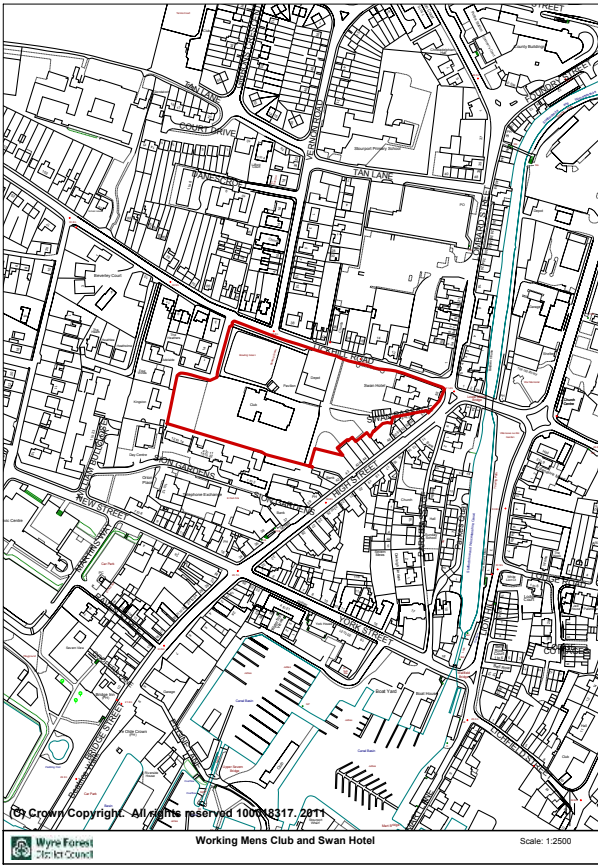
Settlement: Kidderminster	Site Ref: K300	Grid Ref: 383402 276755	Site Area: 0.76 Ha
Site Address: Lion Street, Kidderminster Ward: Greenhill			Within or adjoining settlement: Yes
Current or previous use: Small specialist shops , youth centre and car parking			Brownfield: Yes
Site Description: group of specialist shops, small hotel, youth centre and car park adjacent ring road; fire damaged shops on Coventry Street			
Ownership: private, WFDC and Worcestershire County Council			
Planning History: none of relevance - site to be allocated in KCAAP			
Physical Characteristics	Vehicular access	Reasonable - potential redevelopment of adjoining site would give direct access off ring road	
	Flood risk	No	
	Contamination	Unlikely	
	Topography	Flat	
Environmental impact	Character/visual impact	Would look to retain buildings to north of Lion Street. Redevelopment of remainder of site would improve street scene	
	Natural heritage	No adverse impact	
	Built heritage	A number of buildings are on the Local Heritage List	
	Other	N/A	
Infrastructure capacity		Suitable	
Access to local facilities		Good - site is in town centre	
Public transport accessibility		On bus route - high frequency	
Views on suitability for housing, potential capacity		Suitable for residential use as part of a mixed use scheme - 10 units	
Potential timescale for delivery		2021-26	
Constraints to delivery		Relocation of Youth House required	

SITE REF: K301 LION SQUARE



Settlement: Kidderminster	Site Ref: K301	Grid Ref: 383304 276704	Site Area: 1.15 Ha
Site Address: Lion Square, Kidderminster Ward: Greenhill			Within or adjoining settlement: Yes
Current or previous use: retail and car parking			Brownfield: Yes
Site Description: large retail units fronting Worcester Street connected by steep steps to small number of historic buildings in area of surface car parking			
Ownership: Multiple			
Planning History: none of relevance - site to be allocated in KCAAP for mixed retail and residential uses - residential uses on eastern part of site			
Physical Characteristics	Vehicular access	Good	
	Flood risk	N/A	
	Contamination	Unlikely	
	Topography	Split level site connected by steep steps	
	Character/visual impact	Would look to retain historic buildings for residential use and redevelopment the retail frontage	
	Natural heritage	N/A	
	Built heritage	Propose to add former Freemasons Arms (The Barrel) and the former warehouse building (The Prospect) to Local Heritage List	
	Other	N/A	
Infrastructure capacity		Available	
Access to local facilities		Good - within town centre	
Public transport accessibility		Good - on bus route	
Views on suitability for housing, potential capacity		Consider that former Freemasons Arms (The Barrel) would be suitable for a residential conversion - 10 units	
Potential timescale for delivery		2021-26	
Constraints to delivery		Multiple land ownerships may hinder implementation of overall scheme	

SITE REF: S302 SWAN HOTEL AND WORKING MEN'S CLUB



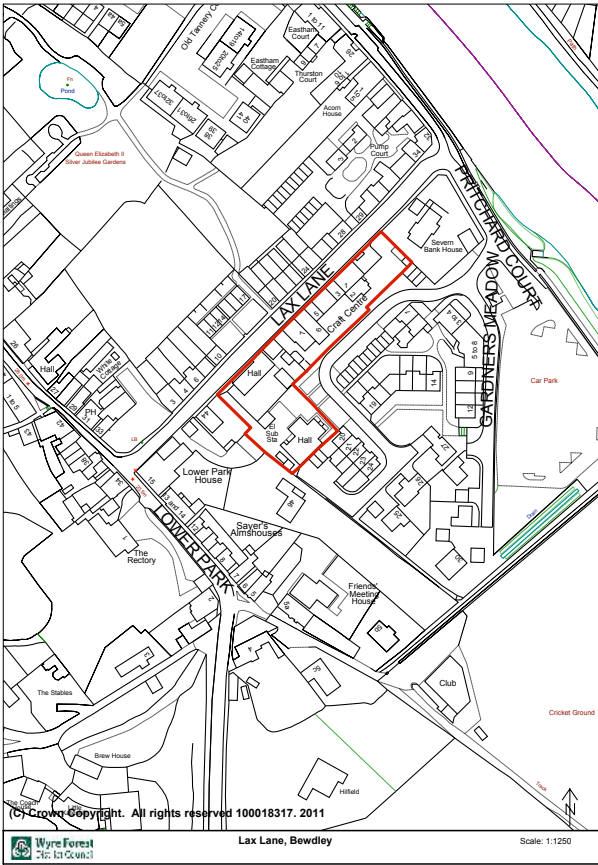
Settlement: Stourport-on-Severn	Site Ref: S302	Grid Ref: 381025 271425	Site Area: 1.52 Ha
Site Address: Swan Hotel and Working Men's Club Ward: Mitton			Within or adjoining settlement: Yes
Current or previous use: vacant hotel, private car parking, club, bowling greens and garage			Brownfield: Yes
Site Description: leisure uses surrounded by retail and residential uses adjacent town centre			
Ownership: private - multiple ownerships			
Planning History: none of relevance but propose to allocate in Site Allocations and Policies DPD for mixed uses including residential			
Physical Characteristics	Vehicular access	Good	
	Flood risk	N/A	
	Contamination	Unlikely	
	Topography	Flat	
	Character/visual impact	Potential to improve street scene and bring heritage asset back into viable use	
	Natural heritage	No potential adverse impact	
	Built heritage	Swan Hotel is a Local Heritage Asset which needs bringing back into economic use again	
	Other	N/A	
Infrastructure capacity		Good	
Access to local facilities		Immediately adjacent to town centre	
Public transport accessibility		Good - on high frequency bus route	
Views on suitability for housing, potential capacity		Potential for conversion of upper floors of Swan Hotel plus some new build; capacity of 20 dwellings	
Potential timescale for delivery		2021-26	
Constraints to delivery		Land owners	

SITE REF: S303 LUCY BALDWIN UNIT



Settlement Stourport-on-Severn	Site Ref: S303	Grid Ref: 308681 272032	Site Area: 1.14 Ha
Site Address: Lucy Baldwin Unit, Olive Grove, Stourport-on-Severn Ward: Lickhill			Within or adjoining settlement: Yes
Current or previous use: Former maternity hospital and mental health unit			Brownfield: Yes
Site Description: vacant hospital buildings in residential area overlooking parkland			
Ownership: NHS			
Planning History: Application received for redevelopment for 37 dwellings plus conversion of lodge to 4 flats; site to be allocated for residential use in SALP DPD			
Physical Characteristics	Vehicular access	Reasonable - access is along narrow road	
	Flood risk	N/A	
	Contamination	Unknown	
	Topography	Flat	
	Character/visual impact	Potential adverse impact on views across parkland	
	Natural heritage	Potential to improve green infrastructure links through site	
	Built heritage	Potential adverse impact on Local Heritage Assets on site with loss of most of the buildings	
	Other	N/A	
Infrastructure capacity		Good	
Access to local facilities		Reasonable - local shops or town centre within 10 minutes walk	
Public transport accessibility		Reasonable - bus stops within 10 minutes walk	
Views on suitability for housing, potential capacity		Suitable for housing - potential capacity 40 dwellings	
Potential timescale for delivery		2011-16	
Constraints to delivery		None	

SITE REF: B304 LAX LANE



Settlement: Bewdley	Site Ref: B304	Grid Ref: 378850 275114	Site Area: 0.26 Ha
Site Address: Lax Lane, Bewdley Ward: Bewdley and Arley			Within or adjoining settlement: Yes
Current or previous use: Craft Centre, former WRVS building and Red Cross building			Brownfield: Yes
Site Description: row of craft units with two community buildings surrounded by residential development			
Ownership: Private and County Council			
Planning History: outline application for residential redevelopment on site of WRVS building in 2005 - withdrawn - access issues. Site to be allocated in SALP DPD			
Physical Characteristics	Vehicular access	Reasonable	
	Flood risk	Within flood zone 3	
	Contamination	Unknown	
	Topography	flat	
	Character/visual impact	Potential to improve area with redevelopment of community halls	
	Natural heritage	N/A	
	Built heritage	Craft units are on local heritage list and houses opposite are statutorily listed	
	Other	N/A	
Infrastructure capacity		Good	
Access to local facilities		Adjacent town centre	
Public transport accessibility		Bus route and town centre within 5 minutes walk	
Views on suitability for housing, potential capacity		Southern part of site suitable for housing - up to 10 dwellings	
Potential timescale for delivery		2021-26	
Constraints to delivery		Access from Lax Lane only	

SITE REF: B305 FORMER WORKHOUSE, 66 HIGH STREET



Settlement: Bewdley	Site Ref: B305	Grid Ref: 378609 275218	Site Area: 0.08 Ha
Site Address: Former workhouse, 66 High Street, Bewdley Ward: Bewdley and Arley			Within or adjoining settlement: Yes
Current or previous use: former workhouse			Brownfield: Yes
Site Description: Listed building on Buildings at Risk register - site has been in dilapidated state since 1960s			
Ownership: private			
Planning History: none of relevance - site to be allocated in SALP DPD			
Physical Characteristics	Vehicular access	Good	
	Flood risk	N/A	
	Contamination	N/A	
	Topography	Slightly sloping	
	Character/visual impact	Renovation and conversion scheme will have positive impact on street scene	
	Natural heritage	N/A	
	Built heritage	Positive impact on conservation area	
	Other	N/A	
Infrastructure capacity		Good	
Access to local facilities		Adjoining town centre	
Public transport accessibility		Bus stop with frequent service within 5 minutes walk	
Views on suitability for housing, potential capacity		Suitable for conversion to residential use - up to 6 units	
Potential timescale for delivery		2016-21 or sooner if at all possible	
Constraints to delivery		Funding	

SITE REF: R161 LAND AT CLOWS TOP



Settlement: Clows Top	Site Ref: R161	Grid Ref: 371561 271812	Site Area: 1.45 Ha
Site Address: Cleobury Road, Clows Top Ward: Rock			Within or adjoining settlement: Yes
Current or previous use: site of public house and operational haulage yard			Brownfield: Yes
Site Description: area of scrubland and haulage yard in village centre adjacent village hall and shop			
Ownership: private - two different owners			
Planning History: previous permission for 21 houses not implemented; application for 12 affordable houses not determined			
Physical Characteristics	Vehicular access	Good	
	Flood risk	N/A	
	Contamination	possibly	
	Topography	sloping	
	Character/visual impact	Potential to remove unsightly development from village centre	
	Natural heritage	Much of site has naturally regenerated	
	Built heritage	N/A	
	Other	Public rights of way	
Infrastructure capacity		Mains drainage will be required	
Access to local facilities		Local shop opposite	
Public transport accessibility		Adjacent bus stop - infrequent service	
Views on suitability for housing, potential capacity		Suitable for up to 30 dwellings	
Potential timescale for delivery		2011- 21	
Constraints to delivery		Mains sewerage required	

APPENDIX C

Residential Land

Availability Report (2012)

EXPLANATION OF COLUMN HEADINGS FOR TABLES 4b & 4d

Unique Site Ref.:

Unique site reference and line number for individual record on schedule

Location of Site:

Location of site

Parish or Town within which the site is located, i.e.:

B: Bewdley
S: Stourport-on-Severn
K: Kidderminster
BR: Broome
CB: Churchill & Blakedown
CC: Chaddesley Corbett
KF: Kidderminster Foreign
R: Rock
RI: Ribbesford
RU: Rushock
ST: Stone
UA: Upper Arley
W: Wolverley and Cookley

Developer or Landowner (10+ Sites):

Name of developer or landowner for sites of 10 or more dwellings

Grid Ref. Easting & Northing (SO):

Six figure grid reference based upon National Grid Square SO

Type of Site:

Classification used by WFDC since 1974, i.e.:

A: Previously undeveloped land for 10 or more dwellings
B: Previously undeveloped land for 10 or less dwellings
C: Conversion of any capacity
R: Redevelopment of any capacity
U: Any of the above but under construction, e.g. AU

Previous Use:

Gr: Greenfield FR: Former Residential
OB: Other Brownfield FE: Former Employment

FR, FE and OB combined make up Previously Developed Land, as defined in NPPF, Annex 2. Since June 2010, garden land has been classed as Greenfield. Any applications or completions on such sites are now Greenfield.

Size of Site (Ha):

Approximate size of site in hectares (1 hectare = 2.471 acres)

Size of Site (Dwells):

Size of site in terms of net number of dwellings capacity, i.e.:

S:	Small	9 or less dwellings
M:	Medium	10 to 24 “
L:	Large	25 or more “

No. Existing Dwellings Retained in Conversion, e.g.:

1 converted into 3 = total capacity 3, net gain 2

No. Dwellings to be Demolished:

Number of dwellings to be demolished in order for development to proceed

No. Dwellings Total Capacity:

Number of dwellings gross capacity of site, including any dwellings to be retained in conversion

Planning Application No./Year:

Planning application number followed by year

Please note that applications registered after 24th August 2005 (numbers after 864/05) only have permission for three years not five)

Planning Status:

Outl	} Type of planning consent -
Full	} outline, full
Resv	} or reserved matters
ADLP:	Adopted District Local Plan allocation

Date of Planning Consent:

Date of planning consent, i.e. day, month and year

Ownership Type:

Pri:	Private sector market housing
RSL:	Registered Social Landlord – housing for rent or shared ownership
AF:	Affordable housing provided by private developer

No. Dwellings Not Yet Started, Under Construction or Complete

(*N.B.* No. dwellings available = NYS + UC)

Date Development Commenced:

Month followed by year

Date Record Last Amended:

Month followed by year

NHBC:

National House Builders Council notification of plot movements

Unique Sub-site Ref. (10 + Sites):

Unique sub-reference for sites with a capacity of 10 or more dwellings

WYRE FOREST DISTRICT

RESIDENTIAL LAND AVAILABILITY: SITES AVAILABLE WITHIN 5 YEARS BY TYPE OF SITE

1ST. APRIL 2012

Unique Site Ref (Line No)	Location of Site	Parish or Town	Grid Ref East/North (SO)	Developer or Landowner (10+ Sites)	Type of Site	Previous Use	Size of Site (Ha)	Size of Site (Dwells)	No Exist Dwells Retained in Conv	No Dwells to be Demol	No Dwells Demol	No Dwells Total Capacity	Planning Application No/Year	Planning Status	Date of Planning Consent	Owner Type	Social Housing via Planning Policy	No Dwgs NYS	No Dwgs UC	No Dwgs Comp	Date Development Commenced	Date Record Last Amended	N H B C	Unique Site Ref (10+ Sites)
4021	Greenhill, Chester Road Bowling Club	K	384222/276960	WFCH	A	Gr	0.43	L				26	382/2010	Full	18/08/2011	RSL	<input type="checkbox"/>	26				08/2011		268
4045	Sebright Road	W	381982/279221	WFCH	A		0.25	M				10	550/2010	Full	29/03/2012	RSL	<input type="checkbox"/>	10				03/2012		271
Sub-tot A							0.7					36						36						

WYRE FOREST DISTRICT

RESIDENTIAL LAND AVAILABILITY: SITES AVAILABLE WITHIN 5 YEARS BY TYPE OF SITE

1ST. APRIL 2012

Unique Site Ref (Line No)	Location of Site	Parish or Town	Grid Ref East/North (SO)	Developer or Landowner (10+ Sites)	Type of Site	Previous Use	Size of Site (Ha)	Size of Site (Dwells)	No Exist Dwells Retained in Conv	No Dwells to be Demol	No Dwells Demol	No Dwells Total Capacity	Planning Application No/Year	Planning Status	Date of Planning Consent	Owner Type	Social Housing via Planning Policy	No Dwgs NYS	No Dwgs UC	No Dwgs Comp	Date Development Commenced	Date Record Last Amended	N H B C	Unique Site Ref (10+ Sites)
3048	Franché, Land off Puxton Drive	K	382960/278069	Bellway Homes	AU	Gr	1.06	L				46	633/2010	Full	01/07/2011	Pri	<input type="checkbox"/>	6	24	16	03/2006	03/2012		180
Sub-tot AU							1.1					46						6	24	16				

Unique Site Ref (Line No)	Location of Site	Parish or Town	Grid Ref East/North (SO)	Developer or Landowner (10+ Sites)	Type of Site	Previous Use	Size of Site (Ha)	Size of Site (Dwells)	No Exist Dwells Retained in Conv	No Dwells to be Demol	No Dwells Demol	No Dwells Total Capacity	Planning Application No/Year	Planning Status	Date of Planning Consent	Owner Type	Social Housing via Planning Policy	No Dwgs NYS	No Dwgs UC	No Dwgs Comp	Date Development Commenced	Date Record Last Amended	N H B C	Unique Site Ref (10+ Sites)
1925	Sutton Park, Adj. 32 Park Lane	K	382969/276390		B	OB	0.01	S				2	376/2009	Full	23/07/2009	Pri	<input type="checkbox"/>	2				12/2009		
1928	Wolverley, R/O 9 & 11 Sebright Road	W	382459/279138		B	FR	0.05	S				1	87/2010	Full	25/06/2010	Pri	<input type="checkbox"/>	1				06/2010		
1935	Bewdley & Arley, 12 Merricks Lane	B	377924/275067		B	FR	0.04	S				1	172/2009	Full	19/05/2009	Pri	<input type="checkbox"/>	1				05/2009		
1968	Sutton Park, Adj. 28 Whitehill Road	K	381032/275503		B	FR	0.08	S				1	773/2009	Full	14/12/2009	Pri	<input type="checkbox"/>	1				01/2010		
1997	Blakedown & Chaddesley, adj. 1 Mill Lane,	CB	387980/278685		B	FR	0.06	S				1	838/2009	Full	29/01/2010	Pri	<input type="checkbox"/>	1				04/2010		
2005	Haberley & Blakebrook, 1 Westville Avenue	K	381452/276370		B	FR	0.06	S				1	26/2010	Full	09/03/2010	Pri	<input type="checkbox"/>	1				03/2010		
2020	Offmore & Comberton, The Firs, 186, Comberton Road	K	384080/276259		B	FR	0.05	S				4	150/2010	Full	14/05/2010	Pri	<input type="checkbox"/>	4				05/2010		
2046	Mitton, Land adjoining 7 Hartlebury Rd	S	382162/271463		B	FR	0.08	S				5	446/2010	Full	17/06/2011	Pri	<input type="checkbox"/>	5				06/2011		
2056	Broadwaters, Adj. 35 Long Acre	K	383534/277243		B	FR	0.01	S				1	823/2007	Full	08/10/2007	Pri	<input type="checkbox"/>	1				10/2007		
2077	Blakedown & Chaddesley, Adj. Rowberrys Nurseries,	CC	389607/272998		B	Gr	0.01	S				1	659/2010	Reserved	14/10/2011	Pri	<input type="checkbox"/>	1				10/2011		
3004	Bewdley & Arley, Braeside, Patchetts Lane	B	378319/275537		B	FR	0.07	S				1	239/2010	Full	18/06/2010	Pri	<input type="checkbox"/>	1				06/2010		
3019	Broadwaters, Land to rear of 60 Stourbridge Road	K	383480/277630		B	FR	0.03	S				2	360/2011	Reserved	27/10/2011	Pri	<input type="checkbox"/>	2				12/2011		
3039	Broadwaters, 32 Baskerville Road	K	383868/278158		B	FR	0.02	S				1	221/2009	Full	22/05/2009	Pri	<input type="checkbox"/>	1				06/2009		
3040	Broadwaters, 7 Long Acre	K	383564/277233		B	FR	0.01	S				1	274/2009	Full	11/06/2009	Pri	<input type="checkbox"/>	1				06/2009		
3046	Cookley, Land off Eleanor Harrison Drive	W	384746/280176		B	OB	0.09	S				3	314/2009	Full	19/06/2009	Pri	<input type="checkbox"/>	3				07/2009		
3053	Bewdley & Arley, Adj. 13 Telford Drive	B	378344/275148		B	FR	0.07	S				1	530/2009	Full	18/09/2009	Pri	<input type="checkbox"/>	1				09/2009		

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3054	Greenhill, Adj. Land Oak Public House, Birmingham Road	K	384215/277233		B	OB	0.07	S				3	143/2010	Full	12/05/2010	Pri	<input type="checkbox"/>	3				05/2010		
3059	Rock, Oxbine Callow Hill	R	374281/273862		B	FR	0.16	S				1	506/2009	Full	22/10/2009	Pri	<input type="checkbox"/>	1				10/2009		
3063	Greenhill, Adj. 78 Cherry Orchard	K	383717/276405		B	FR	0.06	S				5	487/2009	Full	03/11/2009	Pri	<input type="checkbox"/>	5				11/2009		
3070	Bewdley & Arley, Land between 2 Park Lane & 35 Load St	B	378496/275257		B	OB	0.06	S				3	681/2009	Full	11/12/2009	Pri	<input type="checkbox"/>	3				01/2010		
3073	Blakedown & Chaddesley, Rear of 5 Mill Lane	CB	387873/278604		B	FR	0.18	S				3	839/2008	Full	14/12/2009	Pri	<input type="checkbox"/>	3				01/2010		
3076	Greenhill, 30 Leswell Street	K	383715/276791		B	FR	0.08	S				1	757/2009	Full	11/03/2010	Pri	<input type="checkbox"/>	1				03/2010		
3080	Sutton Park, Land between 52-53 Claughton Street	K	382156/276095		B	OB	0.04	S				2	1/2010	Full	19/04/2010	Pri	<input type="checkbox"/>	2				05/2010		
3083	Mitton, 43 Lickhill Road	S	380673/271647		B	FR	0.04	S				1	132/2010	Full	28/04/2010	Pri	<input type="checkbox"/>	1				05/2010		
3091	Franche, Land to rear of the Roundhead	K	382442/278192		B	OB	0.18	S				6	418/2008	Full	18/08/2010	Pri	<input type="checkbox"/>	6				08/2010		
Sub-tot	B						1.6					52						52						

WYRE FOREST DISTRICT

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1ST. APRIL 2012

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1526	Rock, Rear Woodseaves, Callow Hill	R	373886/274018		BU	FR	0.13	S				1	423/2001	Full	19/06/2001	Pri	<input type="checkbox"/>	1			05/2006	06/2006		
1899	Broadwaters, 3 Long Acre	K	383541/277277		BU	FR	0.01	S				1	1272/2007	Full	06/02/2008	Pri	<input type="checkbox"/>	1			02/2010	02/2010		
3016	Greenhill, rear of 44 Coventry Street	K	383671/276933		BU	FR	0.02	S				1	770/2008	Full	24/10/2008	Pri	<input type="checkbox"/>	1			09/2011	09/2011		
3024	Lickhill, R/O 12 Brindley Street	S	381239/272149		BU	FR	0.02	S				2	13/2008	Full	25/11/2008	Pri	<input type="checkbox"/>	2			11/2011	12/2011		
3038	Blakedown & Chaddesley, 13 The Croft	CB	388135/278901		BU	FR	0.03	S				1	188/2009	Full	22/05/2009	Pri	<input type="checkbox"/>	1			03/2012	03/2012		
3084	Aggborough & Spennells, Adj. 60 Aggborough Crescent	K	383322/275500		BU	FR	0.01	S				1	159/2010	Full	18/05/2010	Pri	<input type="checkbox"/>	1			10/2011	10/2011		
3096	Wolverley, The Birchfields	W	380180/280672		BU	Gr	0.03	S				1	37/2011	Reserved	11/03/2011	Pri	<input type="checkbox"/>	1			10/2011	01/2012		
4011	Mitton, 9 Broach Meadow	S	381823/270278		BU	OB	0.04	S				1	816/2009	Full	15/10/2010	Pri	<input type="checkbox"/>	1			03/2011	03/2011		
Sub-tot	BU						0.3					9												

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1866	Sutton Park, Rock Works, Park Lane	K	382812/276670		C	FE	0.30	M				20	/	ADLP	Pri	<input type="checkbox"/>	20				04/2005			230
1884	Wribbenthal, The Riddings, Crundalls Lane	KF	378563/277268		C	Gr	0.01	S				1	699/2009	Full	27/11/2009	Pri	<input type="checkbox"/>	1			01/2010			
2034	Bewdley & Arley, The Bungalow, Long Bank	B	376318/274657		C	FR	0.56	S	1			2	297/2010	Full	12/07/2010	Pri	<input type="checkbox"/>	1			07/2010			
2050	Cookley, Rock Tavern, Caunsall Road	W	384825/280914		C	OB	0.12	S				1	335/2009	Full	25/06/2009	Pri	<input type="checkbox"/>	1			07/2009			
3034	Bewdley & Arley, Rear of 11 Load Street	B	378663/275326		C	OB	0.01	S				1	112/2009	Full	14/04/2009	Pri	<input type="checkbox"/>	1			04/2009			
3043	Stone, Former Depot Butts Lane	St	385827/274560		C	OB	5.00	L				22	247/2009	Full	06/07/2009	Pri	<input type="checkbox"/>	22			07/2009			252a
3044	Stone, Former Depot, Butts Lane	St	385827/274560		C	OB	2.00	L				9	247/2009	Full	06/07/2009	AF	<input checked="" type="checkbox"/>	9			07/2009			252b
3068	Cookley, The Sladd, Kinver Road	W	384143/281590		C	Gr	0.33	S				3	682/2009	Full	20/11/2009	Pri	<input type="checkbox"/>	3			11/2009			
3077	Greenhill, 102 Coventry Street	K	383323/276777		C	OB	0.01	S				2	845/2009	Full	03/02/2010	Pri	<input type="checkbox"/>	2			02/2010			
3085	Greenhill, Brintons Ltd, Exchange Street	K	383124/276511	Shaylor Developments Ltd	C	FE	0.25	L				60	963/2008	Full	02/06/2010	Pri	<input type="checkbox"/>	60			06/2010			263
3088	Oldington & Foley Park, 427, Stourport Road	K	382441/275299		C	FR	0.03	S	1			2	293/2010	Full	21/07/2010	Pri	<input type="checkbox"/>	1			07/2010			
3090	Rock, Upper House Farm, Rock Cross	R	373912/271796		C	Gr	0.07	S				1	350/2010	Full	17/08/2010	Pri	<input type="checkbox"/>	1			08/2010			
3092	Mitton, 29 Bridge Street	S	380940/271287		C	OB	0.01	S				1	732/2009	Full	24/08/2010	Pri	<input type="checkbox"/>	1			09/2010			
3098	Cookley, 7 and 8 The Crescent	W	384967/279643		C	OB	0.09	S				2	544/2010	Full	26/10/2010	Pri	<input type="checkbox"/>	2			10/2010			
4000	Bewdley & Arley, Rear of 66 High Street	B	378591/275224		C	OB	0.03	S				1	267/2010	Full	29/10/2010	Pri	<input type="checkbox"/>	1			11/2010			
4002	Blakedown & Chaddesley, Bluntington Farm	CC	389614/274361		C	Gr	0.10	S				1	82/2011	Full	07/04/2011	Pri	<input type="checkbox"/>	1			05/2011			
4003	Blakedown & Chaddesley, Common Farm Barn	CB	388308/280619		C	Gr	0.14	S				2	586/2010	Full	30/11/2010	Pri	<input type="checkbox"/>	2			11/2010			

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4008	Blakedown & Chaddesley, Gabbs Farm, Clattercut Lane	Ru	389640/271720		C	Gr	0.23	S				1	748/2010	Full	16/02/2011	Pri	<input type="checkbox"/>	1				02/2011		
4012	Blakedown & Chaddesley, Churchill Farm	CB	387879/279413		C	Gr	0.21	S		0		2	105/2011	Full	20/04/2011	Pri	<input type="checkbox"/>	2				06/2011		
4013	Wribbenhall, Holbeach House	KF	378442/279016		C	Gr	0.18	S		0		3	69/2011	Full	28/04/2011	Pri	<input type="checkbox"/>	3				06/2011		
4014	Wribbenhall, Holbeach House	KF	378442/279016		C	OB	0.06	S		0		1	69/2011	Full	28/04/2011	Pri	<input type="checkbox"/>	1				06/2011		
4018	Blakedown & Chaddesley, Stone C of E School	St	386234/274870		C	OB	0.51	S				2	312/2011	Full	22/07/2011	Pri	<input type="checkbox"/>	2				07/2011		
4020	Blakedown & Chaddesley, Deansford Farm	CC	387446/276985		C	OB	0.05	S				1	330/2011	Full	29/07/2011	Pri	<input type="checkbox"/>	1				07/2011		
4022	Sutton Park, 142 Park Street	K	382787/276447		C	OB	0.02	S	1			4	298/2011	Full	19/08/2011	Pri	<input type="checkbox"/>	3				09/2011		
4023	Rock, Land at Ponderosa	R	375877/271531		C	OB	0.07	S				1	533/2010	Full	18/08/2011	Pri	<input type="checkbox"/>	1				09/2011		
4024	Lickhill, 12 Brindley Street	S	381239/272149		C	OB	0.07	S				1	742/2010	Full	18/08/2011	Pri	<input type="checkbox"/>	1				09/2011		
4025	Blakedown & Chaddesley, Common Farm Barn	CB	388308/280619		C	Gr	0.14	S				1	442/2011	Full	16/09/2011	Pri	<input type="checkbox"/>	1				09/2011		
4030	Rock, Piggotts Farm	R	375713/271773		C	FR	0.57	S	1			3	590/2011	Full	23/11/2011	Pri	<input type="checkbox"/>	2				12/2011		
4035	Mitton, 1-1a Bridge Street	S	380981/271267		C	FR	0.01	S				2	435/2011	Full	16/01/2012	Pri	<input type="checkbox"/>	2				02/2012		
4037	Wolverley, High Hobro Farm	W	381480/280778		C	Gr	0.02	S				1	705/2011	Full	10/01/2012	Pri	<input type="checkbox"/>	1				02/2012		
4038	Sutton Park, 21 Castle Road	K	382891/276279		C	FE	0.08	S				3	383/2011	Full	13/01/2012	Pri	<input type="checkbox"/>	3				02/2012		
4039	Greenhill, 9 Tower Buildings	K	383273/276809		C	OB	0.01	S				1	751/2011	Full	07/02/2012	Pri	<input type="checkbox"/>	1				02/2012		
4040	Wribbenhall, Barn at Grey Green Lane	B	378947/275965		C	Gr	0.20	S				1	634/2011	Full	21/02/2012	Pri	<input type="checkbox"/>	1				03/2012		
4042	Sutton Park, 149 Sutton Road	K	382241/275982		C	OB	0.01	S				1	12/2012	Full	02/03/2012	Pri	<input type="checkbox"/>	1				03/2012		

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4043	Greenhill, 36Leswell Street	K	383747/276739		C	FE	0.13	S				5	32/2012	Full	09/03/2012	Pri	<input type="checkbox"/>	5				03/2012		
4044	Bewdley&Arley, 11 Load Street	B	378663/275326		C	OB	0.01	S				2	41/2012	Full	19/03/2012	Pri	<input type="checkbox"/>	2				03/2012		
Sub-tot C							12		4	0		167						163						

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1140	B'down & CC, Stone House Coach House & Stables	ST	386250/275120		CU	FR	0.02	S				2	636/1994	Full	24/01/1995	Pri	<input type="checkbox"/>	1		1	12/1996	03/1997		
1178	Bewdley and Arley, Bannut Tree Farm	UA	375772/279370		CU	Gr	0.30	S				7	882/1995	Full	29/02/1996	Pri	<input type="checkbox"/>		1	6	03/1998	01/2010		
1348	Rock, Coningswick Farm Barn	R	373831/271222		CU	Gr	0.06	S				1	435/2003	Full	24/06/2003	Pri	<input type="checkbox"/>		1		02/2008	02/2008		
1359	Sutton Park, Old Brewhouse, rear 138 Sutton Road	K	382266/275962		CU	OB	0.01	S				2	342/1999	Full	20/07/1999	Pri	<input type="checkbox"/>		2		06/2004	03/2005		
1424	B'down & CC, Oakfield Farm Barn	CC	388126/271862		CU	Gr	0.01	S				1	919/2004	Full	17/12/2004	Pri	<input type="checkbox"/>		1		11/2009	11/2009		
1560	B'down & CC, Longmore Farm Barn	CC	388394/272675		CU	Gr	0.03	S				1	1086/2001	Full	12/05/2003	Pri	<input type="checkbox"/>		1		05/2008	05/2003		
1576	Wolverley, Hobro Croft, Little Hobro Stables	W	381322/280924		CU	Gr	0.20	S				1	668/2001	Full	16/10/2001	Pri	<input type="checkbox"/>		1		10/2006	10/2006		
1581	Cookley, Sleepy Mill off Wolverhampton Road	W	385565/280588		CU	OB	2.57	S				1	698/2001	Full	16/07/2002	Pri	<input type="checkbox"/>		1		07/2007	07/2007		
1620	Cookley, 4 Bridge Road	W	384320/280346		CU	OB	0.01	S				1	329/2002	Full	16/05/2002	Pri	<input type="checkbox"/>		1		05/2007	07/2007		
1731	Rock, Grove End Barn, Gorst Hill	R	373835/273179		CU	Gr	0.02	S				1	517/2003	Full	15/07/2003	Pri	<input type="checkbox"/>		1		11/2006	11/2006		
1732	Sutton Park, 94 Wood Street	K	382811/276205		CU	FR	0.02	S				1	688/2003	Full	12/08/2003	Pri	<input type="checkbox"/>		1		03/2008	09/2003		
1817	B'down & CC, Dorhall Farm Barns	CC	389422/274841		CU	Gr	0.20	S				2	384/2004	Full	27/07/2004	Pri	<input type="checkbox"/>	1		1	10/2006	03/2008		
1827	Rock, Old Lye Farm Barns Tenbury Road Pound Bank	R	373164/273628		CU	Gr	0.22	S				1	521/2004	Full	02/08/2004	Pri	<input type="checkbox"/>		1		04/2008	05/2008		
1830	Blakedown&Chaddesley, The Stables & Play Barn Park Hall	CB	386424/277889		CU	Gr	0.05	S				2	473/2007	Full	03/07/2007	Pri	<input type="checkbox"/>	1	1		11/2009	11/2009		
1842	Greenhill, Piano Building Weavers Wharf	K	382992/276475	Highstone Estates	CU	FE	0.05	M				10	1330/2003	Full	29/11/2004	Pri	<input type="checkbox"/>		10		06/2005	06/2005		225
1887	Rock, Heightington, Stone Barn (Duck House), Elford	R	376190/271367		CU	Gr	0.06	S				1	1220/2004	Full	12/08/2005	Pri	<input type="checkbox"/>		1		07/2010	07/2010		
1888	Rock, Heightington, Timber Clad Barn Elford	R	376190/271367		CU	Gr	0.10	S				1	1222/2004	Full	12/08/2005	Pri	<input type="checkbox"/>		1		07/2010	07/2010		

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1913	Bewdley & Arley, 11 High Street	B	378663/275231		CU	OB	0.20	S				9	145/2009	Full	23/04/2009	Pri	<input type="checkbox"/>	4		5	09/2008	04/2010		
2004	Blakedown & Chaddesley, Leylands Farm, Clattercut Lane	Ru	389610/271885		CU	Gr	0.16	S				2	10/2007	Full	28/02/2007	Pri	<input type="checkbox"/>		1	1	03/2008	03/2009		
2018	Wribbenhall, Barns at Blackstone Farm, Stourport Road	B	379521/274075		CU	Gr	0.27	S				6	229/2007	Full	23/04/2007	Pri	<input type="checkbox"/>		6		04/2010	04/2010		
2054	Blakedown & Chaddesley, Deansford Farm, Deansford Lane	CC	387425/277005		CU	Gr	0.09	S				2	776/2007	Full	25/09/2007	Pri	<input type="checkbox"/>		2		09/2010	09/2010		
2060	Mitton, Bell Row Court, Lion Hill	S	381200/271212		CU	FE	0.02	S				2	834/2007	Full	08/10/2007	Pri	<input type="checkbox"/>	1		1	01/2009	03/2009		
3001	Bewdley & Arley, 18 Load Street	B	378607/275316		CU	FE	0.09	S				5	398/2008	Full	12/06/2008	Pri	<input type="checkbox"/>		5		12/2008	01/2009		
3005	Wribbenhall, Light Marsh Farm, Crundalls Lane	KF	378855/276821		CU	Gr	0.20	S				2	493/2008	Full	14/07/2008	Pri	<input type="checkbox"/>		2		07/2010	08/2010		
3006	Cookley, Sebright Farm, Blakeshall Lane	W	383135/281138		CU	Gr	0.15	S				1	759/2009	Full	15/12/2009	Pri	<input type="checkbox"/>		1		02/2010	02/2010		
3007	Mitton, 30 Wilden Lane	S	382360/271689		CU	FR	0.10	S	1			2	623/2008	Full	15/08/2008	Pri	<input type="checkbox"/>		1		05/2011	05/2011		
3023	Sutton Park, 200 Park Lane	K	382878/276728		CU	OB	0.04	S				2	970/2008	Full	19/12/2008	Pri	<input type="checkbox"/>		2		12/2011	12/2011		
3026	Churchill & Blakedown, Hodge Hill Farm Barns	CB	385242/277290		CU	Gr	0.50	S				5	636/2011	Full	17/01/2012	Pri	<input type="checkbox"/>		5		03/2012	03/2012		
3037	Wolverley, Hobro Lodge Barn	W	381073/280932		CU	Gr	0.03	S				1	109/2009	Full	08/04/2009	Pri	<input type="checkbox"/>		1		03/2011	03/2011		
3047	Rock, Fernhalls Farm, Greenway	R	374394/270864		CU	Gr	0.40	S				3	325/2009	Full	25/06/2009	Pri	<input type="checkbox"/>	1	2			03/2012		
3051	Bewdley & Arley, 58 Load Street	B	378569/275350		CU	FE	0.01	S				3	370/2009	Full	22/07/2009	Pri	<input type="checkbox"/>		3		02/2010	02/2010		
3058	Mitton, 32, High Street	S	381005/271285		CU	OB	0.02	S				2	604/2009	Full	16/10/2009	Pri	<input type="checkbox"/>		1	1	02/2010	03/2011		
3093	Sutton Park, 37 Northumberland Avenue	K	382561/275352		CU	FR	0.05	S	1			3	430/2010	Full	16/09/2010	Pri	<input type="checkbox"/>		1	1	12/2010	03/2011		
4007	Bewdley & Arley, Grove Farm, Dry Mill Lane	B	377671/275808		CU	Gr	0.78	S				4	147/2010	Full	12/01/2011	Pri	<input type="checkbox"/>		4		07/2011	07/2011		
4029	Haberley & Blakebrook, Briars Hotel	K	381371/277193		CU	OB	0.14	S				1	409/2011	Full	11/10/2011	Pri	<input type="checkbox"/>		1			01/2012		

WYRE FOREST DISTRICT

RESIDENTIAL LAND AVAILABILITY: SITES AVAILABLE WITHIN 5 YEARS BY TYPE OF SITE

1ST. APRIL 2012

Unique Site Ref (Line No)	Location of Site	Parish or Town	Grid Ref East/North (SO)	Developer or Landowner (10+ Sites)	Type of Site	Previous Use	Size of Site (Ha)	Size of Site (Dwells)	No Exist Dwells Retained in Conv	No Dwells to be Demol	No Dwells Demol	No Dwells Total Capacity	Planning Application No/Year	Planning Status	Date of Planning Consent	Owner Type	Social Housing via Planning Policy	No Dwgs NYS	No Dwgs UC	No Dwgs Comp	Date Development Commenced	Date Record Last Amended	N H B C	Unique Site Ref (10+ Sites)
4031	Sutton Park, Grand Turk	K	382215/276340		CU	OB	0.08	S				6	591/2011	Full	28/11/2011	Pri	<input type="checkbox"/>	6			12/2011	12/2011		
Sub-tot CU							7.3		2			97						9	69	17				

Unique Site Ref (Line No)	Location of Site	Parish or Town	Grid Ref East/North (SO)	Developer or Landowner (10+ Sites)	Type of Site	Previous Use	Size of Site (Ha)	Size of Site (Dwells)	No Exist Dwells Retained in Conv	No Dwells to be Demol	No Dwells Demol	No Dwells Total Capacity	Planning Application No/Year	Planning Status	Date of Planning Consent	Owner Type	Social Housing via Planning Policy	No Dwgs NYS	No Dwgs UC	No Dwgs Comp	Date Development Commenced	Date Record Last Amended	N H B C	Unique Site Ref (10+ Sites)
1863	r/o 3 & 4 Baldwin Road	S	381549/271576		R	FE	0.64	L		0		36	/	Adopted LF	Pri	<input type="checkbox"/>	36					10/2011		227
1864	Mitton, Carpets of Worth, Severn Road	S	381366/271137		R	FE	3.30	L				159	768/2008	Outline	11/03/2011	Pri	<input type="checkbox"/>	159				03/2011		228
1865	Sutton Park, Timber Yard, Park Lane	K	382904/276533		R	FE	1.00	L				80	/	ADLP	Pri	<input type="checkbox"/>	80					04/2005		229
1921	Mitton, Land at Mitton Street	S	381437/271448		R	FE	0.14	M				12	575/2010	Full	15/11/2010	Pri	<input type="checkbox"/>	12				11/2010		241
1927	Franche, 78 Mill Street	K	382655/276899	Mr & Mrs Worton	R	OB	0.20	M				13	165/2010	Full	23/06/2010	Pri	<input type="checkbox"/>	13				07/2010		242
1933	Rock, Callow Hill, Rock Garage	R	373808/274016		R	OB	0.07	S				2	313/2010	Outline	05/10/2010	Pri	<input type="checkbox"/>	2				10/2010		
1942	Greenhill, 8 Grosvenor Avenue	K	383994/276789		R	FR	0.05	S		1		2	244/2009	Full	18/05/2009	Pri	<input type="checkbox"/>	2				05/2009		
1954	Sutton Park, Sutton Reservoir, Sutton Park Road	K	381375/275663		R	OB	2.00	M				14	61/2009	Outl	16/09/2009	Pri	<input type="checkbox"/>	14				09/2009		240
2025	Bewdley & Arley, Unit 1, Greenacres Lane	B	378365/275793		R	OB	0.08	S				2	215/2010	Outl	18/06/2010	Pri	<input type="checkbox"/>	2				06/2010		
2058	Franche, Costcutter Supermarket, Willowfield Drive	K	382430/278114		R	OB	0.02	S				2	526/2010	Full	26/10/2010	Pri	<input type="checkbox"/>	2				10/2010		
2062	Lickhill, Morgan Advanced Ceramic, Bewdley Road	S	380349/272308		R	FE	1.00	L				24	703/2011	Reserved	16/03/2012	AF	<input checked="" type="checkbox"/>	24				03/2012		251b
2071	Greenhill, Car Park off Church Street	K	383027/276843		R	OB	0.07	M				14	558/2010	Full	20/07/2011	Pri	<input type="checkbox"/>	14				07/2011		253
2079	Bewdley & Arley, Kendal Lodge, Dowles Road	B	378320/275586		R	FR	0.28	S		1		5	611/2009	Full	19/11/2009	Pri	<input type="checkbox"/>	5				11/2009		
2096	Bewdley & Arley, Richmond Road	B	378049/275433	WFCH	R	OB	0.21	S				5	469/2011	Full	02/03/2012	RSL	<input type="checkbox"/>	5				03/2012		
3033	Sutton Park, Sutton Arms, Sutton Park Road	K	381927/275345	Marstons Plc	R	OB	0.39	M				14	512/2011	Reserved	17/11/2011	Pri	<input type="checkbox"/>	14				12/2011		261
3035	Greenhill, Harriers Trade Centre, Stadium Close	K	383685/276137	Cox Homes	R	OB	0.37	L				20	595/2008	Full	14/04/2009	Pri	<input type="checkbox"/>	20				04/2009		262
3036	Greenhill, Harriers Trade Centre, Stadium Close	K	383685/276137	Cox Homes	R	OB	0.15	L				8	595/2008	Full	14/04/2009	Pri	<input checked="" type="checkbox"/>	8				04/2009		262

Unique Site Ref (Line No)	Location of Site	Parish or Town	Grid Ref East/North (SO)	Developer or Landowner (10+ Sites)	Type of Site	Previous Use	Size of Site (Ha)	Size of Site (Dwells)	No Exist Dwells Retained in Conv	No Dwells to be Demol	No Dwells Demol	No Dwells Total Capacity	Planning Application No/Year	Planning Status	Date of Planning Consent	Owner Type	Social Housing via Planning Policy	No Dwgs NYS	No Dwgs UC	No Dwgs Comp	Date Development Commenced	Date Record Last Amended	N H B C	Unique Site Ref (10+ Sites)
3041	Areley Kings, Thomas's Garage, Redhouse Road	S	3801111/269694		R	OB	0.13	S				5	133/2008	Outline	09/06/2009	Pri	<input type="checkbox"/>	5				06/2009		
3042	Greenhill, 25 St Georges Terrace	K	383684/276526		R	FR	0.06	S		1		6	331/2008	Full	05/05/2009	Pri	<input type="checkbox"/>	6				06/2009		
3050	Habberley & Blakebrook, 108/109 Bewdley Hill	K	381452/276233	Halls	R	FR	0.47	M		1		13	977/2008	Outline	22/07/2009	Pri	<input type="checkbox"/>	13				07/2009		
3061	Rock, Oxbine, Callow Hill	R	374290/273846		R	FR	0.12	S		1		2	505/2009	Full	22/10/2009	Pri	<input type="checkbox"/>	2				11/2009		
3071	mitton, 75-77 Mill Road	S	382037/271660		R	FR	0.11	S		2		7	490/2008	Full	22/12/2009	Pri	<input type="checkbox"/>	7				01/2010		
3072	Wribbenhall, Long Coppice, Trimley Lane	KF	379280/280157		R	FR	0.09	S		1		1	766/2009	Full	23/12/2009	Pri	<input type="checkbox"/>	1				01/2010		
3074	Oldington & Foley Park, 17/19 Neville Avenue	K	382564/275275		R	FR	0.07	S		2		2	783/2009	Full	08/01/2010	Pri	<input type="checkbox"/>	2				01/2010		
3079	Offmore & Comberton, 44 Barnetts Lane	K	384425/275843		R	FR	0.24	S		1		6	641/2009	Full	28/04/2010	Pri	<input type="checkbox"/>	6				05/2010		
3082	Habb & Bkbrook, Land between 25 & 26 Habberley St	K	382734/276982		R	OB	0.02	S				2	91/2010	Full	16/04/2010	Pri	<input type="checkbox"/>	2				05/2010		
3086	Lickhill, New Manor PH, 76 Minster Road	S	381406/272169		R	OB	0.36	M				13	125/2010	Full	11/06/2010	Pri	<input type="checkbox"/>	13				06/2010		265
3094	Bewdle & Arley, adj. 60 The racks	B	378094/275302		R	OB	0.01	S				2	447/2010	Outline	17/09/2010	Pri	<input type="checkbox"/>	2				09/2010		
3099	Mitton, 1 Tan Lane	S	381060/271557		R	FR	0.03	S		1		2	345/2010	Full	04/11/2010	Pri	<input type="checkbox"/>	2				11/2010		
4001	Greenhill, Former Carpark Bromsgrove St/Lion St	K	383325/276753	West Mercia Housing	R	OB	0.09	M				19	477/2010	Full	17/11/2010	RSL	<input type="checkbox"/>	19				11/2010		267
4004	Blakedown & Chaddesley, Rose Cottage, Clattercut Lane	CC	389918/272686		R	FR	0.46	S		1		1	752/2010	Full	28/04/2011	Pri	<input type="checkbox"/>	1				04/2011		
4005	Bewdley & Arley, 18 Wyre Hill	B	378044/275045		R	FR	0.03	S		1		1	644/2010	Full	20/01/2011	Pri	<input type="checkbox"/>	1				01/2011		
4006	Bewdley & Arley, Garages at 18 Wyre Hill	B	378044/275045		R	OB	0.05	S				3	644/2010	Full	20/01/2011	Pri	<input type="checkbox"/>	3				01/2011		
4017	Greenhill, 93-94 New Road	K	383220/276353		R	OB	0.05	S				8	787/2008	Full	06/07/2011	Pri	<input type="checkbox"/>	8				07/2011		
4026	Blakedown & Chaddesley, 26, Worcester Road	St	386107/273685		R	FR	0.07	S		1		1	451/2011	Full	15/11/2011	Pri	<input type="checkbox"/>	1				12/2011		

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4027	Broadwaters, Corner Hurcott Rd/Stourbridge Rd	K	383460/277347	WFDC	R	FR	2.01	L			69	97	390/2011	Full	11/10/2011	RSL	<input type="checkbox"/>	97				12/2011		269
4028	Wribbenhall, Easthams Farm	KF	380080/278773		R	FR	0.07	S		1		1	492/2011	Full	07/10/2011	Pri	<input type="checkbox"/>	1				12/2011		
4032	Blakedown & Chaddesley, Garages at The Green	CC	389243/274063	WFCH	R	OB	0.07	S				4	644/2011	Full	02/12/2011	RSL	<input type="checkbox"/>	4				11/2011		
4036	Sutton Park, 6 Adam Street	K	382037/276023		R	FR	0.04	S			1	3	676/2011	Full	01/04/2003	Pri	<input type="checkbox"/>	3				02/2012		
4041	Sutton Park, 10 Adam Street	K	382040/276042		R	OB	0.05	S				4	675/2011	Full	29/02/2012	Pri	<input type="checkbox"/>	4				03/2012		
Sub-tot R							15			16	70	615						615						

Unique Site Ref (Line No)	Location of Site	Parish or Town	Grid Ref East/North (SO)	Developer or Landowner (10+ Sites)	Type of Site	Previous Use	Size of Site (Ha)	Size of Site (Dwells)	No Exist Dwells Retained in Conv	No Dwells to be Demol	No Dwells Demol	No Dwells Total Capacity	Planning Application No/Year	Planning Status	Date of Planning Consent	Owner Type	Social Housing via Planning Policy	No Dwgs NYS	No Dwgs UC	No Dwgs Comp	Date Development Commenced	Date Record Last Amended	N H B C	Unique Site Ref (10+ Sites)
1131	Bewdley & Arley, Dowles Manor, Dowles Road	UA	377533/276390		RU	FR	0.05	S			1	1	931/1993	Full	22/02/1994	Pri	<input type="checkbox"/>		1		02/1994	12/1998		
1271	Wolverley, site of Franche Road Garage	W	382524/279062		RU	OB	0.19	S				4	650/2000	Resv	12/12/2000	Pri	<input type="checkbox"/>		4		12/2003	12/2007		
1331	Cookley, site of Rockview Garage	W	385024/280944		RU	OB	0.21	S				2	181/2011	Full	10/05/2011	Pri	<input type="checkbox"/>	1	1		07/2000	05/2011		
1415	B'down & CC, Site of Bluntington Garage	CC	389651/274455		RU	OB	0.32	S				4	747/2011	Full	24/02/2012	Pri	<input type="checkbox"/>	1	3		04/2001	03/2012		
1647	B'down & CC, Garage, Kidderminster Road	CC	389118/273176		RU	OB	0.20	S				2	728/2002	Full	02/12/2002	Pri	<input type="checkbox"/>		2		12/2007	12/2007		
1752	Broadwaters, Horsefair (Residual dwgs - See 1540)	K	383312/277211	WFCH	RU	OB	0.35	L				27	924/2003	Full	09/12/2003	RSL	<input type="checkbox"/>	2	25		05/2007	03/2008		207
1856	Mitton, Uplands Hillary Road, Wilden	S	382966/273274		RU	FR	0.34	S			1	1	1145/2004	Full	10/02/2005	Pri	<input type="checkbox"/>		1		10/2009	10/2009		
1964	Bewdley & Arley, Cornerways, 1 The Lakes Road	B	377710/275321		RU	FR	0.17	S			1	4	103/2009	Full	09/04/2009	Pri	<input type="checkbox"/>		4		12/2007	04/2009		
1978	Bewdley & Arley, The Beeches	R	378084/273902		RU	FR	0.60	S			1	1	246/2011	Full	16/06/2011	Pri	<input type="checkbox"/>	1			09/2009	06/2011		
2008	Mitton, Former Shell Garage, Vale Road	S	381225/271492	Churchill Retirement	RU	OB	0.23	L				45	509/2009	Full	16/10/2009	Pri	<input type="checkbox"/>		45		05/2011	05/2011	*	244
2030	Sutton Park, 127 Park Lane	K	382887/276135		RU	FR	0.13	S			1	10	347/2008	Full	18/08/2008	Pri	<input type="checkbox"/>		10		06/2011	06/2011		
2061	Lickhill, Morgan Advance Ceramics Bewdley Road	S	380349/272308		RU	FE	2.00	L				74	703/2011	Reserved	16/03/2012	Pri	<input type="checkbox"/>	70	4		03/2012	03/2012		251a
2085	Sutton Park, Castle Road/Park Lane	K	382998/276263	Timothy Smith Homes	RU	OB	0.07	M				13	1063/2007	Full	16/01/2008	Pri	<input type="checkbox"/>		13		01/2011	03/2008		254
2099	Franche, The Eagles Nest, Coningsby Drive	K	381231/277670		RU	OB	0.27	M				14	263/2008	Full	27/05/2008	Pri	<input type="checkbox"/>	12	2		05/2011	05/2011		257
3000	Oldington & Foley Park, Clent Avenue	K	381537/274441	WFCH	RU	OB	0.22	S				7	471/2011	Full	09/02/2012	RSL	<input type="checkbox"/>		7		03/2012	03/2012		
3027	Blakedown & Chaddesley, 1 Roxall Close	CB	388105/278580		RU	FR	0.10	S			1	2	451/2008	Full	16/12/2008	Pri	<input type="checkbox"/>		2		11/2010	11/2010		
3028	Areley Kings, Areley Common First School	S	380002/270428		RU	OB	0.59	S				6	541/2011	Reserved	26/10/2011	Pri	<input type="checkbox"/>		6		11/2011	12/2011		

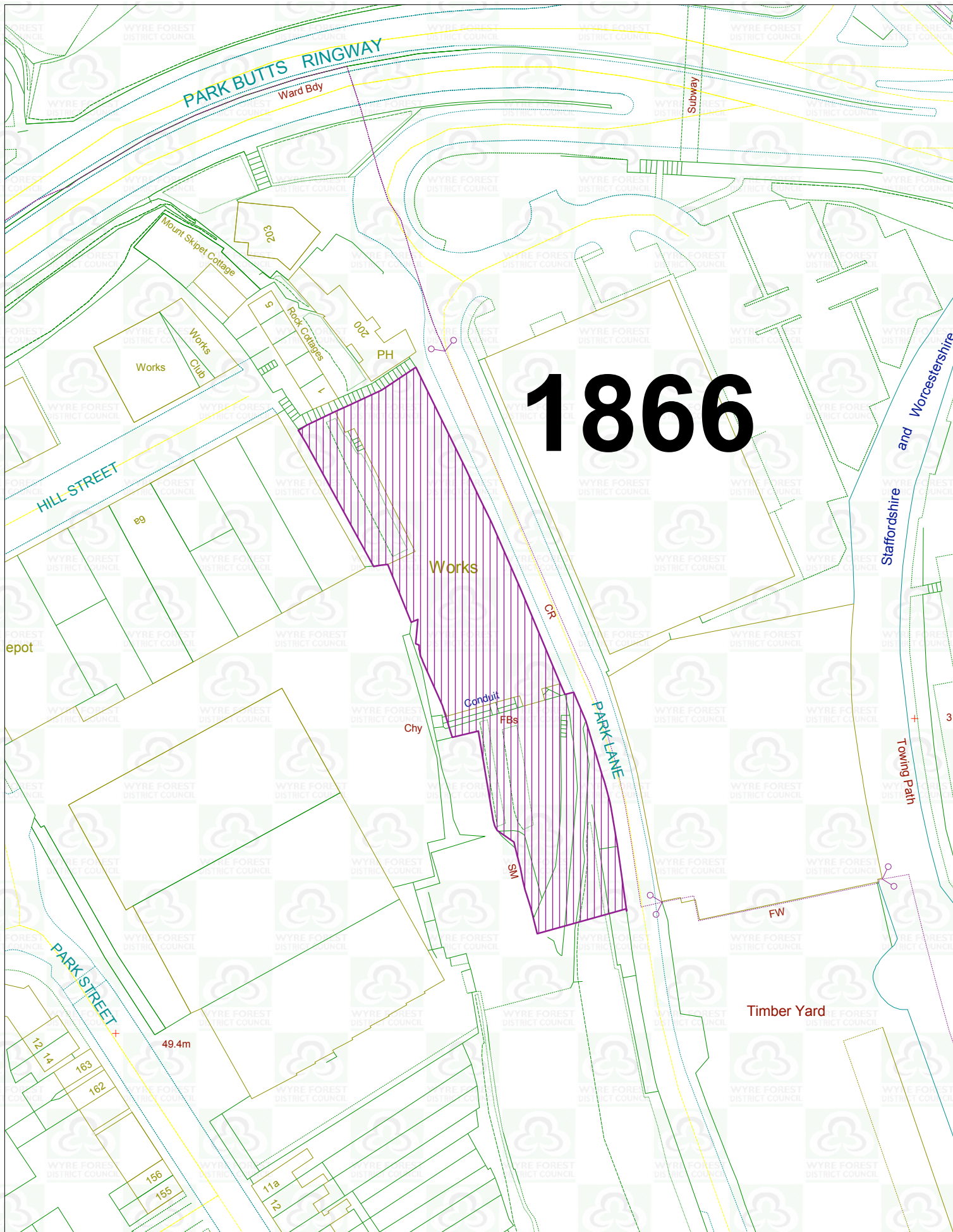
WYRE FOREST DISTRICT

RESIDENTIAL LAND AVAILABILITY: SITES AVAILABLE WITHIN 5 YEARS BY TYPE OF SITE

1ST. APRIL 2012

Unique Site Ref (Line No)	Location of Site	Parish or Town	Grid Ref East/North (SO)	Developer or Landowner (10+ Sites)	Type of Site	Previous Use	Size of Site (Ha)	Size of Site (Dwells)	No Exist Dwells Retained in Conv	No Dwells to be Demol	No Dwells Demol	No Dwells Total Capacity	Planning Application No/Year	Planning Status	Date of Planning Consent	Owner Type	Social Housing via Planning Policy	No Dwgs NYS	No Dwgs UC	No Dwgs Comp	Date Development Commenced	Date Record Last Amended	N H B C	Unique Site Ref (10+ Sites)	
3062	Mitton, 30 Worcester Road	S	382228/270172		RU	FR	0.01	S			1	1	362/2009	Full	12/11/2009	Pri	<input type="checkbox"/>		1			05/2009	05/2009		
3065	Rock, Elfin Glen	R	374138/272934		RU	FR	0.17	S			1	1	416/2011	Full	06/09/2011	Pri	<input type="checkbox"/>		1			09/2011	09/2011		
3075	Blakedown & Chaddesley, 7 New Wood Lane	CB	387536/277921		RU	FR	0.60	S			1	1	874/2009	Full	12/02/2010	Pri	<input type="checkbox"/>		1			09/2011	09/2011		
3078	Broadwaters, 84 Stourbridge Road	K	383708/277752		RU	FR	0.03	S			1	1	336/2009	Full	20/04/2010	Pri	<input type="checkbox"/>		1			11/2010	11/2010		
4019	Blakedown & Chaddesley, 22 Belbroughton Rd	CB	388081/278352		RU	FR	0.12	S			1	1	343/2011	Full	22/07/2011	Pri	<input type="checkbox"/>		1			09/2011	09/2011		
4033	Broadwaters, Churchfields Business Park North	K	382984/277470	Bellway Homes	RU	OB	4.30	L				174	163/2011	Full	07/12/2011	Pri	<input type="checkbox"/>	166	6	2	01/2012	03/2012		270	
4034	Broadwaters, Churchfields Business Park North	K	382984/277470	Bellway Homes	RU	OB	1.20	L				49	163/2011	Full	07/12/2011	RSL	<input checked="" type="checkbox"/>	32	17		02/2012	03/2012		270a	
Sub-tot		RU					12				11	445						285	129	31					

Unique Site Ref (Line No)	Location of Site	Parish or Town	Grid Ref East/North (SO)	Developer or Landowner (10+ Sites)	Type of Site	Previous Use	Size of Site (Ha)	Size of Site (Dwells)	No Exist Dwells Retained in Conv	No Dwells to be Demol	No Dwells Demol	No Dwells Total Capacity	Planning Application No/Year	Planning Status	Date of Planning Consent	Owner Type	Social Housing via Planning Policy	No Dwgs NYS	No Dwgs UC	No Dwgs Comp	Date Development Commenced	Date Record Last Amended	N H B C	Unique Site Ref (10+ Sites)	
Total							50		6	16	81	1467							1166	231	64				



1866

Works

Timber Yard

Scale: 1:1000
Date: 25/04/2008



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RESIDENTIAL LAND AVAILABILITY

Ref: 1866
Rock Works
Park Lane
Kidderminster

APPENDIX D

Details of Possible Alternative Sites

No	SHLAA Site Ref	RLA Site Ref	Location	Flood Zone	Planning	Planning Reference	Details	Conclusion
1	B001		Load Street Car Park, Bewdley, DY12 2AN	2/3	-	-		Higher flood risk than application site
2	S005		Tan Lane School, Stourport-on-Severn, DY13 8HD	1	P	12/3009/DEM	Demolition of modern school buildings (retention of Victorian school building) by Matrix Medical (May 2012); presumably with interest of developing the site for medical use in the short term.	Not considered to be reasonably available.
3	S006		TP Toys, Cheapside, Stourport On Severn	2/3	-	-		Higher flood risk than application site
4	S008		Vale Road Garage, Stourport-on-Severn	1	P	09/0509/FULL	Redevelopment of the former Shell Garage to provide 45No shleted apartments for the elderly (Approved in October 2009). Due for completion in summer 2012.	Not considered to be reasonably available.
5	K011		Former Telephone Exchange, Kidderminster, DY10 2DY	1	-	08/0594/RESE	Expired - Erection of 35No apartments; new retail unit & use of ground floor telephone exchange building as office space; car parking & raised amenity area (approved 2008). No extant permission but still developer interest in the site.	Not considered to be reasonably available.
6	S012		Martley Road, Stoutport-on-Severn, DY13 0NH	1	P	08/0188/FULL	Erection of 15No two storey dwellings & 12No flats (approved in May 2008). Site completed.	Not considered to be reasonably available.
7	K015		78 Mill Street, Kidderminster, DY11 6XJ	3	P	10/0165/FULL	Conversion of existing garage workshop, formerly part of demolished mill, to five two bed dwellings, construction of three dwellings and five live-work units, with associated amenity and parking facilities. Site currently vacant.	Higher flood risk than the application site & not considered to be reasonably available
8	S017		Baldwin Road, Stourport-on-Severn, DY13 9AU	3	P	WF/0721/02	Expired - Erection of fourteen two-storey dwellings with associated garaging and parking.	Higher flood risk than application site
9	B018		Blackstone Barns, Bewdley, DY12 1QD	1	P	07/0229/FULL	Conversion of existing barns to six residential units (approved April 2007). Due for completion in Summer 2012.	Not considered to be reasonably available.
10	S020		Carpets of Worth, Severn Road, Stourport-on-Severn	1/2/3	P	09/0588/OUTL	Redevelopment of site to provide a mixed use development consisting of 159No. residential properties, Class A retail uses, Class B employment, Class C1 hotel and Class D2 assembly & leisure (approved April 2011)	Not considered to be reasonably available.
11	K024		Sutton Reservoir, Sutton Park Road, Kidderminster	1	P	09/0061/OUTL	Fourteen detached dwellings (access, scale & layout to be considered) (approved September 2009). Waelier application renewed in 2009 for 5 years & the development may be brought forward sooner.	Not considered to be reasonably available.
12	K028		Hérons Nursing Home, Kidderminster, DY10 4EX	1	P	09/0731/FULL	Provision of 24 bedroom extension to existing Nursing Home on site of existing disused building (approved January 2010). Development completed.	Not considered to be reasonably available.
13	B034		Bewdley Primary School, Bewdley, DY12 1EH	1	P	09/0292/FULL	Erection of 46 affordable residential units and associated access and parking (approved October 2010). Development was due for completion at the end of 2011.	Not considered to be reasonably available.
14	R016		The Manor House, Wolverley	1	P	06/0616/FULL	Demolition of ex public house & garage, construction of a new dwelling house & 4 car garage Approved July 2006) Completed	Not considered to be reasonably available.
15	K041		Rifle Range Shops, Kidderminster, DY11 7PB	1	-	-	Site owned by The Community Housing Group & will be brought forward together for affordable housing. Redevelopment must include some retail provision. Shop units and first floor residential dwellings are in occupation and therefore site is not considered to be available immediately for development purposes & therefore not reasonably available. Furthermore, application site comprises a single private residential dwelling; with no provision for affordable housing or retail provision. Hence the proposed development does not fit the requirements for development at this site.	Unsuitable
16	K042		Hurcott Road Maisonettes, Kidderminster, DY10 2PJ	1	P	10/0256/FULL	Demolition of 5 No. low rise maisonette flat blocks and the erection of 97 No. new dwellings (apartments and dwelling houses) (approved February 2011). Demolition works completed - due on site Spring 2012.	Not considered to be reasonably available.
17	K050		Chester Road Bowling Club, Kidderminster, DY10 1TE	1	-	10/0382/FULL	Erection of 26 No. 2 & 3 bedroom affordable dwellings comprised of 8 flats for shared equity, 8 flats for social rented and 10 houses for social rented (refused October 2010). Development currently under appeal.	Not considered to be reasonably available.
18	K054		Georgian Carpets, Kidderminster, DY10 2JY	1	P	11/0163/FULL	Construction of 223 dwellings and associated roadworks and landscaping (following demolition of existing buildings) (approved December 2011) On site January 2012, with 2No show homes completed by March 2012.	Not considered to be reasonably available.
19	K061		Harriers Trading Estate, DY10 1NJ	1	P	08/0595/FULL	Demolition of existing industrial units, construction of 28No 2-bed 2-storey dwellings, roads, parking spaces and associated works and improvement to existing footpath link (approved April 2009)...permission due to lapse.	Although permission is due to lapse, site is not considered to be immediately available and therefore is not considered to be reasonably available for the purposes of the proposed development.
20	R066		Butts Lane Depot, Stone, Kidderminster, DY10 4BH	1	-	09/0030/FULL	Withdrawn - Conversion of existing buildings to provide 22 live work units and 9 affordable dwellings, business support facility for residents/community meeting room, addition of new roof structures (buildings 1 & 3), landscape renovations, new access and associated works including offsite highway works. New site owner looking to put forward a renewal application Summer 2012	Not considered to be reasonably available.
21	K074		Blakebrook School & County Buildings, Bewdley Road, Kidderminster, DY11 6RL	1	-	-	School operational, expected to relocate to a new complex in 2014.	Not considered to be reasonably available.

22	S078		Tesco & Bedland Sores, Lombard Street, Stourport-on-Severn, DY13 8DX	1	-	-	Tesco site in continued operation until construction of new store at the Carpets of Worth site.	Not considered to be reasonably available.
23	S085		Manor PH, Minster Road, Stourport-on-Severn, DY13 8AP	1	P	10/0125/FULL	Demolition of public house and erection of 14 dwellings with associated access and parking (approved June 2010). Site clearance stage completed.	Not considered to be reasonably available.
24	K087		108-109 Bewdley Hill, Kidderminster, DY11 6JE	1	P	12/0312/RESE	Reserved matters application for the design and external appearance of the buildings and landscaping following the granting of outline planning permission (08/0977) for the demolition of bungalow and erection of 13 dwellings and retention of 108 Bewdley Hill, Kidderminster (Revised house types for certain plots, layout showing roof changes, Lifetime Homes information and , further drainage details received) (approved August 2012)	Not considered to be reasonably available.
25	S088		Midland industrial Plastics, Bewdley Road, Stourport On Severn, Worcestershire DY13 8QT	1	-	-	Site owned by Bovale Limited (residential, commercial, and mixed use developers). Noted within 'Summary of Responss Received to Site Allocations & Policies issues & Options Consultation Paper (June 2009) by Wyre Forest DC 'possible contamination issues making housing unviable'.Substantial site/ground investigations works required to test viability of this site for suitability for housing; therefore site is not considered to be reasonably available within the short term to accommodate the proposed development.	Not considered to be reasonably available.
26	K089		King Charles 1 School, Comberton Road Kidderminster DY10 1XA	1	-	-	Due to withdrawal of BSF funding, site is likley to remain educational	Not considered to be reasonably available.
27	K090		Sutton Arms PH, Sutton Park Rd Kidderminster DY11 6LE	1	P	11/0268/FULL	Removal of condition 5 ii) of Outline Planning Permission 08/0538 (Demolition of Sutton Arms and redevelopment of site for residential dwellings) to permit shared access arrangements to Sutton Park Road (approved June 2011). Site clearance completed early 2010.	Not considered to be reasonably available.
28	R095		Blakedown Nurseries, Cakebole Kidderminster Worcestershire DY10 4DY	1	P	12/0114/FULL	Proposed change of use from former Garden Centre / Nurseries with shop and office accommodation to residential use with 42 No. dwellings comprising of 7 bungalows, 33 houses and 2 flats together with parking. (awaiting decision)	Not considered to be reasonably available.
29	R104		Land off Sebright Road, Fairfield, DY11 5UE	1	P	10/0550/FULL	The construction of ten affordable dwellings (approved September 2010)	Not considered to be reasonably available.
30	S106	1836	Rear of 33 Bladwin Road, Stourport-on-Severn, DY13 9AZ	1	P	08/0662/FULL	Demolition of 33 Baldwin Rd & construction of 10 No. two bed houses & 1 No. two bed bungalow with associated access & parking (approved July 2008). Site completed.	Not considered to be reasonably available.
31	R115		Oxbine, Callow Hill, ROCK, KIDDERMINSTER, DY14 9XB	1	-	10/0274/FULL	Demolition of existing bungalow and replacement with 3No dwellings (amendment to schemes previously approved under applications 09/0505/FULL and 09/0506/FULL. Considered to be overdevelopment due to single access serving 3No dwellings & other considerations regarding development within an existing private garden.	Site reported to be up for sale, however checking on-line unable to find this property's sale details. Therefore assumed to be sold or taken off the market. As such considered to not be reasonably available for immediate development
32	K134		Muskateer Public House, Avon Road, Kidderminster, DY11 7PB	1	-	-	Site & Rifle Range Shops owned by The Community Housing Group & will be brought forward together for affordable housing. Redevelopment must include some retail provision.Public House is open and curently trading and therefore site is not considered to be available immediately for development purposes & therefore not reasonably available. Furthermore, application site comprises a single private residential dwelling; with no provision for affordable housing or retail provision. Hence the proposed development does not fit the requirements for development at this site	Unsuitable
33	K138		Land off Puxton Drive, Kidderminster, DY11 5HY	1/3	P	10/0633/FULL	Residential development of 73 No. dwellings with associated internal roads, access, car parking & landscaping (approved July 2009 ref 09/0066/FULL). Latest application: Erection of 71 dwellings and associated roadworks (Bellway Homes). Under construction, due for completion end 2012.	Not considered to be reasonably available.
34	R143		Garage Site, The Green, Chaddersley Corbett, DY10 4SL	1	P	11/0644/FULL	Demolition of existing redundant garages and construction of four affordable houses (approved December 2011)	Not considered to be reasonably available.
35	K146		Cheshires, Coventry Street, Kidderminster, DY10 2BG	1	-	-	Site for sale through Lambert Smith Hampton. Site area approx. 0.34Ha. It is considered that through the KCAAP, it would be preferable to develop the site holistically rather than through a piecemeal approach. Furthermore, proposal is for a single house development; and therefore it is unlikely that the current site owners would split the site.	Unsuitable
36	K156		Zanzibars, Castle Road, Kidderminster, DY11 6SW	2/3	P	06/1242/FULL	Part demolition of existing building and conversion of buildings frontage and extension to create 46 units, with associated access and parking (approved July 2007). Site completed March 2012.	Higher flood risk than the application site & not considered to be reasonably available
37	K157		Franchise Street, Kidderminster, DY11 6RE	1	P	09/0663/FULL	Substitution of previously approved apartments (19 in number) with 9 No. 2 & 3 bedroom dwelling houses 2 No. 1 bedroom apartment (Previous approval 07/0362). Total 74 units (approved December 2009) - Miller Homes site completed March 2011	Not considered to be reasonably available.

38	S159		Lichfield Basin, Stourport-on-Severn, DY13 9ER	2	P	07/0697/FULL	Vary conditions nos. 3,5,6,7,8,12,13,14,15,17 & 35 to enable works on unit G (Sail House) provided under permission WF1208/04 & 06/0490/Full prior to submitting details for all other remaining residential units forming part of redevelopment of Lichfield Basin site. Site completed March 2012.	Same flood risk as the application site & not considered to be reasonably available
39	R161		The Terrace, Clows Top	1	-	WF/0265/01	The Clows Top Garage, together with the Terrace site (the former Crown pub) was granted outline planning consent for residential redevelopment on 14th March 2003 under reference WF/0265/01. This was followed by a Reserved Matters approval for 21 dwellings that was issued on 12th June 2006. The permission was subject to a s106 obligation to commit to the construction of off site foul and surface sewers to Rock prior to a start on site. The off-site sewers were costed at circa £500 - £600k and required detailed design and technical approval before Severn Trent would give the go ahead. Delays in achieving this meant that the consent was not implemented and consent has since lapsed. For this reason the development had not proceeded. Given the fact that the proposed scheme on the terrace is only 12 units, and these are all affordable, the scheme on its own is not viable and will not proceed. We understand alternative drainage proposals have been considered but are unlikely to be acceptable to Severn Trent or Wyre Forest Environmental Health.	Unsuitable
40	S208		Wilden Primary School, Stourport-on-Severn, DY13 9LP	1	-	-	School continues to operate from this site with no immediate plans to relocate and release the site.	Not considered to be reasonably available.
41	K209		Sion Middle School, Broadwaters, Kidderminster, DY10 2X	1	-	-	Worcestershire County Council own the site and advise that there are no covenants on the land restricting its use. Extant planning permission for conversion to a professional development centre exist. No plans exist to implement this as yet, however it may be implemented at some time in the future. It is further noted that the playing fields are used by St Oswald's School; who may require expansion in the future. Also there are issues on the site relating to drainage.	Not considered to be reasonably available.
42	K210		Former British Sugar Site, Kidderminster	1	-	12/0146/EIA	An outline application for the redevelopment of the British Sugar Factory (phase 1), including access and Phase 1 link road with all other matters reserved, comprising: demolition of any remaining existing structures on site; residential development up to a maximum of 250 dwellings (class C3); employment development of up to 4 hectares (class B1, B2 and B8); retail development (class A1); restaurant/cafe/drinking establishment/hot food take away (class A3, A4 and A5); hotel (class C1); care home (class C2); extra care facility (class C2); creche (class D1); a railway halt; access into site, ancillary roads, footpaths and cycleways; and open space. (awaiting decision)	Not considered to be reasonably available.
43	K211		Sladen School Site, Hurcott Road. Kidderminster. DY10 2QJ	1	-	-	From the responses to the draft materplan for the Churchfields area it is apparent that there will be local objection to proposals for housing on the former school site. Furthermore the size of the site is very large compared to the land take reired for the application site. it is considered that Worcestershire County Council would prefer transfer to maintain land within single ownership to ensure that development proposals for the site are undertaken holistically, rather than by piecemeal approach.	Unsuitable
44	K212		Brinton's Offices, Exchange Street, Kidderminster, DY10 1AG	3	P	08/0963/FULL	Part demolition, part extension and alterations to provide 60 x 1 & 2 bed extra care residential units with 4 x A1/A3 retail units at ground floor together with ancillary care home facilities and associated parking. Site up for sale.	Higher flood risk than application site
45	K300		Lion Street, Kidderminster, DY10 1PT	1	-	-	Site comprises small specialist shops, youth centre & car parking. Identified as suitable for mixed use development. It is envisaged that there is a preference for holistic development at the site. Furthermore the potential timescale for delivery is estimated at 2021-26.	Not considered to be reasonably available.
46	K301		Lion Square, Kidderminster, DY10 1PD	1	-	-	Site comprises large retail units fronting Worcester Street connected by steep steps to a small number of historic buildings in area of surface car parking. Identified for mixed use development. Constraints to delivery of redevelopment of this site include multiple ownership and the possibility that this may hinder implementation of the overall scheme. It is envisaged that a holistic approach to redevelopment of this area would be preferable. Furthermore the timescale for delivery is estimated at 2021-26.	Not considered to be reasonably available.
47	S302		Swan Hotel & Working Men's Club, 56 High Street, Stourport-on-Severn	1	-	-	Site comprises a vacant hotel, private car parking, a club, bowling greens & garage. Identified for mixed development. The current land owners are identified as constraints to delivery of redevelopment works at this location. The potential timescale for delivery is estimated at 2021-26.	Not considered to be reasonably available.

48	S303		Lucy Baldwin Unit, Olive Grove, Bewdley Road, Stourport-on-Severn, DY13 8XZ	1	-	12/0317/FULL	Demolition of existing main building; construction of 37 new residential dwellings and change of use and conversion of existing lodge building into 4 residential dwellings to comprise 41 dwellings in total to be served via the existing access from Olive Grove; landscaping; car parking; earthworks to facilitate drainage and other ancillary works (awaiting decision)	Not considered to be reasonably available.
49	B304		Lax Lane, Bewdley	3	-	06/0474/OUTL	Outline planning for residential development at the former WRVS building withdrawn in 2006. Site is also comprised of an existing craft centre and Red Cross building. Site constraints have been identified as the access from Lax Lane. The potential timescale for delivery is estimated 2021-26.	Higher flood risk than the application site and not considered to be reasonably available.
50	B305		66 High Street, Bewdley. DY12 2DJ	1	P	08/0569/FULL	Change of use of ground floor to office use (Approved July 2008). Former workhouse and listed building. Constraints to redevelopment at the site include funding issues. Furthermore the potential timescale for deliver is estimated at 2016-21.	Not considered to be reasonably available.
51		1886	Rock Works, Park Lane, Sutton Park	1	-	-	Listed within the Residential Land Availability report as suitable for 'conversion' to provide 20No residential units. It is presumed that retention of the existing building is preferred with conversion to apartments. Due to the nature of the application site i.e. single residential dwelling, the Rock Works site is considered to be unsuitable.	Unsuitable



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Mortgage Report and Valuation

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Applicants Name: Miss SM Matthews

Property Address: Unit 2 Greenacres Lane
 Dowles Road Bewdley DY12 2RE

Property type

X in the appropriate box

House <input checked="" type="checkbox"/>	Bungalow	Detached <input checked="" type="checkbox"/>	Semi detached	Terraced	Flat
--	----------	---	---------------	----------	------

Please indicate numbers of:-

Floors	3	Bathrooms	3
Living Rooms	2	Sep WC	1
Bedrooms	4	Other rooms (specify in General Remarks)	0
Kitchens	1	Garages	0
Outbuildings (specify)		Basement	0

Land Area, if greater than 3 acres:

Construction:

Wall Type	BRICK CAVITY
Is the property standard construction	Yes
Year Built	2012
If new build, provide details of warranties in General Remarks	

Roof Type	PITCHED SLATE
If non-standard construction, detail in General Remarks	
Is the property a new build?	Yes
Have you seen the Disclosure of Incentives form?	No

Tenure

Freehold	Yes	Leasehold	No
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If Leasehold:

Unexpired Term	years	Ground Rent £	Service Charge £
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Services

Water - mains	Yes
Drainage - mains	Yes
Gas	Yes
Central heating	Yes
Road adopted	Yes

Water - private	No
Drainage - private e.g. Cesspit/septic tank	No
Electricity	Yes
Shared driveway	Yes

About the Property

Is the property suitable as security for Melton Mowbray Building Society?	Yes
Is the property fit for immediate occupation and habitable?	No
Is any part of the property tenanted?	No
Is the property being used solely as a residential dwelling?	Yes
Is the property being purchased under Right to Buy scheme?	No
Is the property ex-Local Authority?	No
If ex-Local Authority, are more than 40% of houses in the local area privately owned?	
Is the property Shared Ownership? If Yes, provide details in General Remarks	No
Purchase price advised	£

Saleability

Sale prices for the type of property in the area	Declining	Static	Improving	
Demand for this type of property in the area	Poor	Fair	Good	Excellent
Description of location	Residential	Industrial/Commercial	Rural	Mixed
Location	Poor	Fair	Good	Excellent

Please comment on any adverse features of the location
 The property is accessed via a narrow drive with a residential caravan park and this may deter some future purchasers.

Subsidence

Has the property suffered from structural movement?	No
Is there a risk of further ongoing movement?	NA
Is there any evidence of subsidence in the immediate vicinity?	No
If you have answered Yes to any of the above questions please include details in General Remarks.	

Structure

Was there evidence of or problems in respect of the following during the course of the inspection?

Wet Rot	No	Plumbing	No
Dry Rot	No	Rising damp	No
Roof problem	No	Electrical wiring	No
Woodworm	No	Flooding or Coastal Erosion	No
Cavity wall tie failure	No	Are any essential repairs required?	No

If you have answered Yes to any of the above, please provide details together with a note of any specialist's reports that are considered a requirement.

General Remarks

Please include any remarks helpful to Melton Mowbray Building Society in considering the advance with attention shown to general conditions, repairs necessary by undertaking or retention.

Established residential area convenient for local amenities.

The property is of partial steel framed construction. A number of lending institutions consider steel frame construction to be unacceptable for mortgage purposes, this may detract from the property's marketability. The frame consists of 4 main steel portal frames with infill brick cavity construction. Tender to confirm acceptability.

The conveyancer should ensure that all necessary statutory and Local Authority consents and approvals have been obtained for properties construction.

Construction has not yet commenced. An inspection of plans and the site have been completed.

The conveyancer should ensure that appropriate rights of way and management arrangements are in existence.

Valuation

Market Value at the date of inspection in present condition is considered to be	£ 100,000
Value of the property after completion of any repairs/improvements	£ 350,000
Projected Market Value: specify your assumptions of the time to sell: 120 days	£ 325,000
If new build, estimated value on second hand basis	£ 320,000
Market Rent at the date of inspection	£ 900
Value for Building Insurance (using BCIS guidelines)	£ 420,000
Gross External Floor Area	320 sqm
Date of inspection	23 August 2012



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Mortgage Report and Valuation

Continuation Page

Applicants Name: Miss SM Matthews

Property Address: Unit 2 Greenacres Lane
Dowles Road Bewdley DY12 2RE

General Remarks (continued)

for the shared access to the property over the shared drive.

The applicant advised that the property is to have Architects new build certificate. Therefore confirm acceptability.

Photographs taken of existing unit are access/surround to kitchen or bathroom.

End of Report



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Please indicate numbers of:-

Floors	3	Bathrooms	3
Living Rooms	2	Sep WC	1
Bedrooms	4	Other rooms (specify in General Remarks)	0
Kitchens	1	Garages	0
Outbuildings (specify)		Basement	0

Land Area, if greater than 3 acres:

Construction:

Wall Type	BRICK CAVITY	Roof Type	PITCHED GABLE
Is the property standard construction	Yes	If non-standard construction, detail in General Remarks	
Year Built	2012	Is the property a new build?	Yes
If new build, provide details of warranties in General Remarks		Have you seen the Disclosure of Incentives form?	No

Tenure

Freehold	Yes	Leasehold	No
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If Leasehold:

Unexpired Term	years	Ground Rent £	Service Charge £
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Services

Water - mains	Yes
Drainage - mains	Yes
Gas	Yes
Central heating	Yes
Road adopted	Yes

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Drainage - private e.g. Cesspit/septic tank	No
Electricity	Yes
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About the Property

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Woodworm	No	Flooding or Coastal Erosion	No
Cavity wall tie failure	No	Are any essential repairs required?	No

If you have answered Yes to any of the above, please provide details together with a note of any specialist's reports that are considered a requirement.

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Value for Building Insurance (using BCIS guidelines)	£ 420,000
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Mortgage Report and Valuation

Continuation Page

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Dowles Road Bewdley DY12 2RE

General Remarks (continued)

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Construction:

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Is the property standard construction	Yes	If non-standard construction, detail in General Remarks	
Year Built	2012	Is the property a new build?	Yes
If new build, provide details of warranties in General Remarks		Have you seen the Disclosure of Incentives form?	No

Tenure

Freehold	Yes	Leasehold	No
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If Leasehold:

Unexpired Term	years	Ground Rent £	Service Charge £
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Services

Water - mains	Yes
Drainage - mains	Yes
Gas	Yes
Central heating	Yes
Road adopted	Yes

Water - private	No
Drainage - private e.g. Cesspit/septic tank	No
Electricity	Yes
Shared driveway	Yes

About the Property

Is the property suitable as security for Melton Mowbray Building Society?	Yes
Is the property fit for immediate occupation and habitable?	No
Is any part of the property tenanted?	No
Is the property being used solely as a residential dwelling?	Yes
Is the property being purchased under Right to Buy scheme?	No
Is the property ex-Local Authority?	No
If ex-Local Authority, are more than 40% of houses in the local area privately owned?	
Is the property Shared Ownership? If Yes, provide details in General Remarks	No
Purchase price advised	£

Saleability

Sale prices for the type of property in the area	Declining	Static	Improving	
Demand for this type of property in the area	Poor	Fair	Good	Excellent
Description of location	Residential	Industrial/ Commercial	Rural	Mixed
Location	Poor	Fair	Good	Excellent

Please comment on any adverse features of the location
 The property is accessed via a narrow drive with a residential caravan park and this may deter some future purchasers.

Subsidence

Has the property suffered from structural movement?	No
Is there a risk of further ongoing movement?	NA
Is there any evidence of subsidence in the immediate vicinity?	No
If you have answered Yes to any of the above questions please include details in General Remarks.	

Structure

Was there evidence of or problems in respect of the following during the course of the inspection?

Wet Rot	No	Plumbing	No
Dry Rot	No	Rising damp	No
Roof problem	No	Electrical wiring	No
Woodworm	No	Flooding or Coastal Erosion	No
Cavity wall tie failure	No	Are any essential repairs required?	No

If you have answered Yes to any of the above, please provide details together with a note of any specialist's reports that are considered a requirement.

General Remarks

<p>Please include any remarks helpful to Melton Mowbray Building Society in considering the advance with attention shown to general conditions, repairs necessary by undertaking or retention.</p> <p>Established residential area convenient for local amenities.</p> <p>The property is of partial steel framed construction. A number of lending institutions consider steel frame construction to be unacceptable for mortgage purposes, this may detract from the property's marketability. The frame consists of 4 main steel portal frames with infill brick cavity construction. Tender to confirm acceptability.</p> <p>The conveyancer should ensure that all necessary statutory and Local Authority consents and approvals have been obtained for properties construction.</p> <p>Construction has not yet commenced. An inspection of plans and the site have been completed.</p> <p>The conveyancer should ensure that appropriate rights of way and management arrangements are in existence.</p>
--

Valuation

Market Value at the date of inspection in present condition is considered to be	£ 100,000
Value of the property after completion of any repairs/improvements	£ 350,000
Projected Market Value: specify your assumptions of the time to sell: 120 days	£ 325,000
If new build, estimated value on second hand basis	£ 320,000
Market Rent at the date of inspection	£ 900
Value for Building Insurance (using BCIS guidelines)	£ 420,000
Gross External Floor Area	320 sqm
Date of inspection	23 August 2012

Declaration by Valuer

1.	I confirm that I or the Company I am employed by have/has a current Valuation Agreement with Melton Mowbray Building Society and also have/has current Professional indemnity Insurance for the amount required in the Valuation Agreement.		
2.	I understand that the contents of this valuation will be used to decide whether the property forms suitable security for the mortgage advance required and the valuation report will be used and relied on by Melton Mowbray Building Society in making the mortgage advance requested and their respective successors and assigns and persons deriving title from them whether in equity or in law.		
3.	I confirm that I conducted the valuation and inspection in accordance with the RICS Valuation - Professional Standards UK Appendix 10 RICS Residential Mortgage Valuation Specification and that I have brought to the attention of Melton Mowbray Building Society issues that materially affect value and are critical to lending. I am aware that Melton Mowbray Building Society will act on this report in making the mortgage advance. If any usually circumstances exist that were not apparent and are subsequently discovered then the valuation will need to be reviewed.		
4.	I have enclosed photographs and comparative information required.		
5.	I confirm that I possess one of the following professional qualifications: FRICS or MRICS.		
Name	P. Carroll,	Qualifications	FRICS
		RICS Membership Number	0850264
Signed	532864 3864	Date	23 August 2012
Firm's Name and Address	Chartered Surveyors 100-102, Gold Street Kettering Northants NN16 8AP		

Comparables

	Property 1	Property 2	Property 3
Distance from the subject property	1/2 mile	1 mile	1 mile
Address	VERCATOR LODGE CLEGGERY ROAD BEWLEY NN12	7 BEWLEY GRANGE KIDDERMINSTER NN11	17 BEWLEY HILL KIDDERMINSTER NN11
Type of property	0412	D HOUSE	D HOUSE
No of bedrooms	5	5	5
Differences from the subject property	SIMILAR	LESSER POSITION	BETTER PROPERTY, LESSER POSITION AND CONDITION
Estimated value	£ 336,000	£ 355,000	£ 316,000
Date valued or sold	JULY 2012	JAN 2012	MARCH 12

Please attach photographs - Front, Rear, Street Scene, Kitchen and Bathroom.



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Tel: 01664 414141 Fax: 01664 414040 E-mail: melton@mmbs.co.uk

Mortgage Report and Valuation

Continuation Page

Applicants Name: Miss SM Matthews

Property Address: Unit 2 Greenacres Lane
Dowles Road Bewdley DY12 2RE

General Remarks (continued)

for the shared access to the property over the shared drive.

The applicant advised that the property is to have Architects new build certificate. Therefore confirm acceptability.

Photographs taken of existing unit are access/surround to kitchen or bathroom.

End of Report

Photosheet



STREET/ACCESS



FRONT/PLOT



INTERNAL

Project Title.

Proposed Affordable House, Unit 2 Greenacres Lane, Bewdley

Area M2	Area FT2
100	1,076

ELEMENT	TOTAL COST	COST/M ²	COST/FT ²
1) PRELIMINARIES.	£ 18,000.00	180.00	16.72
2) SUB STRUCTURES.	£ 13,500.00	135.00	12.54
SUPERSTRUCTURE			
3) Frame.	£ -	0.00	0.00
4) Upper Floors.	£ 2,100.00	21.00	1.95
5) Roof & Wall Cladding Construction.	£ 5,800.00	58.00	5.39
6) Stairs.	£ 2,300.00	23.00	2.14
7) External Walls.	£ 7,140.00	71.40	6.63
8) Windows & Ext.Doors.	£ 7,000.00	70.00	6.50
9) Internal Walls.	£ 5,500.00	55.00	5.11
10) Internal Doors.	£ 2,950.00	29.50	2.74
11) Wall Finishes.	£ 3,600.00	36.00	3.34
12) Floor Finishes.	£ 2,400.00	24.00	2.23
13) Ceiling Finishes.	£ 1,800.00	18.00	1.67
14) Decorations.	£ 6,000.00	60.00	5.57
15) Fittings.	£ 12,000.00	120.00	11.15
16) Elec. Installations.	£ 8,000.00	80.00	7.43
17) Elec. Heating.	£ 11,000.00	110.00	10.22
18) Plumb & Mech inc A/C	£ 500.00	5.00	0.46
19) Lift Installation	£ -	0.00	0.00
20) Alarms.	£ 2,000.00	20.00	1.86
21) Builders Work.	£ 1,400.00	14.00	1.30
SUB TOTAL OF ITEMS 3-21.	£ 81,490.00	814.90	75.71
22) Drainage.	£ 4,500.00	45.00	4.18
23) Site Preparation.	£ 10,000.00	100.00	9.29
24) Landscape & Planting.	£ 2,000.00	20.00	1.86
25) Paving,Roads,Parking, & Footpaths.	£ 1,080.00	10.80	1.00
26) Walls & Fencing.	£ 1,690.00	16.90	1.57
27) External Lighting	£ 600.00	6.00	0.56
28) Services.	£ 1,800.00	18.00	1.67
29) Professional Fees	£ 11,000.00	110.00	10.22
30) Building Regulation Fees	£ 1,500.00	15.00	1.39
31) S.I.Report	£ 7,500.00	75.00	6.97
32) Contingencies @ 5%	£ 7,733.00	77.33	7.18
SUB TOTAL OF ITEMS 1-29	£ 162,393.00	1623.93	150.87

OVERHEADS	APPORTIONED		
FINAL TOTAL	£ 162,393.00	1623.93	150.87

ADONIS CONSTRUCTION LIMITED**Date: 10-Sep-12****Project Title.****Proposed Affordable House, Unit 2 Greenacres Lane, Bewdley
Internal Costs**

Area M2	Area FT2
100	1,076

ELEMENT	TOTAL COST	COST/M ²	COST/FT ²
1) PRELIMINARIES.	12000.00	120.00	11.15
2) SUB STRUCTURES	23000.00	230.00	21.37
SUPERSTRUCTURE			
3) Frame.	0.00	0.00	0.00
4) Upper Floors.		0.00	0.00
5) Roof & Wall Cladding Construction.		0.00	0.00
6) Stairs.		0.00	0.00
7) External Walls.		0.00	0.00
8) Windows & Ext.Doors.		0.00	0.00
9) Internal Walls.		0.00	0.00
10) Internal Doors.		0.00	0.00
11) Wall Finishes.		0.00	0.00
12) Floor Finishes.		0.00	0.00
13) Ceiling Finishes.		0.00	0.00
14) Decorations.		0.00	0.00
15) Fittings.		0.00	0.00
16) Elec. Installations.		0.00	0.00
17) Elec. Heating.		0.00	0.00
18) Plumb & Mech		0.00	0.00
19) Lift Installation		0.00	0.00
20) Alarms.		0.00	0.00
21) Builders Work.		0.00	0.00
SUB TOTAL OF ITEMS 3-21.	0.00	0.00	0.00
22) Drainage.		0.00	0.00
23) Site Preparation.		0.00	0.00
24) Landscape & Planting.		0.00	0.00
25) Paving,Roads,Parking, & Footpaths.		0.00	0.00
26) Walls & Fencing.		0.00	0.00
27) External Lighting		0.00	0.00
28) Services.		0.00	0.00
29) Professional Fees		0.00	0.00
30) Building Regulation Fees		0.00	0.00
31) S.I.Report		0.00	0.00
32) ACL's Contingencies		0.00	0.00
SUB TOTAL OF ITEMS 1-29	35000.00	350.00	32.52
OVERHEADS		0.00	0.00
FINAL TOTAL	35000.00	350.00	32.52

JM/EG

12 September 2012

Mr M Harding
Unit 2
Greenacres Lane
Dowles Road
Bewdley
Worcestershire
DY12 2RE

Dear Mr Harding,

Unit 2, Greenacres Lane, Dowles Road, Bewdley, Worcestershire, DY12 2RE

I write in reference to our recent meeting regarding the above unit.

You have asked my guidance and opinion on the property's continued use for some form of commercial use.

As I am sure you are fully aware the premises are situated in the grounds of a caravan site with residential accommodation to three sides and as such upon the face on it this is not a traditional commercial location, especially taking into consideration the immediately adjacent residential property.

The access way to the caravan site is far to be desired in that it is impossible to turn into the access way when approaching along Dowles Road from the opposite direction from Bewdley. Indeed when one enters the caravan site the location of the premises was extremely difficult to find.

Therefore from a commercial point of view, the poor access and the fact that it is situated within a caravan site with residential properties surrounding and the secluded nature of the premises I find it difficult to imagine what form of commercial use would be viable.

Secondly, turning to the condition of the property, its current condition is far from desirable.

The pitched roof appears to be of asbestos containing material and possibly more importantly I consider the structural fabric of the building is in an extremely dangerous condition. Indeed, the rear elevation wall is only one brick thick and there is severe structural cracking in a diagonal direction.

Therefore due to the asbestos roof and structural issues with the premises I would suggest that the only possible solution would be to demolish and rebuild the property in its entirety.

Needless to say if I can be of any further assistance please do not hesitate to contact me.

Yours sincerely,



JONATHAN MOUNTFORD MRICS FICBA
Partner
Andrew Grant LLP
jonathan.mountford@andrew-grant.co.uk

Rebecca Mayman
Planning Policy Manager
Economic Prosperity & Place Directorate
Wyre Forest District Council

Our Reference – 31702/C26

14 September 2012

Dear Rebecca

RE: PRE-SUBMISSION PUBLICATION VERSION OF THE WYRE FOREST DC SITE ALLOCATIONS AND POLICIES DPD, JULY 2012: LEA CASTLE, FORMER HOSPITAL SITE.

PURPOSE

This representation is made on behalf of the Homes and Communities Agency (HCA), Department of Health and the Coventry and Warwickshire Partnership Trust. 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 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.

SUMMARY

The landowners welcome inclusion of Lea Castle as a Previously Developed Site in the Site Allocations and Policies DPD (SALDPD), and broadly support the site specific policy aimed at providing a 'framework' for its future redevelopment. However, whilst our clients do not question the overall soundness of the plan, they **object** to the range of uses deemed acceptable by the Council at this location under Policy SAL.PDS1; uses which it is felt will render the policy undeliverable.

Part of the site is currently allocated for B1 (business) in the Wyre Forest Local Plan, and in the pre-submission publication version of the Site Allocations and Policies DPD (July 2012), is 'allocated' for uses comprising B1, C2 (residential institution), and health and sports facilities. However, despite being listed for a number of years on the District Council's 'WyreForest4Business' website as an available commercial development site, no interest has been shown in the development of the site for employment purposes. Furthermore market advice obtained by the HCA has confirmed not only a lack of interest in the site for major commercial development but also highlighted that without some reference to C3 (dwelling houses) within the mix of uses considered appropriate, there would be very little prospect of delivering a comprehensive redevelopment of this important redundant and derelict site.

The National Planning Policy Framework is supportive of the redevelopment of previously developed sites in the Green Belt, whether redundant or in continuing use, so long as redevelopment would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development. On behalf of our clients AMEC has undertaken a detailed appraisal of the former Lea Castle Hospital site; work

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which has confirmed that due to a combination of factors local topography and existing mature woodland belts, much of the site is enclosed and very well screened thus offering potential for comprehensive redevelopment without impacting on the 'openness' of the surrounding Green Belt.

By creating economic, social and environmental benefits for existing and future residents of the district, the landowners of the site believe that redevelopment of the former hospital site at Lea Castle can help support the Council's regeneration objectives for the wider Kidderminster area. However, to realise and maximise these opportunities through comprehensive redevelopment, it is requested that Policy SAL.PDS1 be re-worded so that (subject to viability testing) 'dwelling houses' (Use Class C3) is included as an acceptable land use. The proposed re-wording of the policy is set out below.

Finally, in order that the impact of proposals for future redevelopment of the former Lea Castle Hospital site can be adequately assessed in relation to issues such as links to the wider regeneration of the area, job creation, the countryside, highway capacity and the Green Belt, the landowners would be happy to accept a requirement to produce a planning brief or masterplan, and for its content to be agreed with the District Council. Such a course of action we consider would be consistent with other major development sites within the district, and will help ensure that best use of this important previously developed site can be realised in a manner that is supported by the local community, stakeholders and the Council.

PROPOSED CHANGES TO POLICY SAL.PDS1

Policy SAL.PDS1

Previously Developed Sites in the Green Belt

Lea Castle Hospital Site

- *Within the ~~Previously Developed~~ area of defined Lea Castle Hospital PDS site boundary, a mix of uses comprising B1 (Business), C2 (Residential Institutions), **C3 (Dwelling Houses)**, and health and sport facilities will be permitted.*

PROPOSED REVISION TO PDS BOUNDARY

It is requested that the Previously Developed Site boundary for Lea Castle, as presented in the SALDPD, is amended to reflect the extent of all developed land at the former hospital site. The proposed revised PDS boundary is illustrated in Figure 1. A revision to the boundary is considered necessary to ensure that the site can be redeveloped in a comprehensive manner and is consistent with advice both in the NPPF and the recent Written Ministerial Statement issued by Communities and Local Government Secretary Eric Pickles on housing and growth (September 2012), which encourages Councils to make best use of previously developed land in the Green Belt.

Figure 1 Proposed Revised PDS Boundary for the former Lea Castle Hospital Site

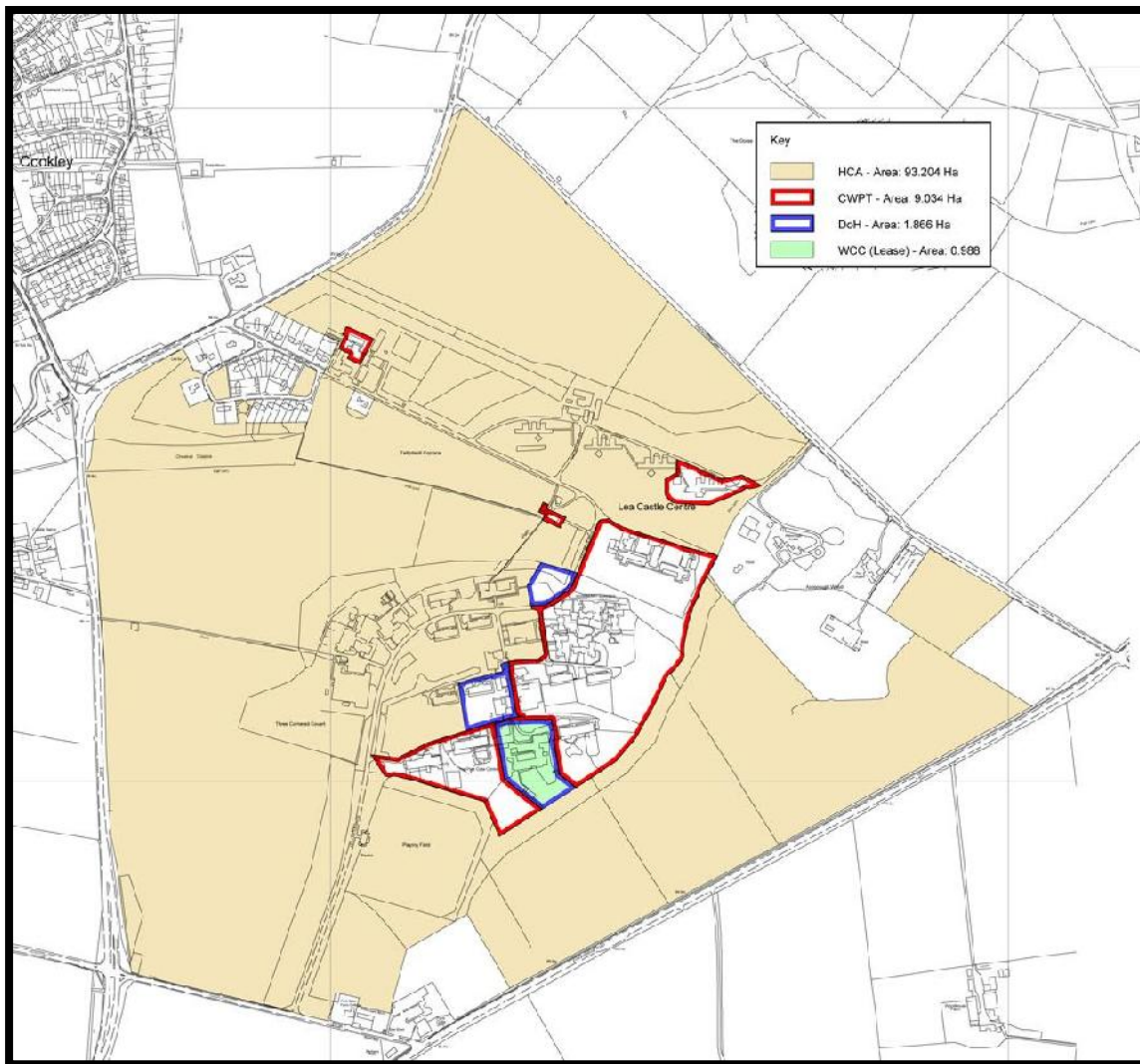


1. BACKGROUND

1.1 LAND OWNERSHIP

The Homes and Communities Agency owns 93 ha of the former hospital site with the Coventry & Warwickshire Partnership Trust owning 9 ha and the Department of Health 1 ha of the remainder of the site; in total the site measures approximately 104 hectares (refer Figure 2). Part of the Department of Health site is leased to Worcestershire County Council. Due to on-going security and essential maintenance, annual estate management costs for each of the landowners is significant.

Figure 2 Former Lea Castle Hospital Site – Land Ownership



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1.2 SITE DESCRIPTION

The site is located just beyond the north-eastern fringe of Kidderminster and is bounded by the A449 (Wolverhampton Road) to the north and the A449 (Kidderminster Road) to the west, by the A451 (Stourbridge Road) to the south-east, the B4189 (Park End Road / Wolverley Road) to the south, and Axborough Lane to the north-east.

The site can be accessed off Park End Road, Wolverhampton Road and Axborough Lane via a series of smaller roads which lead through the site.

The central area of the site currently comprises a mixed cluster of one and two storey derelict prefabricated buildings dating principally from the 1950s and previously used as a hospital for people with learning difficulties which has since closed. These buildings, together with other former hospital buildings located in the north-west corner of the site, have a total estimated footprint of approximately 25,000 sq.m. and a gross floor area of around 30,000 sq.m. There is also an extensive network of underground ducts serving the buildings. Asbestos is also present in the ducts and the buildings.

A sports pitch and club house is located immediately to the south of the main hospital site. The remainder of the undeveloped part of the site comprises a significant area of farmland.

Land beyond the PDS boundary is mainly under agricultural use apart from the former nurses' accommodation located adjacent to the site's north-west boundary which is now in use as private residential accommodation. Approximately 200 metres in the same direction lies the village of Cookley.

1.3 EXISTING AND EMERGING POLICY CONTEXT

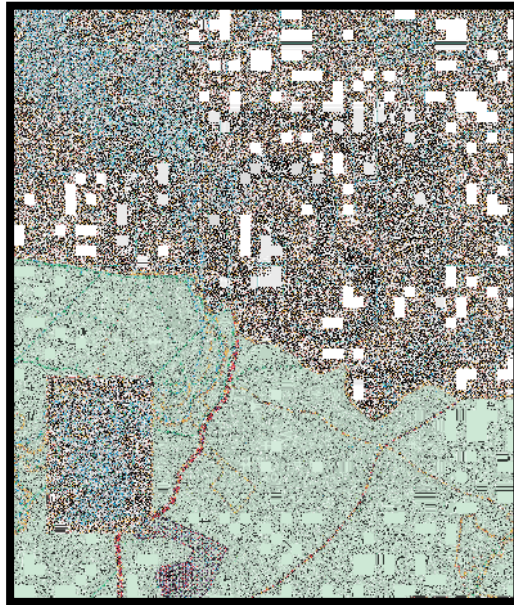
1.3.1 Existing policy context

The planning policy for the site is currently set out in the 2004 adopted Wyre Forest Local Plan. Policy GB4 of the Local Plan states that:

Major developed sites in the Green Belt, as identified on the Proposals Map at Lea Castle Hospital [see Figure 3 below],...will be regarded as being suitable for redevelopment and environmental improvement under the provisions of PPG2 Annex C.

The Proposals Map includes a Major Developed Site (MDS) allocation boundary around the former Lea Castle Hospital site, which broadly reflects the extent of developed land, together with a further boundary around an area identified for allocation under Policy E4. Please refer to Figure 3 which is an extract from the online version of the Proposals Map showing both the Policy GB4/MDS boundary and the boundary corresponding to the employment site allocation under Policy E4.

Figure 3 MDS Boundary for the Lea Castle Hospital Site – Local Plan 2004



Under Policy E4 the Local Plan allocates 6 ha of the Lea Castle site for redevelopment to B1 (employment) use (“ideally High Technology Business development”) According to the District Council, based on a site coverage ratio of about 26%, the 6ha area broadly corresponds to the footprint of buildings which were considered surplus at the time (15,700 square metres). As a consequence of Policy E4, the opportunity for comprehensive redevelopment of the site under Policy GB4 was effectively rendered redundant. This policy approach contrasts to that taken for Rushock Trading Estate, the only other MDS identified in the Plan, whose boundary corresponds solely with Policy GB4 which itself reflected national planning advice as contained at the time in PPG2: Green Belts.

Wyre Forest District Council adopted its Core Strategy Development Plan Document (DPD) on 9th December 2010. This has resulted in a number of the previously ‘saved’ Local Plan policies being replaced though both policies GB4 and E4 continue to remain in force.

1.3.2 Emerging policy context

Over the past few years the district council has been preparing a Site Allocations and Policies DPD which, once adopted, will allocate sites to meet its development needs until 2026.

In May 2011 the Council published a Preferred Options Paper which identifies, under Policy 9, the former Lea Castle Hospital site as one of a number of preferred sites for allocation for employment / economic development over the plan period.

In the paper the Council acknowledges that the previous allocation, through the 2004

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Adopted Local Plan, of part of the site for a High Technology Business Park has 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. Furthermore, in the same paper the Council state that while the Lea Castle site is an attractive semi-rural location, there is concerns about the viability of continuing the existing allocation of the site. As a consequence it is proposed that “other options need to be explored through the Site Allocations process”.

Under Policy 56 (Major Developed Sites in the Green Belt), the paper proposes that within the boundary of the Lea Castle Hospital site, uses comprising B1 (Business), C2 (Residential Institutions) and health and sport facilities would be permitted.

1.3.3 Previous representations

The Homes & Communities Agency has made previous representations in response to formal consultation on the emerging Wyre Forest Site Allocations and Policies DPD, including most recently to the Preferred Options paper. In this representation, the HCA voiced support for the Council’s decision to make provision for additional land uses on the former hospital site. However, the inclusion of C2, along with ‘health uses, and sport and recreational facilities’, did not address the HCAs continued concern that the site is not attractive for employment uses and that, having regard to viability considerations, greater flexibility should be provided for in the policy.

Furthermore, having regard to advice from technical and property advisors the HCA specifically argued in its representations that only by incorporating open market residential (C3) as part of the mix of uses can the necessary infrastructure provision be funded to open-up the site and ensure delivery of a comprehensive redevelopment scheme that will contribute towards Kidderminster’s regeneration.

2. SALDPD PRE-SUBMISSION PUBLICATION VERSION

The Pre-submission Publication version of the SALDPD continues to identify the former Lea Castle Hospital Site as an employment allocation under Policy SAL.GPB1. As one of three named ‘Previously Developed Sites in the Green Belt’ the Council has also confirmed B1 and C2 (together with and health and sport facilities) as the uses that will be permitted as part of any future redevelopment of the site.

At the Preferred Options stage the District Council acknowledged concerns about the viability of employment as a future land use at this location, 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. Given these commitments, and the fact that the landowners have since met with the Council on several occasions to consider future uses for this site, they are therefore disappointed that the Council has not made any further changes to the policies relating to the site and specifically not provided for a more flexible land use mix and the specific inclusion of C3; something which we note is also supported in separate representations by a wide range of respondents

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to both consultations on the Site Allocations DPD and also in response to recent consultation on Gypsy / traveller proposals at Lea Castle.

Our client is not aware of any viability work being undertaken by the Council to ensure that the land use mix provided for under Policy SAL.GPB1 would result in a viable and deliverable development at Lea Castle. It is our contention that, 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 a likely resultant negative effect on the local community.

The SALDPD also includes a map setting out details of the proposed Previously Developed Site (PDS) boundary for Lea Castle, a boundary which is smaller than the one currently included in the adopted Local Plan. Whilst some parts of the site have been sold by the landowners since the Local Plan was adopted, including former nurses accommodation located off The Crescent for example, the PDS boundary in the SALDPD (Figure 4) does not accurately correspond to such changes in landownership and does not accurately reflect the extent of developed land remaining on the site. For this reason, and to ensure that comprehensive redevelopment proposals for the site can be considered in the future, it is requested that the PDS boundary is revised as shown in Figure 5.

Figure 4 PDS Boundary for Lea Castle in the SALDPD

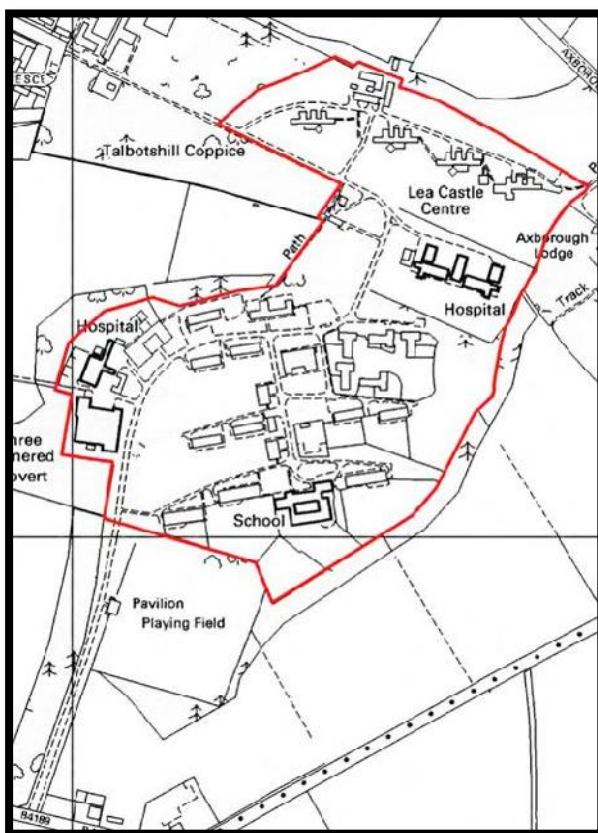
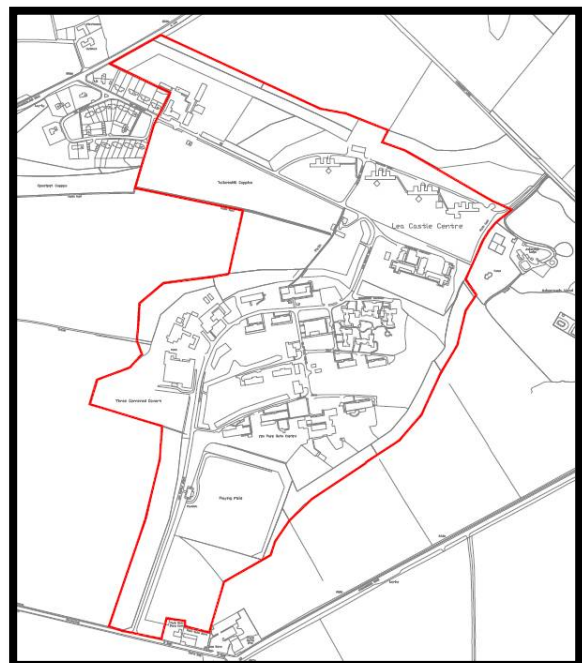


Figure 5 Proposed revised PDS Boundary for Lea Castle



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3. SECURING FUTURE REDEVELOPMENT AT LEA CASTLE

Guidance in the National Planning Policy Framework 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. Additionally, the Secretary of State has recently issued a Written Ministerial Statement in which, in the interest of helping improving the rate of housing building and the economy, he specifically encourages Councils to make best use of previously developed land in the Green Belt. Therefore, in the absence of evidence from the Council on the viability and deliverability of the proposed land use mix on the site, and based on the poor results of initial soft market testing for C2 (either as a standalone scheme or as part B1 mixed use scheme), 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 landowners intention to present the findings of this viability work to the Council as soon as they are available; findings which they believe will support the case for a revision to Policy SAL.GPB1 and ensure that best use of this important previously developed site can be realised. In line with recent dialogue with officers at the Council, it is their hope that this viability work 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 during the Plan Period.

I trust the Council will give these representations consideration before finalising and submitting the DPD to the Secretary of State in advance of the EiP. My client and I would be pleased to have the opportunity to discuss this matter further, however, if you have any immediate questions please feel free to contact me.

Yours sincerely

ANGUS MARTIN

Technical Director

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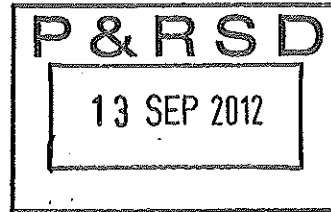
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Planning Policy Manager
Economic Prosperity and Place Directorate
Duke House
Clensmore Street
Kidderminster
Worcestershire
DY10 2JX



11th September 2012

Dear Sirs

Wyre Forest District Local Development Plan Framework – Site Allocations and Policies
Development Plan Documents – Public Stage Representation Forms.

We are pleased to submit a representation in response to the above consultation on behalf of our clients Messrs J & H Evans along with an OS plan identifying certain land edged in blue that is in our clients' ownership part of which that we propose should be incorporated into the Development Plan Documents, for the reasons outlined within the submission.

Within the representation forms we have provided brief reasoning as to why we consider the draft DPD to be unsound, our principal concerns being that the document does not make adequate provision and allocation for affordable and low cost housing, which we consider is contrary to the NPPF. We also believe that the lack of sites included with a commitment to a high allocation of affordable and low cost housing means the document has not been positively prepared nor can it be effective. It is submitted that the site, outlined in red on the enclosed plan (where the landowner has proposed to include a combined minimum of 60% affordable and low cost housing), if incorporated into the DPD would significantly contribute to the changes needed to address the deficiency and make the document 'sound'.

As required by the representation forms we have included our suggested revisions as precisely as possible. These suggested amendments and the information contained within this representation have been made in good faith and so as to be practically helpful. We wish it to be recorded however, that all representations made at this stage are in principle and should not be considered by the LPA to form a legal or binding contract between the parties. We believe there is an excellent opportunity for the LPA to make significant improvements to the DPD relating to the provision of affordable and low cost housing, and we would be delighted to be involved in further discussions at any stage prior, or during the Examination in Public.

Please do not hesitate to contact us at any stage.

Yours faithfully

Miss Hannah Moule BSc (Hons) MRICS FAAV ABIAC
Moule & Co. Chartered Surveyors, Farm and Rural Business Consultants and Services.
Mobile: 07976 568053
Email: hannah@mouleandco.co.uk
Encs.



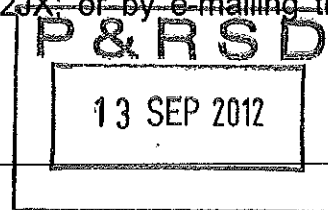
**Wyre Forest District Local Development
Framework – Site Allocations and Policies and
Kidderminster Central Area Action Plan
Development Plan Documents (DPDs)
Publication Stage Representation Form**

Ref:

(For official
use only)

Please return to: Planning Policy Manager, Economic Prosperity and Place Directorate, Duke House, Clensmore Street, Kidderminster, Worcestershire, DY10 2JX; or by e-mailing this form to Planning.Policy@wyreforestdc.gov.uk

BY 5.30pm on Friday 14th September 2012



This form has two parts –
Part A – Personal Details
Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make and remember to specify which document it relates to. Please specify which DPD you are commenting on.

Part A

1. Personal Details*		2. Agent's Details (if applicable)	
<i>*If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.</i>			
Title	Mr		Ms
First Name	Haydn		Hannah
Last Name	Evans		Moule
Job Title (where relevant)	Acting owner and proprietor of the land		Proprietor
Organisation (where relevant)	J & H Evans		Moule & Co
Address Line 1			The Farm Office, Millridge Farm
Line 2			Parsons Lane, Hartlebury
Line 3			Worcestershire
Post Code			DY11 7YQ
Telephone Number			01299 250184 or 07976 568053
E-mail Address (where relevant)			hannah@mouleandco.co.uk

Part B – Please use a separate sheet for each representation

Your representation should cover all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

After this stage, further submission will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Name or Organisation:

Ms Hannah Moule of MOULE & CO is instructed by Mr H Evans of Bowerbatch Farm, Rock, Nr. Kidderminster, Worcestershire DY14 9SQ to make representations to the Wyre Forest District Council in regard to the Site Allocations Local Development Framework of land in the ownership of J & H Evans.

The land is part of Location SO 7271 9950 and is set partly against Rectory Lane and Porchbrook Road and behind the housing development to the west and north of these two roads respectively. E.384980 N.278390

The representation to promote this land for Housing Development to be included in the Local Plan is set out below.

Area of land proposed at Rock

Please see enclosed 3 OS Plans edged in red.

Plan marked No. 1 shows approximately 5 hectares.

Plan No. 2 shows an area of approximately 2.8 hectares to the south of that shown on Plan No .1.

Plan No. 3 shows an area of approximately 2.2 hectares to the north of that shown on Plan No.1.

The LPA is invited to recommend its preferable option in order to accommodate the District wide and Local need.

3. This representation relates to the DPD in regard to "Site Allocations and Policies"
To which part of the DPD does this representation relate?

<p>Paragraph: "Sequential Approach to New Development" to be modified to include a paragraph after "Brownfield Sites within Rural Settlements" stating that where land is adjacent or very nearby to one of the 8 major Rural Settlements and is made available by a landowner, agreeing to provide a minimum of 40% up to a maximum of 55% Affordable Homes and a minimum of 20% Low Cost Housing such should be supported to provide a combined total up to a maximum of 70% and a minimum of 60% inclusive of Affordable and Low Cost Homes (up to 125 square metres) for the benefit of the Local and District Wide Need.</p> <p>~~~~~</p> <p>Rural Regeneration: The provision of Affordable and Low Cost Housing in Rural Areas that meet the criteria set out in DS01 where land is adjacent to the Settlement and the land owner is prepared to allow a minimum of 40% for Affordable Homes and a minimum of 20% Low Cost Homes to be facilitated by Normal Homes in accordance with p.54 of the NPPF.</p> <p>~~~~~</p> <p>"Level of Provision" Following the 2nd Paragraph insert "That adjacent to Rural Settlements where the criteria satisfies the provisions in DS01 and DS04 the minimum combined total for Affordable and Low Cost Housing will be 60% and the maximum 70%</p> <p>~~~~~</p> <p>"Density of New Development" After the 3rd Bullet Point insert</p> <ul style="list-style-type: none"> The Density of Development in Rural Settlements should be in accordance with DS01, DS04 and CP04 and a minimum of 30 and a maximum of 45 dwellings per hectare should be regarded as acceptable so as to be in accordance with paragraph 52 of the NPPF in regard lay out. 	<p>Policy DS01</p> <p>~~~~~</p> <p>DS04</p> <p>~~~~~</p> <p>CP04</p> <p>~~~~~</p> <p>CP05</p>	<p>Other e.g. Map, table, figure, key diagram</p>	<p>As shown edged red on the accompanying OS Plan.</p>
---	---	---	--

4. Do you consider the DPD is :

4.(1) Compliant with the Duty to Cooperate	Yes	YES		No	
4.(2) Legally compliant	Yes	YES		No	
4.(3) Sound	Yes			No	NO

Please refer to guidance notes for explanation of terms
If you have entered **No** to 4(3), please continue to Q5. In all other circumstances, please go to Q6.

through planning for larger scale development such as new settlements or extensions to existing villages and towns that follow the principles of Garden Cities.

The NPPF has been introduced by Government in order that Local Planning Authorities should use it in their decision making process. It is submitted that the contents of the NPPF are all material considerations that should be taken into account in preparing the Development Plan in the form of the Local Development Framework in regard to the Site Allocations and Policies.

It is submitted that the Site Allocations and associated Policies are unsound for 3 reasons as set out below.

Is the DPD positively prepared?

1. It is submitted that the Site Allocations and Policies reflecting such are not positively prepared. The Local Planning Authority as Wyre Forest District Council submits that subject to the landowners releasing such that there is sufficient land to accommodate 4000 houses between 2012 and 2026. This fails to take into account the annual need of sites to provide 260 Affordable Homes (AH) which is seen in the document: Wyre Forest District Core Strategy DPD Matter 9 Affordable Housing Policy CP04 published in April 2012. The figures at paragraph 1.2 confirm a *total shortfall of 260 subsidised affordable housing*. In contrast CP04 suggests at 7.10 in the Reasoned Justification a figure of 175 affordable homes; but that only 30 % of the need is likely to be delivered in the period 2012 to 2017. CP04 confirms the likely delivery of 60 AH per annum. It is calculated therefore that there is a deficiency of 2800 AH over the Plan Period from 2012 to 2026. We would seek clarification of this by the LPA at or before the EIP.
2. Therefore these documents are not in accordance with paragraph 47 of the NPPF in that the supply of affordable homes has not been addressed for the next five years or indeed beyond.

Is the DPD effective?

1. It is submitted that taking into account the above information the Local Plan is not effective. It fails in that no proper account has been taken of the continuing ongoing need for AH and Low Cost Affordable Homes which simply has been sidelined because of the need to provide the Normal Homes requirement of 4000. While much sympathy is given to the fact developers need to reduce the amount of AH in permissions already allowed, and that it appears to be uneconomic to build on these Sites that have permission containing say 40 % AH, this situation simply adds to the ongoing deficiency. The reduction and the reasons for doing so are understood in that the LPA in the past year or two (and this remains in the Core Strategy) has sought to assist developers by allowing the level of AH to drop down to 30% or even 20%; but this means that the LPA is faced with the problem that the DPD is not in accordance with paragraph 47 of the NPPF.

2. It is submitted that the AH deficiency is compounded each year by the reduction of the percentage of AH on Sites of 6/10 or more dwellings wherever the location is, so the lack of AH is not being addressed and deteriorates.
3. These figures demonstrate that the Local Plan is ineffective because it is not delivering the Affordable Homes needed in the 5 year period (nor from 2012 to 2026).

Is the DPD in accordance with National Policy?

1. Section 6 of the NPPF refers to "Delivering a wide choice of quality homes" and at paragraph 47 it confirms that LPAs should identify and update annually a supply of specific deliverable sites... etc. to provide 5 years worth of housing against their housing requirements etc....At paragraph 52 the NPPF confirms that the supply of new homes can sometimes be best achieved through planning for larger scale development such as new settlements or existing villages and towns that follow the principles of Garden Cities.
2. The WFDC as the LPA has regrettably failed to identify sufficient land to accommodate at least 100 Affordable Homes per annum District Wide for the next 5 years and so the Local Plan is unsound for the reasons set out above.

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The Planning Portal dated 06 September 2012 confirms that the Government is committed to:

1. Removing restrictions on house builders to help unlock 75,000 homes currently stalled due to sites being commercially unviable. Developers who can prove that council's affordable housing requirements make the project unviable will see them removed.
2. New legislation for Government guarantees of up to £40bn worth of major infrastructure projects and up to £10bn of new homes. The Infrastructure (Financial Assistance) Bill will include guaranteeing the debt of Housing Associations and private sector developers.
3. Up to 15,000 affordable homes and 5,000 empty homes brought back into use using new capital funding of £300m and the infrastructure guarantee
4. An additional 5,000 homes built for rent at market rates in line with proposals outlined in Sir Adrian Montague's report to Government on boosting the private rented sector

The LPA is respectfully urged to take all the above submissions into account and urgently modify the Local Plan to now incorporate the 5.00 hectares (approx.) of land as shown on OS Plan No.1 (enc.) or its preferred options of parts the land as shown edged red on Nos. 2 or 3 of the OS Maps (enc.), in order to provide sufficient land to accommodate at least some of the serious need for Affordable and Low Cost Housing both Locally and District wide.

Reference is made to the paragraph 47 of the NPPF and footnote 11. The landowner has

confirmed that this Site on the edge of Rock Village is available now. It offers a suitable location for such and that if now incorporated into the plan, we can confirm that all efforts will be made by the owners to make the necessary planning application in order that the required housing in the proportions of a minimum of 40% for Affordable and up to 20% Low Cost Homes can have every reasonable prospect of being delivered within 5 years. Such a proposition can be financed by the Government's Infrastructure (Financial Assistance) Bill 2012-2013 now going through Parliament as promoted by the Chancellor of the Exchequer in order to restart the economy.

It is submitted that by allowing this land into the plan will benefit the whole area of WFDC; in that it will allow Developers who have Sites with planning permission including perhaps 40% AH to apply for reduction of such to make the Sites economic to build. This would be by relying upon the argument that there is a provision of Affordable and Low Cost Homes being accommodated by a land owner who is prepared to allow a higher percentage than normal of such, while understanding and accepting that the return per acre may be less than was expected some 5/6 years ago.

In regard to the proposed inclusion of a minimum of 40% up to 55% affordable homes we rely upon an Appeal Decision allowed by Mr PJ Asquith MA (Hons) MA MRTPI in 2001 [Ref. APP/M0655/A/99/1023973] where at the Public Inquiry reference was made that the LPA covering Lymm in Lancashire/Cheshire simply had failed to deliver sufficient affordable homes in the years before. The proposal was in outline for 200 houses of which 50% were to be affordable homes. This decision was challenged by the LPA and it was subsequently allowed by the Court of Appeal in 2002 Case No. C/2002/0673 (Neutral Citation No. [2002] EWCA Civ. 1762). The lack of provision of affordable homes was a sufficiently important "material consideration" to allow the Appeal to succeed. It is submitted that the figures provided above are more than sufficient to persuade the LPA that this land should now be included in the LP.

There has long been a nationwide LPA concept due to Policy Restraints in Local Plans that Affordable Homes in Rural Areas should be situated adjacent to settlement boundaries and only on odd occasions are they included within. It is submitted that this method of dealing with this need simply adds to social exclusion when such should be integrated within the whole community. There should be no social exclusion by simply "tacking on" development on the edge of a settlement boundary. People who need affordable homes are often important people (often young ones) who may be nurses, doctors and all sorts of persons who play an important role in society for example; who simply have not been able to afford to get onto the housing ladder. It is submitted that this is not a proper reason to separate affordable homes from other development. There should be full social inclusion.

In this instance there is a willing landowner who in principle is agreeable to provide land where up to 70% (and a minimum of 60%) of any proposed housing development can be Low Cost and Affordable Homes. Whilst paragraph 54 of the NPPF appertains to exceptions sites and that LPAs should consider allowing normal housing to facilitate the provision of affordable homes for local need; when taking into account paragraph 52 of the NPPF then the combination of the two facilitates the District Wide need and local need of affordable homes. Any design can follow the principles of Garden Cities.

The landowner has also expressed a willingness to consider that the rest of the field could be made available if needed; for facilities such as a primary school, play area and some small shops that would then if implemented have the effect of creating a self contained community that has in any event an excellent village hall.

The required modifications to the relevant Policies are set out above at Section 3 which then will allow the Affordable and Low Cost Housing needs to be met District Wide and Locally.

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, We wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Because of the importance of the promotion of this land to now be allocated for development for the reasons set out above; and in the likely event that the Inspector may require possible clarification.

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

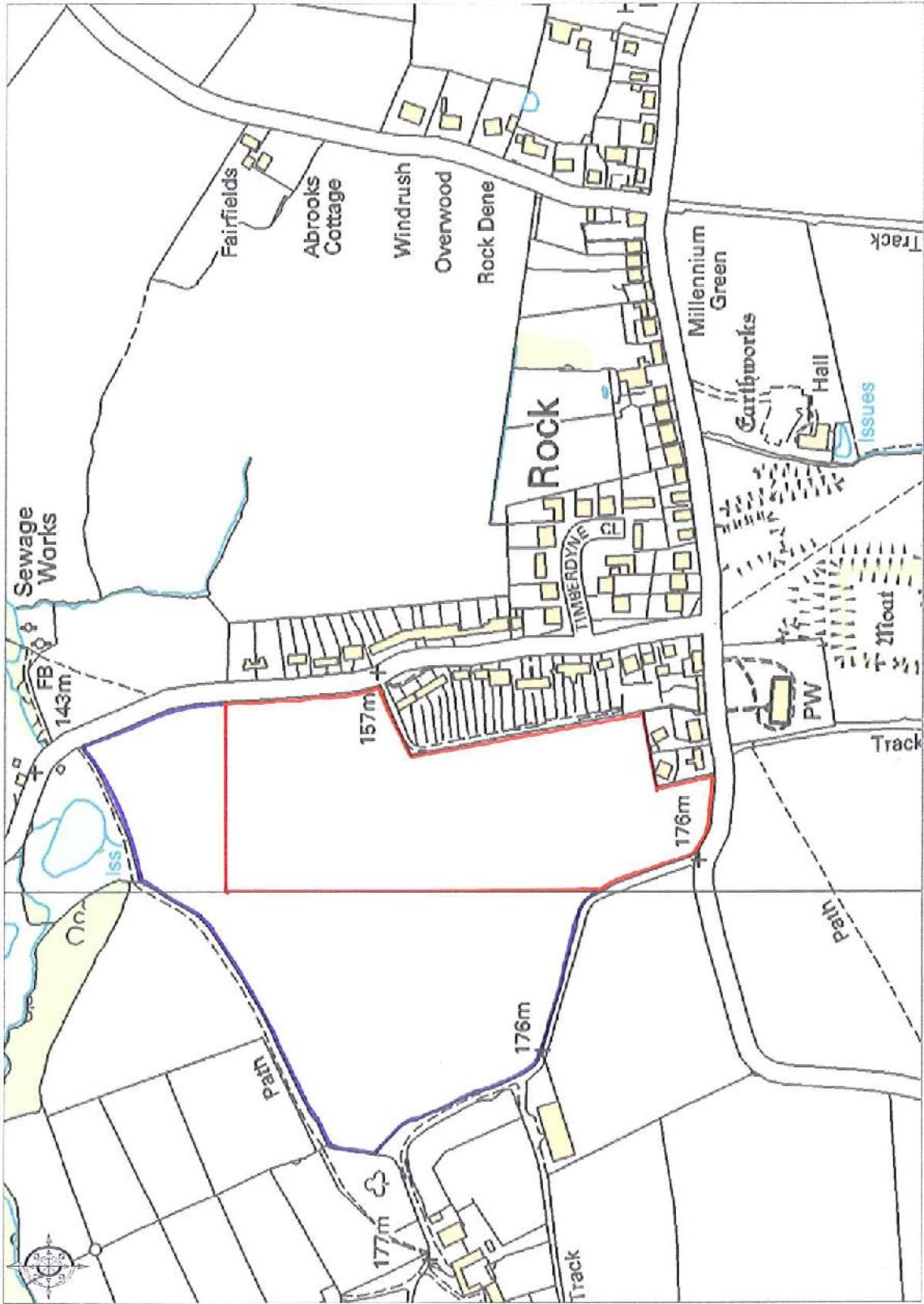
Signature:

Hannah Moule (MOULE & CO.)

Date:

12 Sep. 2012

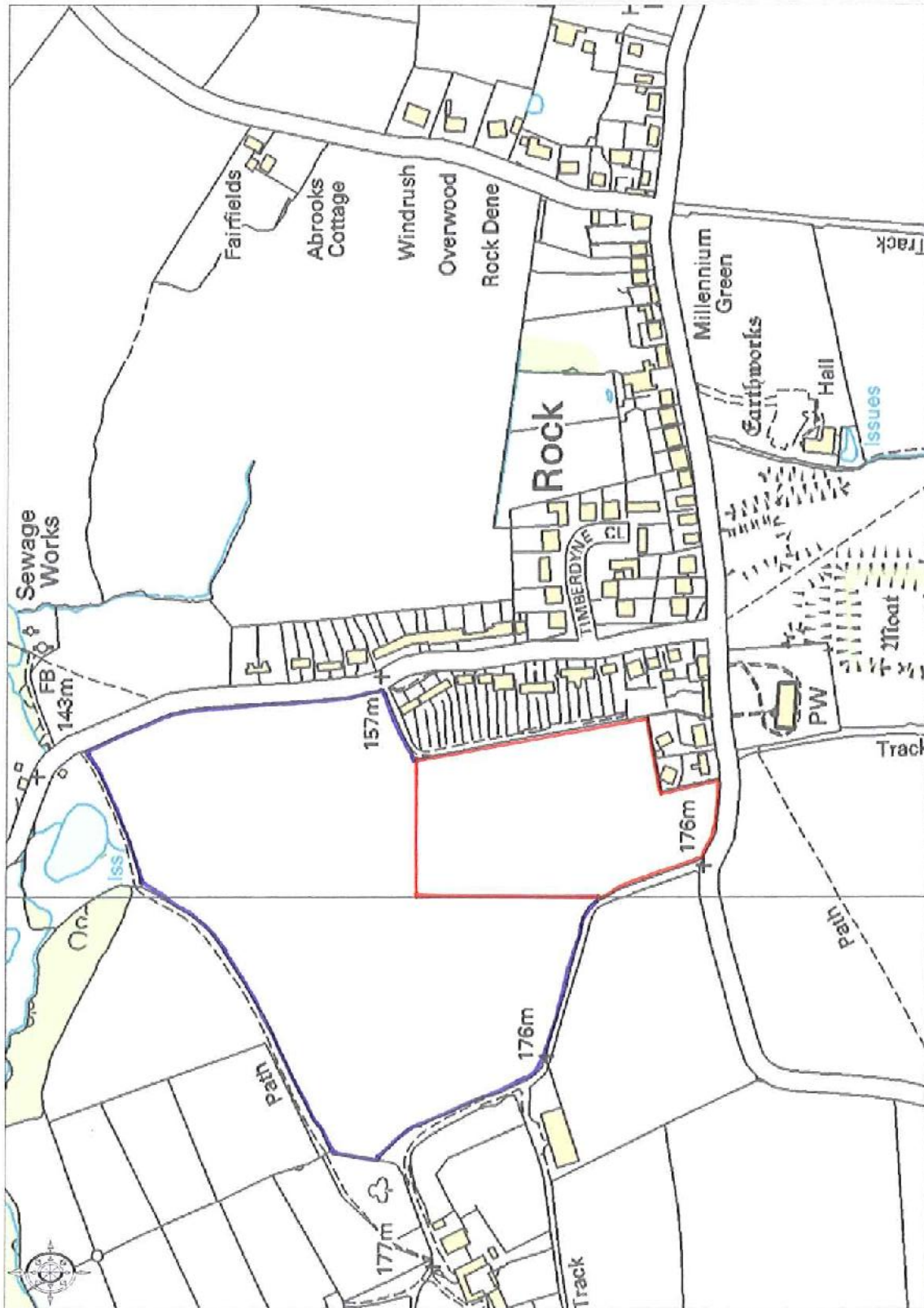
PLAN 1
 Representations to Wyre Forest District Council - Site Allocations and Policies DPD
 Land at Rock - Messrs J & H Evans - Scale 1:5000



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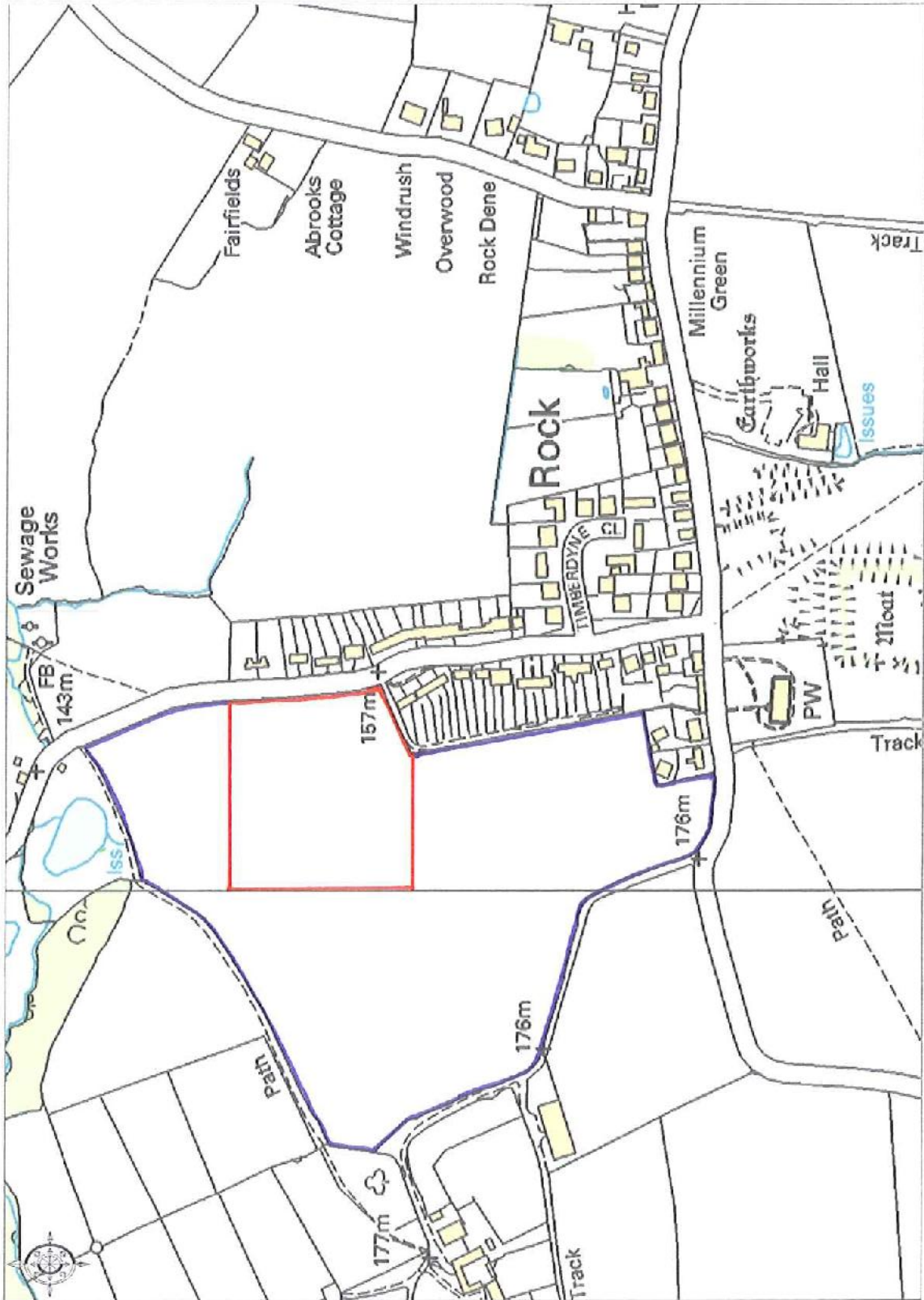
PLAN 2
 Representations to Wyre Forest District Council - Site Allocations and Policies DPD
 Land at Rock - Messrs J & H Evans - Scale 1:5000



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PLAN 3
 Representations to Wyre Forest District Council - Site Allocations and Policies DPD
 Land at Rock - Messrs J & H Evans - Scale 1:5000



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R.A. Watkins B.A. (Hons); D.M.S; MRTPI; FCI
Chartered Town Planner & Management Consultant

email: robertwatkins789@btinternet.com
Tel:01299 405359

The Old Rectory
Lower Park
Bewdley
Worcestershire
DY12 2DP

31st August 2012

Ms Rebecca Mayman
Planning Policy Manager
Wyre Forest District Council
Duke House
Clensmore Street
Kidderminster
Worcs DY10 2JX

Dear Ms Mayman

Site Allocations etc: Public Consultation

I enclose a Representation Form for land adjacent to 18 Wyre Hill, Bewdley. I am agent for this representation.

The representation is in the name of William Jackson, one of 2 Executors of the estate of the late Jean Isobel Bradley of 18 Wyre Hill.

As background, you will be aware of the extant approvals WF 10/0644/FULL and WF 10/0645/CAC, these being determined by Committee. These approvals cannot now be implemented as the dwelling, 18 Wyre Hill, is to remain.

The garage site does not enhance or preserve the conservation area, but a residential development on the land would. The garden land to the rear would remain as gardens, so the previously developed land policy would not be infringed, (but this is a matter of detail).

Open market housing is required to make the proposal viable as only this would exceed the value of the existing garage use, approved under BB131/62 and BB87/64.

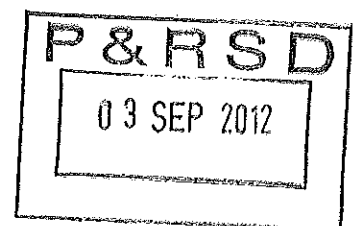
If you wish to view the site other than from the public highway, please let me know. If you wish me to make technical amendments to this representation, then this will be done also.

Many thanks

Yours sincerely


R A Watkins

c.c. Clients





Wyre Forest
District Council

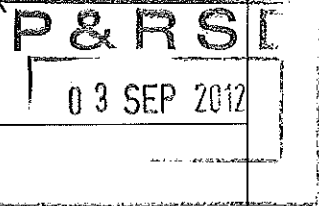
Wyre Forest District Local Development Framework – Site Allocations and Policies and Kidderminster Central Area Action Plan Development Plan Documents (DPDs) Publication Stage Representation Form

Ref:

(For official use only)

Please return to: Planning Policy Manager, Economic Prosperity and Place Directorate, Duke House, Clensmore Street, Kidderminster, Worcestershire, DY10 2JX; or by e-mailing this form to Planning.Policy@wyreforestdc.gov.uk

BY 5.30pm on Friday 14th September 2012



This form has two parts –
Part A – Personal Details

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make and remember to specify which document it relates to. Please specify which DPD you are commenting on.

Part A

1. Personal Details*

2. Agent's Details (if applicable)

**If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

Title	MR	MR
First Name	WILLIAM	ROBERT
Last Name	JACKSON	WATKINS
Job Title (where relevant)		MRPI
Organisation (where relevant)		
Address Line 1	109 WYRE HILL	THE OLD BEBBERY
Line 2	BEWLEY	LOWER PARIC
Line 3		BEWLEY
Post Code		DY12 2DP
Telephone Number		01299 405359
E-mail Address (where relevant)		rd@bebberry789@btinternet.com

Part B – Please use a separate sheet for each representation

Your representation should cover all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

After this stage, further submission will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Name or Organisation :

3. To which DPD does this representation relate? Site Allocations and Policies / ~~Kidderminster Central Area Action Plan (delete as necessary)~~

To which part of the DPD does this representation relate?

Paragraph	Policy	Other e.g. Map, table, figure, key diagram
16.8 et seq	SAL. B2	

4. Do you consider the DPD is :

4.(1) Compliant with the Duty to Cooperate	Yes		No
4.(2) Legally compliant	Yes		No
4.(3) Sound	Yes		No <input checked="" type="checkbox"/>

Please refer to guidance notes for explanation of terms

If you have entered **No** to 4(3), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is **unsound** because it is not:

- (1) Positively prepared
- (2) Justified
- (3) Effective
- (4) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

IN BROWLEY NOT ALL OPPORTUNITIES HAVE BEEN TAKEN IN POLICY SAL. B2 TO IMPROVE THE ENVIRONMENT OF THE TOWN, IN A SUSTAINABLE WAY.

THE SITE ADJ. TO 18 WYRE HILL BROWLEY CURRENTLY USED FOR PRIVATE GARAGING AND PART AS GARDEN LAND COULD BE REDEVELOPED FOR OPEN MARKET HOUSING TO THE BENEFIT OF THE CONSERVATION AREA

(Continue on a separate sheet /expand box if necessary)

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

ADD to POLICY SAC. R2 :

" LAND ADJ. TO WYRE HILL

THIS AREA IS DESIGNATED FOR

• RESIDENTIAL DEVELOPMENT (C3) "

and add para 16.14 to explanatory text :

" THIS ~~SS~~ ~~SMALL~~ SITE IS LOCATED ON WYRE HILL, A RESIDENTIAL AREA. THE GARAGES ARE WITHIN THE CONSERVATION AREA. THE REDEVELOPMENT TO HOUSING WOULD REMOVE A NON-CONFORMING USE AND ENHANCE THE CONSERVATION AREA "

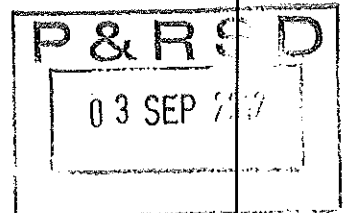
(Continue on a separate sheet / expand box if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:



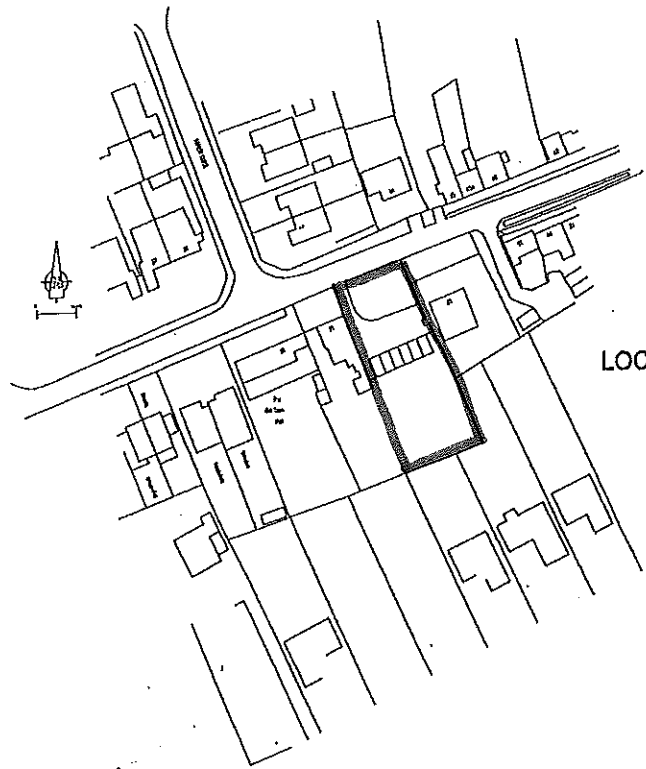
Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

[Signature]

Date:

30/8/12



LOCATION PLAN 1:1250

P & R S D
03 SEP 2012

Stephen Bragginton
14 Beauchamp Avenue
Foley Park
Kidderminster
Worcestershire
DY11 7AQ

August 21st 2012

Rebecca Mayman
Planning Policy Manager
Wyre Forest District Council.
Duke House
Kidderminster.

Dear Sirs / Madam

Wyre Forest District Council. Kidderminster Central Area Action Plan.

Thank you for your letter 20th July 2012, I would wish to make the following comments. I can only make general comments with a particular interest in History and Culture.

Ref Policy KDA DPL 2. Mixed use development. Mixed use developments would ensure that areas developed are used for a greater number of hours per day. And as a result greater natural surveillance and the developments are safe to use.

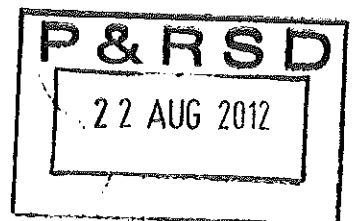
Ref 5.13 improving and utilizing the Vicar Street, High Street, Worcester Street Areas In conjunction with the new Weavers Wharf development would be of great benefit to the long term future of the town. The concentration of primary retail development as against out of town shopping development is welcomed. Large out of Town retail developments damage the viability of the Primary shopping areas in traditional town centres.

Tourism and Heritage sites.

We agree that the Heritage sites in Kidderminster should promoted, with Kidderminster being the hub for tourism for the Wyre Forest.

Tourism is important for the long term survival of the district, we have in our town A Terminal station of a major heritage railway, a new Museum of Carpets, the West Midlands safari park is close by. The Staffordshire and Worcestershire Canal, deserves a higher profile. Ref 7.50 any development along side the canal should be of high quality, so to compliment this asset.

The aim of the KCAAP to "strengthen the tourism offer of the Town" is excellent. The extra visitors will spend in the revitalised primary shopping areas of the town, in turn provide extra jobs.



It would in the long Term make Kidderminster a good place to Live with thriving new business that can be sustained.

The footfall from the Railway stations to the Town Centre needs to be improved re 7.24 page 44, we agree the signage from the stations to the Town centre is confusing to the visitor and, the subways under the Comberton Hill ringway are not visitor friendly.

With Ref to **Policy KCA EG4**, It would a great improvement to infill the pedestrian subway system and replace with surface level pedestrian and Cycle Access.

The Eastern Gateway to the town would be improved greatly, and provide a more User friendly entry to the revitalised town centre.

Traditional Town Centre section 14 Heritage processions Section 15.

We agree with the comments of Section 14, Traditional Town Centre. The old town area needs investment to improve its appearance, to make the area more attractive to both residents and visitors. This will in turn improve the viability of the town.

Any new developments should in the old town should be high quality to enhance the existing conservation areas, and listed buildings.

With Ref to **policy KCA.HP**, It is an excellent plan to ensure that the historic linear processional routes along Green Street, New Road, and Dixon Street are to be protected, and any new development is to be of high quality to complement the existing conservation areas.

With reference to Wyre Forest District Council "Site allocations and Policies Development Plan Document, Pre submission publication version July 2012.

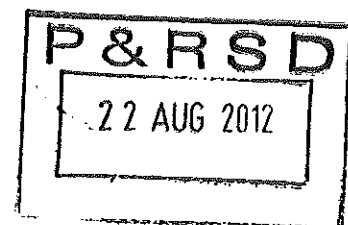
Page 84 Section 7.4 "safe guarding the historic environment"

We agree with the Government statement.

"the historic environment is an asset of enormous cultural, social, economic and environmental value: it makes a very real contribution to our quality of life and the quality of our places"

The council **policy SAL.UP6** is agreed with, so to ensure that our as built environment is protected in consideration of future development. As noted from your report an historic asset is unique. Once destroyed, cannot be replaced. This makes policy SAL.UP6 very important.

It is not beyond imagination to retain the historic aspect of Kidderminster and District, with in a new vibrant, economic and sustainable economy of the whole area.



Ref page 108 section 9 South Kidderminster Enterprise Park.

I have lived in this part of the town for 55 years. It is important that the former Sugar beet site is redeveloped as described in your report, It is better to redevelop a brown field site, that use Green belt land,

Ref page 120 Section 10 West Kidderminster.

General. It would be good to keep all the building that was last used as a law Court in Worcester Street. The Cast iron columns of the former weaving shed are inscribed F. Bradley (and were manufactured in Kidderminster prior to 1900 at Clensmore) and the interior of the building has many fine details, for example in the room used as the former main court room, the Corbels are of note, each one appears to be different design. This room (I am informed) was used originally as a carpet sales room. However I would accept the retention of the frontage of this attractive Landmark building in Kidderminster as stated in your plan for the town.

Policy SAL.WK2. Is to be applauded. The Kidderminster hospital site will be safe guarded for medical purposes. The hospital is a valued service in the three towns Kidderminster, Stourport and Bewdley.

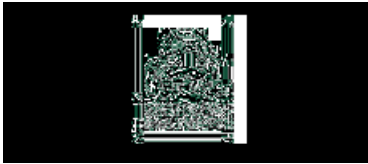
To conclude. Both the KCAAP Development Plan Document July 2012, with site allocation and policies Development plan Document July 2012. Provide an excellent proposed plan for the redevelopment of our town, protecting our as built environment, whilst still retaining economic progress, to take Kidderminster and District into the next century.

Yours faithfully


Stephen Bragginton

Kidderminster Civic Society





Comment

Agent Mr Andrew Murphy (674293)
Email Address andrew.murphy43@ntlworld.com
Company / Organisation Stansgate Planning
Address 9 The Courtyard
Timothys Bridge Road
Stratford-upon-Avon
CV37 9NP
Consultee (674296)
Company / Organisation Lawrence Recycling and Waste Management
Address The Forge
Stourport Road
Kidderminster
DY11 7QE
Event Name Site Allocations and Policies Publication
Comment by Lawrence Recycling and Waste Management ()
Comment ID SALPP41
Response Date 04/09/12 21:40
Consultation Point Policy SAL.UP1 Green Belt ([View](#))
Status Submitted
Submission Type Web
Version 0.1

To which part of the DPD does this representation relate? (Please state paragraph number, policy number, map, table or figure number). Policy SAL.UP1

Please refer to guidance notes for explanation of terms. If you enter **No** to 'Sound', please continue to Q5. In all other circumstances, please go to Q6.

Do you consider the DPD is:

Compliant with the Duty to Cooperate Yes

Legally Compliant Yes

Sound No

Do you consider the document is **unsound** because it is not:

Positively prepared Yes

Consistent with national policy Yes

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

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.

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete

The development provides essential facilities for outdoor sport or outdoor recreation, for cemeteries

Replace with

Provision of appropriate facilities for outdoor sport, outdoor recreation and for cemeteries, as long as it preserves the openness of the Green Belt and does not conflict with the purposes of including land within it;

Delete

iii. It involves the replacement of a dwelling, provided that the new dwelling is not materially larger than the dwelling it replaces, and is on the same site (unless an immediately adjacent alternative provision would reduce the impact on the Green Belt).

Replace with

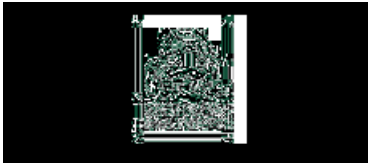
The replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;

Remove

Proposals within or conspicuous from the Green Belt, must not be detrimental to the visual amenity of the Green Belt, by virtue of their siting, materials or design.

This last suggested omission does not require replacement wording - it should just be omitted. There is no reference in NPPF to "visual amenity of the green belt" or "conspicuous from the Green Belt." The draft Green Belt policy SAL.UP1 ostensibly deals with sites located within a Green Belt but also provides grounds for refusing development proposal that lie outside a Green Belt, due to alleged "conspicuousness". Green Belts abut urban areas and development proposals to stimulate growth in the latter will be handicapped by this draft policy. Whilst this "visual amenity" concept was part of PPG2 (para 3.15), it has been omitted from NPPF and should similarly be omitted from the Site Allocations DPD. Moreover, any attempt to inhibit "conspicuous" growth within urban areas (outside a Green Belt) due to alleged harm to a Green Belt will in some cases conflict with an NPPF purpose of Green Belt: *"to assist in urban regeneration, by encouraging the recycling of derelict and other urban land."*

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? No



Comment

Agent Mr Andrew Murphy (674293)
Email Address andrew.murphy43@ntlworld.com
Company / Organisation Stansgate Planning
Address 9 The Courtyard
Timothys Bridge Road
Stratford-upon-Avon
CV37 9NP
Consultee (674296)
Company / Organisation Lawrence Recycling and Waste Management
Address The Forge
Stourport Road
Kidderminster
DY11 7QE
Event Name Site Allocations and Policies Publication
Comment by Lawrence Recycling and Waste Management ()
Comment ID SALPP42
Response Date 04/09/12 21:40
Consultation Point 7.4 Paragraph ([View](#))
Status Submitted
Submission Type Web
Version 0.1

To which part of the DPD does this representation relate? (Please state paragraph number, policy number, map, table or figure number). Paragraph 7.4

Please refer to guidance notes for explanation of terms. If you enter **No** to 'Sound', please continue to Q5. In all other circumstances, please go to Q6.

Do you consider the DPD is:

Compliant with the Duty to Cooperate Yes

Legally Compliant Yes

Sound No

Do you consider the document is **unsound** because it is not:

Positively prepared	Yes
Consistent with national policy	Yes

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

The draft Policy SAL.UP1 and the accompanying justification 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.

There is no reference in NPPF to "visual amenity of the green belt" or "conspicuous from the Green Belt." The draft Green Belt policy SAL.UP1 ostensibly deals with sites located within a Green Belt but also provides grounds for refusing development proposal that lie outside a Green Belt, due to alleged "conspicuousness". Green Belts abut urban areas and development proposals to stimulate growth in the latter will be handicapped by this draft policy. Whilst this "visual amenity" concept was part of PPG2 (para 3.15), it has been omitted from NPPF and should similarly be omitted from the Site Allocations DPD. Moreover, any attempt to inhibit "conspicuous" growth within urban areas (outside a Green Belt) due to alleged harm to a Green Belt will in some cases conflict with an NPPF purpose of Green Belt: *"to assist in urban regeneration, by encouraging the recycling of derelict and other urban land."*

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Remove the final sentence of paragraph 7.4:

The inclusion of land in Green Belts is of paramount importance to their continued protection and it is important that the visual amenities of the Green Belt are not damaged by proposals for development within or conspicuous from the Green Belt.

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? No

Elaine Wilcox

From: Elaine Wilcox
Sent: 09 August 2012 16:09
To: Wyre Forest Planning Policy
Subject: FW: Wyre Forest District - Local Development Plan.

From: william millward [<mailto:williamjohnm@yahoo.co.uk>]
Sent: 09 August 2012 15:49
To: Rebecca Mayman
Subject: Fw: Wyre Forest District - Local Development Plan.

----- Forwarded Message -----

From: william millward <williamjohnm@yahoo.co.uk>
To: "rebecca.mayman@wyreforest.gov.uk" <rebecca.mayman@wyreforest.gov.uk>
Sent: Thursday, 9 August 2012, 15:39
Subject: Wyre Forest District - Local Development Plan.

Attention: Mrs Rebecca Mayman, Planning Policy Manager
Wyre Forest District Council.

Dear Rebecca,

Comments and arguments in relation to recent planning policies - ref development proposals for Land at Moorhall Lane, Stourport on Severn. DY13 8RA

In writing this letter to you now, I feel I am likely to be accused of repeating myself, but none the less I believe as strongly as ever, in the validity of our case.

You will recall various conversations you and I have held in the past, in relation to the land my sister and I own. And I have repeatedly attempted to demonstrate to you and your department the validity of our claim, to allow the development of our Moorhall Lane site.

Whilst not wishing to repeat the full detail of our case, I feel that our key arguments need to be restated for your benefit and subsequently for the Government Land Inspector.

Arguments in favour of development of land at Moorhall Lane, Stourport on Severn. DY13 8RA

- 1) Proximity to town centre - 400 metres to Stourport High Street.
- 2) Benefits of siting - walking distance to shops and offices, with relieve to town centre car parking.
- 3) Adjacent to existing (established) housing and appropriate services such as; gas, electricity and water.
- 4) Topography of site removes majority of any future development away from flooding risk.
- 5) Easy access to site by existing tarmac road.
- 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 Officer).
- 7) Current land owners strongly support the inclusion of key worker and low income homes within their development plans.
- 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.

I hope all of the above will help you better understand our case and encourage your department to take a more sympathetic attitude to any future housing development plans we may seek for our site.

Our corresponding details remain the same as before, but for your records;

Postal address; 2 Brackenwood Mews, Wychwood Park, Weston. Cheshire CW2 5GQ

Tel; 01270 829108 Mob; 07974 242629

Email; williamjohnm@tiscali.co.uk

or; williamjohnm@yahoo.co.uk

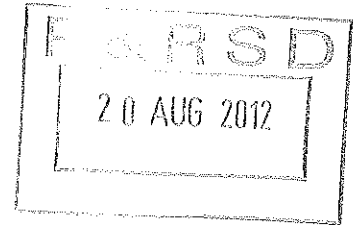
Thank you for your continued assistance in this matter.

Yours sincerely,

William J. Millward.

Mrs Rebecca Mayman, Planning Policy Manager,
Wyre Forest District Council,
Dukes House, Clensmore Street,
Kidderminster.Worcs.. DY10 2JX

2 Brackenwood Mews
Wychwood Park
Weston Cheshire
CW2 5GQ
17th August 2012.



Attention: Mrs Rebecca Mayman, Planning Policy Manager, WFDC.

Dear Rebecca,

Wyre Forest District Council – Development Plan Documents

Following my earlier letter to yourself (9th Aug.'12) and a subsequent reply from Maria Dunn (10th Aug.'12), I have completed the enclosed Publication Stage Representation Form, along with an expanded attachment.

I would like for you to thank Maria, for her assistance in completing this form.


Furthermore I would like to think that the Inspector will be in some way influenced by my observations and introduce a degree of additional flexibility, into future planning decisions.

Thank you for all continued help in these matters.

Yours sincerely

William J. Millward

Mrs Rebecca Mayman, Planning Policy Manager,
Wyre Forest District Council,
Duke House, Clensmore Street,
Kidderminster. Worcs.. DY10 2JX

	Wyre Forest District Council	Wyre Forest District Local Development Framework – Site Allocations and Policies and Kidderminster Central Area Action Plan Development Plan Documents (DPDs) Publication Stage Representation Form	Ref: (For official use only)
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Please return to: Planning Policy Manager, Economic Prosperity and Place Directorate, Duke House, Clensmore Street, Kidderminster, Worcestershire, DY10 2JX; or by e-mailing this form to Planning.Policy@wyreforestdc.gov.uk

BY 5.30pm on Friday 14th September 2012

This form has two parts –
 Part A – Personal Details
 Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make and remember to specify which document it relates to. Please specify which DPD you are commenting on.

Part A

1. Personal Details*	2. Agent's Details (if applicable)		
<i>*If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.</i>			
Title	MR		
First Name	WILLIAM JOHN		
Last Name	MILLWARD		
Job Title (where relevant)	N/A		
Organisation (where relevant)	N/A		
Address Line 1	2 BRACKENWOOD MEWS		
Line 2	WYCHWOOD PARK		
Line 3	WESTON CHESHIRE		
Post Code	CW2 5GQ		
Telephone Number	01270 829108		
E-mail Address (where relevant)	williamjohnm@yahoo.co.uk		

Part B – Please use a separate sheet for each representation

Your representation should cover all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

After this stage, further submission will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Name or Organisation :

3. To which DPD does this representation relate? Site Allocations and Policies / Kidderminster Central Area Action Plan (*delete as necessary*)
To which part of the DPD does this representation relate?

Paragraph	Whole document	Policy	-----	Other e.g. Map, table, figure, key diagram	-----
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4. Do you consider the DPD is :

4.(1) Compliant with the Duty to Cooperate	Yes		No	
4.(2) Legally compliant	Yes		No	
4.(3) Sound	Yes		No	*****

Please refer to guidance notes for explanation of terms

If you have entered **No** to 4(3), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is **unsound** because it is not:

- (1) Positively prepared
- (2) Justified *****
- (3) Effective *****
- (4) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

SE SEPARATE SHEET

(Continue on a separate sheet /expand box if necessary)

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

SEE SEPARATE SHEET

(Continue on a separate sheet /expand box if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

NO

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Date:

16th August
2012

Wyre Forest District Council – Development Plan Documents (To be read in conjunction with completed Publication Stage Representation Form)

Preamble In considering the DPD publication, the area of dispute is in relation to the soundness of the two papers prepared by the WFDC Planning departments. Specifically can the paper's contents be justified and ultimately effective.

Opinion In seeking to develop a planning strategy for the District, it is essential that all practical implications of such a strategy be considered.

Stourport by example and as a key location within the Wyre Forest District has seen its public face deteriorate for quite some significant years. The town's appearance, facilities and public services have dramatically fallen short of what its residents would expect from a long established and historically sited town development.

The incentive to settle within the town and its near boundaries has been removed, not only due to the failure to maintain acceptable and appropriate living facilities, but also to encourage new employers to the town.

To rescue the town and its residents, a complete change of planning criteria needs to be introduced. Furthermore and incorporated into this, Stourport should not be seen as a dormitory facility for other West Midland conurbations, but as a stand alone, self sufficient township.

Housing facilities and employment opportunities should not only be appropriate to attract new residents, but should also encourage existing residents to take a optimistic attitude to the future of their town.

Within the town's existing boundaries there are a number of previously ill-considered sites available that could be developed and given the appropriate encouragement, developers would be able to provide better living facilities, that in turn would stem the town's downward spiral and predicable reduction to the town's population.

Whilst it may be necessary to reconsider existing planning criteria and to encompass previously rejected parcels of land, providing these new tracks of land help to improve, by development, present housing stock through their quality and style, new investment will be encouraged to the town. Brownfield policies, by definition, attract higher costs of development and therefore in the current depressed marketing climate, a reduced incentive for land developers to invest their money in Stourport.

Any revised planning strategies should be sufficiently flexible to recognise all potential land development options and should not be constricted to rigid frameworks, particularly when previously ill-considered land is currently available that would permit a greater of flexibility to the WFDC planners and possibly a better commercial prospect to would be developers.

Conclusion It is for all of these reasons and those that were used previously to promote a specific piece of land close to the High Street in Stourport, that this local Stourport landowner is advocating a change to the proposed District Development Plan, on the basis that its current format cannot be justified or ultimately effective.

Advantages of land usage flexibility, particularly in respect to this third generation landowner's property, would make available land that had been previously discarded for reasons such as flooding and dubious tree preservation orders, whilst ignoring such advantages as; topography, proximity to the High Street, reduced parking and associated traffic problems, along with the existing availability of residential services such as gas, electricity and water running alongside the site. It should also be noted that this landowner has consistently advocated mixed development, with offers of

Development Plan Documents - continued

accommodation for key workers and low income families, another feature that will encourage new residents to Stourport.

**William J. Millward
Email: williamjohnm@yahoo.co.uk
16th August 2012.**



Wyre Forest
District Council

Wyre Forest District Local Development Framework – Site Allocations and Policies and Kidderminster Central Area Action Plan Development Plan Documents (DPDs) Publication Stage Representation Form

Ref:

(For official use only)

Please return to: Planning Policy Manager, Economic Prosperity and Place Directorate, Duke House, Clensmore Street, Kidderminster, Worcestershire, DY10 2JX; or by e-mailing this form to Planning.Policy@wyreforestdc.gov.uk

BY 5.30pm on Friday 14th September 2012

This form has two parts –

Part A – Personal Details

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make and remember to specify which document it relates to. Please specify which DPD you are commenting on.

Part A

1. Personal Details*

2. Agent's Details (if applicable)

**If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

Title

DR.

MR

First Name

FRANK

R.

Last Name

MORGAN

WATKINS

Job Title
(where relevant)

MRCP

Organisation
(where relevant)

Address Line 1

MEASE HOUSE

THE OLD RECTORY

Line 2

3 HURST COURT

LOWER PARK

Line 3

CHILCOTE
SWADLINCOTE

BEWLEY

Post Code

DE12 8DU

DY12 2AP

Telephone Number

01299 405359

E-mail Address
(where relevant)

Part B – Please use a separate sheet for each representation

Your representation should cover all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

After this stage, further submission will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Name or Organisation :

3. To which DPD does this representation relate? Site Allocations and Policies / Kidderminster Central Area Action Plan *(delete as necessary)*

To which part of the DPD does this representation relate?

Paragraph		Policy	SAL KSS 1	Other e.g. Map, table, figure, key diagram	
-----------	--	--------	--------------	--	--

4. Do you consider the DPD is :

4.(1) Compliant with the Duty to Cooperate	Yes		No	
4.(2) Legally compliant	Yes		No	
4.(3) Sound	Yes		No	<input checked="" type="checkbox"/>

Please refer to guidance notes for explanation of terms

If you have entered No to 4(3), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is **unsound** because it is not:

- (1) Positively prepared
- (2) Justified
- (3) Effective
- (4) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

The omission of the Aylmer Lodge Surgery site from the revised SAC KSS1 is unjustified. Its disposal for residential use not only assists the transfer of facilities to the new Hospital site, but will enhance the local listing and have a positive influence on local residential streets were parking is an issue.

(Continue on a separate sheet / expand box if necessary)

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Reintroduce the Aylmer Lodge site into
Main SAL. KSS 1.

(Continue on a separate sheet /expand box if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

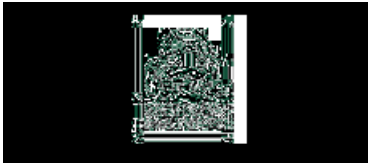
Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:



Date:

4/5/12



Comment

Agent	Mr Ian Jeffrey (544010)
Email Address	ipjeffrey@aol.com
Address	4 Southborough Road Chelmsford CM2 0AQ
Consultee	Mr Ken Moss (544016)
Email Address	Ken.KM18@btopenworld.com
Address	2 Dilston Danbury Chelmsford CM3 4RN
Event Name	Site Allocations and Policies Publication
Comment by	Mr Ken Moss
Comment ID	SALPP102
Response Date	13/09/12 23:18
Consultation Point	17.5 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.1

To which part of the DPD does this representation relate? (Please state paragraph number, policy number, map, table or figure number). 17.5

Please refer to guidance notes for explanation of terms. If you enter **No** to 'Sound', please continue to Q5. In all other circumstances, please go to Q6.

Do you consider the DPD is:

Compliant with the Duty to Cooperate	Yes
Legally Compliant	Yes
Sound	Yes

Do you consider the document is **unsound** because it is not:

Effective	Yes
------------------	-----

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

I confirm that we are pleased with the positive response by the Council to our previous representations to include the Clows Top Garge site as part of the Rural Housing Allocations. I believe that a scheme can be developed on the site which meets the Policy objectives as set out in the Core Strategy and welcome the additional guidance recognising that there may be infrastructure and viability issues to be addressed.

We fully understand that the Council wish to see an holistic approach to the development of the two land ownerships that make up the allocation in order to achieve a comprehensive development within the period 2011-21. 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, because of the potential for a delay or deadlock which could frustrate an early delivery.

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.

"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"

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? No



R. Mayman
Principle Forward Planning Officer
Wyre Forest District Council
Duke House
Clensmore Street
Kidderminster
Worcestershire
DY10 2JX

Your Ref: Site Allocations and Policies
Publication
Email: helen.cork@nfu.org.uk
Direct line: 01952 400500
Date: 11 September 2012

Dear Miss Mayman

Wyre Forest District Council Local Development Framework - Development Management Policies

Thank you for giving the National Farmers' Union (NFU) the opportunity to comment on the Wyre Forest District Council Local Development Framework. The NFU is the foremost trade association representing farmers and growers in England and Wales. Around 75% of all farm businesses are in membership nationally and the NFU has over 6400 members in the West Midlands. This response gives views on behalf of the farming and land management sector.

Policy SAL.DPL2 – Rural Housing

We appreciate that the District Council understands the 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.

Villages must be allowed to grow and develop to remain viable centres of community with adequate services. Smaller settlements must also be allowed to develop in order to meet the housing needs of local people.

Previously developed land outside villages should be considered for housing development. There could be opportunities for development on redundant farm yards and for the re-use of redundant agricultural buildings, which you have recognised and understood the need for. Development of redundant rural buildings into market housing should be permitted, as it will have the benefit of increasing rural housing stocks.

Policy SAL.UP1 – Green Belt

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.

Policy SAL.CC1 – Sustainable Transport Infrastructure

Rural areas are reliant on good transport links to invigorate the local economy, increased access to bus transport and better train services will increase accessibility to services. This is especially important in enabling young people to access training and further education. Rural people are likely to remain reliant on private car transport but this does not mean that rural communities are unsustainable. 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. 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. It is important that road links and structures are maintained to a standard suitable for modern agricultural vehicles and heavy weights such as tractors and loaded trailers.

Policy SAL.CC6 – Renewable Energy

Some Worcestershire farmers are considering opportunities for growing biofuels (biodiesel and bioethanol) and biomass (for heating etc.) locally. Many farmers consider renewable energy to be advantageous to their business and the economy; therefore are seeking ways of incorporating the most appropriate form of renewables into their system. We therefore welcome the policy and its considerations for renewable energy development and on-site energy use.

I wish to add that agricultural businesses have to adapt to current standards for animal welfare, environmental management whilst responding to market demands for increased food production. Therefore, 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.

If you would like clarification on any of the points I have raised please do not hesitate to contact me at the address above.

Yours sincerely

Helen Cork
Policy Adviser



Wyre Forest District Local Development Framework – Site Allocations and Policies and Kidderminster Central Area Action Plan Development Plan Documents (DPDs) Publication Stage Representation Form

Ref:

(For official use only)

Please return to: Planning Policy Manager, Economic Prosperity and Place Directorate, Duke House, Clensmore Street, Kidderminster, Worcestershire, DY10 2JX; or by e-mailing this form to Planning.Policy@wyreforestdc.gov.uk

BY 5.30pm on Friday 14th September 2012

This form has two parts –
Part A – Personal Details
Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make and remember to specify which document it relates to. Please specify which DPD you are commenting on.

Part A

1. Personal Details*	2. Agent's Details (if applicable)
----------------------	------------------------------------

**If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

Title	MR		
First Name	ALAN		
Last Name	YARWOOD		
Job Title (where relevant)	PLANNING OFFICER		
Organisation (where relevant)	NATIONAL FEDERATION OF GYPSY LIAISON GROUPS		
Address Line 1	UNIT 3 MOLYNEUX BUSINESS PARK		
Line 2	WHITWORTH ROAD		
Line 3	MATLOCK		
Post Code	DE4 2HJ		
Telephone Number			
E-mail Address (where relevant)	dglgplanning@hotmail.co.uk		

Part B – Please use a separate sheet for each representation

Your representation should cover all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

After this stage, further submission will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Name or Organisation :

NATIONAL FEDERATION OF GYPSY LIAISON GROUPS

3. To which DPD does this representation relate? Site Allocations and Policies

To which part of the DPD does this representation relate?

Paragraph	Policy	SAL.DPL9	Other e.g. Map, table, figure, key diagram

4. Do you consider the DPD is :

4.(1) Compliant with the Duty to Cooperate	Yes		No	X
4.(2) Legally compliant	Yes		No	
4.(3) Sound	Yes		No	X

Please refer to guidance notes for explanation of terms

If you have entered **No** to 4(3), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is **unsound** because it is not:

- (1) Positively prepared
- (2) Justified
- (3) Effective
- (4) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

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 appropriate criteria for the allocation of sites for travelling showpeople. New and different criteria are unnecessary.

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.

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.

(Continue on a separate sheet /expand box if necessary)

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

(Continue on a separate sheet /expand box if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Date:



Wyre Forest District Local Development Framework – Site Allocations and Policies and Kidderminster Central Area Action Plan Development Plan Documents (DPDs) Publication Stage Representation Form

Ref:

(For official use only)

Please return to: Planning Policy Manager, Economic Prosperity and Place Directorate, Duke House, Clensmore Street, Kidderminster, Worcestershire, DY10 2JX; or by e-mailing this form to Planning.Policy@wyreforestdc.gov.uk

BY 5.30pm on Friday 14th September 2012

This form has two parts –
Part A – Personal Details
Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make and remember to specify which document it relates to. Please specify which DPD you are commenting on.

Part A

1. Personal Details*	2. Agent's Details (if applicable)
----------------------	------------------------------------

**If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

Title	MR		
First Name	ALAN		
Last Name	YARWOOD		
Job Title (where relevant)	PLANNING OFFICER		
Organisation (where relevant)	NATIONAL FEDERATION OF GYPSY LIAISON GROUPS		
Address Line 1	UNIT 3 MOLYNEUX BUSINESS PARK		
Line 2	WHITWORTH ROAD		
Line 3	MATLOCK		
Post Code	DE4 2HJ		
Telephone Number			
E-mail Address (where relevant)	dglgplanning@hotmail.co.uk		

Part B – Please use a separate sheet for each representation

Your representation should cover all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

After this stage, further submission will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Name or Organisation :

NATIONAL FEDERATION OF GYPSY LIAISON GROUPS

3. To which DPD does this representation relate? Site Allocations and Policies

To which part of the DPD does this representation relate?

Paragraph	Policy	SAL.DPL10	Other e.g. Map, table, figure, key diagram
4. Do you consider the DPD is :			
4.(1) Compliant with the Duty to Cooperate	Yes		No <input type="checkbox"/> X <input checked="" type="checkbox"/>
4.(2) Legally compliant	Yes		No <input type="checkbox"/>
4.(3) Sound	Yes		No <input type="checkbox"/> X <input checked="" type="checkbox"/>

Please refer to guidance notes for explanation of terms

If you have entered **No** to 4(3), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is **unsound** because it is not:

- (1) Positively prepared
- (2) Justified
- (3) Effective
- (4) Consistent with national policy

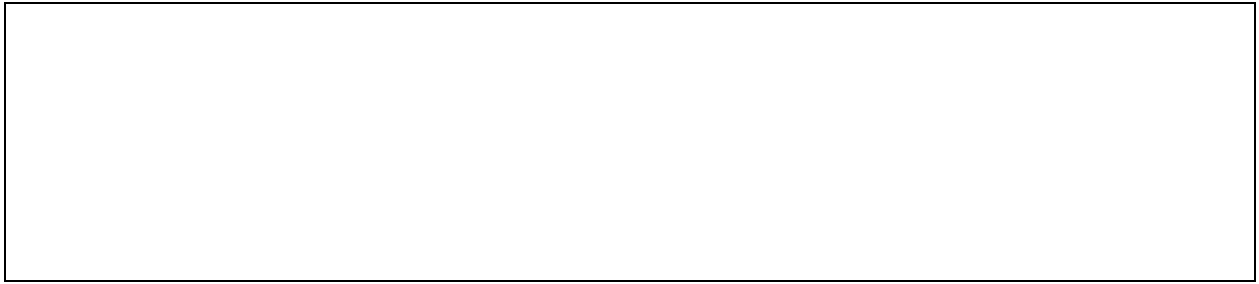
6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

The 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 appropriate criteria for the allocation of sites for Gypsy and Travellers. There is no justification for changing the criteria at this stage. The design restrictions are unnecessary and would be best left to consideration on a site by site basis. In particular design requirement (iv) will be unnecessary, impractical on a small site and should not include compliance with unspecified "local authority standards."

The supporting text is inconsistent with the policy. Most notably paragraph 4.57 prioritises a sequential test (connection to main sewerage) which does not appear in the policy wording and will almost certainly prove to be impractical. The wording needs to make it clear that this only applies where connection is feasible.

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.



7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

(Continue on a separate sheet /expand box if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Date:

Date: 14 September 2012
Our ref: 59370
Your ref: RM/HET/FP-SAL-SD



Rebecca Mayman
Planning Policy Manager
Wyre Forest District
BY EMAIL ONLY
(Rebecca.mayman@wyreforestdc.gov.uk)

Natural England
Consultation Service
Hornbeam House
Electra Way
Crewe Business Park
CREWE
CW1 6GJ

T: 0300 060 3900

Dear Ms Mayman

Pre-Submission Publication of Wyre Forest District Site Allocations and Policies and Kidderminster Central Area Action Plan Development Plan Documents (DPD)

Thank you for seeking Natural England's comments regarding the above. Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

General comments

We have considered the Site Allocations and Policies and Kidderminster Central Area Action Plan Development Plan Documents, and the supporting Sustainability Appraisal and Habitats Regulations Assessment. We are satisfied the preparation of the documents accords with the relevant legal requirements and guidance, and that they are consistent with the National Planning Policy Framework (NPPF) and with relevant local plans and policies, including the Wyre Forest Core Strategy and Sustainable Community Strategy.

We are also generally satisfied that the rationale for the proposed allocations appears reasonable and evidence based and that the environmental implications and constraints associated with each potential site have been understood and adequately addressed, including with respect to landscape, ecology and public access. Furthermore, we can confirm that Natural England broadly supports the proposed development management policies, which appear robust and able to provide appropriate guidance to developers and decision makers to ensure significant adverse effects on the natural environment can be avoided or mitigated. Indeed we would expect the effects of the proposed policies to be generally positive.

Natural England
Foundry House
3 Millsands
Riverside Exchange
Sheffield S3 8NH

Natural England particularly welcomes the policy guidance provided for Green Infrastructure, safeguarding local biodiversity and geodiversity and water quality and quantity. We are very pleased to note the reference in the plan to the use of appropriate sustainable drainage schemes (SUDs) to contribute to re-wetting drying out SSSI wetland in the District, which along with high phosphate levels and effluence in rivers and water bodies, has been identified as being a particular issue for the district.

Wilden Marsh and Meadows SSSI

As you will be aware, this SSSI contains some of the richest and most diverse wetland habitat in Worcestershire, including species-rich marshland and mires with locally scarce plants. The site is also of local ornithological and entomological interest with breeding birds including snipe, reed bunting and water rail.

The SSSI is located in very close proximity to the former British Sugar Site, which has been allocated for mixed use development during the plan period. Due to the highly sensitive nature of the SSSI habitats and features, public access is strictly prohibited and must remain so in the long term. With this in mind, **Natural England recommends that further policy guidance is provided in the Sites Allocations and Policies DPD to ensure that public access to the SSSI will continue to be prohibited.**

Notwithstanding the above, in our view proposed development within the District, perhaps most notably that proposed at the Former British Sugar site, presents an opportunity to provide long-term protection and enhancement for the Wilden Marsh and Meadows SSSI, as part of the wider green infrastructure provision. The SSSI is currently being managed by the Worcestershire Wildlife Trust under a Higher Level Stewardship Agreement and is now classed as 'recovering' in terms of its favourable condition status. Natural England would welcome measures to secure and sympathetically manage land adjacent to the SSSI, known as the Former British Sugar Site settling ponds, next to Wilden Lane. This would provide an important ecological buffer, but could also create opportunities for some carefully managed public access. For example, it may be possible to provide a pedestrian route that links to the wider network and contributes to the Council's ambitions for multifunctional green infrastructure. There may also be potential to provide a bird hide and educational interpretation.

Natural England would be pleased to discuss this and other green infrastructure opportunities with the Council in more detail.

Sustainability Appraisal

We are satisfied the Sustainability Appraisal has provided a systematic assessment of the Pre-Submission Sites Allocations and Policies and the Kidderminster AAP in terms of consistency with the principles of sustainable development, and assessment of likely social and economic and environmental effects. We consider the sustainability objectives to be clear and relevant and that these have helped to refine emerging policies.

Habitats Regulations Assessment

We are satisfied the Habitats Regulation Assessment (HRA) provides a systematic and appropriately detailed assessment of the Sites Allocation and Policies and the Kidderminster AAP in terms of their likely effect on European Sites. We consider the Council's conclusion that implementation of the Sites Allocations plan and AAP is not likely to result in significant effect on European protected sites is reasonable.

Correction

The Jargon Guide refers to Sites of Special Scientific Interest (SSSI) and suggests these are officially notified by English Nature. Please note this responsibility has passed to Natural England.

For any correspondence or queries relating to this consultation only, please contact Amanda Grundy on 0300 060 1454. For all other correspondence, please contact consultations@naturalengland.org.uk.

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

Yours sincerely

Amanda Grundy
Lead Adviser, Sustainable Land Use



Wyre Forest
District Council

Wyre Forest District Local Development
Framework – Site Allocations and Policies
and Kidderminster Central Area Action Plan
Development Plan Documents (DPDs)
Publication Stage Representation Form

Ref:

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use only)

Please return to: Planning Policy Manager, Economic Prosperity and Place Directorate, Duke House, Clensmore Street, Kidderminster, Worcestershire, DY10 2JX; or by e-mailing this form to Planning.Policy@wyreforestdc.gov.uk

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Part A

1. Personal Details*

2. Agent's Details (if applicable)

**If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

Title

MRS

First Name

SHIRLEY

Last Name

NUNN.

Job Title
(where relevant)

Organisation
(where relevant)

Address Line 1

8, ORCHARD CLOSE

Line 2

STOURPORT

Line 3

WDRCS.

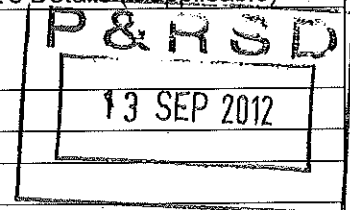
Post Code

DY13 9BQ

Telephone Number

01299 827019

E-mail Address
(where relevant)



Part B – Please use a separate sheet for each representation

Your representation should cover all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

After this stage, further submission will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Name or Organisation : Blackstone

3. To which DPD does this representation relate? Site Allocations and Policies Kidderminster Central Area Action Plan (*delete as necessary*)

To which part of the DPD does this representation relate?

Paragraph	Policy	Other e.g. Map, table, figure, key diagram
-----------	--------	--

4. Do you consider the DPD is :

4.(1) Compliant with the Duty to Cooperate	Yes		No	
4.(2) Legally compliant	Yes		No	
4.(3) Sound	Yes		No	

Please refer to guidance notes for explanation of terms

If you have entered **No** to 4(3), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is **unsound** because it is not:

- (1) Positively prepared
- (2) Justified
- (3) Effective
- (4) Consistent with national policy **YES**

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Because the sites should be for travellers and Gypsies. there is 2 sites you have passed that has all house dwellers on the one site is disgusting living worse than animals. I would like to point out that it needs to be sorted, I am applying one again for blackstone to be considered it will be screened all around and there will only be selected travellers allowed on I will start work on it when it is given the go ahead or otherwise it will stay as it

(Continue on a separate sheet /expand box if necessary)

is a disgrace I am asking you to give me 3 yrs to get it done properly for at least

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

It was stated by government that these sites be found only for Gypsy + travellers so why is it not being fulfilled. I expect it is easier for council to not house these people but it should not be so. What is happening to the 10 families when Mrs Sandford has her site back they are all proper Gypsies and travellers. Over on Watery lane they are double up and trebling up now so tell me what is going to happen in a few years time.

(Continue on a separate sheet / expand box if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

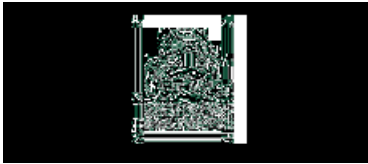
to tell you all about the sites you have passed + more.
The site at Blackstone will be managed properly not by Owners by myself.

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Date:

30-8-12



Comment

Consultee	Mr Jason Orme (661509)
Email Address	jason.orme@centaur.co.uk
Address	Honey Tree House Laneside Gardens Bewdley DY12 2PQ
Event Name	Site Allocations and Policies Publication
Comment by	Mr Jason Orme
Comment ID	SALPP1
Response Date	23/07/12 15:11
Consultation Point	4.1 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.1

To which part of the DPD does this representation relate? (Please state paragraph number, policy number, map, table or figure number). 4.1

Please refer to guidance notes for explanation of terms. If you enter **No** to 'Sound', please continue to Q5. In all other circumstances, please go to Q6.

Do you consider the DPD is:

Compliant with the Duty to Cooperate	Yes
Legally Compliant	Yes
Sound	No

Do you consider the document is **unsound** because it is not:

Consistent with national policy	No
--	----

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

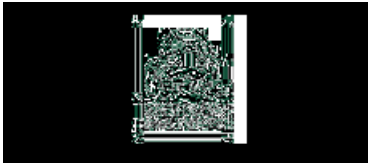
Within the NPPF, the council is required to assess the demand in the area for people who wish to build their own homes. I don't see this anywhere in the document.

There is a growing number of people within the Wyre Forest who would like to build small family homes for themselves and their families to live in. Additionally, it is recognised within the Government's Housing Strategy that self-build is an effective way to not only increase the quality of sustainable housing supply in the UK, but also grow communities in a way that meets the needs of local people in a manageable way.

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

A process to measure demand for individuals who wish to build their own homes within Wyre Forest.

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? No



Comment

Consultee	Mr Peter Rawlings (231268)
Email Address	ruffy@wtfgaming.co.uk
Address	7 Lutterworth Close Worcester WR4 9AY
Event Name	Site Allocations and Policies Publication
Comment by	Mr Peter Rawlings
Comment ID	SALPP255
Response Date	22/08/12 10:21
Consultation Point	Residential Land Allocations (View)
Status	Submitted
Submission Type	Letter
Version	0.5
Files	RawlingsSuppDoc.pdf

To which part of the DPD does this representation relate? (Please state paragraph number, policy number, map, table or figure number). SAL.DPL1

Please refer to guidance notes for explanation of terms. If you enter **No** to 'Sound', please continue to Q5. In all other circumstances, please go to Q6.

Do you consider the DPD is:

Compliant with the Duty to Cooperate	Yes
Legally Compliant	Yes
Sound	No

Do you consider the document is **unsound** because it is not:

Effective	No
------------------	----

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

The 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

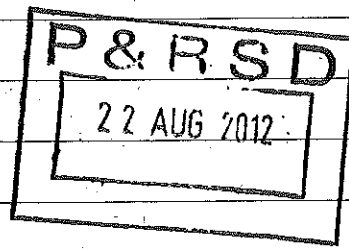
with access to be provided through Hardy Avenue onto Offmore Estate. Therefore, there are two elements to the comments:

1. that the land should not be identified as open space
2. that it should be made available for residential development

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? Yes

①

7, Lutterworth Close,
WORCESTER WR4 9AY



nos N° 07863948137

Re Plot 75

Chester Road Land Society
Kidderminster

Dear Sir

We would like to inform you that the farmer has just built some new houses on what was left of Offmore Lane, he doesn't seem to have the problems we've had. Our solicitor has got a letter from the then council in 1985 telling the land owners to sit tight as they had plans for the said site. They were going to compulsory purchase order the site for school playing fields and this hasn't happened either.

We would like to refer you to the court judgement. The council are trying to call it Allotment Gardens, but it was bought with the deeds stating Chester Road Land Society in private ownership. The council has acquired four plots on the said site and we are in contact with Hereford & Worcester County Council on the highways issues and what's on the council deeds what they have purchased over the years.

Sat Nav people were directing traffic down Offmore Lane many large lorries, so some more bollards went in. When we went to court, we could have gone for judgement to have the school knocked

(2)

down or to open up our access, we went for the latter. Had these ballards been put in place at the time of going to court we would have gone for having the School knocked down.

We took Mrs Orbarska to court, which is all in the court judgement. At the moment various people and dog walkers have broken down our hedge-rows, we would like the council to grasp the nettles and rectify this problem. It is privately owned land with houses on all sides, the council have got their own allotments on the Comberton Estate which they can rent out.

The access road of Offmore Lane is being used by vehicles and large vehicles to the point of the Cricket Ground, it is also serving one house, which has fenced off someone's plots, which the council know about. We're in constant fear of people pinching our land and we are waiting for the council to tell us if they are responsible for the hedgerows.

The council has created this mess, we have private rights of way with vehicles, if the Council does not want to rectify the problems, ie calling the land open space. We would like the site to be designated for affordable housing so we can sell it to a developer with access through Hardy Avenue onto Offmore Estate. We can't see why they want it as open space having already houses around it, lots

③

of people get planning permission to build privately

We are enclosing a map showing 86 plots owned privately with Chester Road Society. We would like this dispute to be rectified by the council as the Judge stated in the Transcript.

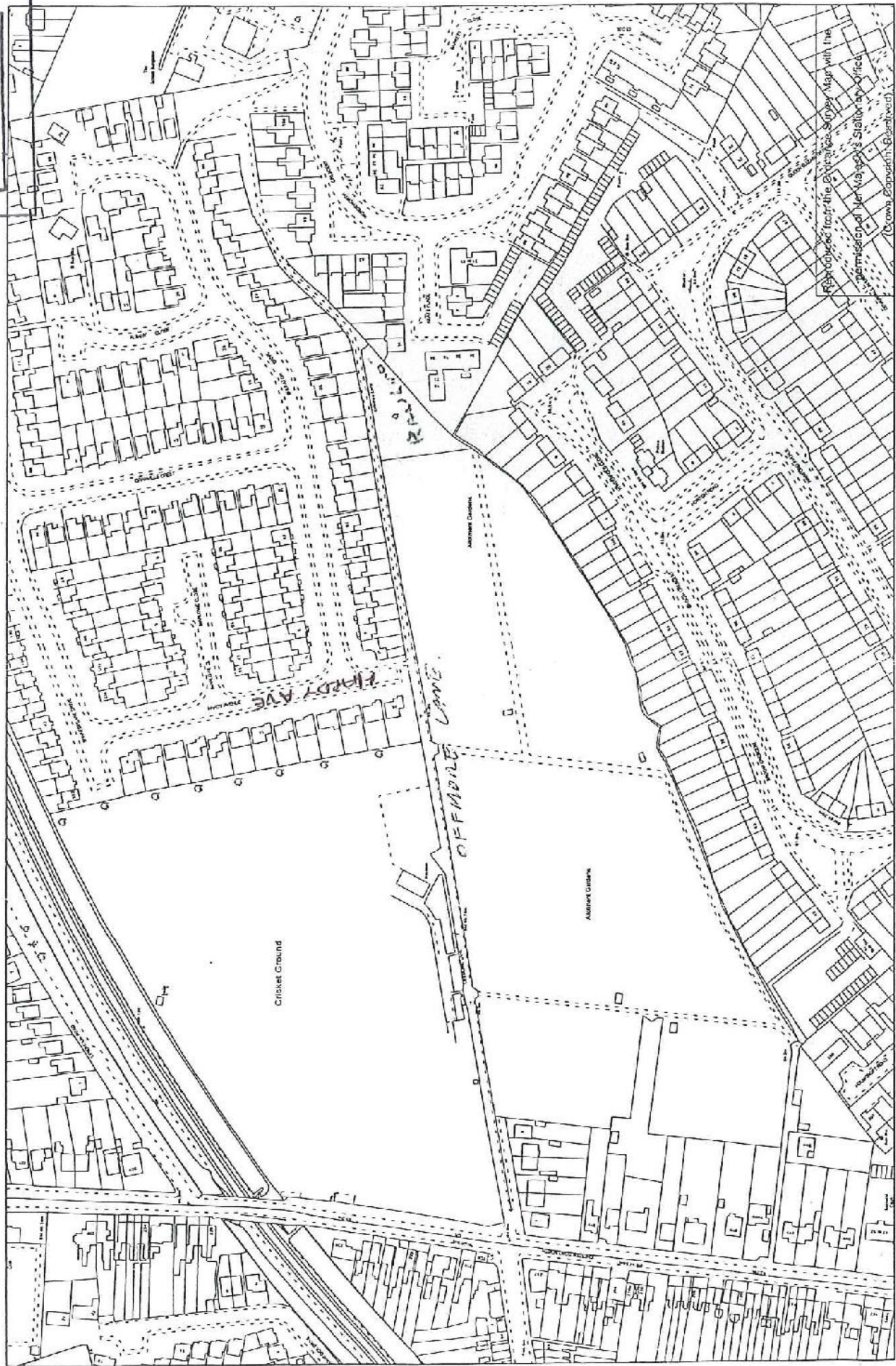
After the court-case we had a meeting with Mr Dickson Rogers of Highways and a solicitor and because Mr Bond came he said you'll be sorry you did that, and walked off after knowing most of the people of the Chester Road Land Society since we were boys, we didn't feel we could let them down. There are no doubt other possible solutions to this problem. It is a Ten Acre Site. Sewer pipes has been put on our land without our permission this was done when my Aunt was ill with Demensia and the deeds were in the court of protection. Since then the majority of the land has not been used we have been waiting for the council to fulfil what the council said in their letter to land-owners

YOURS SINCERELY

P&RSD

22 AUG 2012

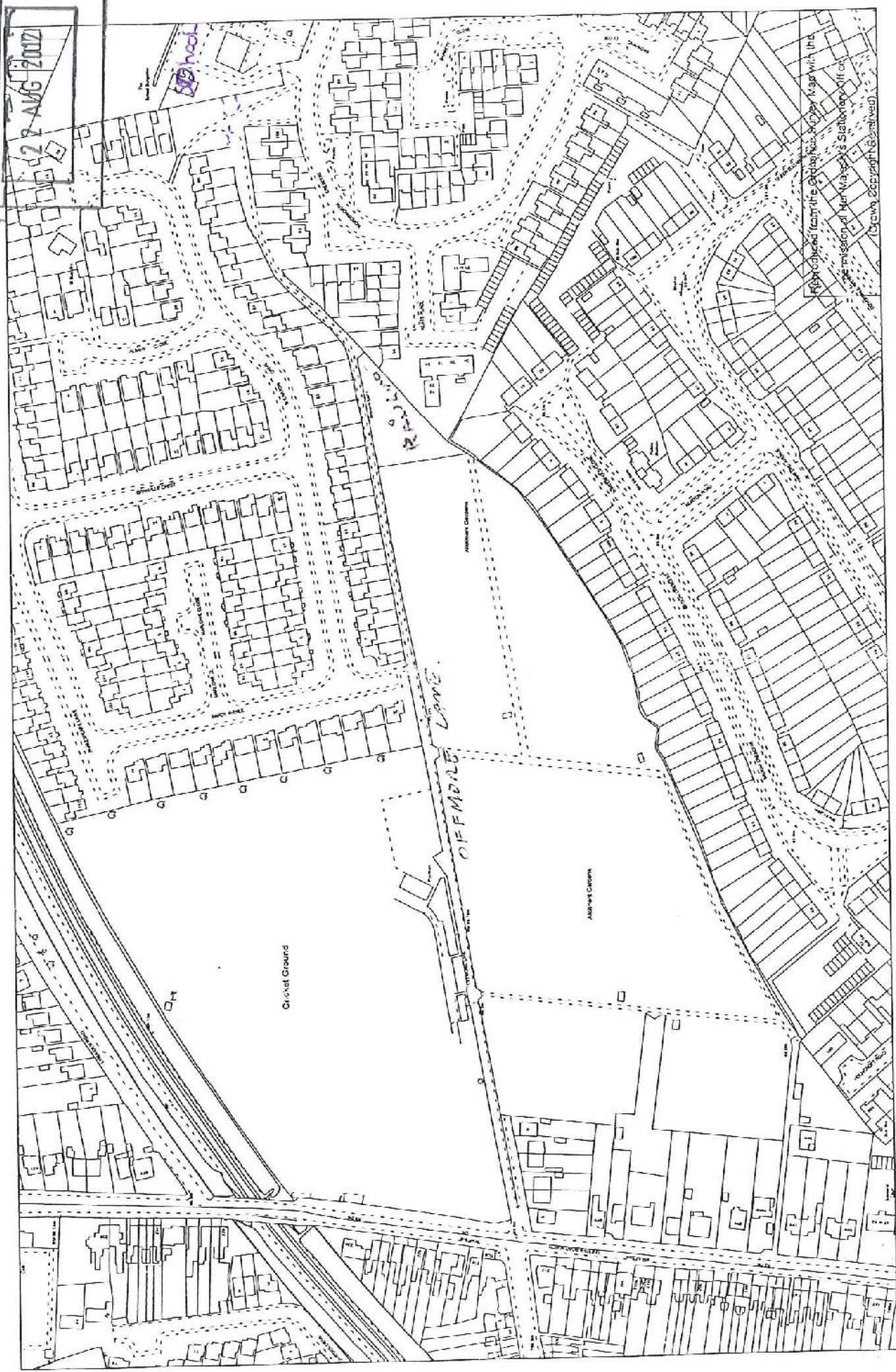
P&HSD
22 AUG 2012



1:2496 06/04/02 14:10:55

P&RSD

29 AUG 2012



Reproduced from the Ordnance Survey map with the permission of Her Majesty's Stationery Office
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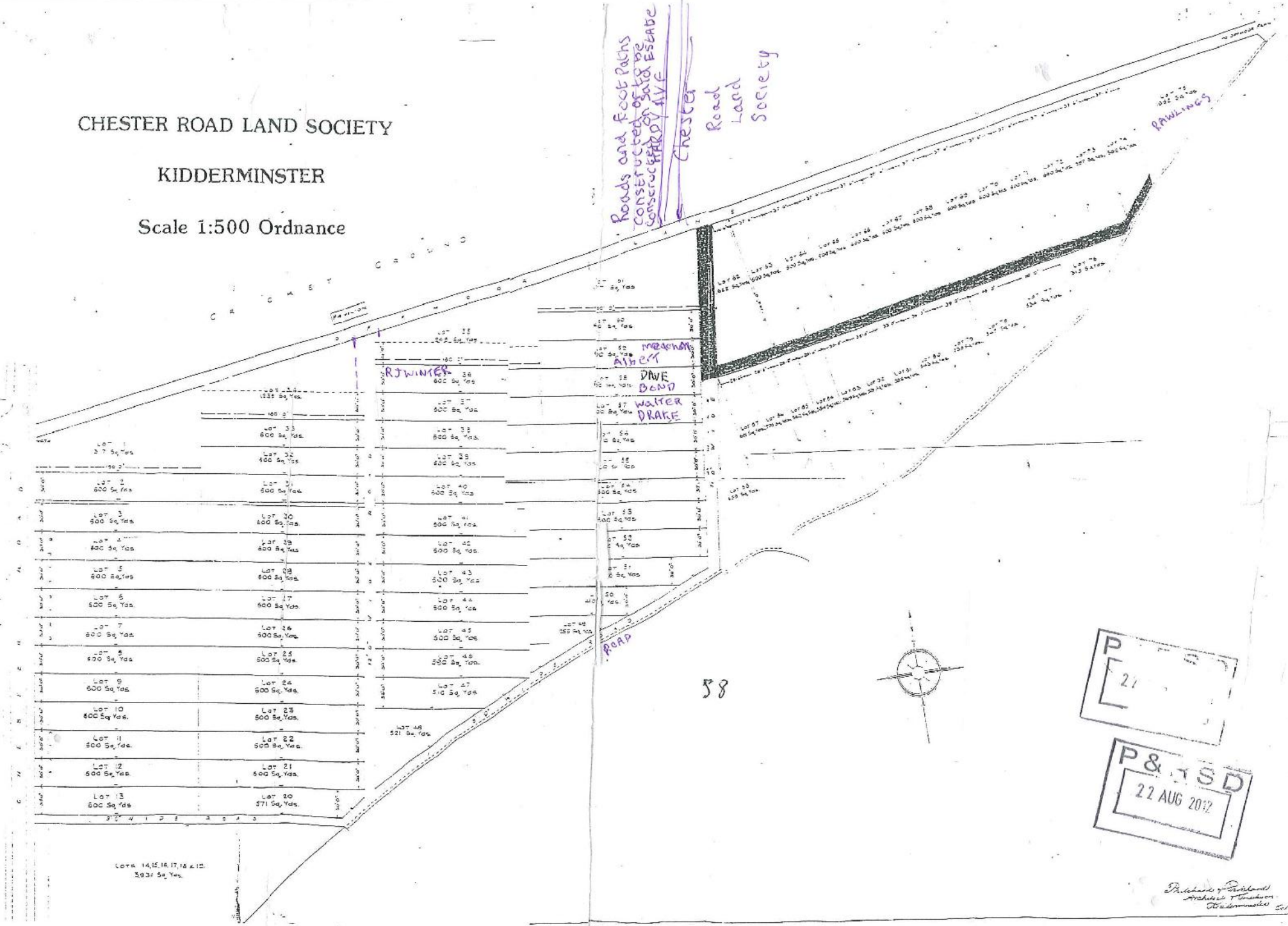
1:2496 08/04/12 14:10:55

CHESTER ROAD LAND SOCIETY

KIDDERMINSTER

Scale 1:500 Ordnance

Roads and foot paths
constructed or to be
constructed by
Chester Road Land Society



P
21
P & ASD
22 AUG 2012

Architects of Kidderminster
Architects & Town Planners
Kidderminster

Our Ref: P831/SH/suej
Date: 11th September 2012

Grosvenor House
75-76 Francis Road
Edgbaston
Birmingham B16 8SP

Planning Policy Manager
Economic Prosperity and Place Directorate
Duke House
Clensmore Street
Kidderminster
Worcestershire DY10 2JX

T 0121 455 9455 F 0121 455 6595
E info@harrislamb.com

Dear Sir/Madam

Site Allocations and Policies DPD Consultation Publication Stage Representations on Behalf of Revelan Group Limited

Thank you for providing Harris Lamb Planning Consultancy (HLPC) with the opportunity to participate in the preparation of the Wyre Forest Site Allocations and Policies DPD. We are instructed to submit representations to the consultation document by Revelan Group Limited.

Revelan Group have a significant landholding located to the west of the Stourport Road in Kidderminster. A plan showing the extent of Revelan Group's ownership is attached in Appendix 1. The land is brownfield and was last used for employment purposes, however, this use ceased a number of years ago. Despite a lengthy and thorough marketing campaign the site has remained vacant and the prospect of an employment operator coming forward on the site are considered to be minimal.

These representations have been prepared in order to introduce greater flexibility into the Site Allocations and Policies Local Plan in order to improve the likelihood of the site being brought back into use. It is in both our Council's interest to facilitate the development of sustainable brownfield sites. However, the policies that guide the development of the Revelan Group land are insufficiently flexible to encourage the redevelopment of the site (and other vacant brownfield sites).

Attached to this letter are completed copies of the Representations Form highlighting concerns with particular policies in the Site Allocations and Policies DPD. In addition, set out below are overarching objections to strategic issues that the Site Allocations and Policies DPD should seek to address.

Background

In June 2011 representations were submitted to the Wyre Forest site allocation and Policies Preferred Options DPD in respect of this site. At this time Countrywide Stores had expressed an interest in developing a store on part of the land in Revelan Group's ownership. The June 2011 representations were, therefore, focused on creating a policy flexible enough to deliver the Countrywide Store on the site. Meetings were held with Council Officers about the preparation of a planning application for the Countrywide proposal and officers expressed indefinitely support for the submission of a planning application.

Unfortunately, the interest from Countrywide has now been placed on hold indefinitely and it is unlikely that this proposal will be forthcoming.

In March 2011 planning permission was granted for the development of a car showroom on part of the site (planning application reference number 10/0751/FULL). The proposed operators have now advised Revelan Group that they no longer wish to pursue their interest in the site.

The land in Revelan Group's control is cleared and awaits redevelopment. It has not been used for employment purposes for in excess of seven years. It has been actively marketed in order to try to find an occupier, however, it has not been possible to secure a tenant or purchaser for any part of the site. The only interest in the site in recent years, from Countywide and a car dealership, has now dropped away. Furthermore, it is useful to note that the most recent interest in the site was not for a B class use. There is no evidence to suggest that the site will come forward for an employment use.

My client is keen to ensure their land interest is brought back into an active use expeditiously. Therefore, flexible policy is required in the Site Allocation and Policy Publication document to facilitate its development. Adopting this approach is in accordance with the guidance set out in Paragraph 22 of the NPPF. Paragraph 22 confirms that planning policies should avoid the long term protection of sites allocated for employment use. Where there is no reasonable prospect of a site being used for an allocated employment use applications for alternative use should be treated on their merits. Given the lack of interest for employment uses it appropriate for other forms of development to be considered on the site.

The Quantum of Employment Allocations

Attached to this letter are completed copies of the response form setting out specific concerns with individual policies in the Site Allocation and Policies Publication and Consultation Document. In addition there is an overarching objection to the Council's approach on employment allocations.

It is appreciated that the Site Allocations and Policies employment land requirements are based upon the Wyre Forest Core Strategy. However, paragraph 158 of the NPPF confirms that local planning authorities should ensure that their DPDs are based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. Local planning authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals. In the case of Wyre Forest there is clear evidence to suggest that the Core Strategy's approach to employment land delivery is now out of date.

The land in Revelan Group's control forms part of the Stourport Road Employment Corridor (SREC) identified by the Wyre Forest District Core Strategy. Core Strategy Policy CP08 – A Diverse Local Economy, advises that major new employment development will be located within the SREC. It confirms that a portfolio of employment sites for a range of businesses will be provided in terms of location, size and quality. Business uses in the context of this policy are defined as B1, B2 and B8 use. It is also noted that some Sui Generis users will also be permissible on employment land due to the nature of their activities, such as car showrooms, vehicle maintenance, repair and service centres.

The Wyre Forest Core Strategy was informed by the Wyre Forest District Employment Land Review (ELR). This ELR was published in July 2007 before the downturn in the economy. The

ELR identifies a requirement for between 43.95 hectares and 46.47 hectares employment land up until 2026. This figure is closely aligned to the employment target contained in the West Midlands Regional Spatial Strategy Inspectors Report of 44 hectares. The findings of the ELR and RSS informed Core Strategy Policy DS01 – Development Locations, that requires the provision of 44ha of employment land in Wyre Forest between 2006 and 2026.

Given the downturn in the economy since 2007, it is suggested that the level of employment land that the ELR suggests is required, is in excess of that actually needed. Consequently it is not necessary for the Council to protect all the land in the SREC for B class employment uses and associated sui generis uses.

The ELR reviewed potential employment sites within the district. One of the key outcomes of the ELR was “even taking into account a flexible approach to the supply of employment land, the analysis suggests that Wyre Forest has enough employment land of the appropriate type to be able to accommodate its employment needs to 2026”.

Taking this information into account, in 2007 when the economy was performing well, it was established that there was sufficient land available to meet the council’s employment land requirement up to 2026 on existing sites. This further suggests that there is an oversupply of employment land.

Site Allocation and Policies Publication and Consultation Document

The key comments made can be summarised as follows:-

- The site has been vacant for a considerable period of time. It has been actively marketed in order to find an operator or purchaser. However, despite a lengthy marketing campaign it has not been able to secure an occupier or purchaser. The most notable interest in the site to date has been for a car showroom. Whilst planning permission has been granted for the development of a car showroom on the site, this interest has now gone. The only other notable party who has expressed interest in the site has been Countrywide Stores. Unfortunately, Countrywide Stores have now advised that they are no longer pursuing the development of this site. There is, therefore, no active interest in the site for employment purposes. It is also useful to note that the previous interest expressed in the site has not been from the use class operators.
- The employment land supply requirements set out by the Core Strategy and carried forward into the Allocations Document are based upon the 2007 ELR. This document bases its employment land requirements on more buoyant economic times. It suggests that the demand for additional employment land can be met on existing employment sites. Given the downturn in the market since the preparation of the ELR, it is likely to have overestimated the requirement for employment land in Kidderminster and there is, little evidence to suggest that this site is required for employment purposes from a quantitative perspective.
- The NPPF seeks to prevent the unnecessary protection of employment land. Given that there is substantial market evidence that suggests that this site will not come forward for employment purposes, alternative uses should be considered in accordance with National Planning Policy.
- Given the strong evidence that the site will not come forward for B Use Classes, the policies guiding the development of the Revelan Group land set out in the Site Allocation

and Policies DPP should be flexible to encourage its development. It is in both the council's and the client's interest that this sustainable brownfield site is brought back into an active use.

- Given the lack of interest in this site for any form of commercial activity, the policies in the Site Allocations Policies Document should be flexible to allow for residential development. The site provides the opportunity to deliver housing on a sustainable location with good transport links. It is appreciated that the council are able to demonstrate a five year supply of housing land. However, the Core Strategy will need updating in due course to reflect more recent evidence on housing need and demand. The land in Revelan Group's control is suitable to meet any increase in the council's housing land requirement.
- The south western most corner of the site, referred to as Zortech Avenue that adjoins the residential properties, located at Kinver Avenue and Walter Nash Road West, provides the opportunity to deliver residential development in the short term. This site is detached from the main SREC area, given its proximity to existing residential development; it is suitable for housing release in the short term.

The prospect of the land in Revelan Group's control coming forward for any form of commercial development appear highly unlikely. Interest in the site has been minimal from B Class and other forms of commercial development. Ultimately it is envisaged that the site will need to come forward for a retail or residential use for it to be brought back into an active use.

The South Western corner of land in Revelan Group's control, refers to Zortec Avenue, is considered appropriate for residential development in the short term. The site is located at Kinver Avenue and Walton Nash Road West, where there are a number of residential properties adjoining the site. It has been vacant for a number of years and ideally suited for residential development. It should, therefore, be allocated for housing in the Site Allocations and Policies DPD.

I trust you have found these representations useful. We would welcome the opportunity to discuss the above matters further. If you have any queries, or would like to discuss this matter further, please do not hesitate to contact me.

Yours Faithfully



Simon Hawley BA (Hons) MA MRTPI
Associate
simon.hawley@harrislamb.com
Tel: 0121 455 9455



Wyre Forest District Local Development Framework – Site Allocations and Policies and Kidderminster Central Area Action Plan Development Plan Documents (DPDs) Publication Stage Representation Form

Ref:

(For official use only)

Please return to: Planning Policy Manager, Economic Prosperity and Place Directorate, Duke House, Clensmore Street, Kidderminster, Worcestershire, DY10 2JX; or by e-mailing this form to Planning.Policy@wyreforestdc.gov.uk

BY 5.30pm on Friday 14th September 2012

This form has two parts –
Part A – Personal Details
Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make and remember to specify which document it relates to. Please specify which DPD you are commenting on.

Part A

1. Personal Details*

2. Agent's Details (if applicable)

**If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

Title	Revelan Group	Mr
First Name		Simon
Last Name		Hawley
Job Title (where relevant)		Associate
Organisation (where relevant)		Harris Lamb
Address Line 1		75- 76 Francis Road
Line 2		Edgbaston
Line 3		Birmingham
Post Code		B16 8SP
Telephone Number		0121 455 9455
E-mail Address (where relevant)		simon.hawley@harrislamb.com

Part B – Please use a separate sheet for each representation

Your representation should cover all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

After this stage, further submission will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Name or Organisation :

3. To which DPD does this representation relate? Site Allocations and Policies / Kidderminster Central Area Action Plan (*delete as necessary*)

To which part of the DPD does this representation relate?

Paragraph		Policy	SAL.SK4	Other e.g. Map, table, figure, key diagram	
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4. Do you consider the DPD is :

4.(1) Compliant with the Duty to Cooperate	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(3) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>

Please refer to guidance notes for explanation of terms

If you have entered **No** to 4(3), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is **unsound** because it is not:

- (1) Positively prepared
- (2) Justified
- (3) Effective
- (4) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

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.

The NPPF paragraph 22 confirms that planning policies should avoid the long term protection sites allocated for employment use. Where there is no reasonable prospect of a site being used for its allocated economic purposes applications for alternative uses should be treated on their merits having regard to market signals. It is, therefore, 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:

- 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.

Part of this site was granted planning permission for the development of car showroom in March 2011 (application reference 10/0751/FULL). However, the potential occupiers have now advised that they no longer have an interest in acquiring the site.

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.

- 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.

(Continue on a separate sheet /expand box if necessary)

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Policy SAL/SK4 should be amended to allow for 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.

“The development of non-employment uses, including residential development, will be supported where it can be demonstrated that :

- ***The site is identified in an up to date Employment Land Review as being suitable for alternative use.***
- ***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”.***

(Continue on a separate sheet /expand box if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

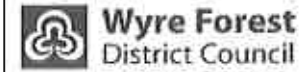
9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

We wish to reserve the right to appear at the examination. Policy SAL.SK4 could stifle the delivery of the significant brownfield site within Kidderminster. The opportunity is required to appear in front of the Inspector in order to explain the difficulty in finding an employment operator for the site and the need to ensure a flexible policy in the site allocation and policies DPD.

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Date:



Wyre Forest District Local Development Framework – Site Allocations and Policies and Kidderminster Central Area Action Plan Development Plan Documents (DPDs) Publication Stage Representation Form

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BY 5.30pm on Friday 14th September 2012

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Part A

1. Personal Details*		2. Agent's Details (if applicable)	
<i>*If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.</i>			
Title	Revelan Group		Mr
First Name			Simon
Last Name			Hawley
Job Title (where relevant)			Associate
Organisation (where relevant)			Harris Lamb
Address Line 1			75-76 Francis Road
Line 2			Edgbaston
Line 3			Birmingham
Post Code			B16 8SP
Telephone Number			0121 455 9455
E-mail Address (where relevant)			simon.hawley@harrislamb.com

Part B – Please use a separate sheet for each representation

Your representation should cover all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

After this stage, further submission will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Name or Organisation :

3. To which DPD does this representation relate? Site Allocations and Policies / Kidderminster Central Area Action Plan (*delete as necessary*)

To which part of the DPD does this representation relate?

Paragraph	Policy	SAL.SK1	Other e.g. Map, table, figure, key diagram
4. Do you consider the DPD is :			
4.(1) Compliant with the Duty to Cooperate	Yes	<input checked="" type="checkbox"/>	No <input type="checkbox"/>
4.(2) Legally compliant	Yes	<input checked="" type="checkbox"/>	No <input type="checkbox"/>
4.(3) Sound	Yes	<input type="checkbox"/>	No <input checked="" type="checkbox"/>

Please refer to guidance notes for explanation of terms

If you have entered **No** to 4(3), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is **unsound** because it is not:

- (1) Positively prepared
- (2) Justified
- (3) Effective
- (4) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Revelan Group control a significant amount of land in the South Kidderminster Enterprise Park and specifically in the Stourport Road Employment Corridor (SREC). Policy SAL.SK1 – South Kidderminster Enterprise Park, seeks to reserve the development of this land for employment purposes. However, 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. Consequently the SAL.SK1 should be amended to introduce greater flexibility to allow for alternative forms of development to come forward.

The National Planning Policy Framework (NPPF) seeks to prevent the longer term protection of employment sites. It advises that planning policies should avoid the long term protection of sites allocated from employment use where there is no reasonably prospect of the site being used for that purpose. Land allocations should be regularly reviewed where there is no reasonable prospect of the site being used for allocated employment use, applications for alternative use of land or buildings should be treated on their merits having regard to market signals over the relevant need of different land uses to support sustainable local communities. 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 :

- 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 development of the site.

Part of the land in Revelan Group's control was granted planning permission for a car showroom in March 2011 (Application Reference No 10/0751/FUL). Unfortunately the proposed operator has now advised Revelan Group that they no longer wish to acquire the site. The only other notable interest in recent years being from Countrywide Stores. This was for a bespoke retail outlet. Countrywide have now advised Revelan Group that their interest in the site is on hold. 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.

- The employment land requirements in the Site Allocations and Policies DPD are based upon the requirements of the adopted 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 purposes.

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.SK1, should be amended to introduce flexibility to allow for the site to come forward for alternative uses.

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.

(Continue on a separate sheet /expand box if necessary)

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Additional text should be introduced into Policy SAL.SK1 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 CP08 – 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 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.

“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:

- ***An up to date employment land review identifies the site being suitable for alternative uses or;***
- ***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”.***

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 Allocation and Policies DPD.

Land at Zortec Avenue should be allocated for residential development by the Site Allocations and Policies DPD.

(Continue on a separate sheet /expand box if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

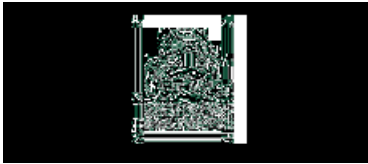
9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

HLPC wish to reserve the right to appear at the examination. Revelan's Group land holding is significant. Its development will play a key role in shaping Kidderminster in the future. It is imperative that the policies in the site allocations and policies publication document facilitate the redevelopment of this brownfield site. We wish to reserve the right to appear in front of the examination to explain to the inspector the difficulties in the site being developed for an employment use.

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Date:



Comment

Consultee	Mr Simon Roper-Pressdee (671112)
Email Address	simon.roper@cgms.co.uk
Address	26 Rosemary Road Kidderminster DY10 2SN
Event Name	Site Allocations and Policies Publication
Comment by	Mr Simon Roper-Pressdee
Comment ID	SALPP38
Response Date	23/08/12 14:27
Consultation Point	Policy SAL.UP6 Safeguarding the Historic Environment (View)
Status	Submitted
Submission Type	Web
Version	0.1

To which part of the DPD does this representation relate? (Please state paragraph number, policy number, map, table or figure number). Policy SAL.UP6 Paragraph 1c

Please refer to guidance notes for explanation of terms. If you enter **No** to 'Sound', please continue to Q5. In all other circumstances, please go to Q6.

Do you consider the DPD is:

Compliant with the Duty to Cooperate	Yes
Legally Compliant	Yes
Sound	No
Do you consider the document is unsound because it is not:	
Positively prepared	No
Justified	Yes
Effective	No
Consistent with national policy	Yes

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

The Proposed Policy states "Redevelopment proposals should provide an exceptional design to mitigate against the loss of the Heritage Asset." However, this fails to be proportionate in the response required of design in relation to the differing levels of heritage assets, requiring the same level of design for non-designated heritage assets as it does for designated heritage assets, and thus is contrary to principles of proportionality within the NPPF. It also fails to consider the reasons for an asset being considered as such, and makes a presumption that the quality of architecture is the sole reason for its inclusion and the sole mitigation for the loss of any heritage asset, although such an asset may be considered of low architectural merit, but of an importance relating to other reasons, such as archaeological, socio-historic or associative .

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The policy needs to recognise the reasons and significance of the various types of heritage assets, and the reasons for their inclusion in any list, whether national or local. Proportionality in the requirements for mitigating any loss of a heritage asset should be used, as is evident throughout the rest of the policy.

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."

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? No

**12, Hafren Way
Stourport on Severn,
Worcs.
DY13 8SJ**
tel. 01299 871259
js@anjo.me.uk
6th September 2012

Policy Planning Manager
Wyre Forest District Council
Duke House
Clensmore Street
Kidderminster
DY10 2JX

Dear Sir/Madam,

Local Development Plan

Regarding your letter dated 20th July 2012 received 24th July 2012.

I am disappointed to note that this consultation, as so many of recent times, is over a period when respondents are potentially restricted by family commitments. In this case the annual summer break. In addition proper consideration of the "Policies" offered require significant reference to other "Policies" which for the reasons above reduces the correct depth of comment. This could create a potential for conflict or confusion that may invalidate opinions given. Consequently my observations are of necessity based on limited cross referencing.

SALP DPD

This document requires a thorough review. It has clearly been updated in a piecemeal fashion but time has overtaken it. Therefore some elements do not reflect the current situation.

Clause 2.6/7

Bearing in mind current housing development spread on known sites the illustrated splits need to be revisited attempting to increase the Bewdley element particularly when reviewing the employment spread. This would have both ecological and congestion benefits.

Clause 2.13

The district having had 3320 residential completions over the period 2001 to 2011 and with a further 1500 completions still required infrastructure improvements need to be given more emphasis and equal status in the "Policy".

Clause 2.17 to 19.

On a political point these statements strengthen the objections to location raised at the time of the Finepoint Civic Centre proposals and the way in which planning rules can be used to avoid full discussion. This situation will create a precedent that the Authority may find difficult to resist under the new planning rules and be used to confound any "Policy" that does not forcefully identify office development locations. Ultimately jeopardising ecological/transport/green belt criteria.

Clause 4.37

This potential for town centre and off centre regeneration is to be welcomed but must have sufficient safeguards regarding possible loss of employment space. It is not sufficient to qualify the possible proposals by loss of character to the area.

Clause 4.47 to 73

This section needs to be revisited and allocations balanced on a Countywide basis. This was emphasised by the strength of the earlier public consultation and Political statements. The Baker Report, by the Planning Departments own statements to the public meetings, has been discredited, as it was only a desktop study on a limited brief. There is a need to

consider the full County implications of the Governments latest requirements.

Clause 5.17

This matter needs to be reviewed based on current Planning Approvals/work in hand. Specifically sites such as MTC Bewdley Road Stourport which is under construction.

Clause 5.24 to 26

These principles seem to directly conflict with the development approval for Tesco in Stourport. Although the 300m rule is a matter of conjecture in relation to the point from which it is measured all the other factors appear to be contravened. Another president to allow developers to challenge the Authority.

Clause 5.32 to 36

Some elements of D1 uses should be encouraged as long as they encourage footfall such as dentists and doctors. The principle should be to return main streets to community based uses not just retail.

Clause 5.52 to 55

The rail link to the Safari Park is something to be welcomed and pushed hard to reduce congestion. Unfortunately visitors will still insist on use of the family car, indeed they will need a car for some of the attractions. The wider use of rail as a means of getting to the attraction from further away should also be supported, if not in policies in requirements on the promoter for development conditions.

Clause 6.14

Again a "political issue" in that parking needs to be reviewed in light of the "Potas Review" not only in planning terms but the Authority need to give it consideration in regards to charging, relating to beneficial use.

Clause 6.18

More emphasis is required on the provision of the Stourport relief road. This will have many benefits which will include, environmental, traffic flows and a more comfortable use of the retail and other main street facilities in line with clauses 5.32 to 36.

Clause 6.32

This section sets a strategy that the Authority should lead by example. It should be part of the consideration of all new buildings. However, care needs to be taken on existing buildings where the financial advantages are not so clear and the character of the area can be severely harmed.

Clause 7.1 to 7

Strong emphasis needs to be given to safeguarding the greenbelt generally but specifically the Severn River corridor through Stourport and Bewdley. The current lines based on the residential rear boundaries particularly on the East side need to be sacrosanct.

Clause 7.72 (SAL.UP8)

These requirements need to be more specific particularly in guidance relating to subservience and not left to unclear and none written Officer preferences.

Clause 12.6 (SAL.STC2)

These proposals need to be revisited in the light of the Healthcare scheme currently under consideration.

Clause 14.1 (SAL.WS1)

This again needs to be considered as it is currently under development with applications for revisions in hand.

14.4 (SAL.WS2)

Due to the narrowness of Olive Grove to the North the proposal should emphasise the use of both current access points to maximise the sites use.

A number of these sites require review or reconsideration based on proposals under consideration.

KCAAP DPD

Clause 2.5/6

The vision and objectives have failed. The construction at Finepoint of the new Civic Centre removes an opportunity to draw people in to the major centre of the District (Kidderminster). It is also remote from services and unless a further change of “use” allocations is approved it fragments the principles of district development.

Clause 4.2

The over use of “mixed use” schemes just out of centre could dilute the central core policy in what is a relatively small area in overall terms. Judicious use of “mixed uses” in locations remote from the centre could be beneficial in ecological and general transport terms.

Clause 4.8 to 16

As with the SALP DPD an emphasis on dwellings, which are a general district requirement, needs to ensure a wider consideration of infrastructure than just the subject area. All types of access and parking needs to be considered carefully in relation to proposed and retained uses.

Clause 4.17.

Increased footfall is important in areas of both retained and new retail uses. Class Use D1 should be encouraged amongst traditionally A1 uses particularly as dental/physiotherapy and similar uses can improve activity when A1 units remain vacant for long periods without interest.

Clause 5.10.

Kidderminster requires a compact centre. This needs to use the traditional shopping streets and the existing shopping zones. Further spread will weaken the potential for take up when newer development attracts people away from the small trader. The changes in tenancy over recent years indicates that Crossley Park’s success is because it also offers good free parking and direct pedestrian links to Weavers Wharf and the limited shopping in the traditional centre.

Clause 5.13.

I believe that this part of the Policy could leave the traditional shopping streets unoccupied and existing centres declining when newer centres attract the larger retailers. An effort in both commercial and Planning terms is required to revitalise what exists rather than encouraging a further destination to create the “dumbbell” pattern.

It is clear by the failure to obtain a user that higher class retailers feel that the distance between Weavers Wharf and the old Woolworth building is too far or uninteresting in shopping terms or a use would have been found by now. Likewise the topography between the proposed supermarket off the ring road will not generate footfall of any great consequence. (My reasons are covered later.)

Clause 5.24

The East end of New Road and Oxford Street are traditional shopping streets and closer infill areas between the existing shopping zones/supermarkets and the museum attraction.

Clause 5.30

As stated above good pedestrian links and free parking make Crossley Park feel less edge of town. However the same can not be said of B&Q which is in a location that is not a natural walking destination from the centre and by the nature of its business is an “in and out” destination more out of town than edge of town.

Clause 5.43/44

It is important that small manufacturing can get a foothold and grow and policy must support small industry as part of housing development proposal. The availability of specialist and manual labour is more obvious in the area and encouragement of service based uses will import travelling labour from outside the area and further adding to the infrastructure requirements.

Section 6

Sustainable transport objectives take no account of struggling privatised public transport and the reliance on the private car to get around the district and outer environs. The introduction of a further supermarket by its nature will increase/divert personal transport around the centre. Although having benefits it also means visitors are “in and out” rather than long stay shoppers.

Tourism will rely on personal transport, as by its very nature it is more convenient for the families that are to be attracted to the area. I feel therefore that the objectives need revisiting. Although not simply a Planning matter alternative out of centre stopping points are required with good transport links as walking is not a national forte and the station to shopping is too far for most even if the new link might seem on paper to be more convenient.

Clause 6.22.

In this clause it should be considered that rather than walking “browsing” would be a more appropriate term.

Tourist will not generally walk “long distances” between points but will stroll a significant way around the shopping centre and attractions. It is therefore necessary to consider how visitors move between access points and the centre. This particularly relates to the station and shops. Park and ride may be a solution but from more than one location. I also refer to Clause 5.24 of SALP DPD.

Clause 10.20.

The proposal in this element of the Policy has the probability of splitting the town in two. The topography does not encourage walking between the West side and this location across the traditional shopping street. These traditional locations will suffer as the new larger retail location will over power the smaller traders leaving a no mans land. This also conflicts with the master plan for a supermarket in clause 10.30 that has been pushed hard by the Politicians.

Clause 10.30

Having been involved in the design of supermarket schemes for eight years for the now defunct Safeway and also in the past for Tesco and Sainsbury I feel strongly that this master plan proposal is not appropriate for a number of reasons.

This policy talks of reducing ground cover required for parking and is encouraging decked systems. This scheme has a large parking area that such retailers require for retail psychology reasons. The car park must be big enough to make the store look busy and interesting whilst having sufficient space clearly available to encourage a visit. There will as in the case of other such locations in the town be a reluctance to allow other than minimal parking for other uses or a requirement for over large parking areas to compensate for other shopper take up. A store of 3715sqm is not large but large enough to have a good none food department and ultimately require a filling station. I fear that such a use will result in it becoming a destination in itself with little interaction with the town centre.

Section 11.

The proposed link to Park Street is creditable. The potential as a “specialist area” with the possible links seems to work. Unfortunately the 3D illustrative scheme does the proposal no service as it shows features that the topography will make difficult particularly on the West side of Park Street. The land behind Rock Works is significantly above Park Street.

Section 12.

This section seems to confuse particularly when read with parts of section 15 as it talks of regeneration introducing limited shopping. This could, due to its location in the road system, become an edge of town shopping destination on its own particularly when read as part of the potential complex outlined in clauses 15.7 to 10.

Sections 13 and 14.

Clearly the District needs to have long term visions for all the areas of the town but these

sections contain proposals which will require careful reconsideration as the regeneration of Kidderminster proceeds. Due to the current dominance of Worcester, Merry Hill and access to other places of major shopping interest Kidderminster will remain a destination of indifference until the centre is more vibrant and easily accessed.

Consider the importance of Ludlow and others locally as vibrant market towns. Or possibly Malvern as a location that has concentrated its major shopping on the edge of town and encouraged more small traders in the centre. These are currently taking shoppers from Kidderminster because of their atmosphere.

In conclusion this document needs I feel a thorough review as time has overtaken the authors ideas and the piecemeal updating is showing in some level of contradiction.

John Shuttes.

Rebecca Mayman
Planning Policy Manager
Economic Prosperity and Place Directorate
Wyre Forest District Council
Duke House
Clensmore Street
KIDDERMINSTER
DY10 2JX

PLEASE ASK FOR: Rosie Murray
DIRECT DIAL: 01684 862354
DATE: 14 September 2012
Our Ref: P104-5 Wyre Forest District
Council
E-MAIL: rosie.murray@malvern hills.gov.uk

Dear Rebecca,

**South Worcestershire Authorities - Representations on Wyre Forest
Development Plan Documents, September 2012:**

**Site Allocations and Policies DPD – Pre-Submission Publication Version July
2012**

**Kidderminster Central Area Action Plan DPD – Pre-Submission Publication
Version July 2012**

Please accept this letter as a joint response to the above Pre-Submission Development Plan Documents on behalf of the three South Worcestershire Local Authorities (Malvern Hills District, Wychavon District and Worcester City Councils).

We are aware that as these are pre-submission documents you require representations to relate to the Tests of Soundness and other legal and procedural requirements.

Duty to cooperate

We confirm that the South Worcestershire Authorities have been in discussion with Wyre Forest officers on cross boundary issues, and in particular the level of development proposed and site proposals in and around the Clows Top, Bayton, Stourport-on Severn and the Hartlebury area. There are no site specific cross boundary issues with Worcester City. We are also aware that in terms of the evidence base for the DPD's you have been part of the Worcestershire Districts joint Strategic Housing Market Assessment, and joint working with the County Council on transport modelling in the area around Worcester.

Tests of Soundness.

We have no comments or issues concerning the Kidderminster Central Area Action Plan, which appears to be in line with the Core Strategy and National Policy.

The South Worcestershire Authorities consider that the approach to the Site Allocations and Policies DPD is generally consistent with National Policy and with the Wyre Forest Core Strategy.

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www.swdevelopmentplan.org
South Worcestershire Development Plan,
Orchard House, Farrier Street, Worcester WR1 3BB



In terms of being positively prepared, the cross boundary work with the South Worcestershire Authorities is mentioned above and it is not considered that Wyre Forest is required to take any unmet requirements from our area in terms of housing or employment development. It is also considered generally that the plan is justified and has considered alternatives. We had no objections at the earlier stages of the Site Allocations and Policies DPD.

The only concerns we have are related to the policy "Providing Accommodation for Gypsies, Travellers and Travelling Showpeople. These are outlined below:

Land Allocations

Paragraphs 4.48, 4.49 and 4.50

The South Worcestershire Authorities do not consider the evidence outlined in paragraphs 4.48, 4.49 and 4.50 to be sound.

The paragraphs suggest that the need for Gypsy and Traveller provision to 2017 is based on the need identified in the 2008 South Housing Market Area GTAA (30 pitches), plus an additional 5 pitches for the period 2013-2017 based on a RSS Phase 3 "Options Generation". 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 2007-2017 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.

Following our representations on this issue to your Potential Site Allocations consultations in November 2011 and March 2012 there still appears to be no justification for pursuing this level of allocation.

Policy SAL.DPL8

The South Worcestershire Authorities do not consider the proposed allocations set out in Policy SAL.DPL8 to be sound.

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.

We consider the proposed allocations in Stourport-on-Severn to be inappropriate for the following reasons:

- (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.
- (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 settled community, potentially leading to problems similar to those experienced at Cleeve Prior.
- (iii) Environmental – it is understood that all the proposed allocations are within Flood Zones 2 and / or 3.

- (iv) Wyre Forest District Council already recognise 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 the area.

Following our representations on the proliferation of sites in Stourport-on-Severn to your consultations in November 2011 and March 2012 there still appears to be no justification for pursuing the approach of concentrating new sites in this area.

Sites for Travelling Showpeople

Policy SAL.DPL9

The South Worcestershire Authorities do not consider Policy SAL.DPL9 to be sound.

Given the above concerns relating to the cumulative impact of sites in Stourport-on-Severn and recognition by the District Council that there is a need to resist further traveller sites in the area, 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.

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.

Sites for Gypsy and Traveller Use

Policy SAL.DPL10

The South Worcestershire Authorities do not consider Policy SAL.DPL10 to be sound.

Given the concerns relating to the cumulative impact of sites in Stourport-on-Severn and recognition by the District Council that there is a need to resist further traveller sites in the area, 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.

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.

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.

Paragraph 4.67

The South Worcestershire Authorities do not consider the policy approach in paragraph 4.67 to be sound.

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.

Yours sincerely

Handwritten mark

Handwritten mark

Paul Bayliss
SWDP Project Manager



**SPORT
ENGLAND**

Creating a sporting habit for life

Planning Policy Team
Wyre Forest District Council

11 September 2012

Dear Sir / Madam

Wyre Forest Site Allocations and Policies DPD

Thank you for consulting Sport England on the above document.

Sport England's comments are as follows:-

Page 37 – Educational Sites – Policy SAL DPL 12

There is a reference in the above policy to a proviso that proposals should not form part of a playing field or sports pitch or if they do that compensatory provision can be provided in a more preferable location. This is welcomed.

It is suggested that the wording would be clearer if it refers to "affecting part of a playing field" and "compensatory re-provision elsewhere".

This would then accord with Sport England's Playing Fields Policy, which can be accessed from our website at:-

Xxxxxxxx

This would also accord with paragraph 74 of the National Planning Policy Framework.

Page 75 – Policy SAL UP4

The terms of this policy concerning Open Space and Planning are welcomed.

Your etc....

Yours faithfully

, SportPark, 3 Oakwood Drive, , Loughborough, Leicestershire, LE11 3QF
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Creating a sporting habit for life

Tony
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Elaine Wilcox

From: Jonathan Elmer
Sent: 14 September 2012 17:50
To: Wyre Forest Planning Policy
Subject: FW: SALP DPD Reps , Wyre Forest District Council, Site Allocations DPD

Jonathan Elmer
Principal Planning Policy Officer
Economic Prosperity and Place Directorate
Wyre Forest District Council

Tel: 01562 732552
Fax: 01562 732556

From: Andy Plant [mailto:andy.plant@stfrancisgroup.com]
Sent: 14 September 2012 17:40
To: Jonathan Elmer
Cc: Matthew Barker; ap.associates@btinternet.com
Subject: SALP DPD Reps , Wyre Forest District Council, Site Allocations DPD

Hi John, following conversations earlier today with yourself, Matt and Julia , I have noted down comments/submissions below in order to meet the deadline for submission and hopefully will hear from you or Rebecca on Tuesday as to the points raised in terms of presentation,

The points to note are as follows although as per our discussion you are obviously aware of some of the points which conflict simply due to timing and the fact that since publication the masterplan has changed and gone through Planning Committee , I would appreciate a call to confirm that you have got these and they make sense,

Regards

Andy

Representation Notes On The Site Allocations Document

A DESIRABLE PLACE TO LIVE (Section 4)

- 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 yield could increase

- It is welcomed that the timescales for delivering the site have been updated from 2016 to 2021 to 2011 to 2021.

- Policy SAL.DPL1 entitled "Sites for Residential Development" set out locations within which residential development will only be allowed. It lists locations from 1 to 5 which imply that there is a sequential approach to be followed,

however, 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 GOOD PLACE TO DO BUSINESS (Section 5)

- 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.

- Policy SAL.CC3 refers to safeguarding of the Hoo Brook and Stourport Relief Road. It sets out that development along or adjacent should not prejudice the delivery and where practical will be expected to contribute towards delivery. More recently, 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 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.

- 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 at present ambiguity as to how contributions would be sought. Further clarification is required in respect of this issue.

ADAPTING AND MITIGATING TO CLIMATE CHANGE (Section 6)

- Policy SAL.CC4 relates to freight. It is suggested at paragraph 6.24 that there is potential for a rail freight connection to Severn Valley heritage line which was once used for freight. As identified previously, it is important though to note that there is no evidence to justify that this proposal 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 use as a Heritage Railway. There is also the matter of insufficient demand for large quantities of freight to be transported to Kidderminster and beyond. It is therefore likely that rail freight would not be used to its full capacity and would be unviable and inefficient. Given the economies of scale at present, the transportation of freight by road is considered to be a more efficient option.

- 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.

- As set out previously, Policy 19, which requires all schemes to implement SUDS, is unnecessary given that Policy CP02 required developers to include SUDS within 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.

- Policy SAL.UP4 is concerned with Open Space and Plan Provision. It sets out that all sites identified within the Wyre Forest Open Space, Sport and Recreation Assessment (October 2008) and the Wyre Forest District Playing Pitch Strategy (2012) as indicated on the Proposals Map, will be safeguarded from development. 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. Furthermore, as it was not publically available at the time of the Playing Pitch Strategy (2012) it was not included in any of the calculations. 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.

SOUTH KIDDERMINSTER ENTERPRISE PARK (Section 9)

- As set out previously, the identification of the former British Sugar site as an allocation for mixed use development is supported. Policy SAL.SK2, entitled Former British Sugar Site, and accompanying text is generally welcomed, however, there are a number of points to highlight in order to ensure the policy is effective and deliverable, which will ultimately improve soundness.

- 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. This has subsequently been endorsed by Planning Committee that have resolved to grant planning permission for the development subject to the completion of a S106 agreement, which is currently being prepared.

- In respect of point ii. as identified earlier within the representations, rail freight is not a viable option and therefore references to rail freight should be removed.

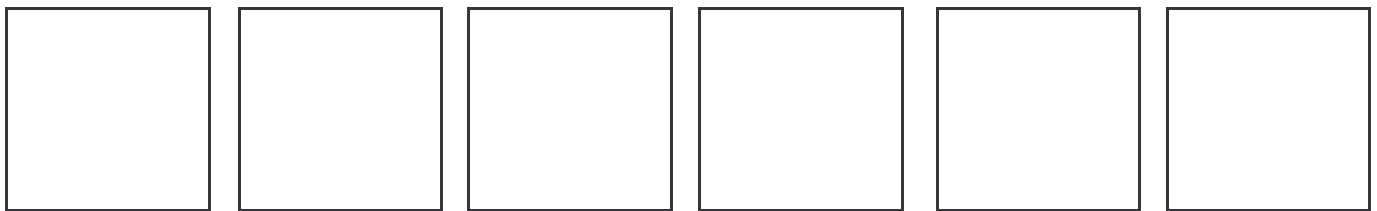
- A number of points listed (iv. v. and vii.), as set out previously, repeat national and/ or ealier policies set out within the DPD. Such site specific references are considered to be unnecessary.

- 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 (as above) 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,

Andy Plant

Planning Consultant
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Acquisition - Remediation - Planning - Site Preparation - Estate Management - Site Disposal



Acquisition - Remediation - Planning - Site Preparation - Estate Management - Site Disposal

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Wyre Forest District Local Development Framework – Site Allocations and Policies and Kidderminster Central Area Action Plan Development Plan Documents (DPDs) Publication Stage Representation Form

Ref:

(For official use only)

Please return to: Planning Policy Manager, Economic Prosperity and Place Directorate, Duke House, Clensmore Street, Kidderminster, Worcestershire, DY10 2JX; or by e-mailing this form to Planning.Policy@wyreforestdc.gov.uk

BY 5.30pm on Friday 14th September 2012

This form has two parts –
Part A – Personal Details
Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make and remember to specify which document it relates to. Please specify which DPD you are commenting on.

Part A

1. Personal Details*	2. Agent's Details (if applicable)
----------------------	------------------------------------

**If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

Title	Mr		
First Name	David		
Last Name	Berry		
Job Title (where relevant)	Planning Liaison Manager		
Organisation (where relevant)	The Coal Authority		
Address Line 1	200 Lichfield Lane		
Line 2	Berry Hill		
Line 3	Mansfield		
Post Code	NG18 4RG		
Telephone Number	01623 637119		
E-mail Address (where relevant)	planningconsultation@coal.gov.uk		

Part B – Please use a separate sheet for each representation

Your representation should cover all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

After this stage, further submission will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Name or Organisation :

3. To which DPD does this representation relate? Site Allocations and Policies / Kidderminster Central Area Action Plan (*delete as necessary*)

To which part of the DPD does this representation relate?

Paragraph	Policy	SAL.RS2	Other e.g. Map, table, figure, key diagram

4. Do you consider the DPD is :

4.(1) Compliant with the Duty to Cooperate	Yes		No	
4.(2) Legally compliant	Yes		No	
4.(3) Sound	Yes		No	x

Please refer to guidance notes for explanation of terms

If you have entered **No** to 4(3), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is **unsound** because it is not:

- (1) Positively prepared
- (2) Justified
- (3) Effective
- (4) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

The Coal Authority is a Non-Departmental Public Body sponsored by the Department of Energy and Climate Change (DECC). The Coal Authority was established by Parliament in 1994 to undertake specific statutory responsibilities associated with the licensing of coal mining operations in Britain; handle subsidence claims which are not the responsibility of licensed coalmine operators; deal with property and historic liability issues; and provide information on coal mining.

The Coal Authority re-engaged with the three planning systems across England, Scotland and Wales. The main areas of planning interest to The Coal Authority in terms of policy making relate to:

- the safeguarding of coal as a mineral in accordance with the advice contained in the National Planning Policy Framework, paragraphs 143 and 144; and

- ensuring that future development is undertaken safely and reduces the future liability on the tax payer for subsidence and other mining related hazards claims arising from the legacy of coal mining in accordance with the advice in the National Planning Policy Framework, paragraphs 109, 120, 121 and 166.

BACKGROUND TO COAL RELATED ISSUES IN WYRE FOREST

Surface Coal Resources and Prior Extraction

Although it is acknowledged that the Wyre Forest Site Allocations and Policies DPD does not cover minerals specifically, you will be aware that parts of the Wyre Forest area contain coal resources which are capable of extraction by surface mining operations.

The Coal Authority is keen to ensure that coal resources are not unduly sterilised by new development. In cases where this may be the case, The Coal Authority would be seeking prior extraction of the coal. Prior extraction of coal also has the benefit of removing any potential land instability problems in the process. Contact details for individual operators that may be able to assist with coal extraction in advance of development can be obtained from the Confederation of Coal Producers' website at www.coalpro.co.uk/members.shtml.

As The Coal Authority owns the coal on behalf of the state, if a development is to intersect the ground then specific written permission of the Coal Authority may be required.

Coal Mining Legacy

As you will be aware, parts of the Wyre Forest area have also been subjected to coal mining which will have left a legacy. Whilst most past mining is generally benign in nature, potential public safety and stability problems can be triggered and uncovered by development activities.

Problems can include collapses of mine entries and shallow coal mine workings, emissions of mine gases, incidents of spontaneous combustion, and the discharge of water from abandoned coal mines. These surface hazards can be found in any coal mining area, particularly where coal exists near to the surface, including existing residential areas. The Planning Department at the Coal Authority was created in 2008 to lead the work on defining areas where these legacy issues may occur.

The Coal Authority has records of over 171,000 coal mine entries across the coalfields, although there are thought to be many more unrecorded. Shallow coal which is present near the surface can give rise to stability, gas and potential spontaneous combustion problems. Even in areas where coal mining was deep, in some geological conditions cracks or fissures can appear at the surface. It is estimated that as many as 2 million of the 7.7 million properties across the coalfields may lie in areas with the potential to be affected by these problems. In our view, the planning processes in coalfield areas need to take account of these coal mining legacy issues.

Within the plan area there are approximately 50 recorded mine entries and other coal mining related hazards. Mine entries may be located in built up areas, often under buildings where the owners and occupiers have no knowledge of their presence unless they have received a mining report during the property transaction. Mine entries can also be present in open space and areas of green infrastructure, potentially just under the surface of grassed areas. Mine entries and mining legacy matters should be considered by the Local Planning Authority to ensure that site allocations and other policies and programmes will not lead to future public safety hazards.

Although mining legacy occurs as a result of mineral workings it is important that new

development delivered through the Local Plans/Local Development Framework recognises the problems and how they can be positively addressed. Land instability and mining legacy is not a complete constraint on the new development; rather it can be argued that because mining legacy matters have been addressed the new development is safe, stable and sustainable.

SPECIFIC COMMENTS ON THE WYRE FOREST SITE ALLOCATIONS AND POLICIES (PRE-SUBMISSION PUBLICATION)

Policy SAL.RS2 –

Test of Soundness

Positively Prepared	Justified	Effective	Consistency to NPPF	Legal & Procedural Requirements Inc. Duty to Cooperate
	x		x	

Objection –

As outlined in our consultation comments at the previous Preferred Options consultation stage, there are areas of surface coal resources within Wyre Forest District. These are primarily located on the western and north-western edges of the District. Whilst the proposed development allocations and development strategy are, for the most part, unlikely to have any significant impact in relation to the sterilisation of these surface coal resources, it is noted that the proposed Clows Top allocation (policy SAL.RS2) proposes development within the surface coal resource area.

The Coal Authority therefore considers that policy SAL.RS2 should draw attention to the need to take into account mineral safeguarding issues, and to consider whether the prior extraction of these resources would be practicable and environmentally feasible, in accordance with the requirements of paragraph 143 of the NPPF.

The proposed Clows Top allocation is also located within the broad part of Wyre Forest where past coal mining legacy issues may be present and will therefore need to be taken into account by new development proposals. However, as the adopted Core Strategy for Wyre Forest already sets out an appropriate policy framework to ensure that coal mining legacy issues are addressed no further policy criteria are considered necessary within the Site Allocations and Policies DPD.

(Continue on a separate sheet /expand box if necessary)

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The following additional criterion is recommended for inclusion within policy SLA.RS2 to address the above objection:

“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.”

Reason –

To meet the requirements of paragraph 143 of the NPPF.

CONCLUSION

The Coal Authority welcomes the opportunity to make these comments. We are, of course, willing to discuss the comments made above in further detail if desired and would be happy to negotiate alternative suitable wording to address any of our concerns. The Coal Authority also wishes to continue to be consulted both informally if required and formally on future stages. The Coal Authority would be happy to enter into discussions ahead of any examination hearing process to try and reach a negotiated position if this were considered helpful.

(Continue on a separate sheet /expand box if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

D. Berry

Date:

31/8/12



Wyre Forest District Local Development Framework – Site Allocations and Policies and Kidderminster Central Area Action Plan Development Plan Documents (DPDs) Publication Stage Representation Form

Ref:

(For official use only)

Please return to: Planning Policy Manager, Economic Prosperity and Place Directorate, Duke House, Clensmore Street, Kidderminster, Worcestershire, DY10 2JX; or by e-mailing this form to Planning.Policy@wyreforestdc.gov.uk

BY 5.30pm on Friday 14th September 2012

This form has two parts –
Part A – Personal Details
Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make and remember to specify which document it relates to. Please specify which DPD you are commenting on.

Part A

1. Personal Details*		2. Agent's Details (if applicable)	
<i>*If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.</i>			
Title	Ms		
First Name	Rose		
Last Name	Freeman		
Job Title (where relevant)	Planning Policy Officer		
Organisation (where relevant)	The Theatres Trust		
Address Line 1	22 Charing Cross Road		
Line 2	London		
Line 3			
Post Code	WC2H 0QL		
Telephone Number	020 7836 8591		
E-mail Address (where relevant)	planning@theatretrust.org.uk		

Part B – Please use a separate sheet for each representation

Your representation should cover all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

After this stage, further submission will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Name or Organisation : The Theatres Trust

3. To which DPD does this representation relate? Site Allocations and Policies / Kidderminster Central Area Action Plan (*delete as necessary*)

To which part of the DPD does this representation relate?

Paragraph		Policy SAL.DPL11		Other e.g. Map, table, figure, key diagram	
-----------	--	---------------------	--	--	--

4. Do you consider the DPD is :

4.(1) Compliant with the Duty to Cooperate	Yes	probably		No	
4.(2) Legally compliant	Yes	probably		No	
4.(3) Sound	Yes	yes		No	

Please refer to guidance notes for explanation of terms

If you have entered **No** to 4(3), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is **unsound** because it is not:

- (1) Positively prepared
- (2) Justified
- (3) Effective
- (4) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

We support the document with regard to Policy SAL.DPL11 which will resist the loss of community facilities.

However we suggest this policy could be made more robust by stating in the opening sentence of the policy that the council will protect existing community facilities and will resist their loss or change of use unless

(Continue on a separate sheet /expand box if necessary)

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

(Continue on a separate sheet /expand box if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

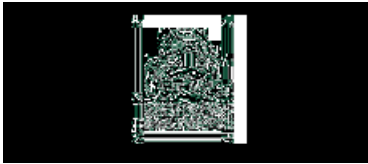
Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Rose Freeman

Date:

11 September 2012



Comment

Agent	Miss Andrea Caplan (678533)
Email Address	ac@brookesmithplanning.com
Company / Organisation	Brooke Smith Planning
Address	The Cloisters 12 George Road Birmingham B15 1NP
Consultee	(678542)
Email Address	ac@brookesmithplanning.com
Company / Organisation	Thomas Vale
Address	C/o Brooke Smith Planning 12 George Road Birmingham B1 2LB
Event Name	Site Allocations and Policies Publication
Comment by	Thomas Vale ()
Comment ID	SALPP108
Response Date	14/09/12 14:13
Consultation Point	Policy SAL.GPB4 Specialist Retailing (View)
Status	Submitted
Submission Type	Web
Version	0.1
To which part of the DPD does this representation relate? (Please state paragraph number, policy number, map, table or figure number).	Policy SAL.GPB4
Please refer to guidance notes for explanation of terms. If you enter No to 'Sound', please continue to Q5. In all other circumstances, please go to Q6.	
Do you consider the DPD is:	
Compliant with the Duty to Cooperate	Yes
Legally Compliant	Yes
Sound	No

Do you consider the document is **unsound** because it is not:

Positively prepared	Yes
Justified	No
Effective	No
Consistent with national policy	No

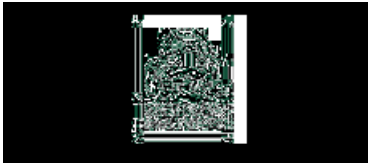
Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Reference should be included to chandlery shops and boat related commercial operations being appropriate at water-based recreational site, such as marinas.

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Reference should be included to chandlery shops and boat related commercial operations being appropriate at water-based recreational site, such as marinas.

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? No



Comment

Agent	Miss Andrea Caplan (678533)
Email Address	ac@brookesmithplanning.com
Company / Organisation	Brooke Smith Planning
Address	The Cloisters 12 George Road Birmingham B15 1NP
Consultee	(678542)
Email Address	ac@brookesmithplanning.com
Company / Organisation	Thomas Vale
Address	C/o Brooke Smith Planning 12 George Road Birmingham B1 2LB
Event Name	Site Allocations and Policies Publication
Comment by	Thomas Vale ()
Comment ID	SALPP109
Response Date	14/09/12 14:15
Consultation Point	5.49 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.1
To which part of the DPD does this representation relate? (Please state paragraph number, policy number, map, table or figure number).	Para 5.49
Please refer to guidance notes for explanation of terms. If you eneter No to 'Sound', please continue to Q5. In all other circumstances, please go to Q6.	
Do you consider the DPD is:	
Compliant with the Duty to Cooperate	Yes
Legally Compliant	Yes
Sound	No

Do you consider the document is **unsound** because it is not:

Positively prepared	No
Justified	Yes
Effective	No
Consistent with national policy	No

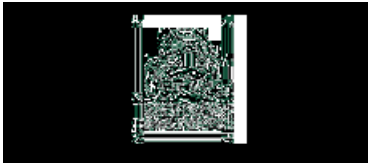
Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

The 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.

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The 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.

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? No



Comment

Agent	Miss Andrea Caplan (678533)
Email Address	ac@brookesmithplanning.com
Company / Organisation	Brooke Smith Planning
Address	The Cloisters 12 George Road Birmingham B15 1NP
Consultee	(678542)
Email Address	ac@brookesmithplanning.com
Company / Organisation	Thomas Vale
Address	C/o Brooke Smith Planning 12 George Road Birmingham B1 2LB
Event Name	Site Allocations and Policies Publication
Comment by	Thomas Vale ()
Comment ID	SALPP111
Response Date	14/09/12 14:21
Consultation Point	5.50 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.1

To which part of the DPD does this representation relate? (Please state paragraph number, policy number, map, table or figure number). para 5.50

Please refer to guidance notes for explanation of terms. If you enter **No** to 'Sound', please continue to Q5. In all other circumstances, please go to Q6.

Do you consider the DPD is:

Compliant with the Duty to Cooperate	Yes
Legally Compliant	Yes
Sound	No

Do you consider the document is **unsound** because it is not:

Positively prepared	No
Justified	Yes
Effective	No
Consistent with national policy	No

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

It is considered that further policy support should be set out in relation to waterways related tourism development. Such a policy would support Core Strategy Policy CP15 'Regenerating the Waterways' which states that any developments, projects and initiatives that assist in promoting the waterways as a tourist attraction will be encouraged. A policy is therefore requested that promotes the delivery of new marinas and related facilities on the local waterways network. There is an identified need for such development on both the canal and river networks in the area. Suggested wording is as follows: '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:

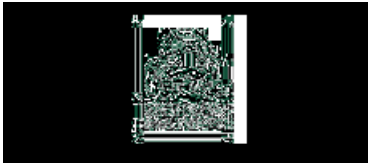
- 1 Development must not result in any unacceptable impacts on flooding, drainage or navigation of the waterway;
- 2 Development must be acceptable in terms of highways and access; and
- 3 Development must not have any significant detrimental impacts on the local environment.'

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Proposed Comments: It is considered that further policy support should be set out in relation to waterways related tourism development. Such a policy would support Core Strategy Policy CP15 'Regenerating the Waterways' which states that any developments, projects and initiatives that assist in promoting the waterways as a tourist attraction will be encouraged. A policy is therefore requested that promotes the delivery of new marinas and related facilities on the local waterways network. There is an identified need for such development on both the canal and river networks in the area. Suggested wording is as follows: '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:

- 1 Development must not result in any unacceptable impacts on flooding, drainage or navigation of the waterway;
- 2 Development must be acceptable in terms of highways and access; and
- 3 Development must not have any significant detrimental impacts on the local environment.'

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? No



Comment

Agent	Miss Andrea Caplan (678533)
Email Address	ac@brookesmithplanning.com
Company / Organisation	Brooke Smith Planning
Address	The Cloisters 12 George Road Birmingham B15 1NP
Consultee	(678542)
Email Address	ac@brookesmithplanning.com
Company / Organisation	Thomas Vale
Address	C/o Brooke Smith Planning 12 George Road Birmingham B1 2LB
Event Name	Site Allocations and Policies Publication
Comment by	Thomas Vale ()
Comment ID	SALPP112
Response Date	14/09/12 14:24
Consultation Point	Policy SAL.GPB5 Supporting Major Tourist Attractions (View)
Status	Submitted
Submission Type	Web
Version	0.1
To which part of the DPD does this representation relate? (Please state paragraph number, policy number, map, table or figure number).	Policy SAL.GPB5
Please refer to guidance notes for explanation of terms. If you enter No to 'Sound', please continue to Q5. In all other circumstances, please go to Q6.	
Do you consider the DPD is:	
Compliant with the Duty to Cooperate	Yes
Legally Compliant	Yes
Sound	No

Do you consider the document is **unsound** because it is not:

Positively prepared	No
Justified	Yes
Effective	No
Consistent with national policy	No

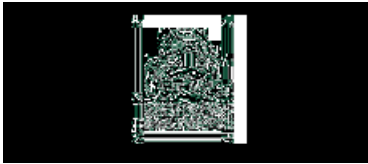
Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

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.

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? No



Comment

Agent	Miss Andrea Caplan (678533)
Email Address	ac@brookesmithplanning.com
Company / Organisation	Brooke Smith Planning
Address	The Cloisters 12 George Road Birmingham B15 1NP
Consultee	(678542)
Email Address	ac@brookesmithplanning.com
Company / Organisation	Thomas Vale
Address	C/o Brooke Smith Planning 12 George Road Birmingham B1 2LB
Event Name	Site Allocations and Policies Publication
Comment by	Thomas Vale ()
Comment ID	SALPP114
Response Date	14/09/12 14:33
Consultation Point	Policy SAL.UP3 Providing a Green Infrastructure Network (View)
Status	Submitted
Submission Type	Web
Version	0.1
To which part of the DPD does this representation relate? (Please state paragraph number, policy number, map, table or figure number).	Policy SAL.UP3
Please refer to guidance notes for explanation of terms. If you enter No to 'Sound', please continue to Q5. In all other circumstances, please go to Q6.	
Do you consider the DPD is:	
Compliant with the Duty to Cooperate	Yes
Legally Compliant	Yes
Sound	No

Do you consider the document is **unsound** because it is not:

Positively prepared	No
Justified	Yes
Effective	No
Consistent with national policy	No

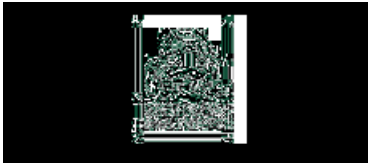
Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

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. This is required to ensure that appropriate water-based recreational and tourist facilities, and associated developments, are brought forward.

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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.

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? No



Comment

Agent	Miss Andrea Caplan (678533)
Email Address	ac@brookesmithplanning.com
Company / Organisation	Brooke Smith Planning
Address	The Cloisters 12 George Road Birmingham B15 1NP
Consultee	(678542)
Email Address	ac@brookesmithplanning.com
Company / Organisation	Thomas Vale
Address	C/o Brooke Smith Planning 12 George Road Birmingham B1 2LB
Event Name	Site Allocations and Policies Publication
Comment by	Thomas Vale ()
Comment ID	SALPP115
Response Date	14/09/12 14:37
Consultation Point	7.106 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.1
To which part of the DPD does this representation relate? (Please state paragraph number, policy number, map, table or figure number).	Para 7.106
Please refer to guidance notes for explanation of terms. If you eneter No to 'Sound', please continue to Q5. In all other circumstances, please go to Q6.	
Do you consider the DPD is:	
Compliant with the Duty to Cooperate	Yes
Legally Compliant	Yes
Sound	No

Do you consider the document is **unsound** because it is not:

Positively prepared	No
Justified	Yes
Effective	No
Consistent with national policy	No

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

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. The waterways network, both rivers and canals, is extremely important to the tourism and leisure industry within the Wyre Forest and as such appropriate development should be encouraged through a specific policy.

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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. Suggested wording is as follows: 'Proposals for waterways related development, including 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:

- 1 Development must not result in any unacceptable impacts on flooding, drainage or navigation of the waterway;
- 2 Development must be acceptable in terms of highways and access; and
- 3 Development must not have any significant detrimental impacts on the local environment.'

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? No



Wyre Forest
District Council

Wyre Forest District Local Development Framework – Site Allocations and Policies and Kidderminster Central Area Action Plan Development Plan Documents (DPDs) Publication Stage Representation Form

Ref:

(For official use only)

Please return to: Planning Policy Manager, Economic Prosperity and Place Directorate, Duke House, Clensmore Street, Kidderminster, Worcestershire, DY10 2JX; or by e-mailing this form to Planning.Policy@wyreforestdc.gov.uk

BY 5.30pm on Friday 14th September 2012

This form has two parts –
Part A – Personal Details

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make and remember to specify which document it relates to. Please specify which DPD you are commenting on.

Part A

1. Personal Details*

2. Agent's Details (if applicable)

**If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

Title	HR		
First Name	ROBERT		
Last Name	WATKINS		
Job Title (where relevant)			
Organisation (where relevant)			
Address Line 1	THE OLD BEGGY		
Line 2	LOWER PARK		
Line 3	BENDLEY		
Post Code	DY12 2DP		
Telephone Number	01299 405359		
E-mail Address (where relevant)	rdherb@watkins789@btinternet.com		

Part B – Please use a separate sheet for each representation

Your representation should cover all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

After this stage, further submission will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Name or Organisation :

3. To which DPD does this representation relate? Site Allocations and Policies / ~~Kidderminster Central Area Action Plan (delete as necessary)~~

To which part of the DPD does this representation relate?

Paragraph JALGON GUIDE	P173	Policy Definition of pd1	Other e.g. Map, table, figure, key diagram
------------------------------	------	-----------------------------	--

4. Do you consider the DPD is :

4.(1) Compliant with the Duty to Cooperate	Yes		No	
4.(2) Legally compliant	Yes		No	
4.(3) Sound	Yes		No	<input checked="" type="checkbox"/>

Please refer to guidance notes for explanation of terms

If you have entered **No** to 4(3), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is **unsound** because it is **not**:

- (1) Positively prepared
- (2) Justified
- (3) Effective
- (4) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

THE DEFINITION OF PDL IN THE JALGON GUIDE (P173) IS A PRECIS OF THAT SET OUT IN ANNEX 2 OF THE NPPF (P.55). THIS CREATED POTENTIAL CONFUSION AS THE PRECIS OMITS PHRASES WHICH MIGHT BE MATERIAL AS CASE LAW/LAWS DECISIONS EMERGE

(Continue on a separate sheet /expand box if necessary)

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

THE DEFINITION OF PDL IN THE BARROW GUIDE (AND ELSEWHERE IF A FULL DEFINITION IS REQUIRED) SHOULD BE THE FULL DEFINITION AS SET OUT IN ANNEX 2 OF THE NPPF.

A FOOTNOTE INDICATING THAT ANY CHANGE TO THIS DEFINITION AT NATIONAL LEVEL WILL AUTOMATICALLY BE ADOPTED BY THE LPA, WOULD ALSO ASSIST CLARIFICATION IN THE FUTURE.

(Continue on a separate sheet / expand box if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:



Date:

2/9/12



Wyre Forest
District Council

Wyre Forest District Local Development Framework – Site Allocations and Policies and Kidderminster Central Area Action Plan Development Plan Documents (DPDs) Publication Stage Representation Form

Ref:

(For official use only)

Please return to: Planning Policy Manager, Economic Prosperity and Place Directorate, Duke House, Clensmore Street, Kidderminster, Worcestershire, DY10 2JX; or by e-mailing this form to Planning.Policy@wyreforestdc.gov.uk

BY 5.30pm on Friday 14th September 2012

This form has two parts –

Part A – Personal Details

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make and remember to specify which document it relates to. Please specify which DPD you are commenting on.

Part A

1. Personal Details*

2. Agent's Details (if applicable)

**If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

Title	MR		
First Name	ROBERT		
Last Name	WATKINS		
Job Title (where relevant)			
Organisation (where relevant)			
Address Line 1	THE OLD RECTORY		
Line 2	LOWER PARK		
Line 3	BENWALLEY		
Post Code	DY12 2DP		
Telephone Number	01299 405359		
E-mail Address (where relevant)			

Part B – Please use a separate sheet for each representation

Your representation should cover all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

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Name or Organisation :

3. To which DPD does this representation relate? Site Allocations and Policies / ~~Kidderminster Central Area Action Plan~~ (delete as necessary)

To which part of the DPD does this representation relate?

Paragraph	4.12	Policy		Other e.g. Map, table, figure, key diagram	
-----------	------	--------	--	--	--

4. Do you consider the DPD is :

4.(1) Compliant with the Duty to Cooperate	Yes		No	
4.(2) Legally compliant	Yes		No	
4.(3) Sound	Yes		No	<input checked="" type="checkbox"/>

Please refer to guidance notes for explanation of terms

If you have entered **No** to 4(3), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is **unsound** because it is **not**:

- (1) Positively prepared
- (2) Justified
- (3) Effective
- (4) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

In para 4.12, 3rd line, within the brackets, there is specific mention of " and thus excluding garden land ". This is a piece of NPPF ANNEX 2: definition of poll and is simplistic.

(Continue on a separate sheet /expand box if necessary)

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Remove "and this excluding gender land"
from the budget in line 3 of para 4.12.

(Continue on a separate sheet /expand box if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:



MDP1

Date:

2/9/12



Wyre Forest District Local Development Framework – Site Allocations and Policies and Kidderminster Central Area Action Plan Development Plan Documents (DPDs) Publication Stage Representation Form

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(For official use only)

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BY 5.30pm on Friday 14th September 2012

This form has two parts –
Part A – Personal Details
Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make and remember to specify which document it relates to. Please specify which DPD you are commenting on.

Part A

1. Personal Details*	2. Agent's Details (if applicable)
----------------------	------------------------------------

**If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

Title	MR		
First Name	ROBERT		
Last Name	WATKINS		
Job Title (where relevant)			
Organisation (where relevant)			
Address Line 1	THE OLD RECTORY		
Line 2	LOWER PARK		
Line 3	BENWOLDY		
Post Code	DY12 2DP		
Telephone Number	01299 405359		
E-mail Address (where relevant)			

Part B – Please use a separate sheet for each representation

Your representation should cover all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

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Name or Organisation :

3. To which DPD does this representation relate? Site Allocations and Policies / ~~Kidderminster Central Area Action Plan (delete as necessary)~~

To which part of the DPD does this representation relate?

Paragraphs	Policy	Other e.g. Map, table, figure, key diagram
4.2 & 4.29		

4. Do you consider the DPD is :

4.(1) Compliant with the Duty to Cooperate	Yes		No	
4.(2) Legally compliant	Yes		No	
4.(3) Sound	Yes		No	✓

Please refer to guidance notes for explanation of terms

If you have entered **No** to 4(3), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is **unsound** because it is not:

- (1) Positively prepared
- (2) Justified
- (3) Effective
- (4) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

In reviewing an AOC, the Council has not justified the demand for 12 months marketing. 12 months is too long and after results in a house staying empty for nearly 2 years. 6 months active marketing would be adequate.

Also "no interest -- from within the locality" is too simplistic. An interest might be expressed but at an unrealistically low price.

(Continue on a separate sheet / expand box if necessary)

Also locality is normally taken to mean a radius of about 10 miles from the property, not a relation to administrative boundaries. Finally, NPPF policies promoting the role of housing strategies at

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Reduce the marketing period to "avoid banks"
• Change "no interest" to "no financially viable interest".
• Change the last sentence of 4.29 to "The locality is taken to mean about ~~8~~ 10 miles from the property".

(Continue on a separate sheet / expand box if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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Signature:

Date:



Wyre Forest
District Council

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Part A

1. Personal Details*

2. Agent's Details (if applicable)

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Title	MR		
First Name	ROBERT		
Last Name	WATKINS		
Job Title (where relevant)			
Organisation (where relevant)			
Address Line 1	THE OLD RECTORY		
Line 2	LOWER PARK		
Line 3	BENWILEY		
Post Code	DY12 2DP		
Telephone Number	01299 405359		
E-mail Address (where relevant)			

Part B – Please use a separate sheet for each representation

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Name or Organisation :

3. To which DPD does this representation relate? Site Allocations and Policies / ~~Kidderminster Central Area Action Plan~~ (delete as necessary)

To which part of the DPD does this representation relate? :

Paragraph		Policy	SAL DPL 2. 3	Other e.g. Map, table, figure, key diagram	
-----------	--	--------	-----------------	--	--

4. Do you consider the DPD is :

4.(1) Compliant with the Duty to Cooperate	Yes		No	
4.(2) Legally compliant	Yes		No	
4.(3) Sound	Yes		No	✓

Please refer to guidance notes for explanation of terms

If you have entered **No** to 4(3), please continue to Q5. In all other circumstances, please go to Q6.

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The "Replacement Dwelling in the Open Countryside" policy is welcomed, BUT:

1. There is no reference to Local Shops or Community Areas as a constraint.
2. ii and iv need linking, as a "less permanent sitting" might require a beneficial change in cartilage.
3. iii - the 20% restriction is unreasonably small and ~~is~~ not justified in the explanatory text. In

(Continue on a separate sheet / expand box if necessary)

practice 'PD Right' may allow expansion beyond 20%, or extant approvals may also exceed this

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Add to:

- "i" - - and is not listed and is not in a Creative Area"
- Merge ii and iv to read " The replacement dwelling is in the same or less prominent position as the original, with curtilage only being amended if required by resiting, landscape enhancement, vehicular safety, or neighbour amenity"
- Delete iii as it is unnecessary.

(Continue on a separate sheet /expand box if necessary)

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No, I do not wish to participate at the oral examination



Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

(Handwritten mark)

Signature:

Date:

2/9/12



Wyre Forest
District Council

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First Name	ROBERT		
Last Name	WATKINS		
Job Title (where relevant)			
Organisation (where relevant)			
Address Line 1	THE OLD BASTORY		
Line 2	LOWER PARK		
Line 3	BENWILEY		
Post Code	DY12 2DP		
Telephone Number	01299 405359		
E-mail Address (where relevant)			

Part B – Please use a separate sheet for each representation

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Name or Organisation :

3. To which DPD does this representation relate? Site Allocations and Policies / Kidderminster Central Area Action Plan (*delete as necessary*)

To which part of the DPD does this representation relate?

Paragraph		Policy	SAC DPC 6	Other e.g. Map, table, figure, key diagram	
-----------	--	--------	--------------	--	--

4. Do you consider the DPD is :

4.(1) Compliant with the Duty to Cooperate	Yes		No	
4.(2) Legally compliant	Yes		No	
4.(3) Sound	Yes		No	<input checked="" type="checkbox"/>

Please refer to guidance notes for explanation of terms

If you have entered **No** to 4(3), please continue to Q5. In all other circumstances, please go to Q6.

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- (3) Effective
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If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

The current wording is based on dated assessments, is overly restrictive, and not in line with Para 60 of NPPG. Specifically -

- 'dependent' relatives are not just the elderly, disabled or sick. The lack of affordable housing and jobs is leading to more mature children returning to their parents home, and needing adjacent but independent accommodation. This demand is valid and should be met if possible.
- Criteria i and ii are drafted one to restrict and meet no valid planning purpose. The only valid reason given in para 4.44 is

(Continue on a separate sheet / expand box if necessary)

"to ensure that annexes do not become physically separate dwellings - - -". This can be achieved by criteria or S106 agreements and criteria i and ii are then obsolete

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Amend Policy SAC. DCL6 such that it reads:
 "The development of new accommodation will be supported subject to its consistency with ~~the~~ other Local Plan Policies and subject to:
 i. the scale and design being appropriate to the host dwelling and setting;
 ii safeguards being applied to any approval to stop a separate dwelling being created"
 Para 4.44 would be amended accordingly

(Continue on a separate sheet /expand box if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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Signature:

[Handwritten Signature]

Date:

2/9/12



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Part A

1. Personal Details*

2. Agent's Details (if applicable)

**If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

Title	MR		
First Name	ROBERT		
Last Name	WATKINS		
Job Title (where relevant)			
Organisation (where relevant)			
Address Line 1	THE OLD RECTORY		
Line 2	LOWER PARK		
Line 3	BENWILEY		
Post Code	DY12 2DP		
Telephone Number	01299 405359		
E-mail Address (where relevant)			

Part B – Please use a separate sheet for each representation

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Name or Organisation :

3. To which DPD does this representation relate? Site Allocations and Policies / ~~Kidderminster Central Area Action Plan (delete as necessary)~~

To which part of the DPD does this representation relate?

Paragraph		Policy	SAL. DPL 7	Other e.g. Map, table, figure, key diagram	
-----------	--	--------	---------------	--	--

4. Do you consider the DPD is :

4.(1) Compliant with the Duty to Cooperate	Yes		No	
4.(2) Legally compliant	Yes		No	✓
4.(3) Sound	Yes		No	✓

Please refer to guidance notes for explanation of terms

If you have entered **No** to 4(3), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is **unsound** because it is not:

- (1) Positively prepared
- (2) Justified
- (3) Effective
- (4) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

The current wording is unprecise and the policy too complicated.

- Why distinguish between a residential caravan and a mobile home, when planning law states that living accommodation is either a caravan, or a dwelling?
- There is no mention of replacements for caravans that already have full approval, or have a COHEUO.
- in (i), the criteria of residential zoning is superfluous.
in (ii), the criteria "with the curtilage - -" is superfluous

(Continue on a separate sheet /expand box if necessary)

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The wording should be amended to

" Residential caravans.

The use of caravans for residential purposes will only be permitted where:

(i) it is the replacement of an existing caravan which is lawful;

(ii) to provide temporary accommodation during the construction, alteration or repair of a dwelling or dwelling

(iii) to meet temporary or seasonal agricultural or forestry use."

(Continue on a separate sheet / expand box if necessary)

para 4.46 would require amendment.

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?


No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:



Date:

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District Council

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Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make and remember to specify which document it relates to. Please specify which DPD you are commenting on.

Part A

1. Personal Details*

2. Agent's Details (if applicable)

**If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

Title

MR

First Name

ROBERT

Last Name

WATKINS

Job Title
(where relevant)

Organisation
(where relevant)

Address Line 1

THE OLD RECTORY

Line 2

LOWER PARK

Line 3

BENWOLD

Post Code

DY12 2DP

Telephone Number

01299 405359

E-mail Address
(where relevant)

Part B – Please use a separate sheet for each representation

Your representation should cover all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

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Name or Organisation :

3. To which DPD does this representation relate? Site Allocations and Policies / ~~Kidderminster Central Area Action Plan (delete as necessary)~~

To which part of the DPD does this representation relate?

Paragraph		Policy	SAL DPC 11	Other e.g. Map, table, figure, key diagram	
-----------	--	--------	---------------	--	--

4. Do you consider the DPD is :

4.(1) Compliant with the Duty to Cooperate	Yes		No	
4.(2) Legally compliant	Yes		No	
4.(3) Sound	Yes		No	✓

Please refer to guidance notes for explanation of terms

If you have entered No to 4(3), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is **unsound** because it is not:

- (1) Positively prepared
- (2) Justified
- (3) Effective
- (4) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

SAL DPC 11, as drafted is too onerous as the existing hardowner and could result in a building being left empty for well over 18 months. For example, for a vacant public house it has probably been marketed for 12 months before any application for COU is submitted. The development of the COU application, and details, new marketing etc, can take another 12 months.

The 12 month marketing is too onerous. The term

(Continue on a separate sheet /expand box if necessary)

'economically viable' is imprecise, as is "clear evidence"
Para 70 of the NPPF is less prescriptive.

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

SAC. DR 11 could read:
 "County Facilities.
 The Council will resist the loss of county services and facilities unless evidence is provided showing that:
 1. the existing use has been marketed actively and realistically for 6 months and
 " no offer was forthcoming that provided the county facility at a realistic return to the freeholder."
 paras 4.75 + 4.76 would be reworded accordingly.
 (Continue on a separate sheet / expand box if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

[Handwritten Signature]

Date:

2/9/12



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District Council

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Title

MR

First Name

ROBERT

Last Name

WATKINS

Job Title
(where relevant)

Organisation
(where relevant)

Address Line 1

THE OLD RECTORY

Line 2

LOWER PARK

Line 3

BEWLEY

Post Code

DY12 2DP

Telephone Number

01299 405359

E-mail Address
(where relevant)

Part B – Please use a separate sheet for each representation

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Name or Organisation :

3. To which DPD does this representation relate? Site Allocations and Policies / ~~Kidderminster Central Area Action Plan (delete as necessary)~~

To which part of the DPD does this representation relate?

Paragraph		Policy	SAL GPB4	Other e.g. Map, table, figure, key diagram	
-----------	--	--------	-------------	--	--

4. Do you consider the DPD is :

4.(1) Compliant with the Duty to Cooperate	Yes		No	
4.(2) Legally compliant	Yes		No	
4.(3) Sound	Yes		No	✓

Please refer to guidance notes for explanation of terms

If you have entered **No** to 4(3), please continue to Q5. In all other circumstances, please go to Q6.

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6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Policy E2 of the Adopted Local Plan (1996-2011) geographically allowed car showrooms etc in areas allocated for B1, B2 and B8 uses.
E2 is replaced by adopted Core Strategy policies DS01 and CS08, but neither geographically repeat the policy for car showrooms etc in B1, B2 and B8 land.
To rectify this omission, Policy SAL.GPB4 should geographically include

(Continue on a separate sheet /expand box if necessary)

car showrooms etc.

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Include in Policy SA2. GPB4 wording which allows car showrooms and vehicle maintenance, repair and service centers to be allowed on B1, B2 and B8 land.
Amend the reasons justification accordingly.

(Continue on a separate sheet / expand box if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

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1. Personal Details*

2. Agent's Details (if applicable)

**If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

Title	HR		
First Name	ROBERT		
Last Name	WATKINS		
Job Title (where relevant)			
Organisation (where relevant)			
Address Line 1	THE OLD RECTORY		
Line 2	LOWER PARK		
Line 3	BENWILEY		
Post Code	DY12 2DP		
Telephone Number	01299 405359		
E-mail Address (where relevant)			

Part B – Please use a separate sheet for each representation

Your representation should cover all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

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Name or Organisation :

3. To which DPD does this representation relate? Site Allocations and Policies / ~~Kidderminster Central Area Action Plan (delete as necessary)~~

To which part of the DPD does this representation relate?

Paragraph		Policy	SAL UP6 (2).	Other e.g. Map, table, figure, key diagram	
-----------	--	--------	--------------	--	--

4. Do you consider the DPD is :

4.(1) Compliant with the Duty to Cooperate	Yes		No	
4.(2) Legally compliant	Yes		No	
4.(3) Sound	Yes		No	<input checked="" type="checkbox"/>

Please refer to guidance notes for explanation of terms

If you have entered No to 4(3), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is **unsound** because it is not:

- (1) Positively prepared
- (2) Justified
- (3) Effective
- (4) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

In SAL UP6 2, the opening paragraph refers to proposals being in "accord with the existing (a draft) Conurbation Area Character Appraisal."

This wording has 2 failings:

1. A draft CACA may have had no public consultation, and therefore has limited weight. Inclusion of this phrase in the policy is no substitute for full public consultation.

(Continue on a separate sheet / expand box if necessary)

2. Some existing CACA are very dated, yet the 1990 Act at S69 et seq. requires revisions 'from time to time'. That is not reflected in the current wording.

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The opening sentence of 2. Converter Areas, should read " When development is proposed in or adjacent to a Converter Area proposals should accord with an adopted C.A.C.A so long as that has been fully renewed by the CPA in the 10 years before the application."

There should be no reference to a draft C.A.C.A.
 The Reasoned Justification should be amended accordingly

(Continue on a separate sheet /expand box if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination


Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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Signature:

Date:

 Wyre Forest District Council	Wyre Forest District Local Development Framework – Site Allocations and Policies and Kidderminster Central Area Action Plan Development Plan Documents (DPDs) Publication Stage Representation Form	Ref: (For official use only)
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Part A

1. Personal Details*	2. Agent's Details (if applicable)		
<i>*If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.</i>			
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First Name	ROBERT		
Last Name	WATKINS		
Job Title (where relevant)			
Organisation (where relevant)			
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Line 3	BENWILEY		
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Name or Organisation :

3. To which DPD does this representation relate? Site Allocations and Policies / ~~Kidderminster Central Area Action Plan (delete as necessary)~~

To which part of the DPD does this representation relate?

Paragraph	Policy	Other e.g. Map, table, figure, key diagram
	SAL. u/s	

4. Do you consider the DPD is :

4.(1) Compliant with the Duty to Cooperate	Yes		No	
4.(2) Legally compliant	Yes		No	
4.(3) Sound	Yes		No	<input checked="" type="checkbox"/>

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If you have entered **No** to 4(3), please continue to Q5. In all other circumstances, please go to Q6.

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Para 7.76 refers to the 45 degree code. The wording is very similar to that of para 5.82 of the Adopted Local Plan (1996-2011). However in a local appeal in 2009 (Decision letter dated 13/11/09 attached) as Inspector ruled that the 45° Code was "not adopted policy".

(Continue on a separate sheet /expand box if necessary)

The material content of the 45° Code requires clarification.

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

It is for the LPA to decide whether it wishes to formally adopt the 45° Code, or not. If it does, then it may be better to integrate it into Policy SAC-UP7, for which a Code should apply to new ~~and~~ development, not just extensions, which is the focus of SAC-UP8.

(Continue on a separate sheet /expand box if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:



Date:

2/7/12



Appeal Decision

Site visit made on 9 November 2009

by **Andrew Hammond** MA MSc CEng
MIET MRTPI

an Inspector appointed by the Secretary of State
for Communities and Local Government

The Planning Inspectorate
4/11 Eagle Wing
Temple Quay House
2 The Square
Temple Quay
Bristol BS1 6PN

☎ 0117 372 6372
email:enquiries@pins.gsi.gov.uk

Decision date:
13 November 2009

Appeal Ref: APP/R1845/D/09/2113708
12 Hales Park, Bewdley DY12 2HT

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.
- The appeal is made by Mr A Lewis against the decision of Wyre Forest District Council.
- The application Ref 09/0364/FULL, dated 11 May 2009, was refused by notice dated 16 July 2009.
- The development proposed is rear first floor extensions and first floor front window.

Decision

1. I dismiss the appeal.

Main issue

2. The main issue in this appeal is the effect on the living conditions of the occupiers of neighbouring properties, with particular regard to outlook and loss of sunlight.

Reasons

3. 12 Hales Park is a detached dwelling which has previously been extended at the rear. The appeal proposals include continuing the rear extension to first floor level.
4. The appeal premises are set slightly higher and further back than the neighbouring property to the north, number 10.
5. The Council suggest that the proposal would breach their 45° rule. However from my observations on site I could see that a line drawn from the nearest bedroom window in number 10 across the corner of the existing ground floor extension would be close to, if not greater than, 45° to the perpendicular. In any event the Council's rule is not adopted policy and I have given it little weight in my determination of the appeal.
6. However number 12 sits almost due south of number 10. As a result a 2-storey rear extension to number 12, projecting well beyond the rear elevation of number 10, would significantly reduce direct sunlight to the rear of the property and parts of the garden at some times of the year.
7. I therefore consider that the proposed development would cause significant detriment to the living conditions of the occupiers of 10 Hales Park in this respect.



Wyre Forest
District Council

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BY 5.30pm on Friday 14th September 2012

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Part A – Personal Details

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make and remember to specify which document it relates to. Please specify which DPD you are commenting on.

Part A

1. Personal Details*

2. Agent's Details (if applicable)

**If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

Title

MR

First Name

ROBERT

Last Name

WATKINS

Job Title
(where relevant)

Organisation
(where relevant)

Address Line 1

THE OLD RECTORY

Line 2

LOWER PARK

Line 3

BENWILEY

Post Code

DY12 2DP

Telephone Number

01299 405359

E-mail Address
(where relevant)

Part B – Please use a separate sheet for each representation

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Name or Organisation :

3. To which DPD does this representation relate? Site Allocations and Policies / ~~Kidderminster Central Area Action Plan (delete as necessary)~~

To which part of the DPD does this representation relate?

Paragraph		Policy	SAL.UPII	Other e.g. Map, table, figure, key diagram	
-----------	--	--------	----------	--	--

4. Do you consider the DPD is :

4.(1) Compliant with the Duty to Cooperate	Yes		No	
4.(2) Legally compliant	Yes		No	
4.(3) Sound	Yes		No	✓

Please refer to guidance notes for explanation of terms

If you have entered **No** to 4(3), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is **unsound** because it is not:

- (1) Positively prepared
- (2) Justified
- (3) Effective
- (4) Consistent with national policy

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There is a potential internal conflict between points i, ii, and iii of this policy. Specifically an existing rural building which is a heritage asset may only be capable of conservation by the insertion of an economic/residential use if it has extensions, alterations, significant building works, etc. This issue of 'enabling' development on (not just within the site) the

(Continue on a separate sheet / expand box if necessary)

existing building should be resolved in the policy wording and the reasons justifications

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The issue of evaluation development linked to and within an existing rural heritage building needs to be addressed in the first part of SACUP11.

(Continue on a separate sheet / expand box if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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Signature:

Date:

2/9/12



Wyre Forest
District Council

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Part A

1. Personal Details*

2. Agent's Details (if applicable)

**If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

Title

MR

First Name

ROBERT

Last Name

WATKINS

Job Title
(where relevant)

Organisation
(where relevant)

Address Line 1

THE OLD RECTORY

Line 2

LOWER PARK

Line 3

BENWILEY

Post Code

DY12 2DP

Telephone Number

01299 405359

E-mail Address
(where relevant)

Part B – Please use a separate sheet for each representation

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Name or Organisation :

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To which part of the DPD does this representation relate?

Paragraph	Policy	Other e.g. Map, table, figure, key diagram
	SAL.UPII	

4. Do you consider the DPD is :

4.(1) Compliant with the Duty to Cooperate	Yes		No	
4.(2) Legally compliant	Yes		No	
4.(3) Sound	Yes		No	<input checked="" type="checkbox"/>

Please refer to guidance notes for explanation of terms

If you have entered No to 4(3), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is **unsound** because it is **not**:

- (1) Positively prepared
- (2) Justified
- (3) Effective
- (4) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

The final sentence of SAL.UPII reads "In addition to these criteria, externalis to dwellings created through the re-use and adaptation of rural buildings, their will not be permitted".

This is too dogmatic and inflexible.

In practice the CPA reserves flexibility when granting approval to re-use (adaptation) under the framework of this policy. This control is acceptable, but it is unjustified to impose a blanket ban on subsequent externalis.

As an occupier's space needs change over time, and there can

(Continue on a separate sheet / expand box if necessary)

be met by ~~an~~ a modest externalis rate than relocates, then such externalis rarely creates material harm to either the host building or general context in rural areas.

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

There should be some cross reference to Policy SAC UP8 (Extensions) such that it is made clear that a building/are allowed under SAC UP11 can have extensions but the criteria for assessing them will be more strict than SAC UP8, probably by ensuring that the degree of 'subservience' is greater.

(Continue on a separate sheet /expand box if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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Signature:



Date:

2/9/12



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Part A

1. Personal Details*

2. Agent's Details (if applicable)

**If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

Title	MR		
First Name	ROBERT		
Last Name	WATKINS		
Job Title (where relevant)			
Organisation (where relevant)			
Address Line 1	THE OLD RECTORY		
Line 2	LOWER PARK		
Line 3	BENWILEY		
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Telephone Number	01299 405359		
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Name or Organisation :

3. To which DPD does this representation relate? Site Allocations and Policies / ~~Kidderminster Central Area Action Plan (delete as necessary)~~

To which part of the DPD does this representation relate?

Paragraph		Policy	SAL.UF12	Other e.g. Map, table, figure, key diagram	
-----------	--	--------	----------	--	--

4. Do you consider the DPD is :

4.(1) Compliant with the Duty to Cooperate	Yes		No	
4.(2) Legally compliant	Yes		No	
4.(3) Sound	Yes		No	<input checked="" type="checkbox"/>

Please refer to guidance notes for explanation of terms

If you have entered **No** to 4(3), please continue to Q5. In all other circumstances, please go to Q6.

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If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

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 statistic from data collected by the LPA in the 1990's and updated in the 2000's. That data should be published as background evidence, and to stop disputes over whether a structure is a 'chalet' or not.

(Continue on a separate sheet /expand box if necessary)

Also, demanding that replacement chalets should be on a 'like for like' basis in terms of design and materials is unreasonable and in some cases impractical.

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Define 'chapel' by reference to the Council survey(s) of the 300 or so that are said to exist, and publish that survey.

Replacement should be on the same footprint (unless a better one is found) and of generally the same volume as existing; but to mimic existing design and materials" is too inflexible.

(Continue on a separate sheet /expand box if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

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Yes, I wish to participate at the oral examination

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First Name	ROBERT		
Last Name	WATKINS		
Job Title (where relevant)			
Organisation (where relevant)			
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To which part of the DPD does this representation relate?

Paragraph	Policy	Other e.g. Map, table, figure, key diagram
7.106		

4. Do you consider the DPD is :

4.(1) Compliant with the Duty to Cooperate	Yes		No	
4.(2) Legally compliant	Yes		No	
4.(3) Sound	Yes		No	<input checked="" type="checkbox"/>

Please refer to guidance notes for explanation of terms

If you have entered **No** to 4(3), please continue to Q5. In all other circumstances, please go to Q6.

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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 regularly graze on agricultural land and so do not require a C01.

(Continue on a separate sheet / expand box if necessary)

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Revised 7.106 to:

" The keeping of horses on agricultural land usually requires an approval for a change of the. Also, any physical development on the land, such as stables, tack rooms, feed stores, jumps and manures also require express planning consent."

(Continue on a separate sheet /expand box if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

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Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:



Date:

3/9/12



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District Council

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1. Personal Details

2. Agent's Details (if applicable)

**If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

Title

MR

First Name

ROBERT

Last Name

WATKINS

Job Title
(where relevant)

Organisation
(where relevant)

Address Line 1

THE OLD BASTORY

Line 2

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Line 3

BEWLEY

Post Code

DY12 2DP

Telephone Number

01299 405359

E-mail Address
(where relevant)

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Name or Organisation :

3. To which DPD does this representation relate? Site Allocations and Policies / ~~Kidderminster Central Area Action Plan (delete as necessary)~~

To which part of the DPD does this representation relate?

Paragraph		Policy	SAL UP 13	Other e.g. Map, table, figure, key diagram	
-----------	--	--------	--------------	--	--

4. Do you consider the DPD is :

4.(1) Compliant with the Duty to Cooperate	Yes		No	
4.(2) Legally compliant	Yes		No	
4.(3) Sound	Yes		No	<input checked="" type="checkbox"/>

Please refer to guidance notes for explanation of terms

If you have entered **No** to 4(3), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is **unsound** because it is not:

- (1) Positively prepared
- (2) Justified
- (3) Effective
- (4) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

1. SALUP13 1 : Commercial Equine facilities : the wording could be improved and clarified
2. SALUP13 2 : As above.
3. There should be explicit cross reference in the Policy wording to SALUP14 (Ag. Land Quality)

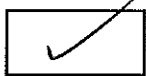
(Continue on a separate sheet /expand box if necessary)

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

1. Amend wording in SAL:UP13.1, second para to "the Green Belt or open countryside", and in next sentence amend to "within the Green Belt, applications will also be assessed against Policy SAL:UP.1"
2. In SAL:UP13.2. 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.

(Continue on a separate sheet / expand box if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?



No, I do not wish to participate at the oral examination



Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Wyre Forest District Local
Development Framework

Date:

3/9/12

Statement of Duty to Co-operate
Requirements (October 2012)



Wyre Forest District Local Development Framework – Site Allocations and Policies and Kidderminster Central Area Action Plan Development Plan Documents (DPDs) Publication Stage Representation Form

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BY 5.30pm on Friday 14th September 2012

This form has two parts –
Part A – Personal Details

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make and remember to specify which document it relates to. Please specify which DPD you are commenting on.

Part A

1. Personal Details:

2. Agent's Details (if applicable)

**If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

Title	MR		
First Name	ROBERT		
Last Name	WATKINS		
Job Title (where relevant)			
Organisation (where relevant)			
Address Line 1	THE OLD RESTORY		
Line 2	LOWER PARK		
Line 3	BEWLEY		
Post Code	DY12 2DP		
Telephone Number	01299 405359		
E-mail Address (where relevant)			

Part B – Please use a separate sheet for each representation

Your representation should cover all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

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Name or Organisation :

3. To which DPD does this representation relate? Site Allocations and Policies / ~~Kidderminster Central Area Action Plan (delete as necessary)~~

To which part of the DPD does this representation relate?

Paragraph		Policy	SAL .B2	Other e.g. Map, table, figure, key diagram	
-----------	--	--------	---------	--	--

4. Do you consider the DPD is :

4.(1) Compliant with the Duty to Cooperate	Yes		No	
4.(2) Legally compliant	Yes		No	
4.(3) Sound	Yes		No	✓

Please refer to guidance notes for explanation of terms

If you have entered **No** to 4(3), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is **unsound** because it is **not**:

- (1) Positively prepared
- (2) Justified
- (3) Effective
- (4) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

LAX LANE SIZE. The difficulties of the former WBS site are set out in paras 16.11 and 16.12. The best way to enhance the conservation area, and the safety of traffic in lane here is to demolish the WBS building and turn that area into residential only car parking. That would enable some of the on-sheet parking in lane here to be removed, and the rest

(Continue on a separate sheet /expand box if necessary)

also used for residential only. The sheet-scape could then be enhanced, and traffic movement controlled more adequately.

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

1. Policy SAC. B2. Law here.
replace "Residential Development (C3)" with
"Residential only parking".

2. Amend 16.11 and 16.12 accordingly.

(Continue on a separate sheet /expand box if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

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Signature:

Date:

4/9/12

21 August 2012

Delivered by Email

Planning Policy Manager,
Economic Prosperity and Place Directorate,
Duke House, Clensmore Street,
Kidderminster,
Worcestershire
DY10 2JX

Our ref: WESA2007
Your ref: -
E: vbarbaro@turleyassociates.co.uk

Dear Sir or Madam

WYRE FOREST DISTRICT COUNCIL – SITE ALLOCATIONS AND POLICIES DPD

I write in respect of the subject document and have been instructed on behalf of Western Power Distribution to make the following consultation response.

Western Power Distribution [may have] [has] a number of strategic electricity distribution circuits (which can operate at 132,000 Volts, 66,000 Volts and 33,000 Volts) in some of the area's being considered for development. These circuits may run both underground and as overhead lines (on either towers/pylons or wood poles). WPD may also have electricity substations in these areas.

Generally, Western Power Distribution would expect developers of a site to pay to divert less strategic electricity circuits operating at 11,000 Volts (11kV) or below. This may include undergrounding some 11kV and low voltage overhead lines as necessary.

Western Power Distribution would normally seek to retain the position of electricity circuits operating at 132,000 Volts (132kV) and 66,000 Volts (66kV) and in some cases 33,000 Volts (33kV), particularly if the diversion of such circuits placed a financial obligation on Western Power Distribution to either divert or underground them as WPD would not be party to any planning application and any such obligation would also go against the statutory and regulatory requirement on Western Power Distribution to operate an economic and efficient electricity distribution system. Assuming the required minimum statutory clearances can be maintained and WPD can access its pylons/poles, WPD does not generally have any restriction on the type of development possible in proximity to its strategic overhead lines but it would be sensible for planning guidance and layout of developments to take WPD's position into account and consider uses compatible with the retention of strategic overhead lines, for example such as parking, estate roads, commercial uses or open space, within their immediate proximity. It is worth noting that any existing circuits crossing the proposed development areas in the document may run both overhead and underground. In any case WPD should be consulted on detail at an early stage and WPD are always keen to discuss larger sites with the local authorities at an early stage, so that constraints can be taken into account and sites planned in the most effective way.

Where WPD have substations on land being considered for development, WPD should be consulted on the detail of proposals in good time to ensure that the required access can be maintained and catered for and that other requirements for development in the vicinity of substations are taken into account.

I trust the information provided is satisfactory and I look forward to receiving your confirmation of receipt of this representation in due course along with the appropriate consultation number for future reference. Should you require any additional information or want to discuss or clarify any matter with a representative from WPD, please do not hesitate to contact me.

Yours faithfully

Veronica Barbaro
Assistant Planner



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1. Personal Details*		2. Agent's Details (if applicable)	
<i>*If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.</i>			
Title	Mr		
First Name	Andrew		
Last Name	Morgan		
Job Title (where relevant)	Strategic Planner		
Organisation (where relevant)	West Mercia Police and Hereford & Worcester Fire and Rescue Service		
Address Line 1	Hindlip Hall		
Line 2	PO Box 55		
Line 3	Worcester		
Post Code	WR3 8SP		
Telephone Number	01905 332885		
E-mail Address (where relevant)	andrew.morgan.60139@westmercia.pnn.police.uk		

Part B – Please use a separate sheet for each representation

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Name or Organisation : West Mercia Police (WMP) and Hereford & Worcester Fire and Rescue Service (HWFRS)

3. To which DPD does this representation relate? Site Allocations and Policies Development Plan Document (SAPDPD)
To which part of the DPD does this representation relate?

Paragraph	7.81 and 7.82	Policy	SAL.UP9	Other e.g. Map, table, figure, key diagram
-----------	---------------	--------	---------	--

4. Do you consider the DPD is :

4.(1) Compliant with the Duty to Cooperate	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(3) Sound	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

Please refer to guidance notes for explanation of terms

If you have entered **No** to 4(3), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is **unsound** because it is not:

- (1) Positively prepared
- (2) Justified
- (3) Effective
- (4) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

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 defensive gardening techniques and commend the Council on their drafting.

The correct uses of certain species of plants such as spiky or thorny shrubs can, for example, help prevent graffiti, loitering and create or enhance perimeter security. It should be noted however that defensive planting is not just about prickly shrubs; it is about selecting the right type of plant for the right aspect and environment. For example, open branched and columnar trees can be used in a landscape scheme where natural or formal surveillance is required. Alternatively, a prickly hedge would deter many thieves from trying to get through it.

We consequently look forward to working with the Council, promoters and other stakeholders in the implementation of Policy SAL.UP9 and paragraphs 7.81 and 7.82.

(Continue on a separate sheet /expand box if necessary)

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

(Continue on a separate sheet /expand box if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Whilst we consider that these representations present our case fully, we would be prepared to participate at the oral part of the examination should the Council and/or Inspector consider this beneficial to proceedings.

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Andrew Morgan

Date:

12/09/12



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Title	Mr		
First Name	Andrew		
Last Name	Morgan		
Job Title (where relevant)	Strategic Planner		
Organisation (where relevant)	West Mercia Police and Hereford & Worcester Fire and Rescue Service		
Address Line 1	Hindlip Hall		
Line 2	PO Box 55		
Line 3	Worcester		
Post Code	WR3 8SP		
Telephone Number	01905 332885		
E-mail Address (where relevant)	andrew.morgan.60139@westmercia.pnn.police.uk		

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Name or Organisation : West Mercia Police (WMP) and Hereford & Worcester Fire and Rescue Service (HWFRS)

3. To which DPD does this representation relate? Site Allocations and Policies Development Plan Document (SAPDPD)
To which part of the DPD does this representation relate?

Paragraph		Policy	SAL.UP7	Other e.g. Map, table, figure, key diagram	
-----------	--	--------	---------	--	--

4. Do you consider the DPD is :

4.(1) Compliant with the Duty to Cooperate	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(3) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>

Please refer to guidance notes for explanation of terms

If you have entered **No** to 4(3), please continue to Q5. In all other circumstances, please go to Q6.

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- (1) Positively prepared
- (2) Justified
- (3) Effective
- (4) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

We welcome and support the 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 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.

We are grateful to the Council for taking into account our previous representations to the Preferred Options (May 2011) document on these matters. The inclusion of part (vii) particularly in Policy SAL.UP7 will ensure that new developments comply with a nationally recognised consistent standard, which in turn will mean they contribute to the achievement of the Government's objectives set out in paragraphs 58 and 69 of the National Planning Policy Framework.

We would also like to emphasise that the benefits of implementing Secured by Design are real and can be measured. In one year alone for example, some 700,000 burglaries nationwide could have been thwarted if appropriate Secured by Design measures has been installed, according to Professor Ken Pease OBE and Professor Martin Gill of Perpetuity Research – an independent organisation which specialises in looking at areas of crime reduction, community safety and security. We consequently

welcome and support the commitment by the Council to monitor Secured by Design as a Sustainability Appraisal indicator through the Annual Monitoring Report.

The above notwithstanding, we are of the view that Policy SAL.UP7 should also require new development schemes to incorporate the following: -

- Automatic water suppression systems
- Adequate water supplies for fire fighting
- Effective and efficient access for emergency vehicles

The Chief Fire Officers' Association (CFOA), HWFRS and WMP strongly advocate the installation of automatic water suppression systems in **all** new housing and other developments. These systems are proven to significantly reduce fire deaths, injuries and property damage as a result of fire. They also control fires with minimal water and reduce the toxic smoke plume fall out, as well as reducing the contaminated water run off from a fire.

The Welsh Assembly Government has recently passed a law to make the installation of sprinklers compulsory in all new build homes in Wales. The CFOA, HWFRS and WMP firmly endorse this approach, and consider that there are major benefits for developers, communities and the emergency services; not only are domestic sprinkler systems cost-effective, but they also reduce community fire risk and reduce the burdens on fire and rescue services, enabling them to deploy more effectively.

The SAPDPD will also need to ensure that all new developments incorporate adequate water supplies for effective fire fighting. Existing HWFRS funding is insufficient to meet the cost of providing fire hydrants in all new developments across the SAPDPD geographical area. We will expect developers to install hydrants attached to the mains suitable for the purposes of fire fighting at their own expense, and to provide funds for their on going maintenance. Locations of hydrants should be approved in consultation with HWFRS. Where hydrants are not feasible suitable alternative water sources, such as gravity tanks, should be installed.

Finally, the design of new housing and other developments must ensure that the emergency services can access all areas and buildings. It is important to remember in this respect that each specific development will have implications for WMP and HWFRS e.g. the need to ensure that WMP personnel can attend quickly in the event of a domestic incident, or ensuring that HWFRS personnel can attend rapidly in the event of a fire.

One of the simplest ways of ensuring that the emergency services can rapidly access all parts of a development is if it has a dedicated emergency access road that connects with the surrounding highway network. We also stress the need to ensure that proposals for on-street car parking within developments do not hinder emergency services access.

As currently drafted, Policy SAL.UP7 does not take into account any of the above and for this reason we consider it unjustified, according to the tests of soundness set out in paragraph 182 of the National Planning Policy Framework.

(Continue on a separate sheet /expand box if necessary)

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

To resolve all our concerns expressed in part 6 of these representations, we suggest the inclusion of the following additional design principle in Policy SAL.UP7: -

(?) *Include automatic water suppression systems, provide adequate water supplies for fire fighting and ensure effective and efficient access for emergency service vehicles.*

(Continue on a separate sheet /expand box if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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Signature:

Andrew Morgan

Date:

12/09/12



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First Name	Andrew		
Last Name	Morgan		
Job Title (where relevant)	Strategic Planner		
Organisation (where relevant)	West Mercia Police and Hereford & Worcester Fire and Rescue Service		
Address Line 1	Hindlip Hall		
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Line 3	Worcester		
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E-mail Address (where relevant)	andrew.morgan.60139@westmercia.pnn.police.uk		

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To which part of the DPD does this representation relate?

Paragraph		Policy	SAL.CC7	Other e.g. Map, table, figure, key diagram	
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4. Do you consider the DPD is :

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4.(2) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(3) Sound	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

Please refer to guidance notes for explanation of terms

If you have entered **No** to 4(3), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is **unsound** because it is not:

- (1) Positively prepared
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6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

WMP and HWFRS are pleased that the robust approach of policy CP02: 'Water Management' of the adopted Wyre Forest Core Strategy (December 2010) has been carried through into Policy SAL.CC7 and its supporting paragraphs.

Consultation on this draft policy has come at an opportune time, as WMP and HWFRS consider and implement the lessons learned from 'Exercise Watermark', held 4 – 11 March 2011. This tested the arrangements across England and Wales to respond to all aspects of severe wide-area flooding. It was conducted in response to the floods of 2007 and the review of the response to them, which was carried out by Sir Michael Pitt.

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.

(Continue on a separate sheet /expand box if necessary)

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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Signature:

Andrew Morgan

Date:

12/09/12



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First Name	Andrew		
Last Name	Morgan		
Job Title (where relevant)	Strategic Planner		
Organisation (where relevant)	West Mercia Police and Hereford & Worcester Fire and Rescue Service		
Address Line 1	Hindlip Hall		
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3. To which DPD does this representation relate? Site Allocations and Policies Development Plan Document (SAPDPD)
To which part of the DPD does this representation relate?

Paragraph	4.13	Policy		Other e.g. Map, table, figure, key diagram	
-----------	------	--------	--	--	--

4. Do you consider the DPD is :

4.(1) Compliant with the Duty to Cooperate	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(3) Sound	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

Please refer to guidance notes for explanation of terms

If you have entered **No** to 4(3), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is **unsound** because it is not:

- (1) Positively prepared
- (2) Justified
- (3) Effective
- (4) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

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. This in turn will support the achievement of the objectives set out in the following: -

- National Planning Policy Framework – Paragraph 69
- Wyre Forest Core Strategy (adopted December 2010) – Key Issues and Challenges (9th bullet point), Vision (paragraph 3.12) and Development Objective 13
- A Single Sustainable Community Strategy for Worcestershire – Wyre Forest Matters
- Wyre Forest Community Safety Partnership – Strategic Objectives Plan 2011/12

(Continue on a separate sheet /expand box if necessary)

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

(Continue on a separate sheet /expand box if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Andrew Morgan

Date:

12/09/12



Wyre Forest District Local Development Framework – Site Allocations and Policies and Kidderminster Central Area Action Plan Development Plan Documents (DPDs) Publication Stage Representation Form

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Part A

1. Personal Details*		2. Agent's Details (if applicable)	
<i>*If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.</i>			
Title	Mr		
First Name	Andrew		
Last Name	Morgan		
Job Title (where relevant)	Strategic Planner		
Organisation (where relevant)	West Mercia Police and Hereford & Worcester Fire and Rescue Service		
Address Line 1	Hindlip Hall		
Line 2	PO Box 55		
Line 3	Worcester		
Post Code	WR3 8SP		
Telephone Number	01905 332885		
E-mail Address (where relevant)	andrew.morgan.60139@westmercia.pnn.police.uk		

Part B – Please use a separate sheet for each representation

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Name or Organisation : West Mercia Police (WMP) and Hereford & Worcester Fire and Rescue Service (HWFRS)

3. To which DPD does this representation relate? Site Allocations and Policies Development Plan Document (SAPDPD)
To which part of the DPD does this representation relate?

Paragraph		Policy	SAL.DPL11	Other e.g. Map, table, figure, key diagram	
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4. Do you consider the DPD is :

4.(1) Compliant with the Duty to Cooperate	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(3) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>

Please refer to guidance notes for explanation of terms

If you have entered **No** to 4(3), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is **unsound** because it is not:

- (1) Positively prepared
- (2) Justified
- (3) Effective
- (4) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

As part of our representations to the previous Preferred Options consultation (May 2011), we requested that the existing WMP and HWFRS stations in the District be subject to new policies safeguarding them both for their current uses and anticipated future expansion to meet the demands of planned development growth. In response, the Council stated that they would be identified on the Proposals Map as community facilities and be protected under Policy CP07: 'Delivering Community Wellbeing' of the adopted Core Strategy (December 2010).

At this juncture it should be noted that the supporting Strategic Infrastructure Assessment (SIA) to these representations, prepared by consultants WYG, does consider that WMP will require additional infrastructure to meet the demands arising from development growth in the District. HWFRS however does not consider that additional capital infrastructure will be required in the District.

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. These issues are described below with reference to the specific tests: -

i. that it would not be economically viable to retain the site/buildings for a community use and that it has been effectively marketed for a minimum 12 month period.

The emergency services do not make decisions on whether to open or close a site/building on the basis of economic viability. It is dependant on either existing operational necessity and/or anticipated future levels of incidents requiring an emergency response.

The above point notwithstanding, there is little information provided in the SAPDPD as to what “economically viable” actually means e.g. does it refer to the costs of maintaining the building and/or does it refer to whether the existing and/or proposed use would make a profit? By their very nature, the emergency services do not operate on the basis that they are viable in the commercial sense; they exist to provide an essential public service.

Even if further clarification was provided in the SAPDPD as to what “economically viable” meant, it would be very difficult to come up with a “one size fits all” approach to accommodate all the priorities, interests, needs and aspirations of the broad spectrum of public bodies and stakeholders that it would be applied to. Any such criteria would have to be so broad as to be effectively meaningless in practical terms.

ii. that the community facility could not be provided by an alternative occupier or the local community.

This criterion is not applicable to the emergency services. The services they provide are founded on the basis of primary legislation enacted by Government. No other organisation of any kind is permitted by law to undertake the responsibilities and services that the police, fire and rescue and ambulance services deliver to, and on behalf of, the general public.

iii. that suitable alternative provision can be provided in an appropriate location.

This test is unacceptably vague as there is no objective or certain criteria by which the emergency services, or other community service providers, can ascertain what is precisely meant or required by it.

Therefore, the imposition of this test as currently drafted could potentially significantly hinder the emergency services providing new facilities and services in the future. This is because it would almost certainly act to restrict the liquidity of redundant asset(s) and potentially leave them with the on-going running costs of a vacant building(s). A pertinent issue considering that the emergency services will be required to respond to the various impacts arising from the delivery of planned development growth.

For all of the above reasons we consequently consider that Policy SAL.DPL11 is ineffective when considered against the tests of soundness in paragraph 182 of the National Planning Policy Framework.

(Continue on a separate sheet /expand box if necessary)

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

To resolve the issues described in Part 6 of these representations, we suggest that the following additional paragraph is inserted beneath the three tests in Policy SAL.DPL11: -

‘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.’

(Continue on a separate sheet /expand box if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Whilst we are of the view that these representations provide a full explanation of our concerns, we would be willing to attend the oral part of the examination should the Council and/or Inspector consider this beneficial to the proceedings.

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Andrew Morgan

Date:

12/09/12



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First Name	Andrew		
Last Name	Morgan		
Job Title (where relevant)	Strategic Planner		
Organisation (where relevant)	West Mercia Police and Hereford & Worcester Fire and Rescue Service		
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Line 3	Worcester		
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3. To which DPD does this representation relate? Site Allocations and Policies Development Plan Document (SAPDPD)
To which part of the DPD does this representation relate?

Paragraph	5.35	Policy	SAL.GPB2	Other e.g. Map, table, figure, key diagram
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4. Do you consider the DPD is :

4.(1) Compliant with the Duty to Cooperate	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(3) Sound	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

Please refer to guidance notes for explanation of terms

If you have entered **No** to 4(3), please continue to Q5. In all other circumstances, please go to Q6.

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6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

WMP and HWFRS welcome and support 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.

However, for the avoidance of doubt, the inclusion of Policy SAL.GPB2 and paragraph 5.35 in the SAPDPD does not preclude the need for the inclusion of detailed policy and guidance in respect of the evening and night-time economy in the Kidderminster Central Area Action Plan. We are not pressing for the same in the SAPDPD, given that the guidance in both consultation documents makes it clear that Kidderminster is the preferred location for this type of development.

(Continue on a separate sheet /expand box if necessary)

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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Last Name	Morgan		
Job Title (where relevant)	Strategic Planner		
Organisation (where relevant)	West Mercia Police and Hereford & Worcester Fire and Rescue Service		
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3. To which DPD does this representation relate? Site Allocations and Policies Development Plan Document (SAPDPD)
To which part of the DPD does this representation relate?

Paragraph	Policy	SAL.PFSD1	Other e.g. Map, table, figure, key diagram
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4. Do you consider the DPD is :

4.(1) Compliant with the Duty to Cooperate	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
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Businesses and communities require safe and secure environments within which to grow and flourish. Therefore, the control of crime and anti-social behaviour and reducing the fear of crime are critical to achieving economic growth and creation of strong, vibrant and healthy communities. Policy SAL.PFSD1 should therefore directly acknowledge that strong communities must be safe and secure communities.

The National Planning Policy Framework (NPPF) acknowledges and seeks to promote this point as a fundamental objective of the planning system. In this respect, paragraph 69 of the NPPF states that planning policies and decisions should aim to achieve places which promote: -

'Safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion.'

In addition to this NPPF objective, the Vision statement in Wyre Forest Core Strategy (adopted December 2010) envisages at paragraph 3.12 that crime and disorder in the District will be low and that local residents will feel safer. Development Objective 13 of the Core Strategy further states that new development must positively contribute towards crime reduction across the District for the benefit of all

residents.

It is therefore the view of WMP and HWFRS that without an explicit reference to the creation of safe and secure communities Policy SAL.PFSD1 is inconsistent with and contrary to the NPPF and adopted Wyre Forest Core Strategy (December 2010).

(Continue on a separate sheet /expand box if necessary)

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To resolve the inconsistencies described in Part 6 of these representations we suggest that Policy SAL.PFSD1 is amended as follows: -

*'Planning applications that accord with the policies **and objectives** in the DPDs...'*

(Continue on a separate sheet /expand box if necessary)

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Andrew Morgan

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First Name	Andrew		
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To which part of the DPD does this representation relate?

Paragraph	Policy	SAL.STC2	Other e.g. Map, table, figure, key diagram

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4.(2) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(3) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>

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- (3) Effective
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6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

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The proposals for how provision of police and fire and rescue services will be provided to meet current and anticipated future increases in demands in Stourport-on-Severn have progressed significantly since our previous representations in May 2011.

The purpose of these representations is therefore to update the Council and the Inspector on the current position with respect to the County Buildings. This will in turn explain why we think the current wording of Policy SAL.STC2 requires amendment to ensure its effectiveness and consequent soundness. The detailed evidence underpinning these representations is provided by the supporting Strategic Infrastructure Assessment (SIA), prepared by consultants WYG.

It is firstly important to be aware however 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 'Capital & Assets Pathfinder' (CAP) initiative.

In brief, CAP is an innovative approach to property management and ownership, based on the principles of resource sharing by partner organisations in order to achieve organisational and fiscal efficiencies, whilst at the same time maximising benefits to communities. In the case of WMP and

HWFRS this has meant jointly examining where resource use can be improved in their respective estates. An example of a typical project that has resulted from this work is the current development of a new Joint Police and Fire Station in Bromsgrove, with the existing police and fire stations disposed of to raise capital receipts and assist Bromsgrove District Council with its regeneration plans for the town through the freeing up of land.

With respect to the County Buildings (owned by Worcestershire County Council), at the time of our previous representations, it was the intention through CAP to move the Library, Health Centre, Police Station and Coroners Court from the site into a new purpose built facility. The fire station at the site, which is owned freehold by HWFRS rather than Worcestershire County Council, would however remain.

The overall objective of the above being to provide significant public benefit through strengthened service delivery by all the partners concerned and achieving value for money through efficiency gains. It was intended that the new facility would allow the partners concerned to not just meet current demands on their services, but also accommodate the expected increase in demand resulting from the delivery of planned development growth. It would also have the added benefit of replacing the County Buildings that are, as recognised by paragraph 12.10 of the SAPDDP, dated, expensive to run and will incur increasing costs to maintain over time.

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.

Although the proposals are still at the feasibility stage, the SIA submitted with these representations examines how WMP could potentially be accommodated within the Civic Centre and the costs involved in doing so. The SIA evidences the fact that the new police facility will not just have to be capable of accommodating existing demands on services from Stourport-on-Severn, but also capable of accommodating the anticipated increase in demand as development growth is delivered in the area.

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 WMP, to meet the expected increase in demand for services that is expected to arise. CIL contributions will also be required towards the up-grading of the existing HWFRS station in Stouport-on-Severn to ensure that fire and rescue service delivery to new development growth can be maintained.

Despite all of the above background, 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.

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 Stouport-on-Severn develops. The amendment to the final paragraph of Policy SAL.STC2, set out in Part 7 of these representations, is consequently required to resolve this fundamental issue.

(Continue on a separate sheet /expand box if necessary)

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

To fully resolve the issues highlighted in Part 6 of these representations and thereby ensure the effectiveness and resulting soundness of Policy SAL.STC2, we recommend the following amendment: -

*'...Proposals will need to ensure that compensatory provision is provided for the existing community uses **affected and for their expansion commensurate with development growth in Stourport-on-Severn**, if these are not to be retained on site, before considering any future redevelopment.'*

(Continue on a separate sheet /expand box if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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Signature:

Andrew Morgan

Date:

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To which part of the DPD does this representation relate?

Paragraph	12.12	Policy	SAL.STC3	Other e.g. Map, table, figure, key diagram
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4. Do you consider the DPD is :

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Please refer to guidance notes for explanation of terms

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5. Do you consider the DPD is **unsound** because it is not:

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- (4) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

As detailed in our representations with respect to Policy SAL.STC2, it is proposed to relocate WMP, the Library, Health Centre and Coroners Court from the County Buildings into a refurbished and modernised Civic Centre. The supporting Strategic Infrastructure Assessment (SIA), prepared by consultants WYG, examines why this relocation is required. At the same time, HWFRS will need to upgrade the existing fire station in Stourport-on-Severn to ensure that fire and rescue service delivery to new development growth can be maintained.

The relocation of WMP is to be undertaken as part of the 'Capital & Assets Pathfinder' (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.

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 replaced

with an alternative development?

A related issue to the above is that if WMP and other CAP partners did relocate to a refurbished Civic Centre that was then subsequently demolished and the site redeveloped, there is currently no policy provision to compensate the infrastructure/service providers affected, including WMP.

Overall therefore, as currently worded, Policy SAL.STC3 and paragraph 12.12 make no allowance for the fact that WMP will need to be accommodated at the Civic Centre site, or suitable compensation provided if the site is subsequently redeveloped, to enable policing services to continue to be delivered to Stouport-on-Severn to an acceptable standard over the lifetime of the SAPDPD. In addition, whilst it is not currently the intention of HWFRS to relocate to the Civic Centre site, it would be inadvisable in terms of sound infrastructure planning not to make allowance for the fact that this position may change during the lifetime of the SAPDPD.

In our view, all of the above this risks Policy SAL.STC3 and paragraph 12.12 being completely ineffective and consequently unsound through omitting reference to infrastructure planning for the emergency services and other CAP partners. To resolve this issue, we therefore recommend the insertion of the amendments set out in Part 7 of these representations.

(Continue on a separate sheet /expand box if necessary)

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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: -

- *Community Uses (D1 and D2, including police and fire services)*

In addition, we recommend the following amendments to paragraph 12.12: -

*'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 **in the first instance, or compensatory provision provided for such uses.** However, due to the size of the site it is considered that other development options could be provided in conjunction with future community facilities.'*

Finally, it is worth noting that incorporating the suggested amendment would also improve the consistency of Policy SAL.STC3 and paragraph 12.12 with Policy SAL.STC2, which in terms of desired outcomes are closely related.

(Continue on a separate sheet /expand box if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Whilst we consider that these representations present our case fully, we would be prepared to participate at the oral part of the examination should the Council and/or Inspector consider this beneficial to proceedings.

Please note: *The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.*

Signature:

Andrew Morgan

Date:

12/09/12



Wyre Forest District Local Development Framework – Site Allocations and Policies and Kidderminster Central Area Action Plan Development Plan Documents (DPDs) Publication Stage Representation Form

Ref:

(For official use only)

Please return to: Planning Policy Manager, Economic Prosperity and Place Directorate, Duke House, Clensmore Street, Kidderminster, Worcestershire, DY10 2JX; or by e-mailing this form to Planning.Policy@wyreforestdc.gov.uk

BY 5.30pm on Friday 14th September 2012

This form has two parts –
Part A – Personal Details
Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make and remember to specify which document it relates to. Please specify which DPD you are commenting on.

Part A

1. Personal Details*		2. Agent's Details (if applicable)	
<i>*If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.</i>			
Title	Mr		
First Name	Andrew		
Last Name	Morgan		
Job Title (where relevant)	Strategic Planner		
Organisation (where relevant)	West Mercia Police and Hereford & Worcester Fire and Rescue Service		
Address Line 1	Hindlip Hall		
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Post Code	WR3 8SP		
Telephone Number	01905 332885		
E-mail Address (where relevant)	andrew.morgan.60139@westmercia.pnn.police.uk		

Part B – Please use a separate sheet for each representation

Your representation should cover all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

After this stage, further submission will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Name or Organisation : West Mercia Police (WMP) and Hereford & Worcester Fire and Rescue Service (HWFRS)

3. To which DPD does this representation relate? Site Allocations and Policies Development Plan Document (SAPDPD)
To which part of the DPD does this representation relate?

Paragraph	1.19	Policy		Other e.g. Map, table, figure, key diagram	
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4. Do you consider the DPD is :

4.(1) Compliant with the Duty to Cooperate	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(3) Sound	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

Please refer to guidance notes for explanation of terms

If you have entered **No** to 4(3), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is **unsound** because it is not:

- (1) Positively prepared
- (2) Justified
- (3) Effective
- (4) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Paragraph 1.9 states that an Infrastructure Delivery Plan (IDP) supported the site selection process leading to the present SAPDPD publication document.

WMP and HWFRS are aware that work by Wyre Forest District Council on the IDP is taking place in partnership with Worcestershire County Council's work on an infrastructure plan for Worcestershire as a whole.

To assist the two councils with respect to emergency service infrastructure planning matters, WMP commissioned consultants WYG to undertake a Strategic Infrastructure Assessment (SIA) to identify the police infrastructure required to serve growth and identify where and when that infrastructure will be required, based on the proposals in the adopted Wyre Forest Core Strategy, Pre-submission Site Allocations and Policies DPD and the Pre-submission Kidderminster Central Area Action Plan DPD.

The SIA examines WMP's existing infrastructure in the District and the specific requirements for additional infrastructure to serve the planned growth, including the need for: -

- New estate and buildings; and

- New staff and the capital expenditure that will be required to ensure that those staff are suitably equipped to provide the required service to the planned new growth.

The SIA consequently forms an integral part of the representations package and should be read in conjunction with all the comments made.

The SIA does not detail HWFRS's infrastructure requirements, as HWFRS are not seeking the provision of additional infrastructure within the Wyre Forest District. Instead HWFRS, with the full support of WMP, want to ensure that planning policies and guidance in the District provide for the following: -

- Ensure that new developments provide adequate water supplies for effective fire fighting;
- Oblige new development to ensure that the emergency services can rapidly access all areas and buildings swiftly and safely; and
- Encourage developers to install automatic water suppression systems (such as sprinklers and water mist systems) in all new developments.

The above position is consequently reflected in all of the comments made in these representations.

Should any further information be required in relation to the SIA, the above or any other aspect of the representations, please do not hesitate to contact us.

(Continue on a separate sheet /expand box if necessary)

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

(Continue on a separate sheet /expand box if necessary)

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No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note: *The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.*

Signature:

Andrew Morgan

Date:

12/09/12

Strategic Infrastructure Assessment

Prepared on behalf of West Mercia Police

in response to pre-submission consultations

Wyre Forest District Council

Site Allocations and Policies DPD and

Kidderminster Central Area Action Plan DPD

September 2012

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Issue	Date	Status
1	07 Sept 2012	First draft to Client
2	13 Sept 2012	Final Report
3		
4		

West Mercia Police – Strategic Infrastructure Assessment

Contents Page

Preamble	7
Executive Summary	8

Part 1 – Context for the SIA

1.0	Introduction	12
2.0	Methodology for the SIA	15
	Stage 1 – Existing baseline infrastructure	17
	Stage 2 – SIA based upon ACPO formula	18
	Stage 3 – SIA based upon net requirements	18
	Stage 4 – Final SIA	19
	Stage 5 – Annual monitoring and review	19
3.0	Wyre Forest Context	20
	Background: National planning context	20
	NPPF	20
	North Worcestershire Context	21
	Development Plan in Wyre Forest	22
	Wyre Forest Core Strategy 2010	22
	Site Allocations and Policies DPD	23
	Kidderminster Central Area Action Plan DPD	23
	West Mercia Police interests	24
	Infrastructure plan	25
	Housing growth	25
	Population & Household Growth	27
	Core Strategy policies relevant to the provision of Police infrastructure	29
	Draft SAP policies relevant to the provision of Police infrastructure	30
	Draft KCAAP policies relevant to the provision of Police infrastructure	31
	Phasing	33
4.0	West Mercia Police – The Financial Context	34
	‘Planning for the Future’ – ‘Making the Difference’	34
	The Government’s Comprehensive Spending Review	35
	West Mercia/Warwickshire Police Authorities’ Strategic Alliance	35
	Interim financial conclusions	37
	Current & prospective funding mechanisms for Police infrastructure	37
	Capital & Assets Pathfinder (CAP)	39
	The Community Infrastructure Levy & S106 obligations	40
	Other infrastructure funding mechanisms	41

Part 2 - Findings of the SIA

5.0	Overview	43
	Need for Police infrastructure	43
	A - Additional Buildings & Accommodation	44
	Existing estate infrastructure in Wyre Forest (baseline)	44
	Assumptions on future infrastructure requirements	45
	Rationale for selecting sites for new estate infrastructure	46
	Requirements for new estate infrastructure	46
	Stourport-on-Severn	46
	Kidderminster	48
	Grasmere Close (Windermere House)	50
	Cost of new buildings and accommodation	53
	B – Additional Personnel set up costs	53
	Existing staff resources (baseline position)	53
	Assumptions on future personnel requirements	54
	Additional personnel requirements	54
	Additional personnel set-up costs	55
	C – Vehicles & other operational equipment	56
	Existing vehicles infrastructure (baseline position)	56
	Assumptions	57
	Additional vehicles & operational equipment requirements	57
	Cost of vehicles and other operational equipment	57
	D – Central Support Services	57
	Existing staff resources (baseline position)	57
	Assumptions	58
	Additional central support personnel required	58
	Cost of additional central support personnel required	58
6.0	Summary Findings and Conclusions	59
	Principle of requirements	59
	Impact of planned growth	59
	Police officers	61
	Vehicles	61
	Support staff	61
	Total costs	61
	Sustainable communities	62

Table Contents

Table 1 : North Worcestershire Districts Housing Growth Proposals

Table 2: Wyre Forest District : Housing Growth Summary

Table 3: Wyre Forest District : Residential Land Allocations

Table 4: Projected Population & Projected Average Household Size in Wyre Forest
- 2006-2026

Table 5: Wyre Forest Core Strategy Growth Proposals - Population & Dwellings 2006-2026

Table 6: Summary of Works and Costs Required at Kidderminster Police Station

Table 7: Summary of Built Infrastructure Requirements

Table 8: Staffing Levels – Existing and Proposed

Table 9: Staff Set Up Costs

Table 10: Vehicle and Other Equipment Costs

Table 11: Personnel Set Up Costs

Table 12: Summary of Built Infrastructure Requirements

Table 13: Summary of Total Additional Infrastructure Costs

Part 3 - Technical Appendices

Appendix 1 - Wyre Forest Additional Buildings Infrastructure Requirements & Locations

Appendix 2A – Stourport Police Post - Estimated Costs (Civic Centre Refurbishment)

Appendix 2B - Kidderminster Police Station – Estimated Costs

Appendix 3A – Churchfields (Grasmere Close) Police Post Replacement – Estimated Costs

Appendix 3B – Churchfields (Grasmere Close) Temporary Re-provision - Estimated Costs

Appendix 4 – Existing Baseline Assets

Appendix 5 – Types of WMP Buildings & Accommodation

Appendix 6 – West Mercia-Warwickshire Police Strategic Alliance

Appendix 7 – Site Maps for Kidderminster Police Station and Stourport Police Station

Appendix 8 – Home Office Guide to the Police Funding Formula

Appendix 9 – Wyre Forest Core Strategy Key Diagram

Appendix 10 - Methodology presented to the Local Authorities for consultation

Appendix 11 – WMP Capital Investment Programme

Appendix 12 – West Midlands RSS Growth Targets Information

Appendix 13 – ACPO Strategic Growth Toolkit – An Overview

Appendix 14 – WMP Medium Term Financial Plan

Preamble

WYG is an established global management and technical consultancy to the natural and built environment that works in partnership with clients in over 40 countries to help them realise their corporate and project ambitions.

WYG has significant experience in advising clients, including police and local authorities about strategic infrastructure and has previously provided advice about such matters to Thames Valley Police, Newark and Sherwood Council and East Riding Council. We specialise in preparing robust evidence base documents in support of the Local Development Framework (LDF) and Community Infrastructure Levy (CIL) processes and have previously provided advice about such matters to Thames Valley Police, Newark and Sherwood Council and East Riding Council. Our work has ranged from producing complete Infrastructure Delivery Plans (IDP) to smaller studies focused on specific aspects to help strengthen existing evidence base documents.

WYG is also supporting the Nationwide CIL Service with the preparation of a viability appraisal, draft CIL charging schedules and Regulation 123 Infrastructure List for Worthing Borough Council. Our role is to review the available infrastructure evidence base and advise the Council whether it is appropriate and robust enough to support the CIL process.

WYG Planning and Environment has been commissioned by West Mercia Police to undertake a Strategic Infrastructure Assessment to respond to the growth proposals set out in the adopted Wyre Forest Core Strategy and to complement West Mercia Police' submission in response to the consultation on the Wyre Forest Local Development Framework Development Plan Documents: the Site Allocations and Policies DPD and the Kidderminster Central Area Action Plan. This report constitutes that SIA, which examines and calculates the new infrastructure which will be required by West Mercia Police (WMP) to meet the additional demands created by the housing and population growth proposed in these documents.

It is necessarily an assessment based upon current knowledge and assumptions about housing and population growth, levels of operational policing and budgetary constraints. It is an SIA which will be monitored and reviewed annually to reflect changing circumstances and objectives.

Executive Summary

This study sets out West Mercia Police's strategic infrastructure requirements to serve the planned growth in Wyre Forest District to 2026. It seeks to identify the infrastructure required to serve the growth and identify where and when that infrastructure will be required, based on the proposals in the adopted Wyre Forest Core Strategy and the pre-submission Site Allocations and Policies DPD and the pre-submission Kidderminster Central Area Action Plan DPD.

This study examines WMP's existing infrastructure in the area and the specific requirements for additional infrastructure to serve the planned growth including the need for:

- new estate and buildings, and
- new staff and the capital expenditure that will be required to ensure that those staff are suitably equipped to provide the required service to the planned new growth.

The study has been undertaken in the context of a number of significant changes that are taking place within WMP and the wider economic situation and indeed changes to planning legislation and policy. This inevitably creates some uncertainty about the precise shape of WMP in the future. However, this SIA uses the best information available today to examine the current resources available to serve the planned growth and the additional resources that will be required to serve that growth.

The findings of the study are based on the specific requirements of WMP and the planned growth that is set out in the adopted Wyre Forest Core Strategy, the pre-submission Site Allocations and Policies DPD and the pre-submission Kidderminster Central Area Action Plan DPD i.e. the proposal to provide for 4,000 additional new homes in the district to 2026. The study examines the proposed distribution of that growth and seeks to identify the requirements for new police infrastructure to serve that growth.

The study identifies the need for 32 new staff to police the planned growth in the District based on the current and anticipated staffing levels in the near future. Of these 32 staff, 21 will be police officers and 11 will be other support staff. The staff will need to be recruited, equipped and trained and this will result in one off costs of about £254,274.

The staff and other resources will need to be accommodated in new estate to serve the planned growth. The new estate will include the re-provision of some functions of Stourport Police Station in a refurbished suite of the Civic Centre, the extension and partial refurbishment (custody) of Kidderminster Police station and one replacement Police Post at Grasmere Close/Churchfields, in the period to 2026. The cost of the new estate (excluding land) will be approximately £1.574m. This cost excludes any land or buildings acquisition because it is assumed that where necessary, the built infrastructure will be provided to WMP via s106 obligations at nil cost.

The total estimated additional infrastructure costs to meet the planned growth of 4,000 dwellings proposed in the draft SWDP are shown in the following table:

Summary of Total Additional Infrastructure Costs

	Current (net) cost for planned growth (4,000 dw)	Reference from main report
Additional buildings and enhanced accommodation	£1,574,313	Table 7
Additional Officers (set-up costs for 21no. officers)	£76,482	Table 8
Additional vehicles and other operational equipment	£148,070	Table 9
Additional central support staff (set up costs for 11no. support staff)	£29,722	Table 10
Total infrastructure cost	£1,828,587	

On the basis of the adopted Core Strategy additional dwelling requirement of 4000 new houses (2006 – 2026), this overall cost equates to about £457 per dwelling or £5.71 per square metre of residential development (if an average dwelling were about 80 square metres, typical of a new 3 bed house). However, on the basis that only 1465 dwellings remain to be granted planning permission in the Plan period to 2026, the cost per dwelling rises to approximately £1248 and the cost per square metre of residential floorspace to approximately £16.60.

The funding for this additional Police infrastructure necessitated by the additional population growth in Wyre Forest District will need to be secured via s106 obligations and the Community Infrastructure Levy.

WMP is keen to play its role in helping to ensure that the planned growth in Wyre Forest District comes forward in a sustainable way and will require additional funding or alternative provision, via s106 obligations and the Community Infrastructure Levy to ensure that this is possible.

Part 1

Context for the SIA

1.0 Introduction

- 1.1 Wyre Forest District Council adopted its Core Strategy DPD in December 2010. Core Strategy Policy DS01 provides for some 4,000 net additional dwellings between 2006 and 2026. In terms of the indicative location of new dwellings, the Core Strategy indicates that 60% will be provided in Kidderminster, 30% in Stourport-on-Severn and the remaining 10% will be provided in Bewdley and the rural areas.
- 1.2 In July 2012, the Council published the Site Allocations and Policies DPD (SAP) and the Kidderminster Central Area Action Plan DPD (KCAAP) for consultation. Together with the Core Strategy, these documents have informed this SIA.
- 1.3 The Site Allocations and Policy DPD notes that of the 4,000 additional dwellings required by the Core Strategy, 1,254 were completed between April 2006 – March 2012, leaving a balance of 2,746 dwellings to be provided between April 2012 and March 2026. This represents an annual build rate of 196 dwellings per annum. No population estimates have been included; however, according to projections produced by Worcestershire County Council, the population of the district will rise from 97,826 in 2006 to 98,745 in 2011 and to 103,695 in 2026¹. This represents an increase of 5,860 over the plan period and 4,950 between 2011 and 2026.
- 1.4 This scale of population and household growth will have implications for the providers of social infrastructure throughout the area, in terms of additional demands being placed upon their services. West Mercia Police (WMP) is one such provider of social infrastructure.
- 1.5 In order to fulfil its statutory obligations to ensure the proper and effective policing of an increased population and geographical urban expansion, WMP will require additional capital funding to make provision for new strategic infrastructure in Wyre Forest District. This infrastructure will include:
 - buildings and accommodation²
 - personnel set-up costs³
 - vehicles and other operational equipment, and

¹ Based on ONS mid year estimates 2006-10 and ONS 2010 population projections.

² A description of the various WMP property types is included in Appendix 5

³ Set-up costs within Territorial Policing Units and centrally based Protective Services, i.e. their recruitment, training and personal equipment

- central support services including personnel in operational support, human resources and corporate services.

- 1.6 In order to calculate the nature and scale of this additional infrastructure requirement, WYG Planning and Environment has undertaken a Strategic Infrastructure Assessment (SIA), the subject of this report. A methodology for this SIA was formulated in consultation with officers of the Worcestershire local planning authorities including Wyre Forest District Council and Worcestershire County Council, and received their endorsement prior to the assessment being undertaken.
- 1.7 Using the peer group endorsed methodology, this SIA quantifies the new strategic infrastructure that will be required and its approximate phasing in relation to the development growth. This includes new premises to serve development growth in the district. The capital cost of providing this new infrastructure is quantified, using established WMP data and the analyses of WYG's professional quantity surveying consultants. From the total estimated capital cost, calculations have been made of the cost per new dwelling and per capita in terms of the additional population.
- 1.8 The SIA methodology uses WMP primary data and comparable organisation secondary data⁴, to establish an existing baseline position. It then makes moderated projections of what infrastructure will be required in the future to 2026 and the capital costs of providing that infrastructure. The methodology uses sufficiently detailed data to ensure accuracy and credibility whilst avoiding complexity in the way the data is used and interpreted. It is a straightforward and accessible method for the purposes of the SIA. The methodology is described in detail at Section 2 below.
- 1.9 WYG and WMP are confident that the resultant SIA presents robust findings of the additional new infrastructure requirements and their capital costs, based upon currently available knowledge and data. These findings are commended to Wyre Forest District Council as the local planning authority, as an important element of the evidence base for the LDF and the forthcoming formulation of the associated Community Infrastructure Levy regime. Policy CP07 of the Wyre Forest DC Core Strategy (adopted December 2010) makes provision for developer contributions for social infrastructure, including emergency services facilities and services. In

⁴ Thames Valley Police (TVP) data has been used in exceptional instances; TVP are in the same CIPFA family grouping of Police Authorities

this regard, WMP as a partner organisation is committed to engaging with the planning process and to working collaboratively with Wyre Forest District to ensure that planned growth is supported by appropriate infrastructure to create sustainable communities in which people feel safe and which can be policed in the most efficient and effective way.

2.0 Methodology for the SIA

- 2.1 It is important that the methodology employed in the preparation of the SIA is clear, logical and readily understood. It should also be capable of replication across WMP's policing area. It will form part of the evidence base for Development Plan Documents – in this case the Wyre Forest SAP and the KCAAP. It is necessarily robust, in order to withstand scrutiny at public examination.
- 2.2 The methodology summarised below was originally the subject of prior consultation with the Worcestershire Local Planning Authorities on the afternoon of 16th May 2011. The matter was also an item on the agenda of a subsequent meeting of the Worcestershire Infrastructure Steering Group at the county council offices on 25th May, 2011. Following a presentation of the draft methodology, comments and questions were invited and this led to a useful round table discussion which resulted in some refocusing of the methodology. One written comment was received following the meeting. Generally, the WMP initiative and the methodology were welcomed by all the local authorities⁵.
- 2.3 The first of the SIAs for WMP to be completed was the South Worcestershire SIA (November 2011), which has been accepted in the main as a useful, credible and robust document. Worcestershire County Council (WCC) has published recently a consultation document "Planning for Infrastructure in Worcestershire" (Version 2 Draft, June 2012) in which the SIA is referenced. Section 4, 'Infrastructure Requirements' has a sub-section devoted to the Emergency Services (page 105) in which it is noted that WMP has engaged positively with planning policy teams throughout the county, but that new infrastructure schemes are progressing ahead of development plan documents. It is recognised that limited contributions are therefore being received by emergency service infrastructure providers, as reference is being made to currently adopted local planning policies which did not include reference to this type of infrastructure. The schedule of infrastructure requirements identified by the SIA is summarised and the total funding gap of £6.271m is referenced.
- 2.4 This reference to the findings of the SIA is repeated but in a greater level of detail, in the WCC evidence base document "Planning for Infrastructure in Worcestershire - Needs and Issues Research Paper" (June 2012), which was published alongside the above consultation document. Chapter 11 is devoted to the Emergency Services and extensive reference to the findings of the

⁵ A copy of the generic methodology presented to the Local Authorities for consultation is included at Appendix 10

SIA are detailed (pp 148 – 161). Essentially, the infrastructure requirements of WMP as detailed in the SIA are recognised fully.

- 2.5 With specific reference to South Worcestershire, a further document entitled “South Worcestershire Infrastructure Development Plan – Interim Position Statement” (SWIDPIPS) is also currently subject to consultation. SWIDPIPS is complementary to the work undertaken by WCC and its ‘Planning for Infrastructure’ documents (above), which are described as ‘joined-up and parallel work streams’. The SWIDPIPS, Appendix Y, Section E, provides a schedule of WMP infrastructure requirements for South Worcestershire which mirrors the content of the WCC documents and the findings of the WMP SIA November 2011. The WMP SIA is more extensively covered in Section 5E of the SWIDPIPS (pp 44 & 45), in which there is acceptance of the SIA methodology as being robust and credible.
- 2.6 For the purposes of the previous SIA for WMP in South Worcestershire, the impending revision to the ACPO formula⁶ and availability of other data caused a variation in approach to this methodology. The methodology is summarised below.
- 2.7 The broad approach has been to base the requirements for new Police infrastructure to serve the planned growth in the area on:
- the planned growth proposals in Wyre Forest District
 - a review of the capacity of the Police’ existing estate to serve that growth
 - the requirement for new strategic Police infrastructure to serve that growth, and
 - the capital costs of providing that new infrastructure.
- 2.8 This approach sought to examine the overall cost of providing the new additional infrastructure, necessitated by growth, on a “per dwelling” basis. This enabled the overall costs to be spread across the South Worcestershire area. We took the approach of spreading the costs evenly across the study area rather than seek to identify specific costs for specific areas of the planned growth. This is because WMP deploy their resources across a wide area. This modified methodology was recognised as being robust and credible, given the inclusion of the South

⁶ The ACPO formula is a methodology devised by the Association of Chief Police Officers (ACPO) to determine the unit costs of additional policing attributable to development growth.

Worcestershire SIA findings in subsequent WCC and South Worcestershire Development Plan infrastructure planning documents.

2.9 We have therefore replicated this approach for the present Wyre Forest SIA. Whilst the ACPO formula has now been revised, it is a tool chiefly for internal police use only. It is essentially a crime incident based formula as opposed to population growth based formula. It requires data at a local authority level rather than a Territorial Policing Unit (TPU) level (North Worcestershire), which is not available for Wyre Forest.

2.10 For these reasons and to provide for a consistency with the South Worcestershire SIA, we have not undertaken Stage 2 of the methodology, which in any event provided only a sense check.

2.11 In summary the SIA methodology therefore comprises the following stages:

Stage 1 - Existing Baseline Infrastructure

2.12 Stage 1 provides an assessment of the existing police infrastructure and consists of a high-level inventory of WMP's significant infrastructure assets. These include property, equipment, vehicles, and other assets within Wyre Forest District. WMP hold detailed inventories and these have been interrogated to enable a comprehensive database to be compiled. Any existing key deficiencies in infrastructure are identified on the basis of zero growth (to establish a baseline position) but in recognition of PFTF, Making the Difference, and WMP's Strategic Alliance with Warwickshire Police.⁷ These initiatives will have an impact on the way Wyre Forest District is policed and on the infrastructure that will be required.

2.13 This information collected has identified any asset/floorspace capacity likely to be yielded by workforce reductions as a result of Making the Difference. This includes property assets scheduled for disposal. A calculation is then made of the extent of any net capacity/under-capacity arising from the above.

2.14 WMP's capital investment programme is also reviewed as part of this exercise⁸.

⁷ WMP commenced a structural review its organisation entitled "Planning for the Future" (PFTF) in September 2009 in anticipation of a more difficult financial climate. Detailed recommendations were agreed by the Chief Constable and WMPA, and the implementation phase commenced in September 2010 – "Making the Difference". An exploration of the opportunities for collaborative working between forces to enable more efficient and effective policing has led to a Strategic Alliance with Warwickshire Police.

⁸ A summary of WMP's Capital Investment Programme is included in Appendix 11.

Stage 2 - SIA based upon ACPO formula

- 2.15 As noted above this stage has been deemed unnecessary and has not been part of this SIA.

Stage 3 - SIA based upon net requirement

- 2.16 This stage of the SIA considers the infrastructure that will be required to police the new development proposed in Wyre Forest. It is informed by the scale of growth provided for in the Core Strategy and distribution/location of the proposed development as set out in the SAP and KCAAP. It also takes into account WMP's programme for the disposal of assets that are no longer required, of which there are none in Wyre Forest District. It includes moderation of the strategic infrastructure requirements by acknowledging existing deficiencies in infrastructure, spare capacity (from stage 1) and potential disposal receipts.
- 2.17 A schedule of infrastructure requirements has then been compiled based upon net requirements.

Residential Development

- 2.18 The infrastructure costs which have been identified are directly related to the planned growth in the number of dwellings in the study area. We have not differentiated the capital cost across different dwelling sizes at this stage because there are no detailed proposals for a specific mix of housing in any draft policies. The figure that we have prepared is therefore an average figure across a range of dwelling types and sizes.
- 2.19 The introduction of the CIL will, in any event, require that charges are imposed on a cost per square metre of new development. It will therefore be necessary to agree a CIL charge per square metre of residential development to fund police infrastructure in due course.
- 2.20 For the purposes of calculating the average cost per dwelling we have assumed an average floor area of 80 square metres, related to a typical 3 bed dwelling.

Commercial Development

- 2.21 There are significant proposals for leisure and tourism development which will create an attendant need for additional custody facilities and this is explored more fully at paragraphs 3.43 to 3.50 below.

2.22 We have assumed that the planned growth in employment is directly related to the planned growth in new dwellings and have therefore sought to establish a cost per dwelling (and cost per square metre of residential floor area), rather than cost per square metre of employment development.

2.23 Furthermore, although CIL will be chargeable on most development, of the Councils who have already published (or adopted) their draft Charging Schedules, the majority are not proposing to impose a CIL charge on employment development (B1, B2, and B8 uses). The majority are proposing to focus the CIL charge on residential and retail/leisure development.

Stage 4 – Final SIA

2.24 The final SIA includes a spatial representation of new building infrastructure requirements.

2.25 All potential sources of funding for the provision of new police infrastructure are identified and a calculation of the funding gap on individual projects is made. This gap will potentially need to be funded through CIL or s106 obligations.

2.26 The SIA includes also, an indication of the phasing of provision insofar as it is known.

Stage 5 – Annual monitoring and review

2.27 The SIA will be subject to annual review and will be amended in the light of changing circumstances. Any amendments will be the subject of discussion with the local authority partners.

3.0 The Wyre Forest Context

Background: national planning context

- 3.1 The provisions of the Localism Act 2011 pave the way for the revocation of the Regional Spatial Strategy, although this has yet to be implemented. However, prior to the government announcing its intention to revoke regional strategies, the emerging West Midlands Regional Spatial Strategy Phase 2 Partial Review had reached examination stage⁹. The Wyre Forest Core Strategy was prepared in accordance with the then emerging West Midlands Regional Spatial Strategy (WMRSS) and stated that the emerging WMRSS provided the regional context in relation to future residential, employment, office and retail development.
- 3.2 The Localism Act 2011 provides for future decisions on housing and other targets to be made locally. Local planning authorities are responsible for formulating development plan documents (DPDs) based on a sound evidence base supported by the appropriate technical studies. This SIA will be one such study.

NPPF

- 3.3 The National Planning Policy Framework (NPPF) was published in March 2012 and sets out a presumption in favour of sustainable development. It notes that local plans must be prepared with the objective of contributing to the achievement of sustainable development in each of its three dimensions - economic, social and environmental. Whilst replacing all PPSs and PPGs (except the Waste PPS), the NPPF carries forward the provisions relevant to policing, particularly those set out in PPS1, PPS3 and PPS12.
- 3.4 NPPF advises that the social role of planning encompasses contributing to strong, vibrant and healthy communities by providing, inter alia, accessible local services that reflect the community's needs and support its health, social and cultural well-being.
- 3.5 The need for planning policies to ensure the creation of safe and accessible environments, where crime and disorder, and the fear of crime, do not undermine quality of life or social cohesion is referenced in paragraph 58 and similarly in paragraph 69, whilst the need for strategic policies to deliver, inter alia the provision of security infrastructure is set out in paragraph 156.

⁹ A summary of the growth targets envisaged in the emerging RSS is included at Appendix 12 for comparative purposes.

- 3.6 Paragraph 157 states that local plans should be based on co-operation with neighbouring authorities, public, voluntary and private sector organisations. It advises that local authorities should work with other authorities and providers to assess the quality and capacity of infrastructure and its ability to meet forecast demand and take account of the need for strategic infrastructure in their area.
- 3.7 Defence, national security, counter-terrorism and resilience are considered in paragraph 164. This notes the need for local authorities to take advice on these matters from the relevant organisations and advisors.

North Worcestershire Context

- 3.8 Kidderminster Police Station will be refurbished and extended to accommodate operational requirements that have a strategic function across the North Worcestershire TPU (Wyre Forest District, Bromsgrove District, Redditch Borough) e.g. custody facilities and the Major Incident Unit (MIU). Each authority could be reasonably expected to contribute to the costs of providing this infrastructure.
- 3.9 The most recent documents which provide information on future growth in Bromsgrove District and Redditch Borough are the Bromsgrove District Council Draft Core Strategy 2 (January 2011) and the Redditch Revised Preferred Draft Core Strategy 2011 (which is now to be incorporated in a new Local Plan No.4). The former provides for approximately 4,000 new dwellings in Bromsgrove between 2006 and 2021. The latter provides for 2,200 new dwellings to be built in Redditch between 2011 and 2026.
- 3.10 Across the TPU there will be growth amounting to approximately 11,200 new dwellings. Since the extended Kidderminster Police Station will be a strategic facility to serve the three districts, it would be reasonable to apportion the costs of its provision pro rata to the number of dwellings to be provided in each district as shown in the following table.

Table 1: North Worcestershire Districts' Housing Growth Proposals

District	Dwellings to be provided (Approx)	% of total dwellings
Bromsgrove	4,000	36
Redditch	3,200	28
Wyre Forest	4,000	36
North Worcestershire TPU	11,200	100

- 3.11 It would therefore be reasonable to apportion 36% of the costs of the extension to Kidderminster Police Station to growth planned for Wyre Forest District.

Development Plan in Wyre Forest

- 3.12 Wyre Forest District Council adopted its Core Strategy in December 2010. It covers the period 2006 – 2026. This document forms part of the statutory development plan for the District. It largely supersedes the 2004 Adopted Local Plan, although a few policies of the 2004 plan remain in force until the emerging DPDs are adopted. The Core Strategy Key Diagram, which covers the whole District, is reproduced at Appendix 9.

- 3.13 The statutory development plan for Wyre Forest District currently comprises:

- the West Midlands Regional Spatial Strategy (on which the previous assessments of infrastructure requirements have been made);
- “saved” policies of the Worcestershire County Structure Plan
- The Core Strategy 2010
- “saved” policies in the 2004 Local Plan

- 3.14 Although there will be some “saved” policies in other development plan documents that remain in force alongside the Core Strategy and emerging DPDs, the focus of this SIA document is on the proposals for growth within Wyre Forest District, set out in the Core Strategy, SAP and KCAAP. It will further inform future DPDs and SPDs the Council may produce.

Wyre Forest Core Strategy 2010

- 3.15 Wyre Forest District Council adopted its Core Strategy DPD in December 2010. The Adopted Core Strategy identifies that Wyre Forest District Council needs to plan for the following quantum of development from 2006 – 2026:

- Residential: 4,000 dwellings (District wide)
- Employment Land: 44 ha (District wide)
- Retail Space: 25,000 sq m (Kidderminster)

- Office Space: 40,000 sq m (Kidderminster)

3.16 The Council is currently consulting on the pre-submission SAP and KCAAP which, when adopted, will form part of the Development Plan for the District.¹⁰ These DPDs contain more detailed proposals on the distribution of development and identify housing and employment sites to meet the required quantum of development proposed in the Core Strategy. The preparation of this SIA has only been possible since the publication of these DPDs, as without information on the geographical distribution of new housing, the additional built infrastructure requirements for WMP could not have been assessed.

Site Allocations and Policies DPD

3.17 The SAP notes that, of the 4,000 dwellings that the Core Strategy indicates will need to be provided in the District up to 2026, and taking account of dwellings completed since 2006, dwellings under construction and dwellings with planning permission, sites will need to be identified through the site allocations process for an additional 1,465 dwellings¹¹.

3.18 In accordance with the Development Strategy of the Adopted Core Strategy the focus is for residential sites to be allocated on previously developed land, with particular emphasis on Kidderminster and Stourport-on-Severn.

3.19 For employment land, taking account of completions and commitments, the amount remaining to be identified through the site allocations process is approximately 17 ha¹².

Kidderminster Central Area Action Plan DPD

3.20 The KCAAP focuses primarily on the opportunities for regeneration and redevelopment in and adjacent to Kidderminster Town Centre. Since 2009 the District Council has been working in partnership with key regeneration bodies to progress the ReWyre Initiative. Its focus is to promote and improve Kidderminster. The role of the KCAAP is to provide a detailed planning policy framework which sets out the strategy and policies for the development of the town's central area, and helps to achieve this regeneration. It promotes sustainable growth for the

¹⁰ These consultation documents are available at <http://www.wyreforestdc.gov.uk/cms/non-ignl-pages/planning-and-regulatory-servic/planning-policy/sal-dpd.aspx> and <http://www.wyreforestdc.gov.uk/cms/non-ignl-pages/planning-and-regulatory-servic/planning-policy/kcaap-dpd.aspx>

¹¹ Paragraphs 2.13 and 2.14 and related table in the SAP

¹² Paragraphs 2.15 and 2.16 of the SAP

town and encourages the investment and economic, social and environmental development needed to make Kidderminster a prosperous and quality place.

3.21 In terms of housing, the objectives of the KCAAP are to:

- Increase the amount of people living within the town centre
- Regenerate Churchfields as a housing-led urban village
- Create a sustainable and balanced community meeting a variety of needs
- Create a safe environment which reduces opportunities for crime

3.22 In addition to the guidance for Churchfields set out in the KCAAP, the District Council has also produced the Churchfields Masterplan Supplementary Planning Document. The Masterplan provides a detailed design framework to help guide future development in this area.

West Mercia Police interests

3.23 West Mercia Police's interest in the Core Strategy, SAP and the KCAAP is fivefold:

- understanding the planned growth within the area to ensure that its resources are directed to meet the additional demands created by this growth
- securing appropriate contributions (financial and otherwise) via either planning obligations or the Community Infrastructure Levy, from new development approvals, towards the new infrastructure which will be required to support its operations in meeting the demands of the growth
- securing the allocation of land to accommodate the requirements of its estate
- informing the Infrastructure Delivery Plans, which we understand are being prepared by WFDC to support the SAP and the KCAAP and also Worcestershire County Council's county-wide IDP
- seeking policies which recognise and promote community safety as a key aspect of urban design and sustainable development.

3.24 It bears repetition to emphasise that, WMP are committed to engaging with the planning process and to working collaboratively with Wyre Forest District Council to ensure that planned growth is

supported by appropriate infrastructure in order to create sustainable communities in which people feel safe and which can be policed in the most efficient and effective way.

Infrastructure plan

- 3.25 In parallel with the preparation of the SAP and the KCAAP, the Council is working in partnership with Worcestershire County Council to identify the infrastructure which will be required to support these plans. In turn this will inform the Infrastructure Delivery Plan currently being prepared by WFDC. Moreover, under the Capital & Asset Pathfinder initiative, which supports collaborative working between public sector organisations, WMP has engaged positively with both WCC and WFDC to explore potential efficiencies (see para.4.29 below).
- 3.26 Earlier studies commissioned by Worcestershire County Council identified infrastructure requirements required as a result of growth proposals set out in the emerging RSS. These included WMP's estate requirements as was determined at that time.
- 3.27 It is important to note that whilst the infrastructure study demonstrated the need for new buildings to serve the planned growth, it did not identify the additional personnel, equipment and central support and specialist services which will be required, nor did it guarantee funding for that infrastructure. This would have to be secured via the CIL, planning obligations and other sources of funding.

Housing growth

- 3.28 As noted above, the Wyre Forest Core Strategy sets out proposals to develop 4,000 dwellings between 2006 and 2026. The SAP notes that sites for 1,465 new dwellings need to be identified over the remainder of the period to 2026. The SAP therefore sets out the following proposals for housing growth:

Table 2: Wyre Forest District: Housing Growth Summary

Total dwelling Requirement 2006 to 2026 (Approx)	Balance to be Provided to 2026 (Approx)	Dwellings with planning permission	Balance yet to be granted planning permission
4,000	2,746	1,281	1,465

- 3.29 The proposals for the area are shown diagrammatically in the Core Strategy Key Diagram¹³
- 3.30 The SAP identifies sites for approximately 1,900 dwellings, which more than meets the requirement to provide for 1,465 dwellings up to 2026. The SAP notes that this will allow some flexibility in the event that some allocated sites do not come forward. The SAP makes the following allocations:

Table 3: Wyre Forest District: Residential Land Allocations

Location	Approximate number of dwellings	Indicative Timetable
KCAAP Sites		
Churchfields	600	2001-21
Eastern Gateway	130	2016-21
Western Gateway	100	2011-26
Crossley Park and Mill Street	30	2016-21
Castle Wharf	50	2016-21
Heritage Processions	25	2016-21
Oldington and Foley Park		
Former British Sugar Site	320	2011-21
Oasis Arts & Crafts and Reilloc Chain	100	2016-21
Rifle Range Shops and Musketeer PH	23	2021-26
Northumberland Avenue Surgery	10	2011-16

¹³ The Key Diagram is included at Appendix 9

Location	Approximate number of dwellings	Indicative Timetable
Elsewhere in Kidderminster		
Broadwaters Community Centre	10 (Affordable housing)	2011-16
Chester Road South Service Station	20	2021-26
Blakebrook School and County Buildings	50 Mixed use	2016-21
Stourport on Severn		
Eastern Approaches	450	2011-26
Town Centre and Adjacent Sites	120	2011-26
Western Gateway	130	2011-16
Queens Road Shops and Garages	15	2016-21
Robbins Depot, Manor Road	12	2016-21
Bewdley		
Load Street Redevelopment Area	16	2016-21
Lax Lane	10	2021-26
Former Workhouse, High Street	6	2011-16
Rural Sites		
Blakedown Nurseries	42	2011-16
Land at Clows Top	30	2011-16

Population and household growth

- 3.31 The Core Strategy, SAP and KCAAP make no explicit reference to population forecasts for the District. According to projections produced by Worcestershire County Council, the population of

the district will rise from 97,826 in 2006 to 98,745 in 2011 and to 103,695 in 2026¹⁴. This represents an increase of 5,860 over the plan period and 4,950 between 2011 and 2026.

- 3.32 ONS has recently released “headline” population statistics at district level from the 2011 Census. This indicates that in 2011, Wyre Forest had a population of 98,000 in 43,000 households, producing an average household occupancy of 2.28 persons per household. The Census figures indicate that the population of the District is slightly lower than the 2010 projections but with a slightly higher average occupancy; (the 2010 projections indicate an average occupancy rate of 2.25).
- 3.33 Worcestershire County Council will in due course be producing revised population forecasts using 2011 Census data; however these will not be available until 2013. At present therefore the estimates provided above represent the best available information and the current forecasts are summarised in Table 4 below:

Table 4: Projected Population and Projected average household size in Wyre Forest, 2006 - 2026

	2006	2011	2016	2021	2026
Total population ¹⁵	97,826	98,745	100,381	102,109	103,695
Average household size ¹⁶	2.30	2.25	2.20	2.15	2.11

- 3.34 In parallel with the population growth, there will (according to the above projections), be a growth in the number of households of 6,612 over the plan period (a 15.6% increase). This is more than is planned for in the Core Strategy, SAP and KCAAP.
- 3.35 The increase in the number of households reflects changes due to people living longer, often in single elderly households, and trends in relationship break-ups, resulting in more, smaller households.

¹⁴ Based on ONS mid year estimates 2006-10 and ONS 2010 population projections.

¹⁵ Based on ONS mid-year estimates 2006-10 and ONS 2010-based population projections

¹⁶ Based on DCLG estimated household population and household numbers and DCLG 2008-based household projections

- 3.36 Both the scale of growth planned and its geographical distribution will have implications for WMP and its resources. WMP has a statutory duty to ensure adequate policing¹⁷. New development has an impact on policing, and there is a commensurate requirement for infrastructure to enable and support the police in carrying out their statutory duties. At c.4,000 new households accommodating c.6,000 new residents in Wyre Forest to 2026, the attendant increase in demands upon the services provided by WMP is of operational significance. It is a demand which has to be met. This SIA utilises this core data of new household provision and population projection data as the basis for calculating strategic infrastructure requirements.
- 3.37 In addition to the growth in population and households, the Core Strategy and emerging DPDs set out proposals for the provision of new employment sites and policies which aim to increase the potential for growth in tourism and to boost the night time economy (notably in Kidderminster Town Centre). These activities, particularly the growth of the night time economy will also have an impact on the services provided by WMP.

Core Strategy policies relevant to the provision of police infrastructure

- 3.38 The Core Strategy contains recognition of the importance of community safety and the need for infrastructure for the Police:
- Paragraph 2.2 sets out the key issues and challenges that set the context for the Strategy's vision and objectives and the core policies. Under the theme of A Desirable Place to Live, one of the challenges is "How can new development help to alleviate the high levels of concern amongst local residents in relation to crime?"
 - The Core Strategy includes reference (at paragraph 3.12) in its vision for the District that crime and disorder will remain low and local residents will feel safer.
 - Policy CP07: Delivering community well-being supports the provision of community infrastructure and requires new development proposals to contribute towards the retention and formation of sustainable communities within the District. It indicates that developer contributions will be required for social infrastructure including health and

¹⁷ Complementary to this is the obligation established in the Crime & Disorder Act 1998 for Local Authorities to introduce a range of measures to prevent crime and disorder. There is a statutory duty on all local authorities (under s17) to ensure community safety is considered when exercising its functions. This is reinforced by Section 1 of the Police and Social Responsibility Act 2011 which requires the Police and Crime Commissioners to secure an effective and efficient Police Force for their area.

community safety (includes emergency services) facilities and services. However the indicative infrastructure schedule in Appendix B of the Core Strategy does not contain any infrastructure requirements relating to Police infrastructure or facilities, although it is noted that this schedule is intended as a guide not a definitive list of requirements.

- Policy CP11: Quality design and local distinctiveness addresses the issue of designing out crime and indicates that developers will be required to demonstrate how their proposals address community safety and crime prevention in Design and Access Statements.
- Similarly Objective 13 of the Development Objectives seeks to “maximise community cohesion and safety and ensure new developments positively contribute towards crime reduction across the District for the benefit of all residents”.
- The importance of community safety is highlighted in paragraphs 9.12 and 9.13. These paragraphs note that even low levels of anti-social behaviour and fear of crime can have a significant impact on people’s lives and community cohesion. It is also noted that whilst the design of the local environment can contribute to community safety and crime reduction, tackling crime requires other mechanisms.

3.39 Whilst the Appendix B of Core Strategy contains infrastructure schedules, it does not note any specific police infrastructure requirements. However paragraph B3 states that more detailed information on infrastructure requirements including emergency infrastructure will inform the Site Allocations and Policies and Kidderminster Central Area Action Plan DPDs.

Draft SAP policies relevant to the provision of police infrastructure

3.40 Policy SAL.STC2 is a site specific policy relating to two linked sites in Stourport – Tan Lane and County Buildings. Both sites are considered to have potential for redevelopment. Stourport Police Station is currently located within the County Buildings complex, together with a range of community uses. The policy states that proposals will need to ensure that compensatory provision is provided for the existing community uses, if these are not to be retained on site, before considering any future redevelopment.

3.41 Policy SAL.STC3 relates to the Civic Centre site. The policy notes that, following the Council’s move to a new headquarters in 2012, this site has the potential to provide a mix of uses including community use. The policy allows for consideration of a range of alternative uses.

- 3.42 Under the Capital & Asset Pathfinder initiative, which supports collaborative working between public sector organisations, WMP is in discussion with Wyre Forest District to secure space in the Civic Centre as a replacement facility for the existing police station currently located in the County Buildings and costs have been included in the SIA to enable this to proceed. In the event that the Civic Centre site is redeveloped, we have assumed that suitable alternative provision will be made elsewhere for WMP at no additional cost.

Draft KCAAP policies relevant to the provision of police infrastructure

- 3.43 The Strategic Objectives for the KCAAP include to “Ensure the town is safe and enjoyable for all users” (Objective 12). Similarly, the Vision for Kidderminster town centre states “The town centre will be a vibrant, attractive and safe environment in which people wish to spend their time at all times of the day and night, taking advantage of a variety of retail, leisure, learning and employment opportunities”.
- 3.44 In terms of overall housing objectives, the KCAAP includes the objective which seeks to “create a safe environment which reduces opportunities for crime” (see page 13). Similarly, under mixed use development objectives, there is an objective which seeks to “create a safe and secure environment which reduces opportunities for crime” (see page 15).
- 3.45 The theme of promoting and enhancing a mix of retail (including food and drink), leisure and tourism activities permeates the Plan. The Tourism objectives seek to encourage tourist attractions accommodation and facilities and promote Kidderminster as a tourism hub for the District. Similarly, the Leisure Objectives aim to encourage new leisure developments and improve the evening economy.
- 3.46 These leisure objectives are translated into Policy KCA.GPB7 which supports new leisure developments both major and small-scale and specifically encourages developments that enhance the evening and night time economy. Supporting text at paragraphs 5.66 – 5.70 amplifies the Council's approach and notes that at present Kidderminster Town Centre is quiet during the evenings and provides opportunities for anti-social behaviour. It continues by suggesting that an increase in evening activity will improve natural surveillance.
- 3.47 While more activity may have this desirable effect, it is also the case that an increase in the number of leisure activities available during the evening, particularly those where alcohol is sold, will certainly require an increased level of policing. WMP's experience elsewhere and indeed that of other forces nationally confirm that there will be a significant increased demand on resources,

especially the need for additional custody facilities. Custody facilities for Wyre Forest District are provided at Kidderminster Police Station (TPU HQ).

- 3.48 In Telford, where WMP made representations on the Central Telford Action Area Plan (CTAAP) and subsequently provided evidence to the Inquiry, based on the inadequate recognition in the plan of the issues associated with the growth of the night time economy and the lack of a policy framework for their management, led the Inspector to conclude that both supporting text and policy changes should be made to address WMP's concerns.
- 3.49 The Inspector noted in Paragraph 31 of his report that "It is an aspiration of the CTAAP to develop a night time economy and there are proposals to do so but as submitted there were no policies or proposals for its management to avoid the well-known downsides of such activities". He concluded that a number of amendments, including those put forward by WMP were necessary to make the plan sound.
- 3.50 As a result the CTAAP was amended to include a policy to secure developer contributions for delivering infrastructure to support the development proposals for the town centre. The range of infrastructure to be provided under Policy CT23 of the CTAAP includes both site related and strategic infrastructure for a range of social infrastructure providers and specifically includes the police. The Plan was adopted in March 2011.
- 3.51 Finally, the KCAAP notes that the Churchfields area, for which a Masterplan was developed in 2011, is one of the District's biggest housing-led regeneration opportunities. It is envisaged that this area could provide up to 600 new homes. Policy KCA.Ch1 deals with the Churchfields area, which is to be developed in conformity with the Masterplan which has been adopted as SPD. It notes that the priorities for Planning Obligations are also set out in the SPD. Paragraph 9.12 notes that contributions will be sought for a range of important infrastructure, including emergency services facilities.
- 3.52 Policy KCA.Ch2 deals with the Grasmere Close site, which is to be cleared and redeveloped and forms Phase 1 of the Churchfields regeneration project. The site currently contains three tower blocks, one of which houses a police post. WMP will therefore need alternative premises within the wider Churchfields area as a replacement for current provision but also to serve the larger new community. It is noted that the Churchfields Masterplan SPD (Section 10 – Funding mechanisms) provides for s106 contributions for "Upgrade of Police Post". Clearly this will involve replacement premises as the current premises are to be demolished.

Phasing

- 3.53 The Churchfields Masterplan indicates that the Grasmere Close area will form Phase 1 of the regeneration project. The existing police post will be demolished as part of this phase. A temporary police post re-provision may be required if permanent premises are not immediately available.

4.0 West Mercia Police – the Financial Context

‘Planning for the Future’ and ‘Making the Difference’

4.1 In December 2009 the previous Government published a White Paper, ‘Protecting the Public: Supporting the Police to Succeed’, which anticipated a much more difficult financial climate in the years ahead for police forces. In response, WMP commenced a full structural review of its entire organisation entitled ‘Planning for the Future’ (PFTF, September 2009). The objectives of the review were to:

- Structure the Force to deliver a new mission, values and outcomes
- Further improve the policing service provided to the public
- Deliver better value for money
- Generate significant cost savings, and
- Make strategic investments

4.2 In 2010 in response to PFTF, new ways of working were identified in relation to six key work streams:

- Territorial Policing
- Protective Services
- Services to the Public
- Resources
- Law and Governance, and
- Human Resources

4.3 Within these themes further recommendations on organisational change were developed and agreed, resulting in the publication of ‘Making the Difference’ which detailed the 3 year implementation process commencing September 2010. In summary, the key points regarding the results of the review were:

- a reduction of the Force’s workforce by 6%
- a deletion of vacant posts/roles to protect the Force’s remaining workforce
- 55% of roles to be lost over the 3 years to go during the period April 2011 to March 2012

4.4 Overall, once PFTF is complete, the workforce will comprise 2,250 police officers and 1,888 police staff¹⁸. This is the baseline from which the Comprehensive Spending Review (CSR) savings, discussed below, will be made.

The Government's Comprehensive Spending Review (CSR)

4.5 As a result of the CSR, the Government informed WMP on 13 December 2010 of the savings that the Force would have to make during the next four years. In broad terms, WMP will need to save approximately £30 million over that period (a 17% reduction in real terms). Overall, the WMP's budget will be reduced to approximately £200m per year.

4.6 As 80% of WMP's total budget is spent on pay, WMPA have confirmed that a reduction in the Force's personnel is inevitable. Work is on-going in quantifying which and how many posts will be lost and it is undecided how many Police Officer and Police Staff posts will be lost.

4.7 It should be noted however, that the Government has confirmed that funding for Police Community Support Officers (PCSOs) is guaranteed for the two years, 2011 – 2013.

4.8 Whilst PFTF will help mitigate the impact of the CSR settlement, WMP has also been taking other measures to help meet budgetary constraints. These include:

- the postponement of the March 2011 intake of student officers
- closer control of external secondments – due to the freeze on recruitment, requests for secondment are now being considered on a case by case basis by Chief Officers, with the potential impact on service delivery being a key consideration, and
- Regional Collaboration – WMP has announced a 'strategic alliance' with Warwickshire Police and further opportunities for regional collaboration with other Forces in the West Midlands are being examined.

West Mercia/Warwickshire Police Authorities' Strategic Alliance

4.9 In June 2011 a 'Strategic Alliance' between the Police Authorities of West Mercia (Herefordshire, Shropshire, Telford & Wrekin, and Worcestershire) and Warwickshire was agreed. The aim is to deliver policing services across both force areas, more efficiently and effectively in the future,

¹⁸ Based on best available information at 1st August 2012

enabling both forces to meet the challenge of reducing policing budgets and providing greater operational and organisational resilience.

- 4.10 Both forces will retain Chief Constables who remain accountable to their Police Authorities and from November 2012 to the Police & Crime Commissioners for the delivery of policing. Force identities will also be retained within an alliance and both forces and authorities emphasise that local policing priorities agreed with local communities and partners will continue to be addressed.
- 4.11 Both forces will retain their separate governance and accountability arrangements (through their Police Authorities), policing budgets, assets and financial accounting arrangements, including independent financial advice. Most importantly, both forces recognise that policing across both areas must continue to address the greatest harms within each area as well as continuing to operate effectively within communities to address local priorities agreed with the public and local partners.
- 4.12 The professional recommendations include a change to how forces are currently planning to deliver reductions in budget, through the creation of a single change programme, and the necessary legal agreements to enable officers and staff to operate across both force areas. Police Authorities have asked both Chief Constables to progress this single change programme and the detailed design and implementation work required to realise the alliance¹⁹.
- 4.13 In June 2012, both Police Authorities approved a four year plan to deliver high quality, value for money policing services to communities across Warwickshire and West Mercia and achieve a £30.3 million cost reduction. In August 2012, the Warwickshire and West Mercia Chief Officer team met to reaffirm the commitment to deliver the new strategic alliance between the two Police Authorities.
- 4.14 Replacement of the Police Authorities in November 2012 with Police and Crime Commissioners will not affect the principle of progressing the Strategic Alliance.
- 4.15 Consequently, the Making the Difference implementation programme is presently being reviewed in conjunction with the Strategic Alliance review. The baseline staffing levels under PTFP remain relevant, but the scale and rate of other planned staffing and other budgetary reductions are now bound in with the formulation of the implementation plan for the Strategic Alliance.

¹⁹ Further information on the Strategic Alliance including the eight supporting key recommendations agreed by members of both authorities is attached at Appendix 6.

Interim financial conclusions

- 4.16 There has been considerable research and preliminary work in terms of re-engineering WMP's activities in the face of projected budget reductions in the coming years. Presently it is not possible to be precise about future planned staffing levels and operational activities within WMP and its North Worcestershire Territorial Policing Unit (TPU), not least because of the progressing 'strategic alliance' with Warwickshire Police.
- 4.17 However, the PTFP analysis of 2009 provides a robust baseline position from which to project future staffing and operational service levels, including as it does a clear recognition of some planned reductions in these aspects.
- 4.18 This SIA makes reasonable assumptions in using the PTFP analysis and projections as a baseline position. This SIA should seek to make moderating calculations where appropriate and possible, in recognition of the drivers for change and the likelihood of further revisions in staffing and operational service levels.

Current and prospective funding mechanisms for Police infrastructure

- 4.19 The funding of WMP is divided into two broad streams, revenue funding and capital projects. The revenue stream relates broadly to the day-to-day running costs of maintaining the existing Police Force, that being the payment and management of staff, the ongoing costs relating to running and maintaining buildings and equipment and repaying any loans. The capital projects element relates to the provision of additional buildings, equipment and other infrastructure items required to respond to increased pressures placed on the Force as a consequence of growth.
- 4.20 The principal sources of WMP funding are central Government (Home Office) grant and the Council Tax Precept. The WMP budget for the current financial year is set out in the Report of the Chief Constable and Treasurer, February 2012. This report included a Medium Term Financial Plan (MTPF) covering the period of the five financial years 2011/12 through to 2015/16 and the relevant extract is included at Appendix 14.
- 4.21 Grants from Government are of two types: Specific and Formula Funding. It is evident from the MTPF that following the CSR, these are reducing in scale for the next three financial years, with a very modest increase due in the final year, 2015/16. Whilst it is anticipated that income from the Council Tax precept will increase by approximately 2.5% year on year, the total funding gap between WMP income and expenditure increases from a shortfall of £3.23m this current year, for

the next two financial years, to nearly £6m in 2014/15. These annual shortfalls are having to be met by the use of financial reserves which are already heavily depleted.

- 4.22 In effect this means that the Home Office grant is entirely unresponsive to new needs for policing which arise from an increase in population and housing stock and that this is not being offset by modest Council Tax precept increases. Further information on the way in which Home Office funding is calculated is set out in the Plain English Guide to the Police Funding Formula²⁰, although it should be noted that this was published in March 2010 prior to the latest CSR.
- 4.23 Funding received by WMP via the Council Tax Precept is used exclusively for revenue purposes and the income contributes towards the running of the existing Force. It does not include any surplus that could be directed towards capital projects/programmes on the basis that directing funds towards such projects would diminish that available for delivery of the policing service. It is part of the remit of the WMP Authority to allocate funding as considered appropriate to achieve the objective of providing an efficient and effective Police service. It should also be noted that even with revenue raised from the Council Tax precept there has been a recognised funding gap created by inflation and a continuing expansion of the role of the Police service and the demands placed upon it. Indeed, there was no increase in the Council tax precept in the current financial year, 2012/13.
- 4.24 While there has been investment from central Government, this has often been ring-fenced for particular initiatives and has not kept up with the demand for services. This has meant that Police Authorities need an increase of over 5% annually from the Council Tax precept simply to 'stand still' in terms of service provision.
- 4.25 In terms of proportional contributions, as noted above, approximately 37% of revenue funding is derived from Council Taxes (including business rates), with the balance of revenue funding coming from Central Government via Home Office Grant. A small amount of funding is available from the Home Office for specific initiatives but this is extremely limited. The ACPO Strategic Growth Toolkit – An Overview (published June 2010) also provides some information on funding²¹. WMP are now in the position of having to use their own reserves to meet the deficit in the current financial year²².

²⁰ This document is included in Appendix 8

²¹ This document is included in Appendix 13

²² Medium Term Financial Plan, Appendix 14.

- 4.26 The effects of the CSR (see paragraphs 4.5 – 4.8 above) will continue to have a significant impact on the funding available to WMP, particularly for capital projects. As a result, the funding gap will increase, with less money for both revenue spending and capital projects.
- 4.27 WMP's position mirrors the experience of Police Authorities nationally which is that the funding allocated to them via Home Office grant, Council Tax Precept and other specific limited grants is generally insufficient to fund in full, capital expenditure requirements. Capital programmes have to date been funded from a mixture of asset disposal, redirection of revenue funding, financial reserves and prudential borrowing. Financial reserves, built up following previous tranches of asset disposal in the 1980s and 1990s, are close to exhaustion and the Capital Programme now relies upon prudential borrowing. WMP has been financially prudent for several decades, doing everything possible to provide its own funding but has now reached a situation where this no longer possible. Colloquially, 'the family silver was sold long ago and now the cupboard is bare'. In the context of the WMP funding position outlined in this SIA, it is highly unlikely that any capital funding will be available from within existing budgets to fund the infrastructure that will be required to serve the planned growth in Wyre Forest District.
- 4.28 Any borrowing or redirection of funds has an impact on police forces' revenue stream and subsequently the police service within that area. Unless additional funding can be secured towards infrastructure costs, less funding will be available to deliver a visible police profile within communities. This undermines the neighbourhood policing objective, and the government's localism initiatives, of seeking to reduce both the incidents and fear of crime and disorder in local communities.

Capital & Assets Pathfinder (CAP)

- 4.29 WMP has been working with other public sector bodies to identify opportunities to share resources, particularly estates to help reduce costs and provide a more efficient service. This continues a long history of positive engagement between WMP and the Local Authorities and other public organisations. In Wyre Forest a replacement Police Station in a refurbished Stourport Civic Centre has been identified as part of Capital & Asset Pathfinder initiative. This will serve as a replacement for the existing station at Bewdley Road, which will revert to WCC under CAP.
- 4.30 The planned redevelopment of the Bewdley Road site in Stourport will be in accordance with Policy SAL.STC2 of the SAP (July 2012). The planned redevelopment of the Stourport Civic Centre will be in accordance with Policy SAL.STC3 of the SAP (July 2012).

- 4.31 In the unlikely event that any additional resources to serve the planned growth are identified through the CAP in due course, these will be identified in the annual update of this SIA.

Community Infrastructure Levy (CIL) and S106 Obligations

- 4.32 Presently there is no specific and definite mechanism which gears funding streams specifically and directly to new police capital infrastructure provision. Many Police forces have therefore, for several years now, been involved in the town planning process through seeking developer contributions towards the capital costs of providing new infrastructure. Increasingly they have sought to fund capital projects through s106 obligations and are now seeking to do this via CIL.
- 4.33 The police service is recognised as a social infrastructure provider under the provisions of the Planning Act 2008, as expressed consistently in the CIL overview documents published by CLG (paragraph 12 of the latest edition published in May, 2011). Regulations for the introduction of the Community Infrastructure Levy will establish the mechanism by which CIL Charging Authorities (Local Planning Authorities) can channel funding to Police Forces to fund the capital provision of new infrastructure.
- 4.34 Indeed, WMP is recognised in the Shropshire Council LDF Implementation Plan as being a legitimate recipient of CIL funds for major new capital infrastructure. The Shropshire CIL Rationale Background Paper, March 2011, also explicitly added 'police stations' to the list of infrastructure provision to be funded by CIL and identified several specific stations for CIL funding. WMP has worked positively as a member of the Shropshire Strategic Infrastructure Forum on these and other related matters.
- 4.35 The tests set out in CIL Regulation 122 require that a planning obligation is:
- (a) Necessary to make the proposed development acceptable in planning terms
 - (b) Directly related to the proposed development
 - (c) Fairly and reasonably related in scale and kind to the proposed development
- 4.36 We are aware that there have been different interpretations by local authorities, planning inspectors and indeed the Secretary of State of these tests insofar as they relate to the provision of police infrastructure. The methodology utilised in the production of this SIA enables police infrastructure costs to be apportioned on a per dwelling basis in a robust and transparent way for use in either a CIL charging schedule or in a s106 obligation, whichever is appropriate in the particular circumstances of a development proposal.

- 4.37 Wyre Forest Council is working with Worcestershire County Council to develop CIL charging schedules. It is not yet known whether the CIL will be chargeable on all forms of development, including housing, employment and retail development. Developers will be required to contribute towards community infrastructure through CIL and/or Planning Obligations.
- 4.38 In addition to considering the requirement for new infrastructure which is required in connection with residential development, the WMP has considered the need for such infrastructure to support the planned growth of other forms of development. This will necessarily require the provision at a strategic level of centralised support services for which would not necessarily be possible to disaggregate at any point over the projected period of population growth.
- 4.39 In addition to funding via CIL, the system of securing infrastructure to serve a specific development via s106 obligations will remain in place.

Other infrastructure funding mechanisms

- 4.40 In addition to considering the requirement for new infrastructure to serve new residential development, the Police have considered the need for such infrastructure to support the planned growth of other forms of development including leisure and tourism related growth. The proposed expansion of the night time economy in particular will have implications for policing (see paras. 3.43 to 3.50 above).
- 4.41 There may also be other forms of public funding which might be available to fund infrastructure to serve the planned growth in the area. Whilst these are not explored in this study, the SIA will inform such initiatives as the New Homes Bonus (NHB) allocated to local authorities based on the annual number of housing completions within their area, and Tax Increment Financing (TIF) that which might in future be a source of funding.

Part 2

Findings of the SIA

5.0 Overview

Need for Police Infrastructure

- 5.1 West Mercia Police has absorbed the growth in population and household numbers to date within its area. As discussed in Part 1 of this report, it will not be able to continue to absorb further growth in the area without increased capacity in its estate, human resources, vehicle fleet and equipment to support its operational activities.
- 5.2 An earlier infrastructure study (Baker Associates, 2010) indicated the Police buildings infrastructure requirements for the higher level of growth anticipated in the emerging WMRSS. As indicated at the outset, Police strategic infrastructure for the purposes of this study is defined as:
- A additional (including new) buildings and accommodation²³
 - B additional personnel set-up costs²⁴
 - C vehicles and other operational equipment, and
 - D central support services including additional personnel in operational support, human resources and corporate services.

Each of these strategic infrastructure items is examined in terms of:

- existing baseline infrastructure
- additional infrastructure required (moderated as appropriate)
- estimated cost.

- 5.3 The overall growth planned in the area to 2026 can be summarised in terms of the anticipated increase in population and planned additional dwellings in the area as shown in Table 5.

²³ A description of the various WMP property types is included in Appendix 5

²⁴ Set-up costs within Territorial Policing Units and centrally based Protective Services their recruitment, training and personal equipment

Table 5: Wyre Forest Core Strategy Growth Proposals – Population and Dwellings 2006 - 2026

Measure of Growth	Amount	Percentage increase over existing	Period
Population	5,869	6.0%	2006-2026
WF Core Strategy Planned Dwellings	4,000	9.4% ²⁵	2006-2026

- 5.4 The requirement for additional Police infrastructure is related to both the anticipated growth in population (because more people will require more policing) and the planned growth in development which will require policing across a greater geographical area. The planned development growth is principally new housing, but includes also employment, leisure, tourism related and other forms of growth.
- 5.5 The SAP establishes that the growth across the area will be focused on the main settlements of Kidderminster, Stourport and Bewdley. The following section considers the capacity of the existing infrastructure to serve the planned growth and the need for additional infrastructure to serve that growth.

A Additional buildings and accommodation

Existing estate infrastructure in Wyre Forest (baseline position)

- 5.6 WMP's estate in Wyre Forest comprises a range of buildings but does not include the Force's Headquarters (FHQ) at Hindlip Hall (Wychavon DC) which, in addition to housing central support services and training facilities, accommodates a variety of operational units for e.g. Operational Support, Protective Services and Enabling Services. In Wyre Forest, the estate includes the TPU

²⁵ This 9.4% increase is based upon a calculated number of 42,533 households at 2006 (97,826 population divided by 2.3 persons average household size); WCC households projections ONS 2010 based. In fact, the number of projected households for 2026 might be calculated on the same basis as being 49,144 (103,695 population divided by 2.11 persons average household size). In this latter case there would be a household increase of 6611 households or 15.5 % increase. A 9.4 % increase is therefore regarded as being a very conservative estimate of household growth.

Headquarters (Kidderminster), 2no. police stations (Stourport-on-Severn and Bewdley), and 5no. police posts ²⁶.

- 5.7 In terms of custody provision, there are currently 11no. cells and associated facilities in the custody suite at Kidderminster Police Station, serving Wyre Forest District.
- 5.8 The estate currently includes 5 no. Police Posts in the District – four in Kidderminster and one in Stourport. The Police Posts are not necessarily occupied on a full time basis but act to supplement the existing network of Police Stations. These premises provide support facilities for the Police to undertake their operations across a wider geographic area and may be used for a variety of purposes including for visiting members of the public and administration.

Assumptions on future infrastructure requirements

- 5.9 The progress towards a 'Strategic Alliance' Warwickshire Police (see 4.9 – 4.15 above) and 'Making the Difference' reviews will have implications for the future use and occupation of the WMP estate. Operational procedures will also be reviewed and targeted savings sought, as required by the CSR. The reviews are likely to entail an examination of how the estate in general and individual buildings in particular might be used more efficiently. However, there will be no WMP owned sites becoming surplus to operational requirements or available for disposal within Wyre Forest District.
- 5.10 Where appropriate, we have identified requirements for new projects to accommodate the infrastructure required to serve the planned growth. It is important to ensure that the KCAAP and SAP policies support the allocation of such sites for infrastructure where it will be required to serve new development, and that any subsequent DPDs and SPDs recognise any site specific WMP infrastructure requirements.
- 5.11 In the context of the ongoing review of the WMP and reduction in its budget, we have assumed for the purposes of this study that the planned growth in the area will not require any additional facilities or expansion at WMP Force HQ at Hindlip, in Worcester.

²⁶ A schedule and map of the existing estate is included at Appendix 4

Rationale for selecting sites for new estate infrastructure

5.12 The WMP rationale to identifying the need for new estate to serve the planned growth in the study area is to:

- examine the geographic spread of its existing estate in the context of the planned growth in the area
- identify where existing facilities have the capacity to accommodate that planned growth without the need for extension or improvement
- identify where existing facilities could be extended or improved to serve the planned growth
- identify where existing facilities could not be extended or improved to serve the planned growth
- identify the most appropriate locations for new infrastructure (where existing facilities do not exist in proximity to the planned growth, or where existing facilities are incapable of being extended and improved to serve the planned growth)
- specify the most appropriate type of new police accommodation required in relation to the geographical characteristics of the location.

Requirements for new estate infrastructure

5.13 This approach has led WMP to identify a number of locations where existing facilities could be extended and improved to accommodate the planned growth in Wyre Forest, as set out in Tables 2 & 3 (paras 3.28 to 3.30 above).

Stourport-on-Severn

5.14 The existing Stourport Police Station is accommodated in the County Buildings at Bewdley Road, on a site which is subject to a redevelopment proposal under Policy SAL.STC2 (see 3.40 above). There is a current proposal for a new station to be provided within a refurbished office suite within the largely vacated Stourport Civic Centre as part of the Capital & Assets Pathfinder initiative (paras. 3.42 and 4.29 above).

5.15 Stourport Police Station accommodates a Major Incident Unit (MIU), as well as a Safer Neighbourhood Team (SNT). The MIU deals only with the most serious crimes e.g. murder, rape

and kidnap, whilst an SNT, as the name implies, delivers day-to-day neighbourhood policing services to local communities.

- 5.16 Under draft proposals for the Strategic Alliance currently being considered by Chief Officers, there is an option to re-locate and expand the MIU at Kidderminster Police Station and have only an SNT remaining in Stourport to deal with current and anticipated future community policing needs. An MIU would require an additional 30 workstations, which are not available in Kidderminster Police Station which would therefore require expansion to accommodate this relocated requirement (paras. 5.22 – 5.24 below).
- 5.17 The proposals for the refurbished accommodation within the Civic Centre will therefore have to accommodate the SNT and a floorspace of 64 sq m is required for this purpose. There will be a public counter service at Stourport which will be a facility shared with other public service functions in a common reception area for the building. The cost of this refurbishment has been estimated to be £122,337²⁷.
- 5.18 This refurbishment cost is notably less than a typical police station²⁸ which is usually a building capable of accommodating 10 - 40 Police Officers and support staff on shift. Based on a specification provided by WMP, the cost of a typical new police station (excluding land) has been calculated under the earlier South Worcestershire SIA (November 2011), to be £1,625,000. The civic centre refurbishment is therefore considered to be an extremely cost effective solution for the relocation of the existing SNT.
- 5.19 The refurbishment of the Civic Centre is regarded as a strategic infrastructure requirement resulting from the SAP SPD policy SAL.STC2 and would therefore be a legitimate recipient of either CIL or S106 funding, which would reimburse, perhaps retrospectively, the expenditure under the CAP initiative. Indeed, this should be seen as a modest, reasonable and wholly

²⁷ Detailed information on the specification and costs for the refurbishment of the civic centre to provide a new police post have been produced by WYG Trench Farrow, specialist cost consultants and are set out at Appendix 2A.

²⁸ Typical facilities for a new police station would include offices, interview rooms, storage for equipment and possibly a counter service for visiting members of the public to be open on a daily basis. Detailed information on the specification and costs for a new police station have been produced by WYG Trench Farrow, specialist cost consultants for the South Worcestershire SIA. A description of the various types of police accommodation is included at Appendix 5.

justifiable CIL/S106 funding requirement given the costs associated with providing a typical new police station.

Kidderminster Police Station

- 5.20 Kidderminster Police Station provides the HQ of the North Worcestershire TPU (Wyre Forest District, Bromsgrove District, Redditch Borough) and is affected by the growth proposals across the three districts. Kidderminster Police Station will be refurbished and extended to accommodate operational requirements that have a strategic function across the North Worcestershire TPU e.g. custody facilities and the Major Incident Unit (MIU). Each authority could be reasonably expected to contribute to the costs of providing this infrastructure and again it is considered to be a reasonable and wholly justifiable CIL/S106 funding requirement, given the population growth across the TPU.
- 5.21 In terms of custody facilities, 8no. additional cells will be required triggering the need for an extension of the Station. These will be required principally to meet the demands of expanded evening and night-time economies, especially in Kidderminster, as described at paras. 3.40 -3.46 above. WMP do not currently have information on the cost of providing these additional cells; however on the basis of information from Thames Valley Police, the cost per cell would be £53,000 i.e. £424,000 for 8no. cells. In addition the proposed new Joint Police and Fire Station in Bromsgrove will not include custody provision and it is proposed therefore that the custody suite at Kidderminster Police Station will share responsibility for coverage of that District with Worcester Police Station. Lastly, the custody extension would be able to accommodate any overspill from Redditch District, should this arise, which currently has 10 cells serving it at Redditch Police Station. It should also be noted that the 8no. additional cells will also require the appointment of an additional custody sergeant for Kidderminster Police Station.
- 5.22 Within a Major Incident Unit there are approximately 25no. full time officers who work throughout the year. When an incident occurs this number rises to 50 at the height of an investigation into a major crime, before being wound down gradually over time (depending on progress into an investigation). With regard to the MIU, 30no. additional work stations would be required to meet the demands of a re-located and expanded MIU team, if indeed Kidderminster Police Station is the chosen location. These would be mothballed until a serious crime occurs. In the meantime they would be used by other teams and/or for training purposes. The mothballed facility is referred to as a Major Incident Room (MIR).

- 5.23 As there is no space within the existing station to accommodate this, an extension would be required. It is anticipated that any such extension would be linked with the expanded custody block, in order that suspects can be held and questioned. The MIU would serve the whole District and North Worcestershire more generally. As noted above, it has not yet been confirmed as to where the MIU from Stourport Police Station will be relocated. Kidderminster Police Station is the obvious option, but it is only one of a number being considered by Chief Officers.
- 5.24 On the basis of an assumption that the MIU will be relocated to Kidderminster Police station, the floorspace of the extension required to accommodate an additional 55 officers has been calculated to be 754 sq m, the cost of which has been estimated as £2,042,600²⁹.
- 5.25 It has also been identified that the 11no. existing custody cells at Kidderminster require upgrading and refurbishment to meet modern standards commensurate with the new cells to be added. The cost of this work has been estimated as £330,000²⁹.
- 5.26 For the purposes of this SIA it seems reasonable and prudent to estimate the costs of Kidderminster Police Station extension, to include both the expanded custody and MIU elements, but to apportion the cost to the growth planned for Wyre Forest District at 36%, in accordance with the calculation of apportioned growth across the three North Worcestershire authorities, explained at Table 1 and 3.9 above.
- 5.27 Table 6 summarises the elements of works required at Kidderminster Police station and their associated costs, on the basis of the assumptions mentioned, and provides a total cost of works attributable to Wyre Forest District planned population growth of £1,217,976.

²⁹ Detailed information on the specifications and estimated costs have been produced by WYG Trench Farrow, specialist cost consultants and are included at Appendix 2B.

Table 6: Summary of Works and Costs Required at Kidderminster Police Station

Project Description	Estimated Cost	Apportioned Cost at 36% Population Growth Across North Worcestershire TPU	Cost Attributable to Wyre Forest District Population Growth
Provision of an additional 8no. cells	£424,000	£152,640	£152,640
Extension to station to accommodate MIU - an additional 55 officers – 754sq.m	£2,042,600	£735,336	£735,336
Refurbishment of 11no. cells in existing building	£330,000	Not Applicable	£330,000
Total Estimated Cost			£1,217,976

Grasmere Close (Windermere House) replacement Police Post

- 5.28 The KCAAP, Policy KCA.Ch2, deals with the Grasmere Close site, which is to be cleared and redeveloped and forms Phase 1 of the Churchfields regeneration project. The site currently contains three tower blocks, one of which houses a police post. WMP will therefore need alternative premises at Grasmere Close or within the wider Churchfields area as a replacement for current provision but also to serve the larger new community. It is noted that the Churchfields Masterplan SPD (Section 10 – Funding mechanisms) provides for s106 contributions for “Upgrade of Police Post”. Clearly this will involve replacement premises as the current premises are to be demolished.
- 5.29 Police Posts can be rooms within larger buildings (for example within a community facility), or as a small free-standing facility. They provide accommodation for 3 – 10 Police Officers and Police Community Support Officers (PCSOs) on shift. They are not always for public use. Police Posts usually consist of an office (or offices) and possibly a shared interview room, W.C. and kitchen area. Freestanding Police Posts typically have an internal floor area of approximately 60sq.m, with 2 parking spaces immediately outside.

- 5.30 A generic specification for Police Posts, together with a plan, has been provided by WMP. This plan has been used to develop an outline cost for developing such a facility including all fees, equipment and VAT, but excluding land costs. The cost is estimated at £159,000³⁰. It is expected that the land/building will be acquired at nil cost through S106 agreements as appropriate to the respective development proposals.
- 5.31 It is possible that following the demolition of the tower blocks there would be a requirement for a temporary facility, pending any longer term redevelopment proposals which might include this Police Post. These costs have been estimated to be £75,000³⁰. Overall therefore, it is reasonably assumed that the cost of the Grasmere Close Police Post re-provision could amount to £234,000.
- 5.32 Table 7 sets out where new estate will possibly be required to serve the planned growth in the area, because the existing estate is insufficient to support the delivery of an expanded police service because of either geographical distances or size of accommodation³¹. All of the facilities identified in the table are necessitated by the planned growth in the area, rather than to accommodate any shortfall in such accommodation for the existing population. None of the accommodation proposed would be required if no growth was proposed (see Appendix 1).

³⁰ Detailed information on the specification and costs for the provision of a generic Police Post have been produced by WYG Trench Farrow, specialist cost consultants and are included at Appendix 3B.

³¹ The additional buildings requirements are detailed in a schedule Appendix 1 and mapped on its accompanying tab.

Table 7: Summary of Built Infrastructure Requirements

Site	Reason	Planned Growth	Draft Policy Requirement	Nature of Provision	Cost Attributable to WFDC Population Growth
Stourport Replacement Police Station	To serve as a replacement to the existing station at Bewdley Road. Existing station to be disposed through CAP	727 dwellings in Stourport	Policies SAL.STC3 and SAL.STC2 of the SAP refer	New station within Stourport Civic Centre refurbishment as part of the Capital & Assets Pathfinder initiative.	£122,337
Kidderminster Territorial Policing Unit HQ	To meet growth requirements identified in Core Strategy and allocated through the SAP and the KCAAP	4000 dwellings in total across the district (approx 1465 yet to be granted planning permission) 5869 population growth across WFDC Employment land: 44ha Retail space: 25,000 sq m - Kidderminster	To meet growth requirements identified in Core Strategy, SAP and KCAAP Policy provision for site to be reserved for police purposes No specific reference to requirement for Police infrastructure	Rationalisation and extension of facilities at TPU HQ existing site, including: custody suite expansion by 8no.cells extension to provide MIU refurbishment of 11no. existing cells	£1,217,976
Churchfields Police Post	Grasmere Close Police Post, due to be demolished as part of Churchfields regeneration scheme	600 dwellings (approx 190 yet to be granted planning permission) Some additional employment land	Policy KCA.Ch2 of the KCAAP Refers Churchfields Masterplan (section 10) - reference to Police Post Re-provision	New Police Post required within the development, possibly temporarily pending permanent replacement	£234,000
Total Cost Attributable to Wyre Forest District Population Growth					£1,574,313

Cost of new buildings and accommodation

- 5.33 From Table 7 above, the total cost of new built infrastructure to serve population growth in Wyre Forest will be £1,574,313. There is no funding available from the disposal of existing sites, as none are forthcoming from these proposals. The Stourport PS site will revert to WCC as the landowner. The total cost of provision excludes any land acquisition at Churchfields because it is assumed that the land required for the police post will be provided to WMP via s106 obligations at nil cost.
- 5.34 The precise timing of the provision of each of the identified elements of estate infrastructure will depend to a significant extent on progress on the individual developments. WMP recognises that the provision of specific new infrastructure might require agreement as a result of a particular planning permission possibly as part of a s106 obligation, whilst remaining consistent with any CIL charging schedule provisions.

B Additional personnel set up costs

Existing staff resources (baseline position)

- 5.35 In the context of the uncertainty about the future organisation and staffing numbers for WMP, we have used the current planned staffing levels, (reduced establishment base as proposed in 'Making the Difference', and set out in Table 8 below) as a basis for calculating the additional staffing requirements to serve the planned growth in the area. The staffing levels below (identified as budgeted posts), are for the whole of the WMP area and include the various support staff, many of whom provide services across the WMP area and not just within the Wyre Forest District³².
- 5.36 They reflect the baseline position of 4129 posts across the Force area that is anticipated by the end of March 2013 by which time, the final phase of the three year implementation phase of the staff reductions agreed in 'Making the Difference' will have been completed.

³² Detailed staffing data for budgeted posts 1st Aug 2012 can be found at Appendix 4

Assumptions on future personnel requirements

- 5.37 The population of WMP's area is currently about 1,189,700 and the area accommodates about 503,000 dwellings (WMP Joint Policing Plan 2011 to 2014). The total levels of staffing across the whole of the WMP area have been used to calculate pro-rata requirements for additional personnel required to serve the proposed population and housing growth in Wyre Forest. As noted above, it is based on the outcome of the implementation of 'Making the Difference'.
- 5.38 This initiative predated the CSR and it is possible that in due course that the outcome of this might lead to further changes to the number of established posts. Other factors, e.g. the Strategic Alliance with Warwickshire Police and the arrival of the Police & Crime Commissioner in November may also have implications for future staffing levels across the Force area.

Additional personnel requirements

- 5.39 Table 8 below shows the current budgeted posts and estimated additional personnel numbers required to serve the Core Strategy's additional 4,000 dwellings completed/planned for Wyre Forest.

Table 8: Staffing levels – Existing and Proposed

Command Area	Budgeted Posts (BP)	Approx Population per BP	Dwellings per BP	Pro Rata BP Requirement for 4,000 additional dwellings
Strategy & Legal Services	60	19,800	8,400	0.5
Corporate Services	346	3,400	1,500	2.5
Human Resources	197	6,000	2,600	1.50
Operational Support	723	1,600	700	6.0
Protective Services	963	1,200	500	8
Territorial Policing	1840	600	300	13.5
Overall Figure	4129	300	121	32

- 5.40 This shows that 1 member of personnel (staff/officers) is required to serve approximately every 121 dwellings or 300 people. A total of some 32 additional personnel will therefore be required to serve the planned growth of 4,000 new dwellings in the Wyre Forest area. This calculation accounts for the required growth in central and specialist services in addition to Wyre Forest specific requirements.
- 5.41 The personnel requirements include both officers and support staff; broadly the Protected Services and Territorial Policing units comprise mainly officers - the visible police presence - and the remaining units provide support functions. For the purpose of this assessment we have assumed that the 32 additional personnel will comprise 21 officers and 11 staff.

Additional personnel set up costs

- 5.42 It is important to note that in considering personnel costs, we have only included the cost of staff set up for additional members of staff i.e. recruitment, uniform and personal equipment (where relevant) and basic office furniture and ICT. We have not at present included any allowance for training of additional officers and the set up costs are therefore very conservative.
- 5.43 We have used information provided by WMP for the recruitment costs per post for officers and staff. Similarly we have used WMP's standard costs for furniture/ICT on a per post basis. The cost of uniform and personal equipment for police officers and PCSOs varies according to their particular role. We have therefore used a median cost in order to avoid undue complexity.
- 5.44 As noted above we have estimating that additional staff will comprise 21 officers and 11 support staff. Table 9 shows the estimated personnel set up costs for additional growth of 4,000 dwellings proposed in the SWDP.

Table 9: Staff Set-Up Costs

Additional Officers	Set up cost per officer	Pro rata requirement for 21 officers
Recruitment	£1,060	£22,260
Training	N/A	
Uniform & Personal equipment ³³	£940	£19,740
Standard equipment (ICT and furniture)	£1,642	£34,482
Total set up cost (21no. officers)	£3,642	£76,482

C Vehicles and other operational equipment

Existing vehicles infrastructure (baseline position)

5.45 Information supplied by WMP shows that the current vehicle fleet for the North Worcestershire TPU comprises 79 cars/vans and 21 bicycles. Based on the number of budgeted posts in the TPU (305 posts in total), this equates to a ratio of 1 vehicle per 3.9 budgeted posts and 1 bicycle per 15 budgeted posts.

Assumptions

5.46 For the purpose of this assessment we have assumed that the current ratio of personnel to vehicles and personnel to bicycles will apply to the additional personnel required as a result of the growth proposed in Wyre Forest District. This comprises the 21 additional posts in Territorial Policing and Protective Services. We have assumed there would not be any requirement for vehicles or other equipment arising as a result of the additional personnel required in central support services.

5.47 Vehicle costs have been capitalised on 5 year lifetime costs for a low/medium size vehicle (excluding fuel). Bicycle costs are established at £1,299 per cycle, with an additional

³³ Appendix 1 refers

maintenance charge of £297 per bicycle per annum, or £1,486 per 5 years, capitalised. The total cost of providing each new cycle and maintaining it for 5 years is therefore £2,785.

- 5.48 We have not at this stage included any costs for specialist operational equipment, and the cost estimates in this section are therefore moderated conservatively.

Additional vehicles and operational equipment requirements

- 5.49 On the basis of an additional 32 staff in the territorial Policing and Protective Services, it is calculated that there will be a requirement for an additional 19 vehicles and 9 bicycles.

Cost of vehicles and other operational equipment

- 5.50 The costs of vehicles (both motorised and bicycles) based on 21 additional officers required as a result of planned growth are shown below:

Table 10: Vehicle and Other Equipment Costs

Additional vehicles and other operational equipment	Cost per item	Current cost for planned growth (4,000 dw)
5no. Motorised	£28,500	£142,500
2 no. Bicycles	£2,785	£5570
Other equipment	N/A	
Total costs	£31,285	£148,070

- D Central support services including additional personnel in operational support, human resources and corporate services

Existing staff resources (baseline position)

- 5.51 The existing personnel resources in central support services are shown in Table 8 at 5.39 above and take account, as noted, of planned staff reductions through the implementation of Making the Difference. In total, the number of budgeted posts in central support services is 1,341.

Assumptions

- 5.52 It is assumed that standard set-up costs (recruitment, furniture and ICT) will apply for the additional central and support staff necessitated by population growth, as they do for officers.

Additional central support personnel required

- 5.53 As detailed at 5.41 above, an additional 11 central and support personnel will be required as a result of the planned population growth in Wyre Forest. These will include any function not involved in delivery of front-line services to the public e.g. Operational Support staff (e.g. forensics), Human Resources, Strategy and Legal services and corporate services.

Cost of Additional Central Support personnel required

- 5.54 The additional personnel set-up costs of central and support staff are set out in Table 11 below

Table 11: Personnel Set-Up Costs

Additional central support services	Set up cost per member of staff	Pro rata requirement for 11 staff
Recruitment	£1,060	£11,660
Standard equipment (ICT and furniture)	£1,642	£18,062
Total costs	£2,702	£29,722

6.0 Summary Findings and Conclusions

Principle of requirement

- 6.1 The principle of providing for police infrastructure to support the planned growth in development in the area through the planning system is supported by draft policies in the Wyre Forest Core Strategy, the SAP and KCAAP DPDs, primary and secondary legislation.

Impact of planned growth

- 6.2 The SIA confirms that the existing police infrastructure in the area is inadequate to serve the planned growth of 4,000 dwellings to 2026. Of these, 1465 new dwellings have yet to be granted planning permission. Additional infrastructure will therefore be required to accommodate the completed and planned development. Without that additional infrastructure, WMP will not be able to continue the current and planned levels of policing across its area. The absence of this important infrastructure will hamper the WMP ability to contribute towards ensuring that the planned growth in Wyre Forest is developed in a “sustainable” manner.

- 6.3 The infrastructure required to serve the planned growth comprises the following elements:

- A additional (including new) buildings and accommodation³⁴
- B additional personnel set-up costs³⁵
- C vehicles and other operational equipment, and
- D central support services including additional personnel in operational support, human resources and corporate services.

³⁴ Appendix 1 refers

³⁵ Set-up costs within Territorial Policing Units and centrally based Protective Services their recruitment, training and personal equipment

Summary of Findings

Table 12: Summary of Built Infrastructure Requirements

Site	Reason	Planned Growth	Draft Policy Requirement	Nature of Provision	Cost Attributable to WFDC Population Growth
Stourport Replacement Police Station	To serve as a replacement to the existing station at Bewdley Road. Existing station to be disposed through CAP	727 dwellings in Stourport	Policies SAL.STC3 and SAL.STC2 of the SAP refer	New station within Stourport Civic Centre refurbishment as part of the Capital & Assets Pathfinder initiative.	£122,337
Kidderminster Territorial Policing Unit HQ	To meet growth requirements identified in Core Strategy and allocated through the SAP and the KCAAP	4000 dwellings in total across the district (approx 1465 yet to be granted planning permission) 5869 population growth across WFDC Employment land: 44ha Retail space: 25,000 sq m - Kidderminster	To meet growth requirements identified in Core Strategy, SAP and KCAAP Policy provision for site to be reserved for police purposes No specific reference to requirement for Police infrastructure	Rationalisation and extension of facilities at TPU HQ existing site, including: custody suite expansion by 8no.cells extension to provide MIU refurbishment of 11no. existing cells	£1,217,976
Churchfields Police Post	Grasmere Close Police Post, due to be demolished as part of Churchfields regeneration scheme	600 dwellings (approx 190 yet to be granted planning permission) Some additional employment land	Policy KCA.Ch2 of the KCAAP Refers Churchfields Masterplan (section 10) - reference to Police Post Re-provision	New Police Post required within the development, possibly temporarily pending permanent replacement	£234,000
Total Cost Attributable to Wyre Forest District Population Growth					£1,574,313

6.4 The total cost of these new buildings will be £1,574,313. This cost excludes land acquisition because it is assumed that the land/buildings required for the infrastructure will be provided to WMP via s106 obligations at nil cost.

Police officers

6.5 The new estate will be required to accommodate an additional 21 no. police officers to serve the planned growth of 4,000 new dwellings. The personnel set up cost for 21 officers will be about £76,482.

Vehicles

6.6 We estimate that an additional 5 no. motorised vehicles and 2 no. bicycles will be required for these personnel. The initial cost of providing these vehicles and bicycles will be about £148,070.

Support staff

6.7 We have estimated that an additional 11 no. central and support personnel will be required to serve the planned growth. We have calculated the set-up cost for these staff to be about £29,722.

Total costs

6.8 The total estimated additional infrastructure costs to meet the planned growth of 4,000 dwellings proposed in the Core Strategy are shown in the following table:

Table 13: Summary of Total Additional Infrastructure Costs

	Current (net) cost for planned growth (4,000 dw)	Reference from report above
Additional buildings and enhanced accommodation	£1,574,313	Table 7
Additional Officers (set-up costs for 21no. officers)	£76,482	Table 8
Additional vehicles and other operational equipment	£148,070	Table 9
Additional central support staff (set up costs for 11no.support staff)	£29,722	Table 10
Total infrastructure cost	£1,828,587	

6.9 On the basis of the original Core Strategy additional dwelling requirement of 4000 new houses, this overall cost equates to about £457 per dwelling or £5.71 per square metre of residential development (if an average dwelling were about 80 square metres, typical of a new 3 bed house). However, on the basis that only 1465 dwellings remain to be granted planning permission in the Plan period to 2026, the cost per dwelling rises to approximately £1248 and cost per square metre of residential floorspace to approximately £16.60.

6.10 The funding for this additional Police infrastructure necessitated by the additional population growth in Wyre Forest District will need to be secured via s106 obligations and the Community Infrastructure Levy.

Sustainable communities

6.11 WMP is highly unlikely to secure the funding that will be required to provide the strategic infrastructure that is needed to serve the planned growth in Wyre Forest outside the planning system. There is a real risk that we will create communities which will not be sustainable in the sense of prejudiced public safety and the experience and/or perception of crime and disorder. Objective 13 of the Core Strategy seeks "To maximise community cohesion and safety and ensure new developments positively contribute towards crime reduction....across the District for the benefit of all residents".

6.12 Reducing grants from central Government and constrained Council Tax precept increases mean that the WMP annual funding gap will increase for the next three years to approximately £6m in 2014/15. This is despite prolonged and systematic efforts to successfully realise efficiency savings. The funding gap is now being met by the use of diminishing financial reserves.

6.13 It is therefore crucial that the funding for new WMP capital infrastructure is secured through s106 obligations and the Community Infrastructure Levy. In this way, WMP will be able to make a full contribution to the creation of sustainable communities in which people feel safe and which can be policed in the most efficient and effective way.

6.14 To conclude, WMP looks forward to continuing to work in partnership with Wyre Forest District on the SAP and KCAAP DPDs, and other DPDs and SPDs and proposals for CIL, to ensure that the necessary police infrastructure is provided to serve the planned growth in a timely manner.

Part 3

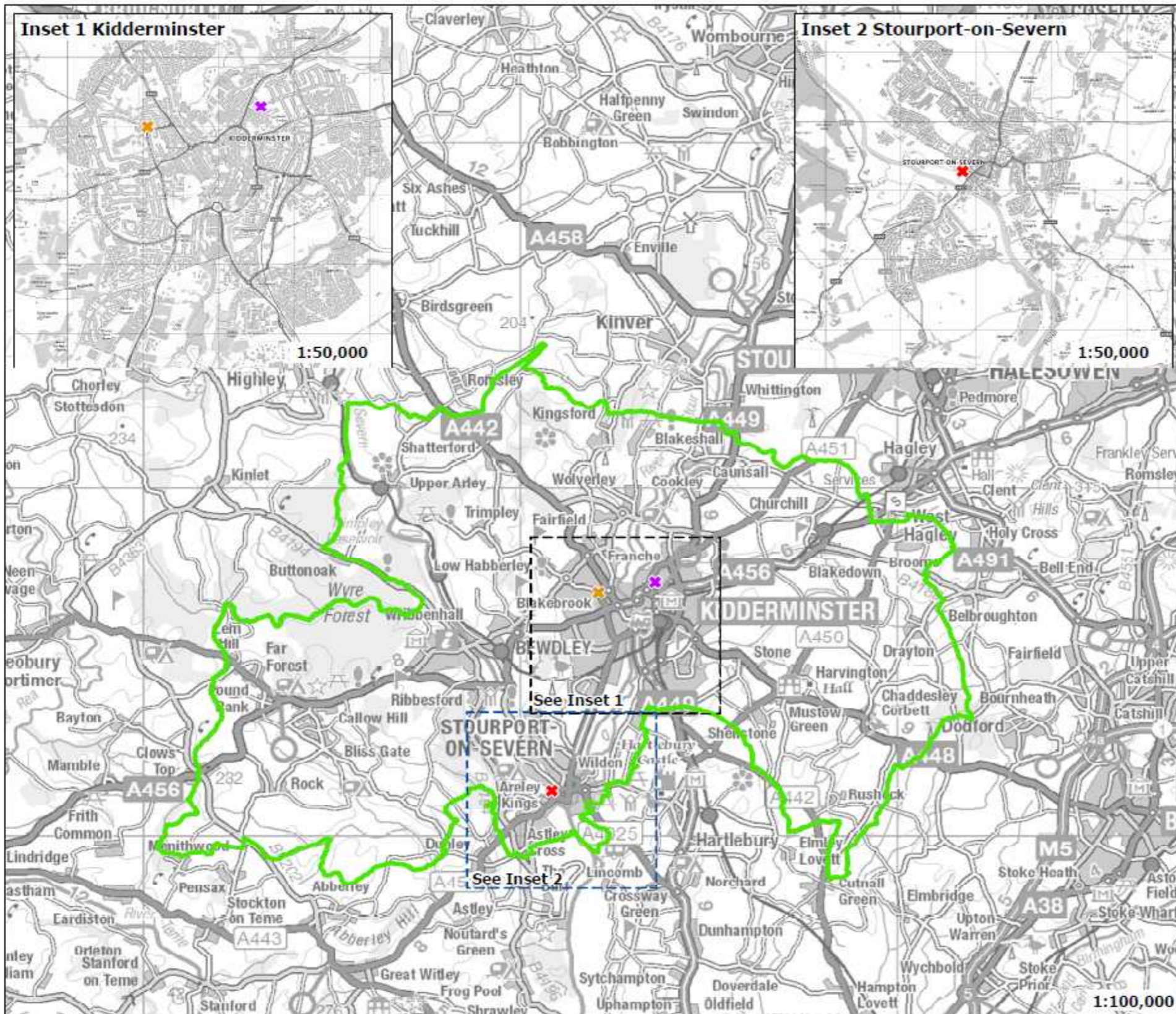
Technical Appendices

Appendix 1

Wyre Forest Additional Buildings Infrastructure Requirements & Locations

Appendix 1 - Wyre Forest Additional Buildings Infrastructure Requirements & Locations

District	Type	Project Description	Reason	Existing or Future Deficit	Essential or Desirable	Priority	Scope of Developer Contributions	Lead Agency	Other Agencies	£Cost	Phasing	Infrastructure Dependencies	Risk	Comments	Date of last update
Wyre Forest	Police	Replacement Police Post in Stourport Civic Centre refurbishment as part of the Capital & Assets Pathfinder initiative.	To serve as a replacement to the existing station at Bewdley Road. Existing station to be disposed through CAP. To meet growth requirements identified in WFDC Core Strategy & SAP (700+ new dwellings). Policy SAL.STC2 refers.	Future	Essential	High		WFDC through CAP initiative	WMP	122,337	As per delivery of the SAP and KCAAP			Policies SAL.STC3 and SAL.STC2 of the SAP DPD refer	Sep-12
Wyre Forest	Police	Kidderminster TPU HQ - Extension to station to accommodate relocation of Major Incident Unit - 754 sq m (Pending formal decision)	To meet growth requirements identified in WFDC Core Strategy, SAP and KCAAP. To meet growth requirements across North Worcestershire TPU. MIU will be displaced as a result of SAP Policy SAL.STC2.	Future	Essential	High		WMP		2,042,600	As per delivery of the SAP and KCAAP			£735,336 is the cost attributable to WFDC population growth. Remaining costs to be apportioned to population growth in Redditch and Bromsgrove Districts	Sep-12
Wyre Forest	Police	Kidderminster TPU HQ - Provision of an additional 8no. cells	To meet growth requirements identified in WFDC Core Strategy, SAP and KCAAP. To meet growth requirements across North Worcestershire TPU	Future	Essential	High		WMP		424,000	As per delivery of the SAP and KCAAP			£152,640 is the cost attributable to WFDC population growth. Remaining costs to be apportioned to population growth in Redditch and Bromsgrove Districts	Sep-12
Wyre Forest	Police	Kidderminster TPU HQ - Refurbishment of 11no. cells in existing building	To meet growth requirements identified in Core Strategy, SAP and KCAAP	Existing/Future	Essential	High		WMP		330,000	As per delivery of the SAP and KCAAP				Sep-12
Wyre Forest	Police	Churchfields Police Post	Replacement of Grasmere Close Police Post, due to be demolished as part of Churchfields regeneration scheme. 600 new dwellings proposed in KCAAP. Policy KCA.Ch2 also refers.	Future	Essential	High		WFDC/WMP	Developer	234,000*	As per delivery of the SAP and KCAAP			*Cost of permanent repovision £159k plus cost of temporary re-provision £75k	Sep-12
									Total	2,918,937					



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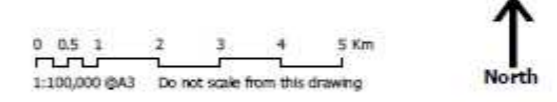


West Mercia Police
Wyre Forest District SIA

**Buildings
Infrastructure
Requirements** **02**

- Key**
- Wyre Forest District
 - x Extension to Territorial Policing Unit Headquarters
 - x Replacement Police Station
 - x Replacement Police Post

NB: This plan does not cover the WMP Force HQ facility at Hindlip near Worcester.



A066406-19
A066406-19 02 Buildings Infrastructure Requirements
August 2012

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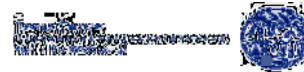
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Appendix 2A

Stourport Police Post (Civic Centre Refurbishment)

Appendix 2B

Kidderminster Police Station Estimated Costs



SUMMARY
Estimate for New Police Post in Stourport Civic Centre

Basis of estimate of construction costs:

West Mercia Police drg: "Feasibility Stouport Police Post - scheme 1"
Floor plans and survey information for Stourport Civic Centre
Priced at 4th quarter 2011 - updated to 3rd quarter 2012
Assumed existing building shell is sound and requires no repair
Assumed adequate foul drainage capacity adjacent to building
Assumed utility supplies available from main building - allowance for distribution only
No allowance required for external works
No contribution required towards general building refurbishment including adjacent entrance area and corridor

Estimate of Construction Costs

Based upon the information provided and assumptions listed, we would recommend the following budget for the fitting out of the Police Post within the Stourport Civic Centre: £122,000

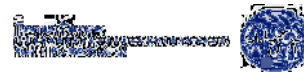
We would make the following provisional allowance for other project costs including, professional fees, IT fit out £40,000

TOTAL PROJECT COST
(see exclusions) £162,000

Assumptions/ Exclusions

No allowance for VAT
No allowance for project finance or future inflation (beyond date of report)
No allowance for purchase of land or lease costs
No allowance for Internal police staff costs in project management etc
Assumed copiers etc will be leased - therefore no capital allowance
Average allowance for furniture and IT fit-out - no specification or scope
Lump sum allowance for professional fees

Client: **West Mercia Police**
 Project: **Strategic Infrastructure Assessment - Sep 2012**
 Report: **Estimate for New Police Post in Stourport Civic Centre**
 Date: **06 September 2012**



SUMMARY
Estimate for New Police Post in Stourport Civic Centre

Package Nr	Package Name	Package Cost £	Prelims 20%	Contingency 8%	Total	Rates per unit area	
						64 m2 £/m2	689 ft2 £/ft2
<u>Demolitions and alterations</u>							
1000	Alterations to building shell - strip out	7,500.00	1,500.00	675	9,675	151.17	14.04
<u>Substructure</u>							
1100	Foundations and slab	-	-	0	0	0.00	0.00
1200	Drainage	6,500.00	1,300.00	585	8,385	131.02	12.17
<u>Superstructure</u>							
2100	External Walls	2,500.00	500.00	225	3,225	50.39	4.68
2200	Roof	-	-	0	0	0.00	0.00
2300	Windows and doors	1,050.00	210.00	95	1,355	21.16	1.97
2400	Internal walls and doors	9,400.00	1,880.00	846	12,126	189.47	17.60
<u>Services</u>							
3100	Electrical Installations	6,120.00	1,224.00	551	7,895	123.36	11.46
3200	Mechanical + PH Installations	9,000.00	1,800.00	810	11,610	181.41	16.85
3300	Security Installations	5,500.00	1,100.00	495	7,095	110.86	10.30
3400	Specialist Installations	10,000.00	2,000.00	900	12,900	201.56	18.73
<u>Finishings</u>							
4100	Floor	6,105.00	1,221.00	549	7,875	123.05	11.43
4200	Wall	2,850.00	570.00	257	3,677	57.45	5.34
4300	Ceiling	2,560.00	512.00	230	3,302	51.60	4.79
4400	Decoration	1,250.00	250.00	113	1,613	25.20	2.34
4500	Fittings/ furniture	19,500.00	3,900.00	1,755	25,155	393.05	36.51
<u>External Works</u>							
5100	Hard landscape	-	-	0	0	0.00	0.00
5200	Soft landscape	-	-	0	0	0.00	0.00
5300	Street Furniture/ Fittings	5,000.00	1,000.00	450	6,450	100.78	9.36
5400	Utilities	-	-	0	0	0.00	0.00
	Sub- Total £	94,835.00	18,967.00	8,535.15	122,337.15	1,911.52	177.58
9100	Preliminaries	20%	18,967.00			inc	
9200	Overheads and profit (included on summary)	0%	-			inc	
			113,802.00			1,911.52	177.58
9300	Contingency	7.5%	8,535.15			inc	
	TOTAL cost of Estimate for New Police Post in		122,337.15			1,911.52	177.58

Client: **West Mercia Police**
 Project: **Strategic Infrastructure Assessment - Sep 2012**
 Report: **Estimate for New Police Post in Stourport Civic Centre**
 Date: **06 September 2012**

TRENCH FARROW
Jon. Tylee

Estimate for New Police Post in Stourport Civic Centre

Package Nr	Item Nr	Dimension Reference	Item Description	Quantity	Unit	Rate	Item Total	Group Total
1000	1,000.00		<u>Alterations to building shell - strip out</u>					
	1,000.05		Allowance for stripping out existing partitions, finishings, services etc and making good	1	sum	7,500.00	7,500.00	7,500.00
1100	1,100.00		<u>Foundations and slab</u>					
	1,100.05		Assumed no works required in existing building		m2	120.00	No Quantity	
								0.00
1200	1,200.00		<u>Drainage</u>					
	1,200.05		Foul Drains to and including adjacent manhole circa 1m deep	1	sum	1,500.00	1,500.00	
	1,200.10				sum	1,500.00	No Quantity	
	1,200.15		Allowance for drain runs and connections to mains sewers - say 30m n.e. 2m deep, backfill with exc mats and make good	30	m	150.00	4,500.00	
	1,200.20		CCTV and testing on completion	1	sum	500.00	500.00	
2100	2,100.00		<u>SUPERSTRUCTURE</u> <u>External Walls</u>					6,500.00
	2,100.05		Assumed no works required in existing building		m2	120.00	No Quantity	
	2,100.10				sum		No Quantity	
	2,100.15		Signage/ Branding	1	sum	2,500.00	2,500.00	
								2,500.00
2200	2,200.00		<u>Roof</u>					
	2,200.05		Assumed no works required		m2	120.00	No Quantity	
	2,200.10				sum	500.00	No Quantity	
								0.00
2300	2,300.00		<u>Windows and doors</u>					
			Minor overhaul and repair of existing windows					
	2,300.05		0.9 * 1.5m (guessed size)	7	nr	150.00	1,050.00	
	2,300.10		Assumed external door is part of main building refit		nr		No Quantity	
	2,300.15				nr		No Quantity	
2400	2,400.00		<u>Internal walls and doors</u>					1,050.00

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Jon. Tylee

Estimate for New Police Post in Stourport Civic Centre

Package Nr	Item Nr	Dimension Reference	Item Description	Quantity	Unit	Rate	Item Total	Group Total
	2,400.05		Timber stud walls, insulation, 2 layers p/bd each side	60	m2	80.00	4,800.00	
			Timber doorset; door, frame, ironmongery					
	2,400.10		single	2	nr	500.00	1,000.00	
	2,400.15		fire door; 1/2 hr FR	4	nr	900.00	3,600.00	
			SERVICES					9,400.00
3100	3,100.00		Electrical Installations					
	3,100.05		Small power, inc external charge point	64	m2	40.00	2,560.00	
	3,100.10		Lighting + emergency lighting	64	sum	40.00	2,560.00	
	3,100.15		External lighting fixed to building		sum	500.00	No Quantity	
	3,100.20		Dimplex heating units (PC supply £100); wall mounted		sum	200.00	No Quantity	
	3,100.25		BWIC	1	sum	1,000.00	1,000.00	
								6,120.00
3200	3,200.00		Mechanical + PH Installations					
	3,200.05		Radiators and distribution (boilers etc in main building)	1	sum	3,000.00	3,000.00	
	3,200.10		Hot & cold water supply to toilets and shower; Upvc waste water	1	sum	2,000.00	2,000.00	
	3,200.15		Sink + sanitary ware to w.c.	2	sum	1,500.00	3,000.00	
	3,200.20		shower	1	sum	750.00	750.00	
	3,200.25		BWIC	1	sum	250.00	250.00	
								9,000.00
3300	3,300.00		Security Installations					
	3,300.05		Fire alarm system	1	sum	500.00	500.00	
	3,300.10		Intruder alarm, external monitoring facilities and links to centre	1	Prov	5,000.00	5,000.00	
								5,500.00
3400	3,400.00		Specialist Installations					
	3,400.05		Hydraulic platform lift including gates etc	1	sum	10,000.00	10,000.00	
								10,000.00
4100	4,100.00		INTERNAL FINISHINGS					
			Floor					
	4,100.05		new levelling screed etc; prepare floor	64	m2	20.00	1,280.00	
	4,100.10		Marley vinyl safety floor to toilets/ locker room, coved skirting	15	m2	60.00	900.00	
	4,100.15		Carpet tiles; decorated timber skirting to lobby & office areas	49	m2	75.00	3,675.00	
	4,100.20		entrance mat inc mat well	1	item	250.00	250.00	
								6,105.00
4200	4,200.00		Wall					
	4,200.05		Ceramic tiles to toilets and locker room	50	m2	45.00	2,250.00	

Client: **West Mercia Police**
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 Date: **06 September 2012**

TRENCH FARROW
Jon. Tylee

Estimate for New Police Post in Stourport Civic Centre

Package Nr	Item Nr	Dimension Reference	Item Description	Quantity	Unit	Rate	Item Total	Group Total
	4,200.10		Splash backs		m2	75.00	No Quantity	
	4,200.15		Skim coat to dry lining; beads etc	50	m2	12.00	600.00	
4300	4,300.00		Ceiling					2,850.00
	4,300.05		Suspended ceiling; concealed grid; perimeter trim	64	m2	40.00	2,560.00	
								2,560.00
4400	4,400.00		Decoration					
	4,400.05		Painting plaster walls, 1 u/ct 3ct vinyl silk	50	m2	10.00	500.00	
	4,400.10		Painting timber, primer, 1 u/c, 2coat gloss	1	sum	750.00	750.00	
								1,250.00
4500	4,500.00		Fittings/ furniture					
	4,500.05		work stations	6	nr	1,500.00	9,000.00	
	4,500.10		interview room furniture	1	sum	5,000.00	5,000.00	
	4,500.15		lockers	12	nr	250.00	3,000.00	
	4,500.20		allowance for additional cupboards/ cabinets etc	1	sum	2,500.00	2,500.00	
								19,500.00
5100	5,100.00		EXTERNAL WORKS					
			Hard landscape					
	5,100.05		Parking area		m2	70.00	No Quantity	
	5,100.10		Pathways (1.5m wide)		m	50.00	No Quantity	
								0.00
5200	5,200.00		Soft landscape					
	5,200.05		Topsoil, seeding, planting		prov	1,000.00	No Quantity	
								0.00
5300	5,300.00		Street Furniture/ Fittings					
	5,300.05		Allowance for car park signage, line marking, branding	1	item	5,000.00	5,000.00	
	5,300.10				item		No Quantity	
								5,000.00
5400	5,400.00		Utilities					
			Incoming mains; connections					
	5,400.05		water/ drainage		item	1,200.00	No Quantity	
	5,400.10		electricity		item	900.00	No Quantity	
	5,400.15		BT		item	0.00	No Quantity	
								0.00
9100	9,100.00		Preliminaries					
	9,100.05		15.50% of total price	20%		94,835.00	18,967.00	
9200	9,200.00		Overheads and profit					18,967.00

Client: **West Mercia Police**
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TRENCH FARROW
Jon. Tylee

Estimate for New Police Post in Stourport Civic Centre

Package Nr	Item Nr	Dimension Reference	Item Description	Quantity	Unit	Rate	Item Total	Group Total
	9,200.05		included in rates	0%		113,802.00	0.00	0.00
9300	9,300.00		<u>Contingency</u>					
	9,300.05		separate cost plan allowance	7.5%		113,802.00	8,535.15	8,535.15
						To Summary £	122,337.15	122,337.15



SUMMARY
Estimate for extension to Kidderminster Station - 754m2

Basis of estimate of construction costs:

Correspondence from Andrew Morgan indicated number of work stations and number of cells required.
 WYG assumption that MIU is to be largely independent from main station - hence provision on space analysis
 Priced at 3rd quarter 2012

Estimate of Construction Costs

Based upon an analysis of costs for other Police projects, we would recommend a budget of £1,900/m2 for the construction of an additional 635m2 of accommodation at Kidderminster Police Station:

		Construction Costs £	Other Costs £	Total Costs £
Extension to station to accommodate an additional 55 officers	754m2	£1,432,600	£610,000	2,042,600
Provision of an additional 8nr cells	8nr	£424,000		424,000
Refurbishment of 11nr cells in existing building	11nr	£330,000		330,000
				<u>2,796,600</u>

Additional Costs

Assumptions/ Exclusions

No allowance for VAT		nil		
No allowance for project finance or future inflation (beyond date of report)		nil		
No allowance for purchase of land		nil		
No allowance for Internal police staff costs in project management etc		nil		
Assumed copiers etc will be leased - therefore no capital allowance		nil		
Profession and Statutory fees	175k/ project (average)		175,000	
Legal fees etc	30k/ project		30,000	
Additional project contingency allowance	10% average		100,000	
removal of contamination/ remediation				
additional obligations imposed by LPA				
Archaeology/ Environmental surveys or mitigation				
Allowance for the provision of IT equipment (network cabling, computers, copiers, telephones etc)				
structured cabling		25,000		
work station equipment		55,000		
general equipment - printers, servers etc		70,000		
		<u>150,000</u>	150,000	
Allowance for client fit-out (loose furniture etc)				
assume 55nr workstations @ £1,000		55,000		
common filing etc		30,000		
reception, tea points etc		70,000		
		<u>155,000</u>	155,000	
Estimate of total additional costs per 754m2 police station			<u>610,000</u>	

KIDDERMINSTER POLICE STATION PROPOSED EXTENSION SPACE ANALYSIS							
	Quantity	Unit	m2/unit	Total Area - m2		Total Area - ft2	
Cellular Offices							
Senior officers	1	nr	15	15		161	
Senior officers	1	nr	12	12		129	
Senior officers	1	nr	9	9		97	
	1				36		388
Meeting Rooms							
4 person	2	nr	15	30		323	
6 person	1	nr	20	20		219	
Conference	1	nr	60	60		646	
	4				110		1,187
Open Plan							
General areas + circulation	55	nr	9.00	495	495	5,328	5,328
Central Services/Ancillary							
Tea point/ Vending		nr	15	0		0	
Kitchen	1	nr	30	30		323	
Reception	1	nr	25	25		269	
Stores	2	nr	9	18		194	
Post Room	1	nr	18	18		194	
Copy Room	1	nr	10	10		108	
Bulk Filing (inc in open plan)							
Sick Room/ Area		nr		0		0	
Computer room (MCR)	1	nr	12	12		129	
					113		1,216
TOTAL (ALL FUNCTIONS)				754 m2	8,119 ft2		

£/m2 study (New build)

Police stations

Rate per m2 gross internal floor area for the building Cost including prelims.
Last updated 10-Sep-2011 12:09.

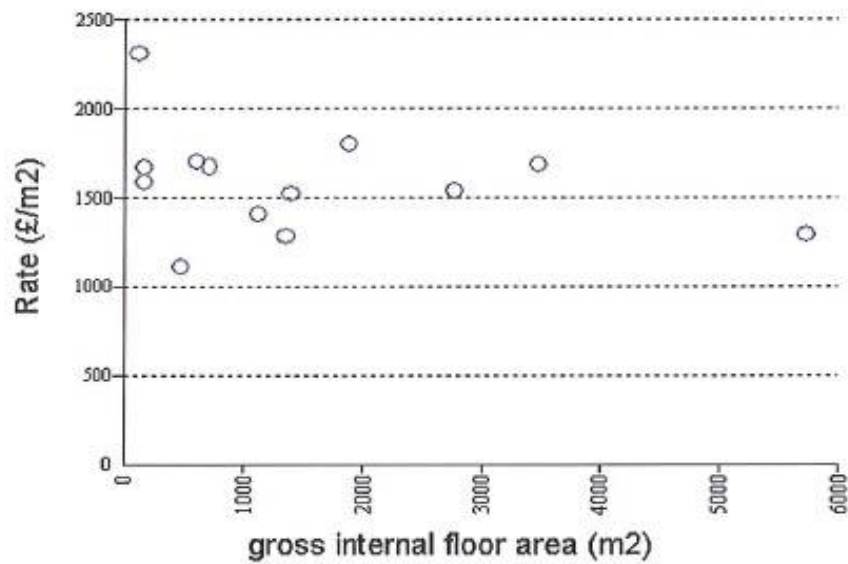
At 3Q2011 prices (based on a Tender Price Index of 225) and UK mean location (Location index 100).

Maximum age of results: 15 years (default)

Mean	Median	Range	Standard Deviation	Sample
1582	1586	1108 - 2309	296	13

Deciles									Quartiles	
1	2	3	4	5	6	7	8	9	1 st	3 rd
1282	1336	1475	1534	1586	1669	1676	1695	1782	1405	1682

Building cost per m2 against floor area



£/m2 study (New build)

Police admin/control buildings

Rate per m2 gross internal floor area for the building Cost including prelims.
Last updated 10-Sep-2011 12:09.

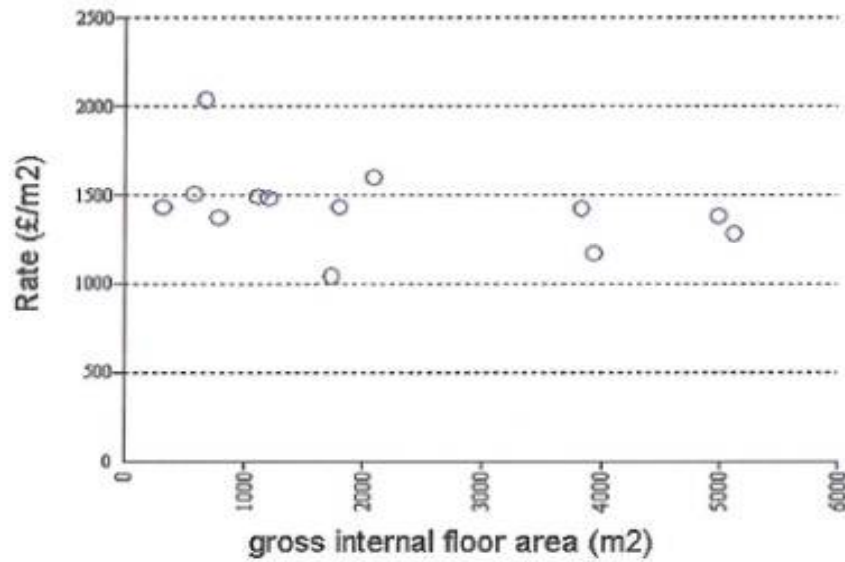
At 3Q2011 prices (based on a Tender Price Index of 225) and UK mean location (Location index 100).

Maximum age of results: 15 years (default)

Mean	Median	Range	Standard Deviation	Sample
1433	1429	1040 - 2034	233	13

Deciles									Quartiles	
1	2	3	4	5	6	7	8	9	1 st	3 rd
1191	1320	1378	1415	1429	1441	1483	1496	1574	1375	1487

Building cost per m2 against floor area



Appendix 3A

Churchfields (Grasmere Close) Police Post Replacement Estimated Costs

Appendix 3B

Churchfields (Grasmere Close) Temporary Re- provision Estimated Costs



SUMMARY
Estimate for New Residential Police Point

Basis of estimate of construction costs:

West Mercia Police drg: "Residential local police post/ temp sales office - Worcester"
 West Mercia Police draft Performance specification for Worcester Residential New Police Post
 Priced at 4th quarter 2011 - updated to 3rd quarter 2012

Estimate of Construction Costs

Based upon the information provided and assuming a single project built in-situ, we would recommend the following budget for the construction of the Residential Local Police Post: £104,000

We would make the following provisional allowance for other project costs including, professional fees, site abnormals, furniture and IT fit out £55,000

TOTAL PROJECT COST **£159,000**
 (see exclusions)

It should be noted that the headline cost includes approximately £39,000 of works associated with specialist installations for solar panels, security systems, shutters and external works

We would recommend considering off-site manufacture by a timber frame (or mobile home) company which could produce sizable savings. A multi project order should produce economies of scale and significantly reduce supply prices.

Similarly, we would expect the costs of professional fess etc to reduce if a multi-project contract is let.

Assumptions/ Exclusions

- No allowance for VAT
- No allowance for project finance or future inflation (beyond date of report)
- No allowance for purchase of land
- No allowance for Internal police staff costs in project management etc
- Assumed copiers etc will be leased - therefore no capital allowance
- Notional allowance for abnormals - additional contingency 10%
- Average allowance for furniture and IT fit-out - no specification or scope
- Lump sum allowance for professional fees



Client: **West Mercia Police**
 Project: **Strategic Infrastructure Assessment - Sep 2012**
 Report: **Estimate for New Residential Police Point**
 Date: **06 September 2012**



SUMMARY
Estimate for New Residential Police Point

Package Nr	Package Name	Package Cost £	Prelims		Contingency	Total	Rates per unit area	
			12%	8%			36 m2 £/m2	388 ft2 £/ft2
<u>Substructure</u>								
1100	Foundations and slab	4,320.00	518.40	363	5,201	144.48	13.42	
1200	Drainage	7,100.00	852.00	596	8,548	237.46	22.06	
<u>Superstructure</u>								
2100	External Walls	11,500.00	1,380.00	966	13,846	384.61	35.73	
2200	Roof	4,820.00	578.40	405	5,803	161.20	14.98	
2300	Windows and doors	12,850.00	1,542.00	1,079	15,471	429.76	39.93	
2400	Internal walls and doors	3,300.00	396.00	277	3,973	110.37	10.25	
<u>Services</u>								
3100	Electrical Installations	3,350.00	402.00	281	4,033	112.04	10.41	
3200	Mechanical + PH Installations	3,000.00	360.00	252	3,612	100.33	9.32	
3300	Security Installations	5,500.00	660.00	462	6,622	183.94	17.09	
3400	Specialist Installations	12,500.00	1,500.00	1,050	15,050	418.06	38.84	
<u>Finishings</u>								
4100	Floor	1,930.00	231.60	162	2,324	64.55	6.00	
4200	Wall	1,350.00	162.00	113	1,625	45.15	4.19	
4300	Ceiling	1,200.00	144.00	101	1,445	40.13	3.73	
4400	Decoration	1,550.00	186.00	130	1,866	51.84	4.82	
4500	Fittings/ furniture	2,750.00	330.00	231	3,311	91.97	8.54	
<u>External Works</u>								
5100	Hard landscape	5,450.00	654.00	458	6,562	182.27	16.93	
5200	Soft landscape	1,000.00	120.00	84	1,204	33.44	3.11	
5300	Street Furniture/ Fittings	650.00	78.00	55	783	21.74	2.02	
5400	Utilities	2,100.00	252.00	176	2,528	70.23	6.52	
	Sub- Total £	86,220.00	10,346.40	7,242.48	103,808.88	2,883.58	267.89	
9100	Preliminaries	12%	10,346.40			inc		
9200	Overheads and profit (included on summary)	0%	-			inc		
			96,566.40			2,883.58	267.89	
9300	Contingency	7.5%	7,242.48			inc		
	TOTAL cost of Estimate for New Residential Police Point £		103,808.88			2,883.58	267.89	

Client: **West Mercia Police**
 Project: **Strategic Infrastructure Assessment - Sep 2012**
 Report: **Estimate for New Residential Police Point**
 Date: **06 September 2012**

TRENCH FARROW
Jon. Tylee

Estimate for New Residential Police Point

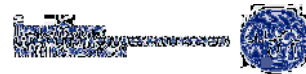
Package Nr	Item Nr	Dimension Reference	Item Description	Quantity	Unit	Rate	Item Total	Group Total
1100	1,100.00		<u>Foundations and slab</u>					
	1,100.05		Excavate for foundations and slab, cart away, 1m deep strip foundations, 150thick suspended slab, 100 insulation, 75 screed	36	m2	120.00	4,320.00	
								4,320.00
1200	1,200.00		<u>Drainage</u>					
	1,200.05		Foul Drains to and including adjacent manhole circa 1m deep	1	sum	1,500.00	1,500.00	
	1,200.10		Surface Water drains to and including adjacent manhole circa 1m deep	1	sum	1,500.00	1,500.00	
	1,200.15		Allowance for drain runs and connections to mains sewers - say 30m each; n.e. 2m deep, backfill with exc mats	60	m	60.00	3,600.00	
	1,200.20		CCTV and testing on completion	1	sum	500.00	500.00	
2100	2,100.00		<u>SUPERSTRUCTURE</u> <u>External Walls</u>					7,100.00
	2,100.05		Timber frame wall, timber weatherboard cladding, insulation, dry lining	75	m2	120.00	9,000.00	
	2,100.10		Allowance for wind posts, structural reinforcement	1	sum		Not Priced	
	2,100.15		Signage/ Branding	1	sum	2,500.00	2,500.00	
								11,500.00
2200	2,200.00		<u>Roof</u>					
	2,200.05		Timber roof trusses, insulated metal roof deck (solar panels msd e	36	m2	120.00	4,320.00	
	2,200.10		Rainwater goods	1	sum	500.00	500.00	
								4,820.00
2300	2,300.00		<u>Windows and doors</u>					
			Aluminium windows; St Gobain low E planitherm ultra tinted safety glass; double glazed					
	2,300.05		0.60 * 1.20m	2	nr	500.00	1,000.00	
	2,300.10		1.00 * 1.20m	2	nr	650.00	1,300.00	
	2,300.15		2.00 * 2.00m	1	nr	2,000.00	2,000.00	
			Aluminium double glazed entrance door; St Gobain low E planitherm ultra tinted safety glass					
	2,300.20		0.9 * 2.00m; power operated, push pad controls	1	nr	2,000.00	2,000.00	
			Timber shutters to doors and windows; sliding track system; power operated					
	2,300.25		0.60 * 1.20m	2	nr	750.00	1,500.00	
	2,300.30		1.00 * 1.20m	2	nr	900.00	1,800.00	
	2,300.35		2.00 * 2.00m	1	nr	2,000.00	2,000.00	
	2,300.40		0.9 * 2.00m	1	nr	1,250.00	1,250.00	
2400	2,400.00		<u>Internal walls and doors</u>					12,850.00

Client: **West Mercia Police**
 Project: **Strategic Infrastructure Assessment - Sep 2012**
 Report: **Estimate for New Residential Police Point**
 Date: **06 September 2012**

TRENCH FARROW
Jon. Tylee

Estimate for New Residential Police Point

Package Nr	Item Nr	Dimension Reference	Item Description	Quantity	Unit	Rate	Item Total	Group Total
	2,400.05		Timber stud walls, insulation, 2 layers p/bd each side	20	m2	80.00	1,600.00	
			Timber doorset; door, frame, ironmongery					
	2,400.10		single	3	nr	500.00	1,500.00	
	2,400.15		double cupboard	1	set	200.00	200.00	
			SERVICES					
3100	3,100.00		Electrical Installations					3,300.00
	3,100.05		Small power, inc external charge point	1	sum	800.00	800.00	
	3,100.10		Lighting + emergency lighting	1	sum	1,000.00	1,000.00	
	3,100.15		External lighting fixed to building	1	sum	500.00	500.00	
	3,100.20		Dimplex heating units (PC supply £100); wall mounted	4	sum	200.00	800.00	
	3,100.25		BWIC	1	sum	250.00	250.00	
								3,350.00
3200	3,200.00		Mechanical + PH Installations					
	3,200.05		Hot & cold water supply to tea point and toilet; Upvc waste water	1	sum	1,250.00	1,250.00	
	3,200.10		Sink + sanitary ware to w.c. (assume Doc M pack)	1	sum	1,500.00	1,500.00	
	3,200.15		BWIC	1	sum	250.00	250.00	
								3,000.00
3300	3,300.00		Security Installations					
	3,300.05		Fire alarm system	1	sum	500.00	500.00	
	3,300.10		Intruder alarm, external monitoring facilities and links to centre	1	Prov	5,000.00	5,000.00	
								5,500.00
3400	3,400.00		Specialist Installations					
	3,400.05		Solar panels to both roof pitches; say 15m2	1	prov	12,500.00	12,500.00	
								12,500.00
4100	4,100.00		INTERNAL FINISHINGS					
			Floor					
	4,100.05		Marley vinyl safety floor to tea point and wc, coved skirting	8	m2	60.00	480.00	
	4,100.10		Carpet tiles; decorated timber skirting to lobby & sales area	20	m2	60.00	1,200.00	
	4,100.15		entrance mat inc mat well	1	item	250.00	250.00	
								1,930.00
4200	4,200.00		Wall					
	4,200.05		Ceramic tiles to tea point and wc	15	m2	45.00	675.00	
	4,200.10		Splash backs	1	m2	75.00	75.00	
	4,200.15		Skim coat to dry lining; beads etc	50	m2	12.00	600.00	
								1,350.00
4300	4,300.00		Ceiling					



SUMMARY Estimate for Temporary Police Point

Basis of estimate of construction costs:

Unit purchased and installed at Abbotswood, Romsey 35m² (see photo)
 Priced at 4th quarter 2011 - updated to 3rd quarter 2012

Estimate of Construction Costs

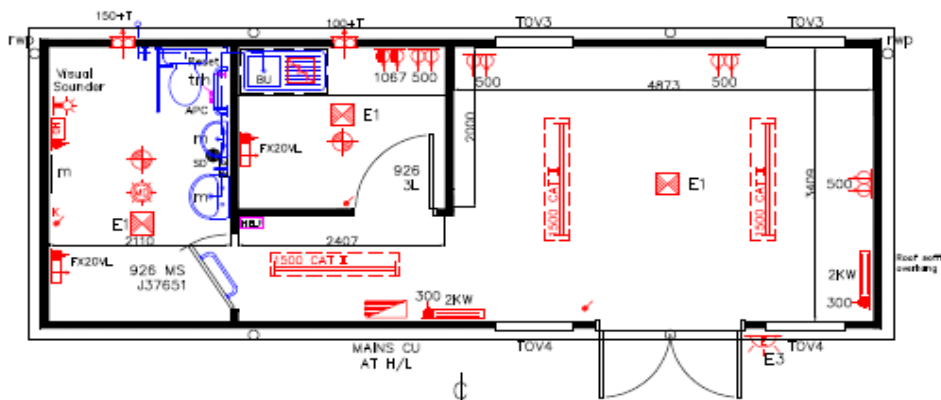
Based upon the information provided and assuming a single project built in-situ, we would recommend the following budget for the construction of the Temporary Police Post: £50,000

We would make the following provisional allowance for other project costs including, professional fees, site abnormalities, furniture and IT fit out £25,000

TOTAL PROJECT COST
(see exclusions) **£75,000**

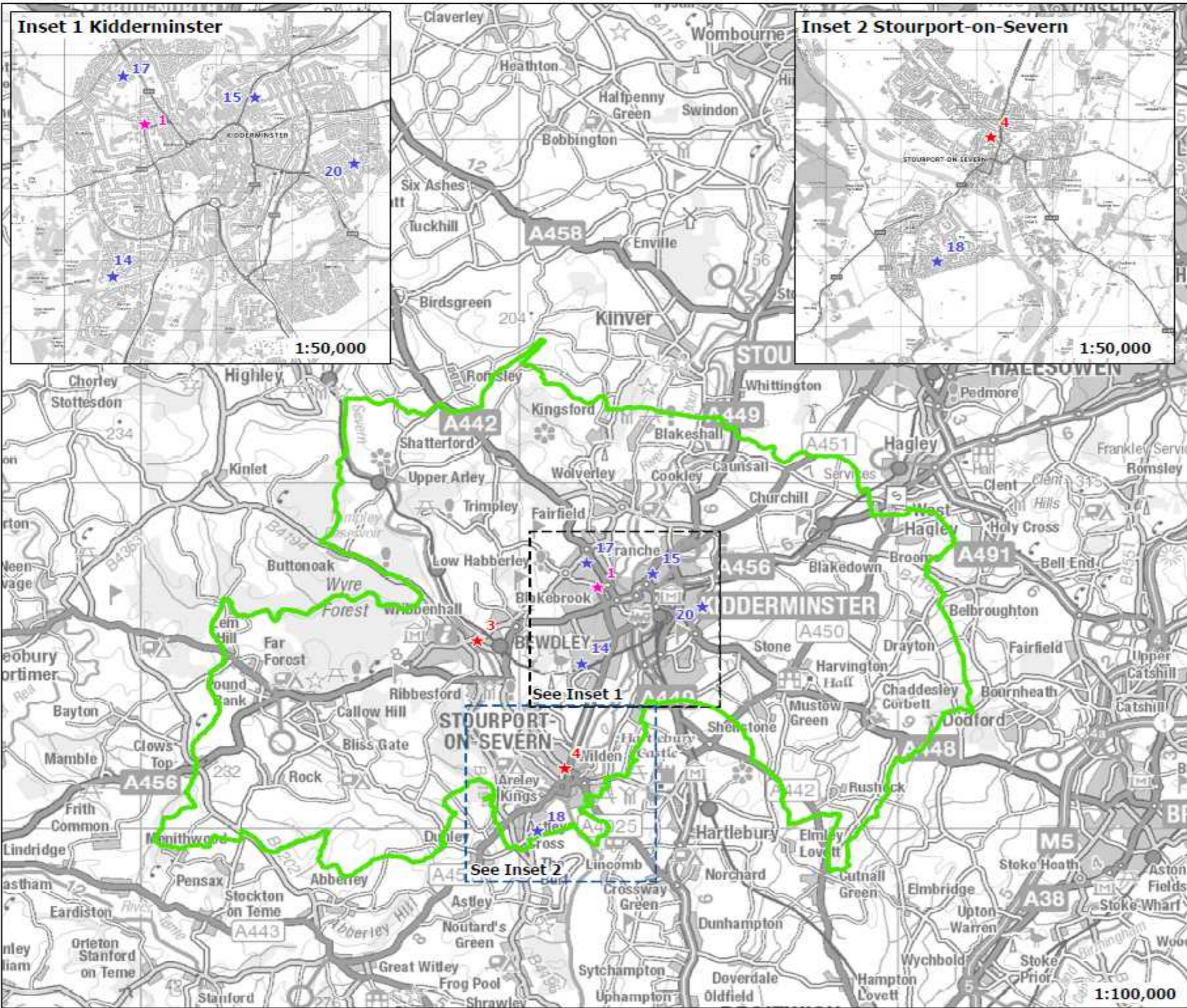
Assumptions/ Exclusions

- No allowance for VAT
- No allowance for project finance or future inflation (beyond date of report)
- No allowance for purchase of land
- No allowance for Internal police staff costs in project management etc
- Assumed copiers etc will be leased - therefore no capital allowance
- Notional allowance for abnormalities - additional contingency 10%
- Average allowance for furniture and IT fit-out - no specification or scope
- Lump sum allowance for professional fees



Appendix 4

Existing Baseline Assets



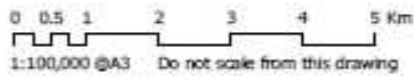
West Mercia Police

Wyre Forest District SIA

Existing Buildings Infrastructure **01**

- Key**
-  Wyre Forest District
 -  Territorial Policing Unit Headquarters
 -  Police Station
 -  Police Post

NB: This plan does not cover the WMP Force HQ facility at Hindlip near Worcester.



A066406-19
A066406-19 01 Existing Buildings Infrastructure
August 2012

5th Floor, Longcross Court, 47 Newport Road, Cardiff CF24 0AD
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Appendix 4 - Schedule of WMP Wyre Forest Premises and Services Delivered from HQ Sites Sep-12

WMP Premises within the Wyre Forest District

Ref:	Wyre Forest (part of North Worcestershire TPU)	Leashold/Freehold	Property Type
1	Kidderminster Territorial Policing Unit Headquarters, Habberley Road, Kidderminster. DY11 6AN	FH	TPUHQ
3	Bewdley Police Station, 15 Kidderminster Road, Bewdley. DY12 1AQ	FH	P Station
4	Stourport on Severn Police Station, County Buildings, Bewdley Road, Stourport-on Severn. DY13 8YZ	FH	P Station
14	Birchen Coppice Police Post, Birchen Coppice Middle School, Woodbury Road, Kidderminster. DY11 7JJ	LH	P Post
15	Windermere House, Grasmere Close, Kidderminster. DY10 2PD	LH	P Post
17	Franche School Police Post, Chestnut Grove, Franche, Kidderminster. DY11 5QB	LH	P Post
18	The Walshes Police Station, 36 Old Ford Walk, Stourport on Severn. DY13 0DW	LH	P Post
20	Comberton Police Post, Queen Elizabeth Road, Kidderminster. DY10 3BD	LH	P Post

Headquarters-Based Services Delivered to the Wyre Forest Area

The following services are centrally managed from our headquarters sites:

Operational Support:

Command & Control and Communications
Safeguarding Services
Criminal Justice Services

Protective Services:

Major Crime
Intelligence
Public Protection
Specialist Crime
Force Operations
Forensic Services

Enabling Services:

Finance
Information Management and Technology
Estate Services
Fleet Management
Procurement
Resource Management
Professional Standards
Personnel
Learning & Development
Strategy & Change
Legal Services
Performance
Corporate Communications
Change and Strategic Partnerships

Appendix 4 - Summary

**West Mercia Police
Force Summary September 2012**

	Police Officers			Police Staff (inc CSOs)			Specials Actual	CSOs		
	BP	FTE	Actual	BP	FTE	Actual		BP	FTE	Actual
Territorial Policing	1498	1424.8	1448	342	310.7	326	292	283	255.9	261
Protective Services	633	579.5	585	330	306.4	347				
Operational Support	77	76.7	77	654	566.4	649				
Human Resources	37	34.6	35	160	138.0	149				
Strategy & Legal Services	1	4.0	4	59	51.7	63				
Chief Officers & Corporate Services	4	4.0	4	342	309.5	335				
Police Authority				9	7.4	8				
Total	2250	2123.6	2153	1896	1690.1	1877	292	283	255.9	261.0

	Police	Staff	Specials	CSO
Total Career Breaks	18	20		0
Total Secondments	12	7		0
Number of female	626	1144	101	125
Number of BME	40	26	5	6

**Police Staff Budgeted Posts - Actual Strength
1st September 2012**

	Total			Command			Grades 7-13			Grades 4-6			Grades 1-3		
	BP	Staff	FTE	BP	Staff	FTE	BP	Staff	FTE	BP	Staff	FTE	BP	Staff	FTE
Territorial Policing															
South Worcestershire	58	53	52.3												
North Worcestershire	54	50	49.7												
Herefordshire	36	30	29.5												
Shropshire	78	76	74.1												
Telford & Wrekin	46	44	42.4												
Command Support	36	41	33.9												
Crime Management	34	36	32.6												
Sub-total	342	330	314.5	0	0	0.0	9	8	7.0	325	312	300.6	8	10	6.9
Protective Services															
Sub-total	330	351	311.4	0	0	0.0	79	89	83.1	169	181	160.5	82	81	67.8
Operational Support															
Sub-total	646	656	577.1	0	0	0.0	15	15	14.5	406	404	369.6	225	237	193.0
Human Resources															
Sub-total	160	148	137.0	0	0	0.0	91	84	79.7	38	38	35.2	31	26	22.1
Strategy & Legal Services															
Sub-total	59	63	51.6	0	0	0.0	29	35	30.3	23	20	16.7	7	8	4.6
Corporate Services															
Sub-total	342	327	300.6	1	1	1.0	125	109	106.7	104	101	94.3	112	116	98.6
Police Authority															
Police Authority	9	8	7.4												
Total	1888	1883	1699.6	1	1	1.0	355	346	326.7	1067	1056	978.9	465	478	393.0

The departments above encompass the following:

Protective Services	Operational Support	Human Resources	Strategy & Legal Services	Corporate Services
ACPO Firearms	Casualty Reduction Partnership	Human Resources	Strategy & Legal Services	Chief Officer Command Team
Central Counties Air Ops Unit	Command Control & Comms	Learning & Development	Corporate Communications	Estate Services
Force Operations	Criminal Justice	Personnel	Legal Services	Finance
Forensics	Operations	Professional Standards	Performance	IMTD
Intelligence	Safeguarding Services		Strategy & Change	Procurement
Major Investigation Unit			Sub-total	Resource Management
Public Protection Unit				Transport
Safer Roads Partnership				
Specialist Operations				

Police Budgeted Posts - Staffing Levels 1st September 2012

Territorial Policing	FTE	BP	Staffing
Territorial Policing	1	1	100.0%
South Worcestershire	257	271	95.0%
North Worcestershire	288	305	94.3%
Herefordshire	155	173	89.3%
Shropshire	263	269	97.8%
Telford & Wrekin	182	193	94.5%
Command Support	18	18	99.4%
Crime Management	276	268	103.0%
Sub total	1440	1498	96.1%

Protective Services	FTE	BP	Staffing
Sub total	581	633	91.7%
Operational Support	FTE	BP	Staffing
Sub total	77	77	99.5%
Human Resources	FTE	BP	Staffing
Sub total	35	37	94.6%
Strategy & Legal Services	FTE	BP	Staffing
Sub total	4	1	400.0%
Corporate Services	FTE	BP	Staffing
Sub total	5	4	125.0%

Staffing using Full Time Equivalent			
	FTE	BP	Staffing
Force Staffing Total	2141.3	2250	95.2%

Staffing using Actual Strength			
	Actual	BP	Staffing
Force Staffing Total	2169	2250	96.4%

Appendix 5

Types of WMP Buildings & Accommodation

Appendix 5

TYPES OF WEST MERCIA POLICE BUILDINGS & ACCOMMODATION INFRASTRUCTURE

The different types of WMP infrastructure should be understood as follows: -

Territorial Policing Headquarters

These facilities function as command and control centres, normally on a county wide basis. They encompass offices, usually a call management centre, facilities for specialist police units and a custody suite. A building/complex of this type would typically provide accommodation for approximately 300-400 Police Officers and support staff on shift.

Section Station

This is a facility which is capable of accommodating approximately 50 Police Officers and support staff working on shift. A typical station of this type would include offices, interview rooms, data rooms, briefing rooms and storage for equipment. They typically occupy sites of approximately 1 hectare.

Police Station

These are building capable of accommodating 10 - 40 Police Officers and support staff on shift. Typical facilities include offices, interview rooms and storage for equipment.

Police Post

These can be found as rooms within larger buildings, or as a small free-standing facility. They provide accommodation for 3 – 10 Police Officers and Police Community Support Officers (PCSOs) on shift. They are not always for public use. They usually consist of an office/offices and possibly a shared interview room, W.C. and kitchen area. Freestanding Police Posts typically have an internal floor area of approximately 60sq.m, with 2 parking spaces immediately outside.

A map which shows the location of WMP's existing infrastructure in Wyre Forest is included at Appendix 4.

Appendix 6

West Mercia-Warwickshire Police

Strategic Alliance

Appendix 6

West Mercia/Warwickshire Police Authorities' Strategic Alliance

In August 2012, the Warwickshire and West Mercia Chief Officer team met to reaffirm the commitment to deliver the new strategic alliance between the two Police Authorities.

The two authorities are working in alliance and whilst almost all business areas and teams will combine to deliver services, they will continue as two forces retaining separate identities.

Chief Constables and Deputy Chief Constables remain accountable personally for policing in their force area.

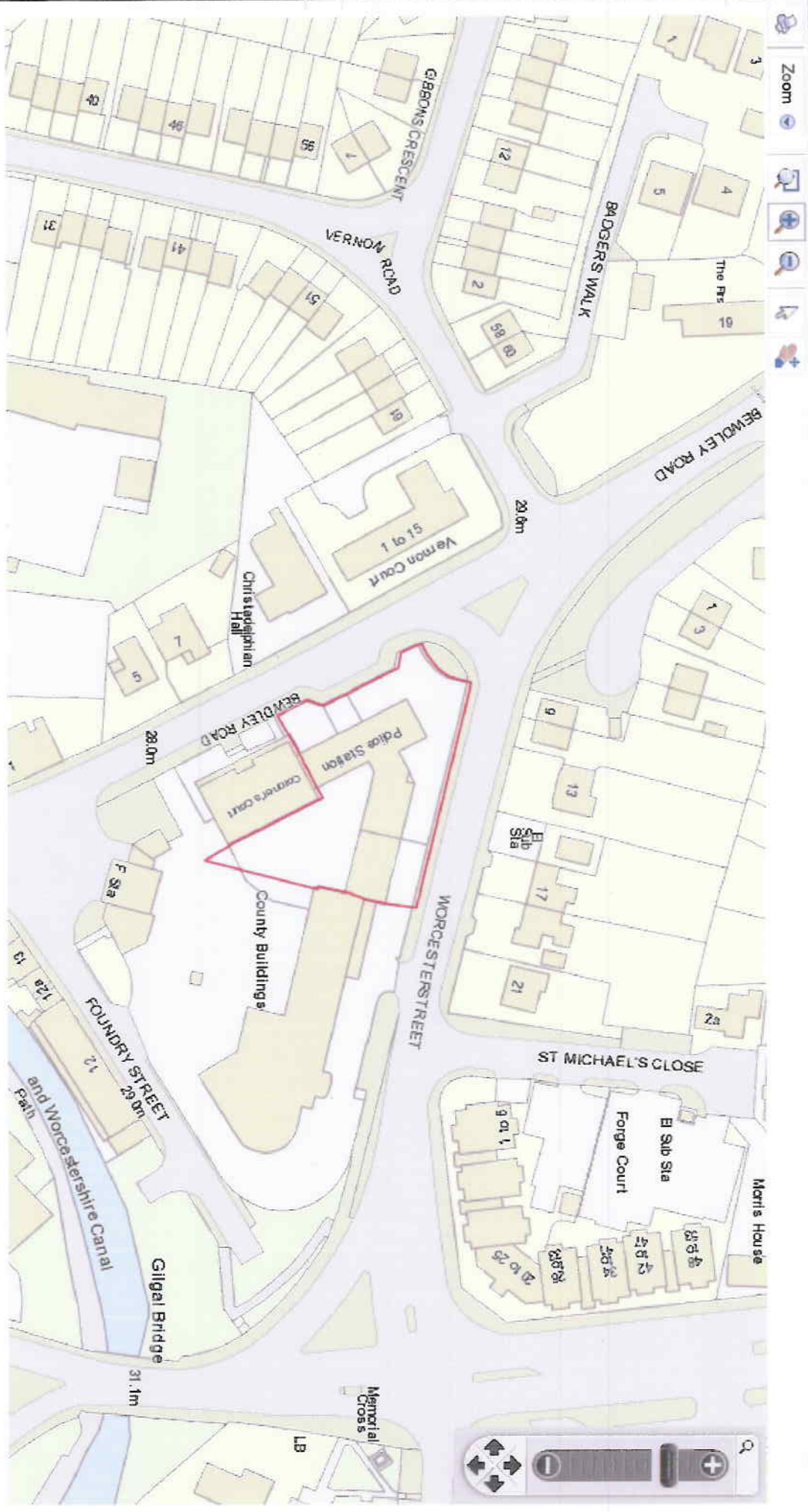
Replacement of the Police Authorities in November 2012 with Police & Crime Commissioners will not affect the principle of progressing the strategic alliance.

Set out below are the key recommendations for the Strategic Alliance from June 2011.

1. The executive leadership model to consist of two Chief Constables and two Deputy Chief Constables, commissioning services provided by three directorates in alliance – Protective Services, Local Policing and Enabling Services. The concept of this shared commissioning role and the relationship between CC roles and DCC roles requires immediate work to define.
2. These three directorates should be led by two Assistant Chief Constables and a Director of Enabling Services. The portfolios of these chief officers need to be confirmed including the amount of delegated authority and independence around financial decisions as well as the nature of governance and reporting requirements.
3. The chief officers should be appointed as soon as possible to provide the necessary momentum and oversight of the ongoing design while driving out further efficiencies as yet unidentified. For the same reason, the Alliance Programme Director should be appointed at the earliest stage as it should become the one change programme for both forces.
4. The chief officers should work with the Police Authorities to understand and shape how their respective management and governance roles will operate to complement this model. This will give rise to the necessary initial section 23 arrangements.
5. Both forces' underpinning values, strategic objectives and performance approaches should be aligned as quickly as possible.
6. Operational decisions should be based upon addressing the greatest harms within each policing area. Chief Officers should urgently develop a model to address tasking and operational deployment across both force areas based on a commissioning approach. This approach will be subject to annual review by their respective governing bodies advised by their respective treasurers.
7. We will ensure that diverse local communities continue to receive the policing services they need within Herefordshire, Shropshire, Telford & Wrekin, Warwickshire and Worcestershire. We will maximise this by developing a model of local policing within the Alliance approach while reflecting local differences.
8. Each Chief Constable will have access to independent financial advice. An early review is required to provide clarity over financial arrangements. The two organisations will need to maintain their own balance sheets, retain their own assets and meet the costs that fall exclusively on their own force area. New alliance services covering both forces will be apportioned on an appropriate basis (the default will be that net revenue expenditure which suggests apportionment broadly 31% for Warwickshire and 69% for West Mercia).

Appendix 7

Site Maps of Kidderminster Police Station & Stourport Civic Centre



X: 381225.467448, Y: 271822.744792 (METER)

0 feature selected

1: 1250.00

329.74 x 164.04 (m)

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Measure Area



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This plan was printed from SIGnet on 05-Jul-2011 and is not for use within a legal document.

The information is indicative only.
Worcestershire District Local Development Framework
Site Allocations & Policies - Pre Submission Responses (October 2012)

Kidderminster Police Station



Appendix 8

Home Office Guide to the Police Funding Formula



PLAIN ENGLISH GUIDE TO THE POLICE FUNDING FORMULA

Introduction

What is the Police Funding Formula?

The Police Funding Formula (PFF) is essentially a calculation that uses various data sources (such as population density) to share money between police authorities in England and Wales. It is not a calculation of absolute needs i.e. it does not estimate how much each force needs independently of other forces. Instead it shares out the amount of money designated for police funding between forces based on their relative needs compared to each other.

Why is the Police Funding Formula important?

The PFF is important because it is used to divide the majority of the money available for total police funding between forces. Consequently, the results of the PFF have a significant impact on how much money a force will receive in order to police its local area.

Is the PFF used to distribute all funding from central government to the police?

There are 4 main sources of funding from central government to the police. Two are from the Home Office and two are from the Department for Communities and Local Government (DCLG) in England and the Welsh Assembly Government (WAG) in Wales:

1. The Police Grant (from the Home Office)
2. Revenue Support Grant (from DCLG and WAG)
3. Redistributed Business Rates (from DCLG and WAG)
4. Specific Grants (from the Home Office)

For the first three of these the Home Office, DCLG and WAG distribute around £8.5bn using the PFF. For the distribution of Revenue Support Grant and Redistributed Business Rates, DCLG and WAG take into account the 'relative resources' as well as the 'relative needs' expressed through the PFF. To do this, WAG and DCLG include the council tax base in their calculations so that the total payment (including that from the Home Office) takes this into account. This is because some areas will have a higher tax base (i.e. more band-D equivalent properties) to levy council tax from. Taking this into account goes some way to levelling the playing field in terms of access to local tax funding.

The fourth source of police funding is a set of grants for specific purposes (totalling around £2.5bn) which are distributed on a different basis to the PFF, with the exception of the capital grant which does use the PFF¹.

Is the PFF the right way to distribute police funding?

Designing a system to fund the 43 police forces of England and Wales is complex. The PFF is a way to measure the need for policing in areas relative to each other. It uses a range of indicators that are available on a consistent basis for all police authorities.

The limitations of available data mean that the PFF cannot capture every factor that will affect relative need for policing in an area. But the model is designed to be able to provide a good statistical prediction of relative police workload across the country. We are constantly trying to improve it, and this is currently being done by the Police Allocation Formula Working Group (PAFWG) which is an official-level working group made up of officials from Home Office, DCLG and WAG and representatives from police authorities, the Association of Police Authorities (APA) and the Association of Chief Police Officers (ACPO). After the PAFWG has made its recommendations, ministers will decide on which they wish to include in a public consultation where anyone from police authorities, and other authorities with an interest in policing, together with the general public, can make representations to the Home Office and DCLG/WAG. This process ensures that the formula is scrutinised and can be discussed by a wide range of stakeholders.

¹ Note that the Crime Fighting Fund also partially uses the PFF to distribute funding.

How the Police Funding Formula distributes funding

How does the PFF divide funding by activities that the police perform (police workload)?

The first step of the PFF is to divide everything the police service has to do to police the country (total police workload) into eleven categories (tasks). Seven of these relate to reducing/investigating different types of crime². The other four are as follows: providing reassurance to the public, providing assistance at or reducing road traffic accidents, providing assistance with non-crime incidents and policing special events such as protest marches or football matches.

Using data that the police provide on how they spend their time we know that some of these activities take up more police time than others. As a result more funding is allocated by reference to activities which take up a lot of police time, like investigating violent crime, and less by reference to activities which take up less time, like policing special events. For example we allocate 60% of funding on the basis of reducing/investigating crime nationally. It is important to note that although this is how the PFF allocates funding, police authorities and forces do not have to spend their budget according to this allocation. They get a lump sum and are free to spend it according to their assessment of local priorities.

How does the PFF take into account the different policing needs of different areas?

So far we have divided funding by reference to duties that all police forces need to perform. But, we know, from crime statistics, that different forces will have different amounts of work in each of these categories, and this obviously impacts on the workload of the police in different areas. For example, urban forces will tend to have more violent crime than rural forces, but rural forces tend to have more road traffic accidents than urban ones. To deal with this the PFF allocates a bigger share of the funding for a particular category (e.g. vehicle crime, reducing road traffic accidents etc.) to forces which have greater needs in that area. For example, a bigger proportion of the funding allocated for burglary will go to forces in which burglary is more likely to happen and a lower proportion to forces in which burglary is less likely. Again, it is important to note that although funding is based on police activity, like how much burglary there is in an area, police authorities and forces do not have to spend their funding in line with the way the total amount of money received has been calculated.

This raises the question: How does the formula know which areas have a greater need for funding for certain categories (such as robbery or providing public reassurance) and which have less? The PFF does this by predicting the relative workload (or need) for each category of police activity for each force based on socio-economic and demographic factors (e.g. amount of bars per hectare in an area).

If we take 'providing assistance at and reducing road traffic accidents' as an example, population sparsity is the predictor we use because across England and Wales this tends to be higher in areas where there are more road traffic accidents. This means that a police force area that has a very low population density (i.e. high population sparsity) will be allocated more of the funding that is available for the traffic accidents category than an area with high population density. This relationship is given at the bottom of page 6 on The Police Grant Report³. So, for a given force:

$$\text{Traffic accident workload} = 1.1555 \times \text{population sparsity}$$

The number we multiply population sparsity by, 1.1555, is generated by a statistical technique⁴ and represents the relationship between population sparsity and traffic accident workload on average in England and Wales. It is important to note that although population sparsity is used in this case, this does not mean that population

² The seven crime types are as follows: More serious violence/sexual offences, less serious violence, robbery, vehicle crime, domestic burglary, other crime (high cost), other crime (low cost).

³ The Police Grant Report 2010/11 can be found at <http://police.homeoffice.gov.uk/publications/finance-and-business-planning/draft-police-grant-report-10-112835.pdf?view=Binary>

⁴ A weighted least squares regression is used to generate this coefficient

sparsity particularly causes road traffic accidents. It only means that population sparsity has a statistical relationship with road traffic accidents. The equations for the other police workloads can be found in the Police Grant Report and can be understood in exactly the same way as the above example⁵.

How does the PFF deal with the different costs of wages in different parts of England and Wales?

We know that there are regional differences in costs across England and Wales and the PFF incorporates these by adjusting funding by a factor called the Area Cost Adjustment (ACA). This factor compares wages, and rental rates for business premises, across England and Wales and ensures that the differences for equivalent services are taken into account. For example, a cleaner in a police station in Northumbria earns less than a cleaner in a City of London police station. Thus the City of London gets a higher ACA factor than Northumbria.

How does the PFF fit in with the minimum increase in annual funding guaranteed to all police authorities?

In this Spending Review⁶ period, each police authority is assured a minimum percentage increase of 2.5% ('the floor') in grant year-on-year. Those police authorities that get less than this based purely on the formula are topped up so that their grant increase equals 2.5%. In order to pay for this any force receiving an increase based purely on the formula that is greater than 2.5% has their grant increase above 2.5% scaled back by a standard proportion. For example, if Force A has only received an increase of 2.4%, in order to meet its floor increase it needs another 0.1%. Now, if Force B received a 2.7% increase on last year, part of the 0.2% increase above the 2.5% floor would be used to finance the cost of providing the floor for Force A. This process is commonly referred to as floor damping. Note that this does not mean that all the forces end up receiving a 2.5% increase because those that receive an increase above 2.5% only have part of their funding scaled back so that they are still above the 2.5% floor.

Frequently asked questions

1. *What are Rule 1 Grants?*

These are similar to the floor damping mechanism mentioned above. The reason this is done separately from floor damping is that floor damping is done by DCLG for English authorities. Rule 1 is the equivalent for Wales with South Wales being scaled back because it is above the floor and this money then being redistributed to the other Welsh forces. However, this redistribution is not sufficient to bring the other Welsh forces up to the 2.5% floor increase. During this Spending Review period the Home Office pays a further grant called The Welsh Top-Up Grant so that they attain the floor increase.

2. *What are Rule 2 Grants?*

This is an amalgamation of five specific grants that are not distributed on the basis of the PFF. They are as follows: the Rural Policing Fund, the Forensic DNA grant, the Integrated Police Learning and Development Programme, the London and South East Allowances, and Special Priority Payments. They were combined into one non-ring fenced grant to give police authorities more control over how they are used.

3. *What is the Metropolitan Police Service Special Payment?*

The Metropolitan Police Service has duties related to its national and international capital city functions which other forces don't have. These factors are difficult to include in the PFF and so this grant is given instead.

4. *How do the top-ups listed in the Police Grant Report correspond to the 11 categories of police workload mentioned in this document?*

The top-ups correspond to the categories as given in the table below:

⁵ In the Police Grant Report each crime equation is given the label 'crime top-up'. See table at end of document for details on how the crime top-ups in the Grant Report correspond to the 11 categories of police workloads mentioned above.

⁶ Comprehensive Spending Reviews (CSRs) are carried out by HM Treasury, usually every three years to set the spending limits for Government departments and public services. The current CSR runs until the end of the financial year 2010-11.

Crime Top-Up in Police Grant Report	Police Workload category
Special Events Basic Amount	Policing special events
Police Crime Top-Up 1	Violence against the person (more serious) and sexual offences
Police Crime Top-Up 2	Robbery
Police Crime Top-Up 3	Violence against the person (less serious)
Police Crime Top-Up 4	Vehicle crime
Police Crime Top-Up 5	Burglary
Police Crime Top-Up 6	Other crime (high cost)
Police Crime Top-Up 7	Other crime (low cost)
Police Incidents Top-Up	Providing assistance with non-crime incidents
Police Fear of Crime Top-Up	Providing reassurance to the public
Police Traffic Top-Up	Providing assistance at or reducing road traffic accidents
Police Sparsity Top-Up ⁷	A top-up that addresses the specific needs of forces in rural areas

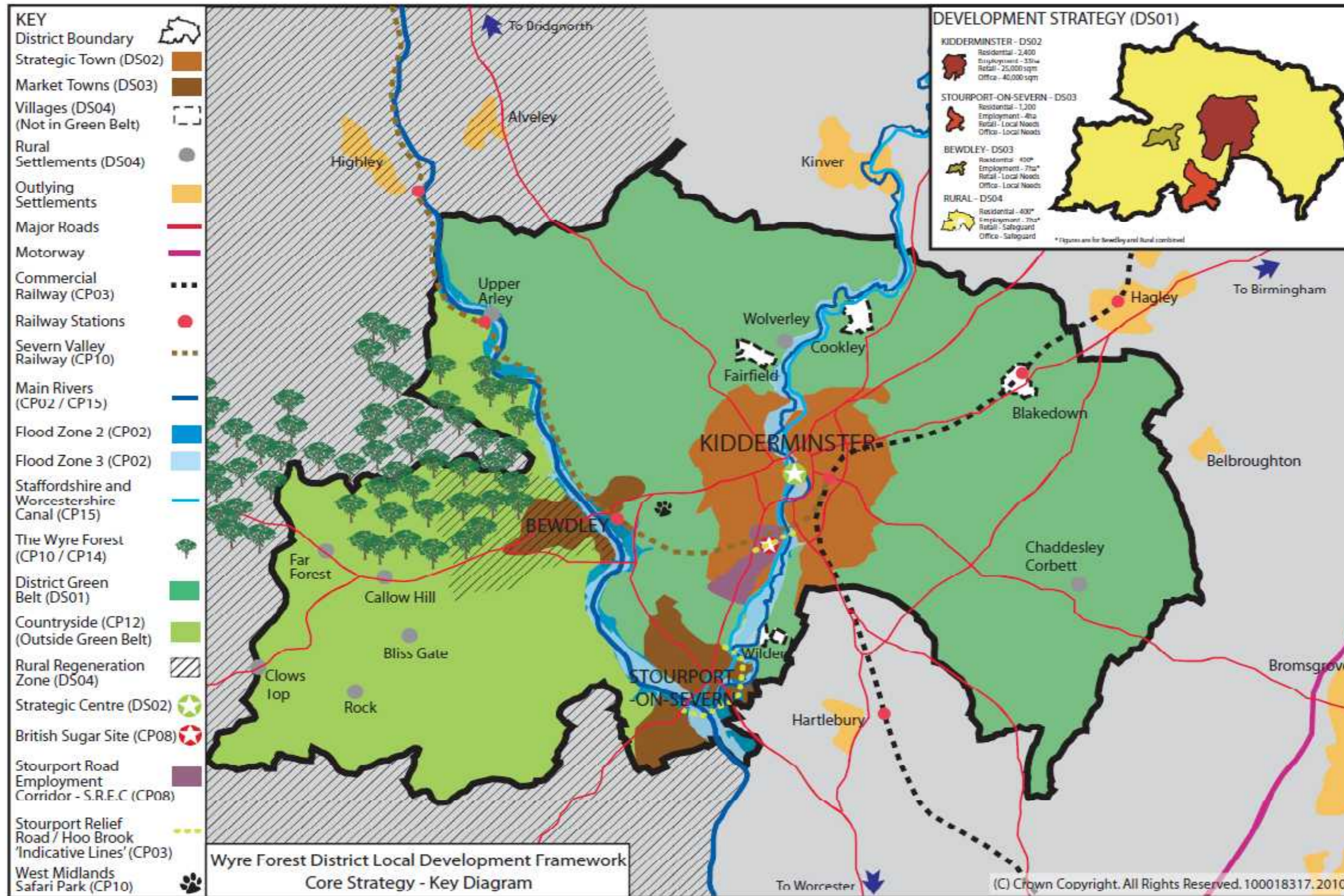
Police Finance and Pensions Unit, Police Reform and Resources Directorate, Home Office, London.
15 March 2010.

⁷ Note that this is not one of the eleven categories of police workload. It is a top-up for rural forces.

Appendix 9

Wyre Forest Core Strategy Key Diagram

APPENDIX 8 - WYRE FOREST CORE STRATEGY - KEY DIAGRAM



DEVELOPMENT STRATEGY (DS01)

KIDDERMINSTER - DS02



Residential - 2,400
Employment - 33ha
Retail - 25,000 sqm
Office - 40,000 sqm

STOURPORT-ON-SEVERN - DS03



Residential - 1,200
Employment - 4ha
Retail - Local Needs
Office - Local Needs

BEWDLEY - DS03

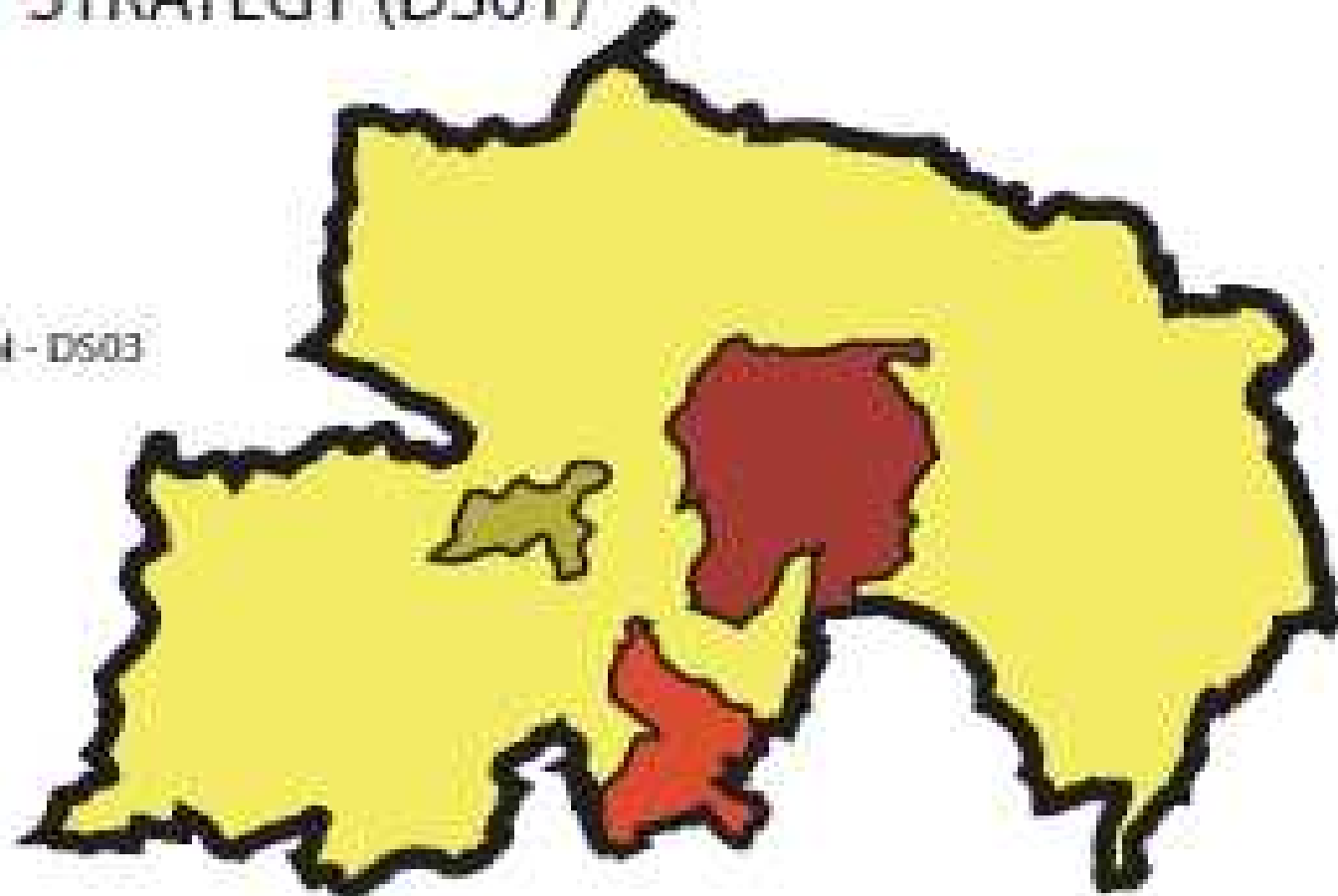


Residential - 400*
Employment - 7ha*
Retail - Local Needs
Office - Local Needs

RURAL - DS04



Residential - 400*
Employment - 7ha*
Retail - Safeguard
Office - Safeguard



* Figures are for Bewdley and Rural combined

Appendix 10

Methodology presented to the Local Authorities for consultation

Appendix 10 - Generic Methodology for Strategic Infrastructure Assessments



Work Stages & Tasks	Factors for Consideration	Outputs	Value Quantification
Stage 1 Existing Baseline Infrastructure			
Establish extent, availability and quality of information held by WMP on existing, significant infrastructure assets: property, equipment, vehicles, other			
Existing Asset Base Produce a baseline spatial representation (i.e mapping) of significant property assets, if possible, disaggregated on TPU area basis		Mapping Document	
Compile a baseline high-level inventory of equipment/vehicles/other capital assets, if possible disaggregated on TPU area basis		Inventory Document	
Existing Deficiencies Identify existing key deficiencies in infrastructure on basis of zero growth but in recognition of PFTF, Making the Difference		Deficiencies Schedule	
Identify asset/floorspace capacity likely to be yielded by Force workforce reductions (Making the Difference)		Capacity Schedule	
Net [Surplus/Shortfall] Capacity Calculate net capacity/under-capacity following Making the Difference		Schedule of net capacity available - floorspace - equipment - vehicles - other	E Quantification required
Review WMP Capital Investment Programme	2010-2011 *New command and control system *Operational Data Store *Sexual Abuse and Referral Centre *New police station at Market Drayton *Custody improvements at Telford *New police station at Bromsgrove *Central store at Defford	Comparison with net capacity to identify any opportunities (highly unlikely)	
Stage 2 SIA based upon ACPO Formula			
ACPO Formula Run standard (or amended) ACPO formula based upon policing costs data provided by WMP. Business crime to be estimated as a percentage of overall crime			
Generate total overall cost of policing population growth NB: tolerances of population projections to be recognised on LPA basis			E Quantification required
Generate cost (developer contribution) per new dwelling/sq m commercial floorspace			E Quantification required
SI Aspirations Express overall cost as actual provision of additional infrastructure at strategic and local level recognising not just population growth but also real numbers/location housing growth as expressed in LDF or equivalent documents			
Identify planned and aspirational infrastructure: 1. Strategic projects (including Force-wide apportionments) 2. TPU and local projects To be cognisant of opportunities for more efficient ways of working - vehicles, equipment, central services, forensics etc and stemming from PFTF and Making the Difference		SI Aspirations Schedule of new infrastructure requirements	E Quantification required To be commensurate with line 14 above
Spatial representation of additional infrastructure requirements		Annotated mapping document	
Stage 3 SIA based upon net requirement			
Disposal of Assets		Disposals Schedule	E Quantification required
Moderation of SI Aspirations, acknowledging existing deficiencies in infrastructure, spare capacity (from stage 1) and potential disposal receipts			
SIA based upon moderated net requirements		First Draft SIA Document	E Quantification required
Stage 4 Final SIA			
Spatial representation of net infrastructure requirements, if appropriate with recognition of S106 v CIL funding issues			
Identification of all potential sources of funding for the provision of new police infrastructure (including potential for New Homes Bonus contributions)			
Calculation of shortfall to be funded, potentially through CIL			
Calculation of E contribution per dwelling/commercial floorspace			
Phasing of provision in relation to amount and location of growth			
Draft costed SIA sense checked and subject to internal WMP consultation		Final Draft SIA	
Draft costed SIA sense checked and subject to external consultation with LPA(s)			
Final revisions		Publication of Final SIA	
Stage 5 Annual monitoring and Review			

Appendix 11

WMP Capital Investment Programme

Appendix 11 - Summary of WMP Capital Programme – Buildings

Detailed Projects – Buildings Title	Estimated Project Total £000
<u>Core Capital</u>	
Disability Discrimination Act	£1,726.50
Environmental Improvements	£300.00
Total Core Capital	£2,026.50
<u>Work in Progress</u>	
New Bromsgrove Police Station	£10,538.00
New Bewdley Station	£175.00
Hindlip Space Audit	£200.00
Shrewsbury Joint Agency Interviewing Facility	£400.00
Total Work in Progress	£11,313.00
Total Buildings	£13,339.50

Appendix 12

West Midlands RSS Growth Targets Information

Appendix 12 – West Midlands RSS Growth Targets Information

RSS Growth targets

The Regional Strategy (RS) for the area assumed growth of 10,500 dwellings in Worcester, 9,100 dwellings in Wychavon and 4,900 dwellings in Malvern Hills (a total of 24,500) from 2006 to 2026 as per the table below:

Local Authority Area	Overall requirement 2006 to 2026	Within the City/Town	Urban Extensions	Rural Areas
Worcester	10500	3,200	3,500 at Worcester West 3,000 at Worcester South 500 at Fernhill Heath 500 at Kilbury Drive	
Wychavon	9100	1180 in Evesham 395 in Droitwich Spa 285 in Pershore	1,500 at Offenham Road in Evesham 800 at Hampton in Evesham 1,800 at South Droitwich (Copcut) 250 north of Pulley Lane at Droitwich 1000 within 3 urban extensions at Pershore	1900
Malvern Hills	4900	1700 - Great Malvern	1,600 in two urban extensions to Great Malvern	1,600

The current proposals in the SWDP assume a lower level of growth than anticipated in the RSS. The SWDP has a different time horizon to the RSS and it proposes about 20% fewer new dwellings and a 30% lower annual build rate.

Appendix 13

ACPO Strategic Growth Toolkit

An Overview

ACPO STRATEGIC GROWTH TOOLKIT

An Overview

June 2010

*Association
of Police
Authorities*



The Toolkit

- 1) The Association of Chief Police Officers (ACPO) and the Association of Police Authorities (APA) have prepared a toolkit (The Toolkit) to equip forces with a standardised approach to assess the impact of planned growth and to encourage them to engage actively with Local Planning Authorities (LPAs), developers and landowners through the planning system. The Toolkit provides:
 - a) guidance to police forces on how to present a case for securing developer contributions towards policing infrastructure to ensure the delivery of safe and sustainable communities. It establishes a basis for securing developer contributions towards policing which accords with the advice in Circular 05/2005 and CIL Regulation 122.
 - b) advice to police forces on engaging with LPAs to assist in the Forward Planning of local areas.
- 2) This overview of the Toolkit provides local planning authorities and other parties involved in the development process with an understanding of its purpose, and an expectation of how police forces will be engaging with the planning process now and in the future.

Creating Safe and Sustainable Communities through the Planning System

- 3) Historically, police involvement in the planning system has been limited to providing advice on Secured by Design and crime and safety issues as a consultee to planning applications. There has been a long held view by local authorities and applicants that Secured by Design mitigates crime in full and therefore guarantees safe communities.
- 4) Whilst Crime Prevention advice and the implementation of Secured by Design (SbD) in particular aids significant improvements to the safety of local environments, designing out crime alone will not meet all the needs of a modern police service or its local community. Judicious and careful design can assist enormously in this aim and will be championed wherever possible. However, whilst it is acknowledged that design and layout is proven to influence criminal behaviour, new development continues to place a significant additional burden on the police service which is obliged to tackle a wide range of incidents from anti-social behaviour (ASB) to terrorism. Designing out crime and the need for new police infrastructure are therefore not mutually exclusive.

- 5) Additional growth has arisen as a consequence of the housing targets set by Regional Spatial Strategies in England and the Government household projections in Wales. The extent of long term population growth expected to be accommodated by new housing and development across England and Wales is substantial, and will have an unavoidable impact on police resources. While RSS's may be replaced the housing and population growth and demand remains significant in most LPAS.
- 6) In order to maintain adequate levels of policing in the face of an expanding population and associated new housing and economic growth, investment into resources is a necessity to mitigate the resulting impacts. This must be addressed through the planning system.
- 7) There is a direct proven link between new development and the need for new police infrastructure. New development attracts and/or accommodates new population, placing additional pressure on police forces. As the population grows so does the incidence of crime and disorder. New developments can create new or significantly altered communities, and change the character of others, with differing impacts on policing. Accordingly, additional staff, equipment and facilities are required by the police to maintain current levels of resources relative to a greater population.
- 8) PPS12 advises local authorities to engage with police forces through the development of strategic plans for their areas and to understand infrastructure requirements across all services. There has been a misconception that policing is fully funded by the Home Office and Council Tax precept and therefore any infrastructure funding necessary to meet planned development has been or will be met. However, these sources of funding are for revenue expenditure and do not provide for the costs of new growth related infrastructure provision. While borrowing is theoretically possible, it is unsustainable because of its impact on police revenue budgets.
- 9) Therefore, the police require the mitigation of the direct impact of development via Section 106 developer contributions, as is the case with other public infrastructure providers subject to similar resourcing arrangements. ACPO has recognised the significance of the impact of growth by developing the Toolkit and some forces have identified levels of growth as a strategic risk. LPAs are obliged to seek to reduce crime and disorder by the terms of Section 17 of the 1998 Crime and Disorder Act through all its services. Accordingly, the police welcome the opportunity to work in partnership with LPAs towards safety and social sustainability.



The Purpose of the Toolkit

- 10) The Toolkit guides forces in assessing and highlighting the impact of new development, and establishes a national approach to securing planning obligations commensurate with that growth, in order for forces to maintain an adequate level of service. The Toolkit advocates forces engaging in the planning system and encourages involvement in the preparation of Local Development Documents.

What Local Planning Authorities Can Expect from the Police

- 11) The Toolkit recommends proactive engagement by the police with local planning authorities (LPA), to ensure key national, regional and local objectives to reduce crime and the fear of crime are delivered through the Local Development Framework. Often at a local level community safety is a key theme in Sustainable Community Strategies, and as such, should be delivered in spatial terms through the planning system.
- 12) Local authorities should expect to see a change in the level of engagement received from their local police force in the planning process where resourcing permits. This would include some or all of the following:
 - a. LPAs should be provided with a single point of contact at their local force for planning matters – a growth lead and an Architectural Liaison Officer (ALO) or Crime Prevention Design Adviser (CPDA);
 - b. The police growth lead should ensure regular involvement of the police in public and stakeholder consultation events on planning policy documents, to secure clearer policy objectives for safer communities and recognition of the need for police infrastructure to meet the needs of growth.
 - c. Seek robust policies on Crime Prevention through Environmental Design (Secured by Design).
 - d. The police should have a clear understanding of the local authority's future plans to address growth.
 - e. The Police will be involved in Local Strategic Partnerships and Community Safety Partnerships (formerly known as Crime and Disorder Reduction Partnerships) establishing key local objectives and priorities on crime and disorder through the Sustainable Community Strategy, which in turn informs the Local Development Framework. Future growth is expected to be addressed in these forums.

- f. The police should contribute positively to LPA infrastructure planning evidence gathering exercises.
- g. Claims for developer contributions are supported by national guidance and Leading Counsel's written advice.
- h. Developer contributions or obligations in lieu should be supported by infrastructure planning to identify items of infrastructure required to meet the needs of development. This is a key component of the Toolkit which introduces specificity and provides connectivity between the obligation sought and the delivery of infrastructure to secure safer communities. The Toolkit recommends the use of infrastructure plans to underpin all claims for contributions, informed by a robust consideration of the anticipated operational impacts of growth on the Force concerned.
- i. Local Authorities can start to see a consistent approach from forces nationally to requests for developer contributions. This is based on a standard formula to calculating developer contributions, establishing a direct relationship between development, local population growth and the level of police resources required. Some Forces have been using an alternative formula approach which is expected over time to be replaced with the recommended one. The formula is suitable for application to the new CIL regime with some limited modification.
- j. The Police have prepared a "Compendium of Crime Prevention and reduction Advice in the Planning System" This compendium has been produced to assist those operating within the planning system to appreciate the range of national advice and legislation ALO/CPDA's use when considering designs, or planning out opportunities for crime to occur in the built environment. The Compendium draws together all relevant national documents into an easy to use format to assist all stakeholders in the planning process in recognising the need for a consistent approach to safe and inclusive design.

What the Police Expect from the Planning System

- 13) The Police expect Government Planning Policy messages on crime and disorder, and the creation of safer communities to be carried through into Local Development Frameworks. PPS1 is underpinned by an objective to create safer communities and reduce opportunities for crime. PPS12 advises that the police are a key infrastructure provider who should be consulted on its infrastructure requirements arising from new development. Accordingly, the police expect to be effectively engaged in local policy development and to receive specific and sufficient recognition within Local Development Framework policies regarding:
- The need to plan for safer communities;
 - Identification of the police as a key infrastructure service provider and recipient of developer contributions to fund growth-related infrastructure requirements; and
 - Reference to crime prevention through environmental design with development proposals achieving Secured by Design standards and similar Safer Parking standards through a certification process.
- 14) The police will also expect to engage with LPAs through the development control process. Where planning applications are submitted to the local authority for development proposals, the police may submit a claim for developer contributions as part of the Section 106 Agreement towards police infrastructure costs necessary to mitigate the impact of the development. In such cases, the police would expect to:
- a. Establish an early dialogue with LPA officers to discuss the opportunities to secure developer contributions towards police infrastructure;
 - b. Have developer contribution claims considered fairly and reasonably alongside all other infrastructure claims
 - c. To be involved in any consideration of issues such as scheme viability that may impact on the scale of contributions secured.
- 15) The Toolkit advocates partnership working with LPAs and recommends the use of a Memorandum of Understanding between forces and LPAs to set out practical working arrangements. The police should always be prepared to defend a case for contributions through application and appeal stages, if necessary, regardless of the strength of local policy support for police contributions.

A Nationally Consistent Approach

- 16) Where forces are able to provide the required resource, LPAs should expect to receive transparent and clear infrastructure planning by police forces to establish the impact of growth on its operations. Local police forces are being recommended to prepare policing plans to set out the infrastructure plan for the Core Strategy period, providing an understanding of the existing police assets, and the additional burden on infrastructure imposed by new development.
- 17) A nationally consistent approach to policing plans and presentation of the formula-based approach to calculating developer contributions is set out within the Toolkit. The recommended structure of a [Policing Plan](#) and [Presentation Document](#) structure are set out in Annex A and B.
- 18) The Policing Plan will be supported by a Presentation Document setting out the methodology for calculating developer contributions and the cost of infrastructure items identified by the policing plan.
- 19) An outline of the police contributions Presentation Document is set out in the Annex B

Managing Expectations

- 20) Some forces are not able to resource a dedicated growth lead which may limit their ability to fully engage the planning system locally. Allowances will need to be made for this when consulting forces, and a lack of or limited response is not indicative of a lack of intent, interest or justification for recognition. Forces will undertake to use reasonable endeavours to respond as best they can within their own resource circumstances.
- 21) Forces are aware that planning obligations are sought for growth related infrastructure costs, and not to supplement other areas. Forces are also aware that scheme viability may be an bona fide issue in some cases, and where that is proven to be the case, are prepared to work with LPAs in determining the appropriate approach to take in relation to planning obligation requirements.



Relevant Q&A Issues

- 22) ACPO and the APA are promoting a national approach among police forces towards developer contributions and infrastructure planning for new police infrastructure to address growth impacts. However, it is recognised that the introduction of the police as a claimant of developer contributions into local areas which have traditionally not sought such contributions may be met with challenge by some.

In order to dispel some common misconceptions about the police service, its funding arrangements and legitimacy of any claims for contributions the Toolkit sets out a number of Question and Answer scenarios to assist Police Forces. A few scenarios are set out below with summaries of the appropriate responses set out in the Toolkit.

Q1 The Police are funded via the Home Office and Central Government. There is no justification for additional funding from planning obligations.

- A1 The funding allocated to Police Authorities via Home Office grant, Council Tax Precept and other specific limited grants is generally insufficient to fund in full request for capital expenditure. Capital programmes are funded generally from a mixture of asset disposal, redirection of revenue funding and prudential borrowing. Any borrowing or redirection of funds will have an impact on a police forces' revenue stream and subsequently the police service within that area. Unless additional funding can be secured towards infrastructure costs, less funding will be available to deliver a visible Police profile within communities, undermining the neighbourhood policing objective of reducing both the incidents and fear of crime and disorder.

Q2 Policing is a public service funded by other means and extends beyond the parameters of planning obligations.

- A2 Community safety is a key planning objective enshrined within PPS1 and is a legitimate spatial planning consideration. The means of delivering community safety inevitably takes a variety of forms from design of buildings and layout planning to the provision of new dedicated police infrastructure. As there is insufficient funding to deliver infrastructure out of existing taxation, contributions from development can be justified against the tests in CIL Regulation 122.

Q3 Section 106 contributions towards policing are inappropriate and contrary to the tests respect of Circular 05/2005 (partially appropriate to CIL Regulation 122 on planning obligations).

A3 The CIL Regulation 122 tests require obligations to meet the following tests:

- a) necessary to make the development acceptable in planning terms;
- b) directly related to the development; and
- c) fairly and reasonably related in scale and kind to the development.

Developer contributions towards policing based on the Toolkit's formula-based approach meet these tests on the following grounds:

a) With an increase in population there is an increase in development (dwellings/employment) to support that population. Housing development is the spatial consequence of population increase and changes to demographics which can lead to a need for policing infrastructure. It is appropriate to conclude that it will have a direct impact on the ability of the police to provide an adequate service and therefore seek contributions from housing and other development.

b) The formula-based approach anticipates that there will not necessarily be a direct relationship between population growth and housing growth based on current household size. A discount factor is therefore applied to ensure there is proportionality between new population and new dwellings. It is appropriate to seek contributions towards community safety from employment and housing developments which will have a direct impact on delivery of the police service in an area.

c) The formula based approach serves to ensure that development proposals will contribute towards the appropriate proportion of police infrastructure to maintain the ratio of police staff and accommodation to the expanded population.

Q4 A development scheme has fully incorporated Secured by Design principles to minimise the potential for crime. Therefore the scheme would not place any additional burden on the Police to justify seeking contributions.

A4 The inclusion of design measures to reduce opportunities for crime will assist in delivering sustainable communities. However, designing out crime and disorder will certainly not remove all activity and there remains a key role for the police to play in both responding to crime and disorder and in prevention and reducing the fear of crime and disorder. Secured by Design incorporates measures to increase natural surveillance. This in turn not only aids preventing crime but contributes to the detection of crime and ASB which otherwise may have gone undetected. Therefore infrastructure delivery is required in addition to design measures.

Q5 Section 106 contributions should not be used to remedy existing deficiency.

A5 The Methodology does not seek to address existing deficiencies in service provision; it is based on population increases and is proportionate to an acceptable level of service required to support that population.

Q6 There is no evidence to suggest that new residents will engage in criminal activity and therefore no direct link between crime and development.

A6 Whilst it is not possible to prove that any particular development will have a definite impact on crime rates, it is reasonable to assume an average rate of incidents per quantum of population. It will only ever be reasonable to assume that an existing ratio will continue unless there is clear evidence to assume otherwise. New developments and their occupants can generate the need for police involvement through being a target/victim or perpetrator/cause of crime and disorder on or off site.

Securing Contributions - Examples of Success

23) An increasing number of Forces within England and Wales have already made, or are making, significant efforts to establish policy support for planning obligations towards police infrastructure. Details of further such cases nationally and where achieved locally can be provided on request from your local police Force.

Further Contact

- 24) Forces actively involved in growth planning welcome any opportunity to discuss the police approach with planning authorities, developers or other interested parties to enhance engagement at a local level, to address relevant issues, and develop constructive working arrangements
- 25) Please contact your local force growth lead for further details. If unknown, please contact the non-emergency police switchboard or Local Strategic Partnership or Community Safety Partnership.





Annex A: Policing Plan

Characteristics of the Local Authority Area

Brief description of the district/unitary area, typical crime issues, size of main towns etc.

Current Operational Premises within the LPA

- a) Existing Premises
Brief description of each Police Station/facility
- b) Current Planned Projects
Brief description of proposed facilities, as relevant

Key Current Issues and Priorities

General Trend in Crime and Disorder

Brief description of the types of crime problems affecting the district/unitary.

Current Resource Capacity

Property and Staff

Brief description of current staff resources and the need for additional staff and property to meet the demands arising from growth.

Expected Impact of Planned Growth Within the Local Authority Area (& Where relevant a wider police Command Area or other Adjacent LPAs)

The need for full time equivalent staff, at all operational and support levels including the local Police Area Command(s) and force level.

Requirements for Policing the Expanded LPA to Ensure an Effective Police Service Delivery to Current Standard

Property Requirements

The need for additional vehicles, for example:

- Patrol or Neighbourhood Policing car
- Neighbourhood Policing vans or mobile Police Stations
- Bicycles





Annex B: Police Contributions Presentation Document

Introduction

- National Planning Policy context to policing and securing safer environments
- PPS1
- Safer Places – The Planning System and Crime Prevention
- Planning & Compulsory Purchase Act 2004

Definition of Community Safety

Safety and security is a fundamental requirement of sustainable communities, it covers a wide range of activity designed to reduce the likelihood of crime, disorder anti social behaviour, road casualties and fires which impact on people's quality of life. Importantly it also involves reducing the fear of crime, to promote people's sense of well-being, and reducing the harm caused by drug and alcohol misuse and behaviour damaging to the environment.

Why Community Safety from a Policing Perspective is so important

Description of the form police community safety infrastructure takes locally including a description of the typical hierarchy of police facilities and services.

New Developments

Outline of formula-based approach to seeking contributions from development schemes to ensure there is transparency and consistency in the approach to calculation of contributions.

The formula-based approach applies a cost per new dwelling and unit of business floorspace to all development. The methodology proposes that any increase in population within a policing area will have an impact on the ability of the police force to deliver an efficient and effective policing service. Accordingly it is appropriate to require a proportionate contribution from each new unit of accommodation that has an impact on delivery of the service.

To enable continued delivery of an efficient and effective police service in response to planned growth, the



Presentation Document will identify where expansion of infrastructure will be required including reference to increasing capacity outside a local planning authority area, for instance at county/force level(s).

Reference made to the Policing Plan and how the area would be policed by the additional infrastructure.

It will not be the case that each individual development will give rise to a direct need for a specific item of infrastructure. However all development will contribute towards a cumulative impact on delivery of the policing service, and as such it will be appropriate to pool contributions, in accordance with the advice currently contained at paragraphs B21-24 of Circular 05/2005 and paragraphs 2.18-2.20 of the DCLG Planning Obligations: Practice Guidance.

Pooled contributions would be used by the Police to provide additional policing infrastructure required to maintain an efficient and effective policing service within the local policing area. This could take a variety of forms ranging from purpose-built new facilities, to extension and adaptation of existing buildings to create additional capacity e.g. standard office accommodation and larger custody provision.

In accordance with guidance within Circular 05/05 the Police Authority would be required to ring fence contributions and report to the Local Planning Authority on how monies generated through planning obligations had been used. Any monies not expended within a timescale to be specified within the legal agreement would be returned.

Methodology for Calculating Contributions

STEP 1

Derive an incident ratio per head of population.

STEP 2

Establish an acceptable ratio of incidents to police officers.

STEP 3

Derive the additional infrastructure requirement from the additional staff quotient numbers required to provide effective policing.

STEP 4

Divide the projected infrastructure costs by the planned number of new dwellings to give a standard charge per dwelling. This figure requires adjustment to determine a new resident occupancy rate per new dwelling and a proportionate charge per new dwelling.

STEP 5

Apportion the total cost per dwelling between residential and employment development.

STEP 6

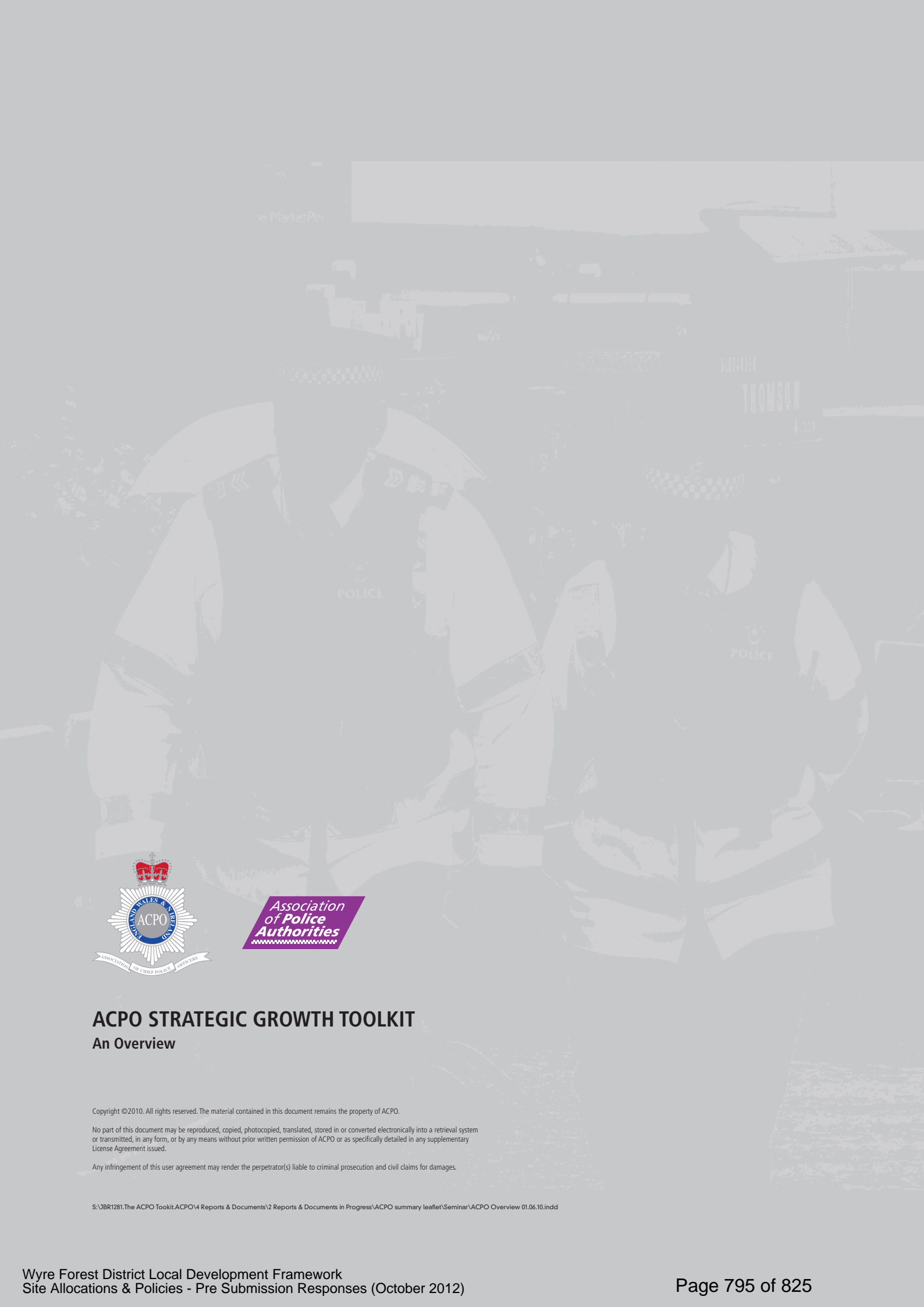
Adjust the standard charge per dwelling to reflect occupancy rates of new residents. This is achieved by dividing the projected number of new residents by the forecast number of dwellings.

Worked Example of Formula

Developer contributions by Use Class (based on accepted residential ratios and employment densities):

- Residential
- Retail (A1-A5)
- Leisure/recreation
- Hotels
- B1 Offices
- B1 Light Industrial
- B2 General Industrial
- B8 Warehousing





ACPO STRATEGIC GROWTH TOOLKIT

An Overview

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S:\JBR1281.The ACPO Toolkit\ACPO\4 Reports & Documents in Progress\ACPO summary leaflet\Seminar\ACPO Overview 01.06.10.indd

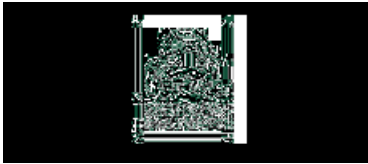
Appendix 14

WMP Medium Term Financial Plan

Appendix 14

WMP Medium Term Financial Plan (February 2012)

	Year 1 2011/12 £m	Year 2 2012/13 £m	Year 3 2013/14 £m	Year 4 2014/15 £m	Year 5 2015/16 £m
West Mercia net spending before specific grants	218.188	211.314	214.535	218.811	223.425
<u>Medium term budget reductions</u>					
Strategic Alliance 2013/14			-5.000	-5.000	-5.000
2014/15				-6.000	-6.000
2015/16					-6.073
	218.188	211.314	209.535	207.811	206.352
<u>Funding</u>					
Specific grants	-7.723	-8.415	-0.711	-0.711	-0.711
Formula Funding grants	<u>-126.204</u>	<u>-119.720</u>	<u>121.237</u>	<u>116.834</u>	<u>118.794</u>
	-133.927	-128.135	-121.948	-117.545	-119.505
Council tax	<u>-79.352</u>	<u>-79.949</u>	<u>-81.861</u>	<u>-84.317</u>	<u>-86.847</u>
Total funding before use of reserves	-213.279	-208.084	-203.809	-201.862	-206.352
Gap before use of reserves	4.909	3.230	5.726	5.949	0
Use of reserves		-3.230	-5.726	-5.949	0
Met by underspend in 2011/12	-4.909	-	-	-	-
Budget imbalance for the year	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Cumulative total of medium term reductions			-5.000	-11.000	-17.073



Comment

Agent	Mr Nick Laister (658903)
Email Address	nick.laister@rpsgroup.com
Company / Organisation	RPS Planning & Development
Address	20 Milton Park Abingdon OX14 4SH
Consultee	(676361)
Company / Organisation	West Midland Safari Park
Address	Spring Grove Bewdley DY12 1LF
Event Name	Site Allocations and Policies Publication
Comment by	West Midland Safari Park ()
Comment ID	SALPP101
Response Date	13/09/12 18:24
Consultation Point	Policy SAL.PDS1 Previously Developed Sites in the Green Belt (View)
Status	Submitted
Submission Type	Web
Version	0.1

To which part of the DPD does this representation relate? (Please state paragraph number, policy number, map, table or figure number). Policy SAL.PDS1

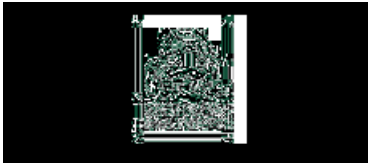
Please refer to guidance notes for explanation of terms. If you enter **No** to 'Sound', please continue to Q5. In all other circumstances, please go to Q6.

Do you consider the DPD is:

Compliant with the Duty to Cooperate	Yes
Legally Compliant	Yes
Sound	Yes

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

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.



Comment

Agent	Mr Nick Laister (658903)
Email Address	nick.laister@rpsgroup.com
Company / Organisation	RPS Planning & Development
Address	20 Milton Park Abingdon OX14 4SH
Consultee	(676361)
Company / Organisation	West Midland Safari Park
Address	Spring Grove Bewdley DY12 1LF
Event Name	Site Allocations and Policies Publication
Comment by	West Midland Safari Park ()
Comment ID	SALPP122
Response Date	14/09/12 15:26
Consultation Point	18.13 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.1

To which part of the DPD does this representation relate? (Please state paragraph number, policy number, map, table or figure number). Paragraph 18.13

Please refer to guidance notes for explanation of terms. If you enter **No** to 'Sound', please continue to Q5. In all other circumstances, please go to Q6.

Do you consider the DPD is:

Compliant with the Duty to Cooperate	Yes
Legally Compliant	Yes
Sound	No

Do you consider the document is **unsound** because it is not:

Positively prepared	No
----------------------------	----

Justified	Yes
Effective	Yes
Consistent with national policy	No

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Paragraph 18.13 states that the Previously Developed part of the Safari Park site "is contained primarily around the rides and leisure element of the park as well as the associated Car Parking". Whilst it is our view that the entire site could be considered to be previously-developed, we understand the Council's preference to draw the boundary tightly around the main area of built development and hardstanding. However, the plan which accompanies this paragraph does not include all of these existing areas. We have therefore produced an alternative version which provides a more accurate boundary around the built development and areas of hardstanding. This drawing (RPS Drawing 001-01) has been emailed to WMSP's policy department under separate cover.

In summary, the additional areas are:

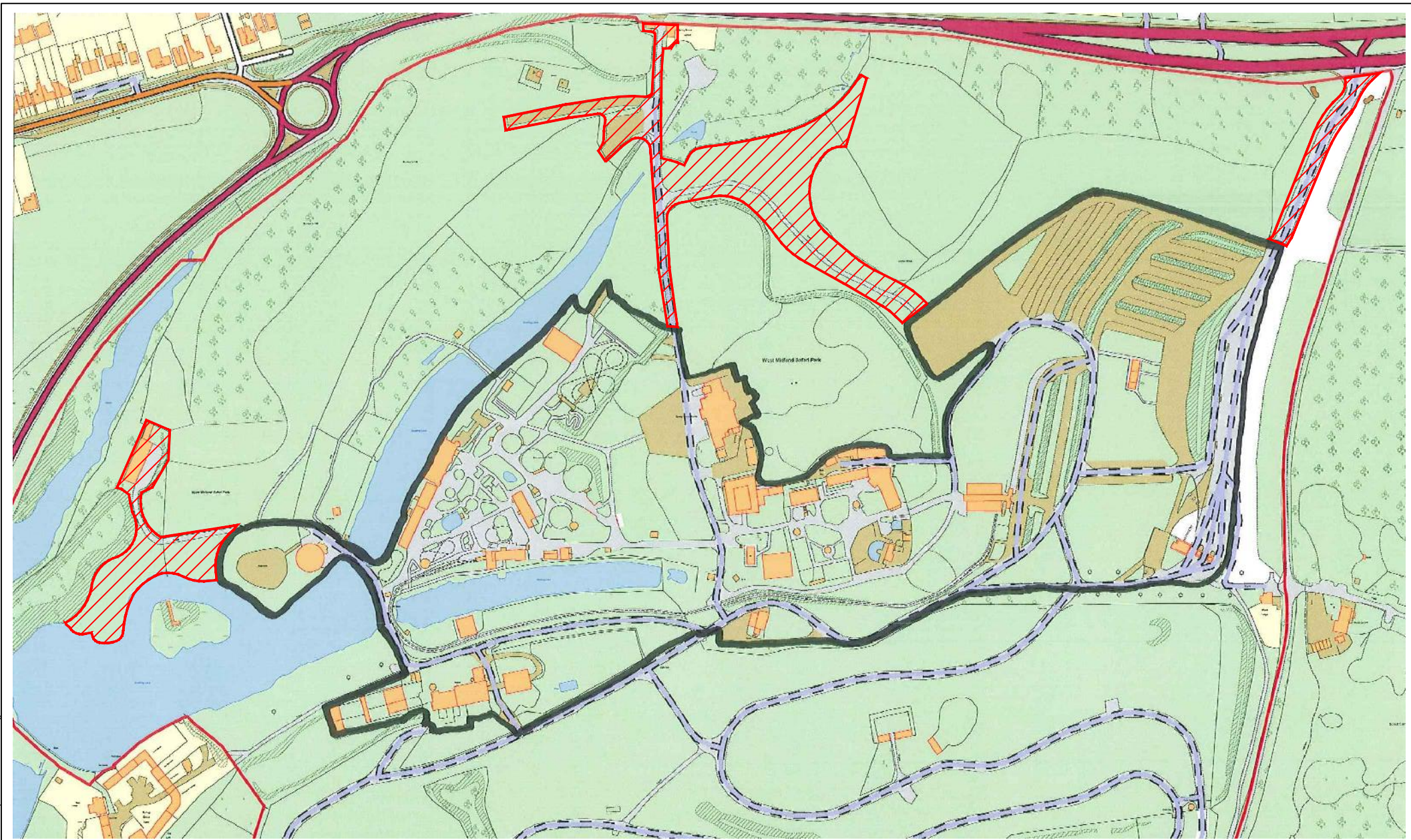
1. Area to the west of Cubs Kingdom, which is currently hardstanding and used for maintenance and storage purposes.
2. Large area of hardstanding to the north of the amusement area. This includes the staff/overflow parking area, maintenance area and an access road to the A456 (which was previously one of the main entrances to Spring Grove House, but is no longer used as an access to the highway network).
3. The main entrance to the park and access road, which links the A456 with the admissions area.

We consider the DPD to be unsound until these amendments are made 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.

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.



In our view the boundary should be amended to include the additional hatched areas shown on our Drawing 001-01, sent under separate cover. 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.

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? No



20 Milton Park Abingdon Oxon OX14 4SH
 T 01235 821888 E rps@rpsgroup.com W www.rpsgroup.com

LEGEND:

-  PDS Boundary
-  Additional PDS Boundary



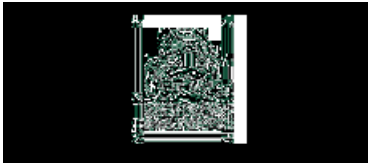
Project: West Midland Safari Park

Title: PDS Boundary

Date: Sept 12 Datum: OSGB36

Drawn: GP Checked: NL Job Ref: 2025

Drg no: 0001-01



Comment

Agent	Mr Nick Laister (658903)
Email Address	nick.laister@rpsgroup.com
Company / Organisation	RPS Planning & Development
Address	20 Milton Park Abingdon OX14 4SH
Consultee	(676361)
Company / Organisation	West Midland Safari Park
Address	Spring Grove Bewdley DY12 1LF
Event Name	Site Allocations and Policies Publication
Comment by	West Midland Safari Park ()
Comment ID	SALPP100
Response Date	13/09/12 18:23
Consultation Point	Policy SAL.GPB5 Supporting Major Tourist Attractions (View)
Status	Submitted
Submission Type	Web
Version	0.1

To which part of the DPD does this representation relate? (Please state paragraph number, policy number, map, table or figure number). SAL.GPB5

Please refer to guidance notes for explanation of terms. If you enter **No** to 'Sound', please continue to Q5. In all other circumstances, please go to Q6.

Do you consider the DPD is:

Compliant with the Duty to Cooperate	Yes
Legally Compliant	Yes
Sound	Yes

Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

West Midland Safari Park Ltd supports Policy SAL.GPB5. We consider the policy to be sound as it is:

- positively prepared, in consultation with the Safari Park, and will enable the tourism/economic development policies in the Core Strategy to be positively implemented;
- justified, by the work the Council has undertaken on the economic impact of development at the Safari Park and other parts of the Council's evidence base;
- is likely to be effective, in that it provides a positive framework to take development forward through a masterplan; and
- is consistent with national policies set out in the National Planning Policy Framework (March 2012).

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? No



Unit 2 Eclipse Office Park Staple Hill Bristol BS16 5EL

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F: 0117 970 1293

E: all@tetlow-king.co.uk
W: www.tetlow-king.co.uk

Planning Policy Manager
Economic Prosperity and Place Directorate
Wyre Forest District Council
Duke House
Clensmore Street
Kidderminster
Worcestershire DY10 2JX

28 August 2012

HM/MR M5/0513-08

FAO REBECCA MAYMAN

By Email Only:
planning.policy@wyreforestdc.gov.uk

Dear Ms Mayman

RE: SITE ALLOCATIONS AND POLICIES DEVELOPMENT PLAN DOCUMENT PRE-SUBMISSION PUBLICATION VERSION CONSULTATION

We represent the **West Midlands HARP Planning Consortium** which includes all the leading Housing Association Registered Providers (HARPs) across the West Midlands. Our clients' principal concerns are to optimise the provision of social / affordable housing and to ensure the evolution and preparation of consistent policies throughout the region.

Our comments on the Site Allocations and Policies DPD are as follows:

Policy SAL.DPL2

We support the policy on exception sites as being appropriate and justified. We do however recommend a minor wording alteration which would be more practical to implement:

"v. The site should ~~provide access~~ be accessible to local services and facilities by sustainable modes of transport."

This wording would still allow for conditions or section 106 obligations to be required of individual schemes where additional support for sustainable modes of transport are necessary. Without this change the policy will be less effective and interfere with any Community Infrastructure Levy requirements that the Council may wish to introduce.

The flexibility introduced by the allowance for cross-subsidy of affordable housing developments on exception sites is welcomed. This ensures the policy is compliant with the NPPF definition of rural exception sites which states that small numbers of market housing will be allowed where, for example, this is necessary to support delivery of affordable housing without grant funding.

Policy SAL.DPL5

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.

We would like to be informed when the Site Allocations and Policies Development Plan Document is submitted for Examination and at further stages thereafter. Please ensure that the **West Midlands HARP Planning Consortium** is retained on the LDF database, with **Tetlow King Planning** listed as their agents.

Yours sincerely



∩
HANNAH MACHIN
ASSISTANT PLANNER
For and On Behalf Of
TETLOW KING PLANNING

Enc: Response Form

Cc: Bromford Housing Group
Festival Housing Association
Jephson Housing Association
Longhurst Group
Marches Housing Association
Midland Heart Limited
Waterloo Housing Association Limited
WM Housing Group



Wyre Forest District Local Development Framework – Site Allocations and Policies and Kidderminster Central Area Action Plan Development Plan Documents (DPDs) Publication Stage Representation Form

Ref:

(For official use only)

Please return to: Planning Policy Manager, Economic Prosperity and Place Directorate, Duke House, Clensmore Street, Kidderminster, Worcestershire, DY10 2JX; or by e-mailing this form to Planning.Policy@wyreforestdc.gov.uk

BY 5.30pm on Friday 14th September 2012

This form has two parts –
Part A – Personal Details
Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make and remember to specify which document it relates to. Please specify which DPD you are commenting on.

Part A

1. Personal Details*		2. Agent's Details (if applicable)	
<i>*If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.</i>			
Title		Miss	
First Name		Hannah	
Last Name		Machin	
Job Title (where relevant)		Assistant Planner	
Organisation	West Midlands HARP Planning Consortium	Tetlow King Planning	
Address Line 1		Unit 2 Eclipse Office Park	
Line 2		High Street, Staple Hill	
Line 3		Bristol	
Post Code		BS16 5EL	
Telephone Number		0117 9561916	
E-mail Address		hannah.machin@tetlow-king.co.uk	

Part B – Please use a separate sheet for each representation

Your representation should cover all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

After this stage, further submission will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Organisation : **West Midlands HARP Planning Consortium**

3. To which DPD does this representation relate? Site Allocations and Policies
To which part of the DPD does this representation relate?

Paragraph		Policy	✓	Other e.g. Map, table, figure, key diagram	Please see attached letter
-----------	--	--------	---	--	-----------------------------------

4. Do you consider the DPD is :

4.(1) Compliant with the Duty to Cooperate	Yes			No	
4.(2) Legally compliant	Yes			No	
4.(3) Sound	Yes			No	

Please refer to guidance notes for explanation of terms

If you have entered **No** to 4(3), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is **unsound** because it is not:

- (1) Positively prepared
- (2) Justified
- (3) Effective
- (4) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Please see attached letter

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see attached letter

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note: *The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.*

Signature:

Date:

28 August 2012

Elaine Wilcox

From: BEVERLEY DREW [beverleydrew@virginmedia.com] on behalf of Wolverley and Cookley Town clerk
Sent: 12 September 2012 12:14
To: Wyre Forest Planning Policy
Subject: Pre submission publication of Wyre Forest District Site Allocations and policies and Kidderminster Central Area Action Plan Development Plan Documents

Dear Rebecca

Wolverley and Cookley Parish Council would like to thank you for the very comprehensive documents. The Council have discussed and reviewed these and are happy with the contents contained therein,

Kind Regards,

Mrs Bev Drew
Clerk to Wolverley & Cookley Parish Council

01562 850435 / 07702 521072

wolverleyandcookleyparishcouncil.org.uk
bev100@tiscali.co.uk



Ms Rebecca Mayman
Planning Policy Manager
Wyre Forest District Council

14 September 2012

Our ref: MW/HLB
Ask for: Martyn Wilson

Dear Ms Mayman

Pre-Submission Publication of Wyre Forest District Site Allocations and Policies Development Plan Document (DPD) and Kidderminster Central Area Action Plan Development Plan Document (DPD)

Recommendation: That these comments are taken into account in the determination of this proposal.

Worcestershire County Council welcomes the opportunity to comment on the above consultation. Officer comments on the consultation are set out in the following pages. These comments include those from Strategic Planning & Environmental Policy, Minerals & Waste, Transport, Economy and Worcestershire Archive & Archaeology Service.

In responding to the impact of the economic recession on Worcestershire, the County Council has set out a new vision and strategic direction which recognises the fundamental role that the economy has in contributing to the economic, environmental and social prosperity of Worcestershire's communities. The new corporate Plan 'A Prosperous Worcestershire' reflects the need for change within key "areas of focus" including:

- **Open for Business** - to include the needs of business, infrastructure, flood risk and transport.
- **The Environment** - to include green infrastructure (biodiversity, landscape, archaeology), flood risk and the built environment.

Ahmed Goga
Head of Economic
Development and
Planning

County Hall
Spetchley Road
Worcester
WR5 2NP

The County Council is working with partners to develop the frameworks that will assist the delivery of this new direction including the Worcestershire Infrastructure Strategy, Green Infrastructure Strategy, Renewable Energy Strategy and the Worcestershire Local Flood Risk Management Strategy. The County Council has linked the response set out below to these areas of focus.

Long term restructuring of the economy is required to address enduring issues of business disinvestment, unemployment, poor skills and low aspiration in both Kidderminster and the wider Wyre Forest District.

The wider regeneration of Kidderminster articulated through the ReWyre initiative provides a long term vision within which many of the sites identified in the submission documents sit. Early delivery of these sites will provide confidence, but will require co-ordination between public and private sector organisations to maximise sustainable economic impact.

The County Council is keen to play an active role in working with and supporting partners including the Worcestershire LEP, the ReWyre Board and the North Worcestershire Economic Development and Regeneration team, in shaping the future prosperity of Kidderminster and Wyre Forest District.

Notwithstanding this, the County Council is however required to balance its statutory responsibilities with its role as a partner in the regeneration of both Wyre Forest District and Kidderminster. The County Council has highlighted areas which it considers require further consideration in order to safeguard and future proof the performance of the environment, economy and infrastructure and these include:

Open for Business

The Council has significant concerns with the Submission document as currently written, in that it is considered to not be in accordance with the Waste Core Strategy and could exclude waste management, which could usefully and appropriately be located on employment land. The permitted uses proposed in the Submission for this site, Use Classes B1, B2 and B8, could deter waste development from the site.

If the document were to proceed as currently worded it would give us significant concerns regarding conformity with the Waste Core Strategy. In the spirit of the Duty to Cooperate we would welcome further discussion of this particular matter to reconcile current concerns.

To pass the test of soundness a *"plan should be deliverable over its timeframe and based on effective joint-working on cross-boundary strategic priorities such as sound infrastructure delivery planning"*. The pre-submission documents are not currently accompanied by an up to date Infrastructure Delivery Plan. However, the County Council is happy to support the proposed documents on

the basis of continued collaboration with Wyre Forest District Council in the development of both the Wyre Forest Infrastructure Delivery Plan and the Worcestershire Infrastructure Strategy.

The Environment

The County Council welcomes the emphasis placed on promoting opportunities to improve water quality, the re-charge water bodies and the use of SuDS to reduce the risk of flooding and considers this to pass the test of soundness.

However, we would welcome greater recognition of the statutory role of Wyre Forest District Council as a Risk Management Authority (as defined by the Flood and Water Management Act) and particularly the requirement to have regard to the Local Flood Risk Management Strategy (LFRMS). We would welcome the inclusion of a policy that is consistent with the above statutory requirement and identifies the need for development proposals to have regard to the emerging LFRMS.

Worcestershire Archive & Archaeology Service has worked closely with Wyre Forest District Council in drafting of the historic environment content in the DPD and is supportive of the proposed policies subject to the detailed comments that follow being addressed.

Open for Business

Site Allocations & KCAAP - Infrastructure Delivery

1. To pass the test of soundness a *"plan should be deliverable over its timeframe and based on effective joint-working on cross-boundary strategic priorities such as sound infrastructure delivery planning"*. The pre-submission documents are not currently accompanied by an up to date Infrastructure Delivery Plan. However, the County Council is pleased to support the proposed documents on the basis of continued collaboration with Wyre Forest District Council in the development of both the Wyre Forest Infrastructure Delivery Plan and the Worcestershire Infrastructure Strategy. This continued partnership working will assist in demonstrating the Duty-to-Cooperate.
2. We would welcome more detail with regard to delivery methods, role, responsibilities etc, especially around transport interchange, railway station etc, and the role planning and the public sector may play in this.

For example the KCAAP recognises that development will need to contribute to island improvements at Eastern Gateway, but there may be other schemes that require funding.

Site Allocations & KCAAP – Transport

3. We welcome the inclusion within the documents of supporting mixed use developments within the KCAAP. Correctly located and designed mixed use sites can help to reduce the need to travel and therefore reduce the impact development will have on the transport network. The policies to improve pedestrian connectivity throughout the area are also welcomed which as above can have a positive impact on the transport network.
4. We support the objectives contained within Section 6, Sustainable Transport. We will continue to work closely with Wyre Forest to realise their ambitions for Kidderminster. This work will be achieved through our ongoing LTP3 Kidderminster Town Centre Strategy Package works which are currently underway.
5. We will also continue to work with Wyre Forest District Council to review the Ring Road and establish to what extent it is possible to improve pedestrian and cycle connectivity across and through the ring road but still providing appropriate vehicle 'space' to ensure the economic vitality of the Town centre.

Site Allocations & KCAAP - Minerals and Waste Planning

6. The County Council is in general supportive of the approach to promoting sustainable economic growth in Wyre Forest and Central Kidderminster. However, notwithstanding the above we would advise that the test of soundness would be improved and would align more closely with the Worcestershire Waste Core Strategy (now found sound, to be adopted in November 2012) if Wyre Forest DC was to propose an "Additional change" so that it referred to:
7. The need for all new development to comply with the Waste Core Policy "Making Provision for waste in all new development" (ref WCS14 in all currently published documents but to be WCS 16 in the version to be adopted, currently being formatted.) That policy states that *"proposals for new development will be permitted where:*
 - *they incorporate facilities into the design that allow occupiers to separate and store waste for recycling and recovery; or*

- *developer contributions are made, for proposals where this is more appropriate than provision of on-site facilities; or*
 - *the existing provision is adequate".*
8. The supporting text in the WCS states:
9. *"The level of onsite provision of facilities for the separation or storage of waste should be adequate to meet the needs of the proposed development and the type and amount of waste arising from occupation.*
10. *On smaller sites provision might include collection points for segregated waste. On larger sites, particularly where significant areas of new housing or employment land are proposed, waste storage facilities will almost always be needed and provision might also include on-site treatment facilities such as community composting, anaerobic digestion forming part of a district heating system or, in the case of industrial operations, the management of specific wastes produced on site.*
11. *The ADEPT report "Making Space for Waste" (The Association of Directors of Environment, Economy, Planning and Transport guidance "Making Space for Waste Designing Waste Management in New Developments: A Practical Guide for Developers and Local Authorities" available on www.worcestershire.gov.uk/wcs) sets out specifications for the minimum standards for the type, and scale of facilities and vehicular manoeuvrability needed for new residential, commercial and mixed use developments. All applications will be assessed against this or other appropriate guidance. 7.5. Where developer contributions are more appropriate than on site provision, the level of contribution will be determined in accordance with the City, Borough, District or County Council's policy on developer contributions as appropriate".*
12. The council is concerned with the very precise definitions of the uses proposed for the South Kidderminster Enterprise Park and Previously Developed Sites in the Green Belt, specifically that Policies SAL.SK1, SAL.SK2, SAL.SK3, SAL.PDS1 (Rushock) are defined rather precisely as "B1, B2 and B8 development).
13. Waste management development does not necessarily or easily fit into these definitions; appeal decisions have determined some waste development to

be B2, some "sui generis" and (with the exception of landfills and incinerators) they are best considered as akin to B2.

14. As currently written the Submission document is not in accordance with the Waste Core Strategy, in that it could exclude waste management which could usefully and appropriately be located on employment land. Annex A of the Waste Core Strategy states *"58 areas of search have been identified as being potentially suitable for most waste management facilities"* these include the Former British Sugar Site. The permitted uses proposed in the Submission for this site, Use Classes B1, B2 and B8, could deter waste development from the site.
15. The council considers that the Submission would be improved if the supporting text in part 8 of the Submission included the terms used in the proposed Phase Two Revision of the WMRSS, that proposals for the Employment Land Provision needed to achieve a 5 year reservoir of *"readily available employment land"* outside of town centres, regional employment sites, regional and major investment sites would include *"land suitable for development within use classes B1 (except offices located in town centres), B2 and B8 uses and also some sui generis uses such as waste management facilities which have characteristics and require land and property requirements that would normally only be found in employment areas."* (Source: WMRSS Phase 2 Revision p96 footnotes 1 and 2) These concepts and the terms used were accepted by the Panel in their Examination of the proposed Phase 2 revision.
16. The Council would welcome the inclusion by Wyre Forest District Council of the "Additional Changes" to the Publication document proposed above and the inclusion of the supporting text along these lines and will readily agree to a Statement of Common Ground to this effect.

Site Allocations DPD - A Good Place to do Business

17. Section 5.6 refers to the importance of planning documents reflecting the aims and ambitions of the LEPs, but this must be a two-way exchange. It is equally important for the LEPs to take account of the aims and ambitions of the Core Strategy, and to help inform and influence planning documents such as the Site Allocations DPD.
18. In part 2 of Policy SAL.GPB1 'Employment Land Allocation', it should read *"no adverse effect"* (rather than *affect*).

19. Section 5.13 states that "future proposals to convert new buildings [created by redevelopment of existing rural buildings to economic use] into residential dwellings will be prohibited". The strength of the economic argument in individual cases will be important here, as the NPPF states (at section 51) that local planning authorities "*should normally approve planning applications for change to residential use and any associated development from commercial buildings (currently in the B use classes) where there is an identified need for additional housing in that area, provided that there are not strong economic reasons why such development would be inappropriate*". This approach also seems important enough to warrant inclusion in the policy itself, rather than being part of the reasoned justification.
20. The District Council should also be mindful of government intentions to re-introduce proposals to enable the change of use from commercial to residential announced September 2012 by the Secretary of State.
21. The value of section 5.14 is questioned, as it essentially just repeats part 2 of the policy itself.

The Environment

KCAAP & Site Allocations - A Proactive Approach to Sustainable Development

22. Policy SAL.PFSD1 & KCA.PFSD1 'Presumption in Favour of Sustainable Development' are both designed to reflect the presumption in favour of sustainable development in the NPPF, and does so.

Site Allocations - Renewable Energy Policy

23. Paragraph 6.32 – states that no sites are allocated at the current time however the NPPF states that LPA's should:
24. "*Consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure the development of such sources*".

Site Allocations - Historic Environment

25. Worcestershire Archive & Archaeology Service has worked closely with Wyre Forest District Council in drafting of the historic environment content in the DPD and policy. So, overall we are very happy with the product all bar a couple of points, which are:
26. Paragraph 7.43: the opening statement - *Wyre Forest District contains a variety of heritage assets, including buildings, areas, monuments, landscapes and archaeology* – we feel might benefit from clarification.
27. We assume by *areas* the statement is referring to conservation areas we would welcome clarification on this matter. However, if it is a reference to more generic areas of historic significance then we would welcome the inclusion of a statement that clarifies this for example: areas of special historic character. We understand the ambition to minimise policy wording but would welcome clarification on this matter.
28. Paragraph 7.48: We consider that the paragraph of statistics should include that the District also contains *in excess of 3000 currently known heritage assets recorded on the Worcestershire Historic Environment Record*.
29. The council strongly supports the way sites of geological interest are addressed in paragraphs 7.31, policy SAL.UP5, paragraph 7.35 and the associated table and the inclusion, by name, of all the sites of geological interest in the district. We believe that this in accordance with the NPPF and reflects the attention and protection they deserve.

Site Allocations & KCAAP – Water Management and addressing flood risk

30. The emphasis in this policy and the reason and justification in promoting opportunities to improve water quality, the re-charge of water bodies (to prevent drying out) and the use of SuDS to reduce the risk of flooding are very much welcomed.
 31. However, notwithstanding the above, in addition to the SAB function the Flood and Water Management Act places a statutory duty on Worcestershire County Council as the Lead Local Flood Authority to prepare a Local Flood Risk Management Strategy for Worcestershire (currently being developed).
 32. Wyre Forest District Council is a Risk Management Authority (as defined by the Act) and has a "*duty to exercise their flood risk management functions in a manner consistent with local and national strategies and to have regard to those strategies in their other functions*".
-

33. Developers will also have a vital role to play in delivering the outcomes of risk management strategy. Planning authorities should take necessary regard of not just the statutory planning framework and the National FCERM Strategy, but also the Local Flood Risk Management Strategy. In so doing, future developments proposals will need to give proper regard to the local flood risk management strategy including the risk of flooding from surface water, groundwater and ordinary watercourses.
34. We would welcome the inclusion of a policy that is consistent with the above statutory requirement and identifies the need for development proposals to have regard to the emerging strategy. This would also assist in demonstrating the Duty to Co-operate.

Site Allocations - Green Belt

35. Policy SAL.PDS1 – assume paragraph requires a bullet point.
36. Previously Developed Sites in Green Belt Policy SAL.DPS1 (ii) states that new development should not exceed the height of existing builds and other structures. This appears to at least partly duplicate (a) which states new development should not normally protrude above the existing development and trees. However, (ii) is much stronger in its wording stating "should not" whereas (a) states "not normally". We would welcome consistency in the terminology used.

Site Allocations - Green Infrastructure

37. The County Council is generally supportive of the approach to Green Infrastructure in Policy SAL.UP3. We would however refer to our previous comments at paragraph 1 (of this document) with regard to infrastructure delivery and this should include green infrastructure delivery and implementation.
38. The County Council does however have general concerns with regard to the potentially narrow approach to the interpretation of GI, limiting it to canals and river corridors (please see appendix 1). We would welcome the opportunity for collaborative working on this matter via the Worcestershire Green Infrastructure Partnership.

Monitoring and Implementation

Site Allocations & KCAAP

39. The monitoring and implementation section does not directly identify delivery agencies i.e. those who are responsible for implementing the policies. As identified under the test of 'soundness' for the plan to be effective, however, delivery agencies and implementation are identified in the Core Strategy which it should be read in conjunction with.
40. The table under paragraph 16.6, in the Kidderminster Central Area Action Plan DPD, would also be relevant and useful in this document.
41. It is not clear why all the policies in the KCAAP, have not been included under the table entitled 'Relevant Core Strategy Policies', as they would seem relevant to e.g. Policy KCA.CW1 Castle Wharf mentions Core Strategy Policy CP01, but this is not highlighted in the table.

Appendix 1 – Green Infrastructure comments

Kidderminster KCAAP

Green infrastructure objectives and policy	The listed objectives are very limited; including the role of GI in recreation, landscape enhancement (in an urban context), climate change adaptation and flood attenuation is not referred to. Even within the town centre, there are opportunities to deliver a range of GI objectives. Policy should be expanded to reflect a greater range of objectives.
7.68	References are made to a green links between a number of sites. These need some greater explanation; as to its purpose and function; i.e. recreational links, biodiversity, landscape etc. Without this, there is a danger of a link being created which is inappropriate to the sites, which does not enhance any GI functions.

7.70	Support the potential use of street trees, green roofs and SuDs, but their functionality needs to be further explained given this document's current focus on GI to deliver biodiversity.
7.71	Functions of the parks and open spaces are greater than biodiversity enhancement which is just one function. within the urban setting there may be the opportunity to link these spaces together through "greened" routes, explore walking., cycling routes, create good quality public realm etc.

Site Allocations and Policy

Policy SAL.UP3	
Compensatory provision	Any compensatory provision for the loss of GI needs to provide equivalent (or enhanced / increased) multi-functionality.
Compensatory provision	The location of any compensatory provision needs to take into account the functions served by the areas of GI to be lost, and their social, economic and environmental value and the potential impact of the loss of GI on existing communities.
Existing network	There is considerable emphasis within the policy on existing GI corridors. Whilst enhancements to benefit these corridors are to be encouraged, opportunities for new GI provision, especially within new developments or in areas identified as lacking in existing GI provision should be promoted, to provide a

	range of functions including landscape, and biodiversity enhancements, climate change adaptations, informal recreation etc.
Wyre Forest	The role of the Wyre Forest as a GI asset not only for the District, but also as a sub-regional asset is not explored in any detail, and could benefit from greater consideration to both develop its potential and also to develop social and environmental links where appropriate.
SAL.UP5	
Up to date biodiversity action plan	This should be clarified to be the Local Biodiversity Action Plan, or Worcestershire Biodiversity Action Plan (two different ways of referring to the same document)
Special wildlife sites Ecological survey	The correct nomenclature is Local Wildlife sites. Refer to the need to survey for protected and priority species.



Wyre Forest District Local Development Framework – Site Allocations and Policies and Kidderminster Central Area Action Plan Development Plan Documents (DPDs) Publication Stage Representation Form

Ref:

(For official use only)

Please return to: Planning Policy Manager, Economic Prosperity and Place Directorate, Duke House, Clensmore Street, Kidderminster, Worcestershire, DY10 2JX; or by e-mailing this form to Planning.Policy@wyreforestdc.gov.uk

BY 5.30pm on Friday 14th September 2012

This form has two parts –
 Part A – Personal Details
 Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make and remember to specify which document it relates to. Please specify which DPD you are commenting on.

Part A

1. Personal Details*

2. Agent's Details (if applicable)

**If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

Title	Mr		
First Name	Steven		
Last Name	Bloomfield		
Job Title (where relevant)	Conservation Officer – Planning		
Organisation (where relevant)	Worcestershire Wildlife Trust		
Address Line 1	Lower Smite Farm		
Line 2	Hindlip		
Line 3	Worcester		
Post Code	WR3 8SZ		
Telephone Number	01905 754 919		
E-mail Address (where relevant)	stevenb@worcestershirowildlifetrust.org		

Part B – Please use a separate sheet for each representation

Your representation should cover all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

After this stage, further submission will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Name or Organisation :

3. To which DPD does this representation relate? **Site Allocations and Policies** (*delete as necessary*)
To which part of the DPD does this representation relate?

Paragraph	Policy	Other e.g. Map, table, figure, key diagram	Whole document
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4. Do you consider the DPD is :

	Yes	X	No
4.(1) Compliant with the Duty to Cooperate	Yes	X	No
4.(2) Legally compliant	Yes	X	No
4.(3) Sound	Yes	X	No

Please refer to guidance notes for explanation of terms

If you have entered **No** to 4(3), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is **unsound** because it is not:

- (1) Positively prepared
- (2) Justified
- (3) Effective
- (4) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

General comment – The 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.

(Continue on a separate sheet /expand box if necessary)

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

N/A

(Continue on a separate sheet /expand box if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

N/A

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Date:

7.9.2012